

1 IN THE SUPERIOR COURT OF THE VIRGIN ISLANDS

2 DIVISION OF ST. CROIX

3
4 -----
5 HISHAM HAMED, individually, and

6 derivatively on behalf of

7 SIXTEEN PLUS CORPORATION,

8 Plaintiff,

9 v.

Case No.

10 FATHI YUSUF, ISAM YOUSUF,

SX-2016-CV-00650

11 and JAMIL YOUSUF,

12 Defendants.

13 and

14 SIXTEEN PLUS CORPORATION,

15 a nominal Defendant.

16 -----
17 SIXTEEN PLUS CORPORATION,

18 Plaintiff,

Consolidated with

19 v.

Civil No.

20 MANAL MOHAMMAD YOUSEF,

SX-2016-CV-00065

21 Defendant,

22 and

MANAL MOHAMMAD YOUSEF,

1 Counter-Plaintiff,

2 v.

3 SIXTEEN PLUS CORPORATION,

4 Counter-Defendant

5 -----

6 MANAL MOHAMMAD YOUSEF,

7 Plaintiff,

Consolidated with

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 And

18 SIXTEEN PLUS CORPORATION,

19 Third-Party Plaintiff,

20 v.

21 FATHI YUSUF,

22 Third-Party Defendant.

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VIDEOTAPED DEPOSITION OF
MANAL MOHAMMAD YOUSUF AKHRAS

DATE: Thursday, August 10, 2023
TIME: 9:05 a.m.
LOCATION: Remote Proceeding
Washington, DC 20005
REPORTED BY: Shondra Dawson, Notary Public
JOB NO.: 6014366

A P P E A R A N C E S

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1 A P P E A R A N C E S (Cont'd.)

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12 ALSO PRESENT:

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15 Pam Bayless, Paralegal, Dudley Newman Feuerzeig

16 (by videoconference)

17 Waleed Hamad, Plaintiff (by videoconference)

18 Ben Pelta-Heller, Videographer

19 (by videoconference)

20 Isam Yousuf, Defendant (by videoconference)

21 Jamil Yousuf, Defendant (by videoconference)

22

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P R O C E E D I N G S

THE VIDEOGRAPHER: Good morning. We are going on the record at 9:05 a.m. on Thursday, August 10, 2023.

This is media unit 1 of the video recorded deposition of Manal Yusef taken by counsel in the matter of Hamed et al. v. Yusuf et al., in the Superior Court of the Virgin Islands, Division of St. Croix.

My name is Ben Pelta-Heller representing Veritext. I'm the videographer. The court reporter is Shondra Dawson from the firm Veritext.

Counsel and all present, including remotely, will now state their appearances and affiliations for the record, and will the reporter please swear in the witness?

MR. HOLT: Yes. Just for the record, my name is Joel Holt, and I represent Sixteen Plus.

MR. HYMES: Good morning. My name is James Hymes. I represent Manal Yousef.

MS. PERRELL: Good morning. Charlotte

1 Perrell, and I believe my co-counsel Stefan Harpul
2 will be on the call in a few moments, and we represent
3 Fathi Yusuf.

4 MR. AL-OBAIDY: My name is Husein Al-
5 Obaidy. I am the interpreter for the session today.

6 She was asking about my voice. It's
7 not clear. Am I clear for you all?

8 THE REPORTER: Yes, but you can move
9 closer to the microphone, maybe, because it's
10 important that the witness hears.

11 MR. AL-OBAIDY: Is it good now? It's
12 better?

13 MR. HOLT: I think so.

14 MR. AL-OBAIDY: All right.

15 THE REPORTER: I am the reporter
16 assigned by Veritext to take the record of this
17 proceeding. I am a notary authorized to take
18 acknowledgements and administer oaths in the District
19 of Columbia. Parties agree that I will swear in the
20 witness remotely outside of his or her presence.

21 Mr. Al-Obaidy, this is just a
22 stipulation. You don't need to interpret this part.

1 Additionally, absent an objection on
2 the record before the witness is sworn, all parties
3 and the witness understand and agree that any
4 certified transcript produced from the recording of
5 this proceeding:

6 - is intended for all uses permitted
7 under applicable procedural and
8 evidentiary rules and laws in the same
9 manner as a deposition recorded by
10 stenographic means; and

11 - shall constitute written stipulation
12 of such.

13 Mr. Al-Obaidy, will you please raise
14 your right hand?

15 (Interpreter Husein Al-Obaidy sworn to
16 translate between English and Arabic.)

17 (All answers through interpreter unless
18 otherwise noted.)

19 THE REPORTER: Ms. Yousef, could you
20 please raise your right hand?

21 //

22 //

1 WHEREUPON,

2 MANAL MOHAMMAD YOUSUF AKHRAS,
3 called as a witness, and having been first duly sworn
4 to tell the truth, the whole truth, and nothing but
5 the truth, was examined and testified as follows:

6 THE REPORTER: Thank you. You may
7 proceed.

8 EXAMINATION

9 BY MR. HOLT:

10 Q Good morning. Can you state your full name
11 for the record?

12 THE INTERPRETER: Sorry, say again?

13 BY MR. HOLT:

14 Q Good morning. Could you state your full
15 name for the record?

16 A My name is Manal Mohammad Yousuf Akhras.

17 Q How do you spell your last name?

18 A (In English.) Akhras, A-K-H-R-A-S.

19 Q I'm sorry, was that --

20 THE INTERPRETER: She just -- sorry,
21 sir. She just mentioned the spelling. Doesn't need
22 any interpretation for spelling. She said it in

1 English.

2 MR. HOLT: No problem.

3 BY MR. HOLT:

4 Q Where were you born?

5 A Amman.

6 MR. HOLT: I didn't hear the answer.

7 THE INTERPRETER: Amman.

8 BY MR. HOLT:

9 Q Okay, and what is your date of birth?

10 A March 22 -- April 22 --

11 THE INTERPRETER: Sorry, April 22, and
12 the year --

13 THE INTERPRETER (FOR THE WITNESS):
14 1968.

15 BY MR. HOLT:

16 Q Where do you currently reside?

17 A Palestine.

18 Q What is the street and city address?

19 A Ramallah Kawther Street, Al-Bireh, Al-Balou.

20 Q Are you a citizen of any place other than
21 Palestine?

22 A I hold the Jordan -- the temporary Jordanian

1 passport.

2 Q This proceeding is known as a deposition.
3 You've been sworn to tell the truth. Do you
4 understand that?

5 A Yes.

6 Q Have you ever been in a proceeding where you
7 were answering questions under oath before?

8 A No.

9 Q It's important that you listen to each
10 question and answer it as best you can. If I cut you
11 off before you finish an answer, please tell me to
12 wait because we want to hear your answer. If you want
13 to take a break, just let us know and we'd be glad to
14 take a break.

15 Are you married?

16 A Yes.

17 Q What is your husband's name?

18 A Zayed Ahmed Mohamad Akhras [ph].

19 Q Does he currently reside with you?

20 A Yes. But he live now in Saint Martin.

21 Q -- does he live in Saint Martin?

22 THE INTERPRETER: I'm sorry, sir --

1 BY MR. HOLT:

2 Q Let me rephrase that question. Do you know
3 who he lives with in Saint Martin?

4 A His brother.

5 Q What's his brother's name?

6 A Jamil.

7 Q Is that Jamil Yousef?

8 A No.

9 THE INTERPRETER: Sorry if I
10 interpret -- I have to educate the witness but just --
11 she has to answer yes or no -- sorry -- you can
12 proceed.

13 BY MR. HOLT:

14 Q Have you ever been divorced?

15 A No.

16 Q Do you have children?

17 A Yes.

18 Q Can you tell me their names and ages?

19 A Tasneem. She's born in December 13, 1996.
20 Ahmad. He was born on December 18, 1998. Hytham,
21 February 6, 2000 -- 2002.

22 THE INTERPRETER: Sorry.

1 BY MR. HOLT:

2 Q Were any of your children born in Saint
3 Martin?

4 A Ahmad and Hytham.

5 Q And that was in 1998?

6 A Yes.

7 Q What does your husband do for a living?

8 A Now he has -- body parts shop -- car body
9 parts -- body parts shop.

10 Q Has he ever owned a business, to your
11 knowledge?

12 A Before this business, he used to have a
13 supermarket.

14 Q And where was that located?

15 A The French side of Saint Martin. Marigot.

16 Q Any other businesses besides those two
17 businesses?

18 A No.

19 Q And both business were located in Saint
20 Martin?

21 A So the supermarket was in the French side,
22 and the body parts car, it was in Holland side.

1 Q And why does your husband live in Saint
2 Martin?

3 A We do business there in Saint Martin, and he
4 is following up on our business there.

5 Q Did he sell the grocery store?

6 A So is the question is did he sell the
7 business of supermarket, or he used to sell in the
8 supermarket?

9 Q Did he sell the business of the supermarket?

10 A Yes, he sold it.

11 Q Do you know how much he sold it?

12 A No.

13 Q Do you how much he makes each year from his
14 current business?

15 A No.

16 Q Does he provide support to you and your
17 children?

18 A Yes.

19 Q When was the last time you actually lived in
20 Saint Martin?

21 A I get back from Saint Martin in 2010.

22 Q You moved back to Palestine from Saint

1 Martin in 2010?

2 A That's correct.

3 Q So have you been to Saint Martin since 2010
4 to visit?

5 A No.

6 Q When did you first move to Saint Martin?

7 A 1991.

8 Q And did you live continuously from 1991
9 until 2010 in Saint Martin?

10 A Yes, but I used to go as a visit -- visit to
11 back --

12 Q Back to Palestine?

13 A Palestine or Jordan.

14 Q Have you ever been to the United States
15 Virgin Islands?

16 THE INTERPRETER: Can you say again,
17 Mr. Joel?

18 BY MR. HOLT:

19 Q Have you ever been to the United States
20 Virgin Islands?

21 A No.

22 Q Have you ever been to the United States

1 other than the Virgin Islands?

2 A No.

3 Q Who was your father?

4 A His name, Mohamad Yousef Mohamad -- Hamdan
5 Akhras [ph].

6 Q What did he do for a living?

7 A For whole his life?

8 THE INTERPRETER: She's asking, are you
9 asking about whole his life what he was doing?

10 BY MR. HOLT:

11 Q I'll rephrase that question. What did he do
12 for a living from -- virtual connectivity
13 interruption --

14 THE INTERPRETER: I'm sorry --

15 THE REPORTER: Mr. Holt, you cut out.
16 Can you please repeat your question?

17 MR. HOLT: Yes. I'm going to start
18 that all over again.

19 BY MR. HOLT:

20 Q When you moved to Saint Martin in 1991, did
21 you father live there?

22 A He wasn't continuously lived there, he was

1 just go there and back to this place. He was going
2 back to Jordan from Jordan to Saint Louis.

3 THE INTERPRETER: Saint Martin. Sorry.

4 BY MR. HOLT:

5 Q In 1991, do you know what he was doing for a
6 living when you moved to Saint Martin?

7 A I'm not sure about what he was doing, but he
8 was doing whatever he would, like he's buying land
9 there -- furniture shop, buying those kind of things.

10 Q I lost internet but I'm back. Was your
11 father's name originally Mohamad Yousef?

12 A Yes.

13 Q Is he Fathi Yusuf's brother?

14 A Yes.

15 Q Do you know if your father was ever arrested
16 anywhere?

17 A No.

18 Q Did he ever own any real property in Saint
19 Martin?

20 A I'm not sure. Maybe he had something. I
21 don't know.

22 Q Did he have a business in Saint Martin?

1 A No.

2 Q Did he have a business anywhere in the
3 United States that you're aware of?

4 A I think he had a furniture shop in Virgin
5 Island, and shoe shop also.

6 Q When did your father pass away?

7 A In the beginning of 1997.

8 Q Can you tell me the names of your brothers?

9 A Isam --

10 MR. HYMES: -- little objection, okay.

11 A Everybody, like all girls and boys, man or
12 woman?

13 Q I want to know the names of the brothers and
14 the sisters; correct.

15 A Oldest, Fayzeh. Then Isam. Then Fawzyeh.
16 Then Ayed. Then me, Manal. Then Arabieh.

17 MR. HYMES: And Joel, before we go any
18 further, I would just like the interpret to please
19 interpret fully and completely all of the witness's
20 answers. There's some feeling that this is not being
21 done on a regular, consecutive basis.

22 //

1 BY MR. HOLT:

2 Q Okay. Have you ever met Fathi Yousef?

3 A Yes.

4 Q Can you tell me where you met him?

5 A He was visiting my father.

6 Q That was in Saint Martin or somewhere else?

7 A Saint Martin and once in Jordan.

8 Q When did you -- did you say you met Fathi
9 Yousef once in Saint Martin?

10 A Yes.

11 Q Do you recall when you met him in Saint
12 Martin?

13 A I remember my father was sick and he was
14 visiting him. And the other time when we did the
15 power of attorney -- the authorize document.

16 Q Okay, so you met him twice in Saint Martin?

17 A I'm not sure, really. Maybe more than that.
18 I'm not sure.

19 Q Okay. When you met him in Saint Martin when
20 you father was sick, wasn't that like 1996 and '97?

21 A I'm not sure about the dates.

22 Q When you met Fathi Yousef about the power of

1 attorney, was that in 2009?

2 A 1999? Sorry?

3 Q 2009.

4 A Yes, correct.

5 Q Have you ever discussed purchasing property
6 on Saint Croix, U.S. Virgin Islands, with Fathi
7 Yousef?

8 A In which year, Mr. Holt?

9 Q Any time.

10 A Me, personally, no, but my father maybe did.
11 And also Isam.

12 MR. HOLT: I'm sorry, what was that
13 answer again?

14 THE INTERPRETER (FOR THE WITNESS): And
15 also Isam.

16 BY MR. HOLT:

17 Q Okay. Have you ever met Waleed -- Hamed?

18 A I saw him, but I did not sit with him.

19 Q Did you speak with him at all?

20 A I think I just say hello.

21 Q You did not discuss any business with Waleed
22 Hamed; correct?

1 A No.

2 Q Have you ever met Mayor Mike Yusuf?

3 A Mayor Mike Yusuf? I saw him before. That
4 was in the past, really long long time.

5 Q Did you discuss any business with him?

6 A No, we were little, young.

7 Q Okay. And you never discussed any business
8 with Fathi Yusuf either?

9 A Me personally, I don't talk with him in any
10 business. But Isam and my father, they were talking
11 about things like concerning me.

12 Q Okay. What did you hear them discussing?

13 A Can you repeat the question?

14 Q Yes. When you heard your father speaking
15 with Isam, did you hear what they were speaking about?

16 A Yes, of course.

17 Q And what were they speaking about?

18 A There's certain money which is my father
19 want to give it to me, and it will be under Isam
20 supervision, or in his opinion, how he do that.

21 Q Was your father present when this
22 conversation took place?

1 A Sorry, say again?

2 Q Was your father present when Isam and Fathi
3 Yusuf were speaking?

4 A I'm not sure. I don't know.

5 Q Did you hear Isam and Fathi talking about
6 any specific item that they may use the money to buy?

7 A It was a common subject, like properties,
8 some kind of commercial business. Something like
9 that.

10 Q You don't remember the name of the specific
11 property or business that they were discussing?

12 A No, but it may be that it was land or
13 belonged to a company.

14 Q And where was that land located?

15 A Virgin Island.

16 Q Okay, and do you know about when this
17 conversation took place that you heard?

18 A Maybe it was in the end of 1996 or the
19 beginning of 1997.

20 Q Okay. Showing you Exhibit 1, if we can --
21 in response to interrogatory number 6 you stated: "I
22 have never worked. I have been a housewife my entire

1 life."

2 (Exhibit 1 was marked for
3 identification.)

4 A That's correct.

5 Q Is this sworn response still true today?

6 A Yes.

7 Q Have you ever owned a business?

8 A No.

9 Q Showing you Exhibit number 2. In response
10 to interrogatory number 3, you stated the following:
11 "During the course of my lifetime, I was given money
12 by my father for my benefit for investment purposes.
13 These funds were managed for me by my brother, Isam."
14 Is that statement true?

15 (Exhibit 2 was marked for
16 identification.)

17 A Yes, correct.

18 Q When did you father first discuss giving
19 these funds to you?

20 A The idea was in 1996, maybe before.

21 Q Did he tell you how much he intended to give
22 you?

1 A At the beginning it wasn't obvious how much.
2 It was like a big number, but then he clarified what
3 was.

4 Q And what was the number?

5 A Four millions and five hundred thousand.

6 Q And did he actually give you these funds?

7 A Yes. He gave me those -- this money, but
8 not in my hand.

9 Q Did he give the money to someone else to
10 hold for you?

11 A Yes -- he gave it Isam to manage it.

12 Q So these moneys were never in an account in
13 your personal name?

14 A No.

15 Q Do you know where your father got these
16 funds from that he gave to Isam for your benefit?

17 A The sources -- my father, he was always in
18 the business -- I mean working.

19 Q So you don't know how where he got the funds
20 from?

21 A Selling lands, properties, businesses. I
22 mean, trading.

1 Q Do you know where the lands were located
2 that he was selling?

3 THE INTERPRETER: I'm sorry, say again?

4 BY MR. HOLT:

5 Q Do you know where the lands were located
6 that he was selling?

7 A Depends where is the lands located. Some of
8 them in Palestine. Some of them in Jordan. Some of
9 them in Caribbean.

10 Q Where were the places in the Caribbean that
11 he owned land?

12 A I'm not sure. I don't know where exact, but
13 I just know.

14 Q Do you know whether or not Waleed Hamed ever
15 gave him money?

16 THE INTERPRETER: Sorry, the voice --
17 what? Sorry, say again?

18 BY MR. HOLT:

19 Q Do you know whether or not Waleed Hamed ever
20 gave him money?

21 A No.

22 Q Do you know whether or not Fathi Yusuf ever

1 gave him any money?

2 A No, I don't know.

3 Q How do you know that the money your father
4 said he was giving you did not in fact belong to
5 someone else?

6 A It's for sure his money. How can he give
7 someone else money?

8 Q How do you know it was his money?

9 A Because my father -- he used to have
10 money -- a lot of business.

11 Q Do you know how much money your father had
12 when he gave you the 4.5 million?

13 A I don't know exact number.

14 Q Did he give each of your brothers and
15 sisters an equal amount of money, 4.5 million each?

16 A No.

17 Q Did he give your brothers -- any of your
18 brothers or sisters any money at all?

19 A Yes.

20 Q How much did he give each of your brothers
21 and sisters?

22 A He used to give them lands, properties,

1 money, and I know -- for example, I saw -- for
2 example, Isam, 20 millions, for example.

3 Q I'm sorry, did you say he gave Isam 20
4 million dollars?

5 A I don't know exactly, but yes, yes, maybe,
6 it was -- I'm sorry. Twenty millions.

7 Q Do you know where he --

8 THE INTERPRETER: I'm sorry?

9 THE INTERPRETER (FOR THE WITNESS): Me
10 and Isam and Ayed, maybe we took more than 20
11 millions.

12 BY MR. HOLT:

13 Q The money that he gave Isam for you, did he
14 give it to him in cash?

15 A I don't know, honestly.

16 Q The 20 million dollars that he gave Isam,
17 did he give him that in cash?

18 THE INTERPRETER: Mr. Joel, can you
19 repeat the question?

20 BY MR. HOLT:

21 Q The 20 million dollars that he gave to Isam,
22 was that give in cash?

1 A I don't know.

2 Q Did he give any of your other brothers or
3 sisters money besides Isam?

4 A Yes. He gave them lands, properties, money,
5 but exact numbers, I don't know.

6 Q Did he give any of your other -- other than
7 Isam, did he give any of your brothers and sisters
8 more -- virtual connectivity interruption --

9 THE INTERPRETER: Mr. Joel, your
10 question was fading because the internet wasn't good
11 on your side.

12 MR. HOLT: No problem.

13 BY MR. HOLT:

14 Q Other than Isam, did he give any brothers
15 and sister more than a million dollars?

16 A Me and Isam-- maybe 20 millions, but the
17 rest of us, I don't know how much exact number.

18 Q Of the 20 million that he gave for you and
19 Isam, how much of that was yours?

20 THE INTERPRETER: I will interpret the
21 exact number. Four thousand, she said, then six
22 hundred thousand.

1 MR. HOLT: I'm going to repeat the
2 question.

3 THE INTERPRETER: Yes, please.

4 BY MR. HOLT:

5 Q Of the 20 million dollars that he gave you
6 and Isam, how much of that money was your money?

7 A Four millions and five hundred.

8 Q And did your father tell you that, or did
9 you just overhear him speaking with Isam about it?

10 A He -- my father told me this money is for me
11 and Isam. Okay. So my money -- this was for me
12 and -- and the hold of Isam, the hand of Isam.

13 MR. HOLT: Okay. You don't need to
14 interpret this just yet. I'm going now put up on the
15 screen another exhibit, and there's a long answer in
16 English and in Arabic, and so I'm going to read it for
17 the record, and then I'm going to ask the question,
18 "Is this correct?" and then you can translate it all
19 and ask that question, okay?

20 THE INTERPRETER: Okay.

21 BY MR. HOLT:

22 Q Okay. Showing you Exhibit number 3. That's

1 not Exhibit number 3. There we go. Thank you.

2 In repose to interrogatory 9 sent to you in
3 this case, asking about where these funds were held,
4 you were asked and then answered as follows:

5 "Interrogatory 9: Please list all financial accounts
6 you have, that are fully or partially in your name or
7 as to which you are a beneficiary from January 1,
8 1995, through December 31, 2000, including but not
9 limited to all bank accounts, stock brokerage
10 accounts, negotiable instrument accounts, retirement
11 accounts, trading or options accounts, and funds
12 transfer accounts. For each identify the name and
13 address of the institution, the title holders, the
14 beneficiaries or trust beneficiaries as well as the
15 last four digits of the account numbers."

16 You responded: "I object to providing any
17 identifying bank or financial institution account
18 numbers on the grounds they need to be kept out of the
19 public domain for safety reasons. Without waiving the
20 objection, the money which was given to me by my
21 father was managed for me by my brother in an account
22 over which he had management control."

1 Is this answer true?

2 (Exhibit 3 was marked for
3 identification.)

4 THE INTERPRETER: Sorry, I was stopping
5 interpretation because you said. Do you want me now
6 to do interpretation? I'm confused now.

7 MR. HOLT: Yes. I want you to -- since
8 we're doing a record, you have to now read that
9 question and answer, and then ask her if it's correct.

10 THE INTERPRETER: Can you repeat the
11 question, please?

12 MR. HOLT: The question is, "Is it
13 correct?" but in order to get there, you have to read
14 the answer, which is in Arabic on Exhibit 9.

15 THE INTERPRETER: Okay. Let me see
16 that Exhibit 9. Give me one minute, please.

17 MR. HOLT: Jim, if you have an easier
18 way of doing this, I mean, maybe we can stipulate that
19 she can read the Arabic and answer -- I'll leave it up
20 to you.

21 MR. HYMES: It seems to be the
22 interpreter ought to read the English question and

1 answer and then interpret that, and then ask her if
2 that's correct.

3 MR. HOLT: That's fine.

4 THE INTERPRETER: Yes, I have it now.
5 So do you want me to read it in English and Arabic
6 also?

7 MR. HOLT: You only need to read it in
8 Arabic to her and then ask her if it's correct.

9 THE INTERPRETER: Okay.

10 So I just interpreted the whole
11 question and the reply. So now the question, "Is that
12 correct" you want me to say for her?

13 MR. HOLT: Right.

14 THE INTERPRETER (FOR THE WITNESS):

15 Yes.

16 BY MR. HOLT:

17 Q So you never actually had these funds in
18 your own personal possession; correct?

19 THE INTERPRETER: Sorry, say again, Mr.
20 Joel?

21 BY MR. HOLT:

22 Q So you never actually had these funds in

1 your own personal possession; correct?

2 A Yes, correct.

3 Q Do you know where the account was located
4 where the accounts were deposited?

5 A No.

6 Q Did you ever, other than these funds, did
7 you ever yourself ever have another account where you
8 held any funds in your own name?

9 A No. And I will not give you details about
10 my account number.

11 Q Did you have other accounts?

12 A I have personal account, but regarding this
13 subject, no.

14 Q How many other personal accounts have you
15 ever had?

16 A Is that necessary to answer this question?

17 Q Yes.

18 A I don't want to answer.

19 Q Let me ask you a little differently. I
20 might -- what is the most money you have ever had in
21 an account in your own name?

22 A Was this going to be benefit for the case?

1 Q Yes.

2 THE INTERPRETER: She asking, was this
3 going to be any benefit for the case?

4 THE INTERPRETER (FOR THE WITNESS):
5 This is personal.

6 MR. HOLT: I know. She still needs to
7 answer the question.

8 THE INTERPRETER (FOR THE WITNESS): I
9 object.

10 BY MR. HOLT:

11 Q You have to provide the information.

12 A Regarding this case, I don't have anything
13 relative to this case, any bank account.

14 Q Have you ever had a bank account anywhere
15 with more than \$100,000 in your lifetime?

16 A Also I object for this question.

17 MR. HOLT: Attorney Hymes, can you
18 instruct her to answer these questions?

19 THE INTERPRETER: I'm sorry?

20 MR. HOLT: I'm asking her lawyer to
21 tell her she has to answer these questions.

22 MR. HYMES: I'm certainly not directing

1 her not to answer them. The witness is raising her
2 own objection.

3 MR. HOLT: I mean, we can adjourn this
4 deposition, or save this question and continue this
5 deposition later. I can go to the next questions, but
6 that's information we're entitled to, and if you want
7 to complete the deposition today, you need to suggest
8 she answer the question.

9 MR. HYMES: In the interest of getting
10 this over today, I suggest that you answer the
11 question to the best of your ability.

12 THE INTERPRETER: Is this now I have to
13 interpret for her, or you're talking --

14 MR. HYMES: Yes. You need to interpret
15 what I just said to her.

16 THE INTERPRETER: Okay. Can you repeat
17 it again, please?

18 MR. HYMES: Manal, as I understand his
19 question, he is not asking you for any information
20 regarding identity of any of your personal accounts.

21 Translate that for her.

22 THE INTERPRETER: I'm sorry, I'm

1 confused -- sorry. You're trying to explain to her --
2 advise her for what? Can you repeat again, or
3 rephrase?

4 MR. HYMES: Let me rephrase it.
5 Attorney Holt has asked you -- let's do it a piece at
6 a time --

7 THE INTERPRETER: Yes, continue.

8 MR. HYMES: Do you have any bank
9 account with more than \$100,000 in it? He is not
10 asking you where that account is, or to identify the
11 account --

12 THE INTERPRETER (FOR THE WITNESS):
13 Yes, but I will not give any details.

14 MR. HYMES: Mr. Holt, I think you have
15 your answer.

16 MR. HOLT: Jim, are you thinking -- she
17 said she's not going to give details of the account,
18 or any details of the amount as well?

19 MR. HYMES: She's not going to give any
20 account of that personal account which has nothing to
21 do with the case.

22 MR. HOLT: Well, I beg to differ. She

1 claims she has millions of dollars, and the question
2 is, does she have her own money?

3 BY MR. HOLT:

4 Q In 1996 and 1997, did you have any bank
5 accounts in your name that had more than \$100,000
6 dollars in it?

7 THE INTERPRETER: Are you asking 1991
8 and 1996 -- 1997?

9 MR. HOLT: I'll rephrase it.

10 BY MR. HOLT:

11 Q Between 1991 and 1997, did you have any
12 accounts of any kind in your personal name with more
13 than \$100,000 in it?

14 A So it will be \$100,000 or more; right?

15 Q Right.

16 A No.

17 Q Since 1997, have you ever had a bank account
18 in your name that had more than \$100,000 in it?

19 A No, my money was -- all my money was with
20 Isam and I take money from him.

21 Q When you say, "All your money was with
22 Isam," is that the 4.5 million that we're already

1 discussed, or was that other money as well?

2 A It was -- the right number was \$4,600,000.

3 Q Did Isam ever hold any moneys for you other
4 than the 4.6 million?

5 A Yes. It used to be before that -- that
6 amount of money, that was -- little than that money
7 was, like, my father send me through Isam, yes.
8 Before that.

9 Q About how much was that?

10 A My father, he was always send me -- used to
11 send me money.

12 Q Was it more than \$100,000 -- let me rephrase
13 it. Other than the 4.6 million we've already
14 discussed, did he ever send you more than \$100,000?

15 THE INTERPRETER: I will repeat that
16 question if you don't mind, Mr. Holt.

17 MR. HOLT: Okay.

18 THE INTERPRETER (FOR THE WITNESS): He
19 used to send me money, but less than this amount.

20 BY MR. HOLT:

21 Q Okay. So showing you Exhibit number 4.

22 //

1 (Exhibit 4 was marked for
2 identification.)

3 MR. HOLT: And once again, I'm going to
4 read it in English, and then I'm going to ask the
5 question, "Is this true?" and then you can translate
6 the question and ask the question.

7 THE INTERPRETER: Okay.

8 BY MR. HOLT:

9 Q Response to interrogatory number 13, you
10 stated: "In early 1996 or 1997, discussion took
11 place in my home at Cole Bay in Saint Martin between
12 me, my father, Fathi Yusuf, and Waleed Hamed
13 concerning my loaning the Sixten Plus Corporation
14 money for it to use to purchase property in St. Croix,
15 U.S. Virgin Islands. The essence of the discussions
16 were that it would be beneficial both to me and to the
17 corporation. My loan would be repaid with interest,
18 and the corporation would be able to buy a valuable
19 piece of property in St. Croix."

20 Is that statement true?

21 THE INTERPRETER: I'm trying to find
22 the exhibit here in my computer. You mentioned this

1 Exhibit 4?

2 MR. HOLT: It's Exhibit 4. It's on the
3 screen, I think, but anyway.

4 THE INTERPRETER: Yeah, but it's
5 very --

6 MR. HOLT: No problem. No problem.
7 Yes. No problem.

8 THE INTERPRETER: The screen is not
9 Exhibit 4, it's 13, Mr. Holt.

10 MR. HOLT: That's Exhibit 4. It just
11 talks about question 13.

12 THE INTERPRETER: Oh, okay. I was
13 confused about the numbering.

14 MR. HOLT: Sorry about that.

15 THE INTERPRETER: Sorry. Just give me
16 one minute, please. Okay. I don't have it in my --
17 but I will read it from here.

18 THE INTERPRETER (FOR THE WITNESS):
19 Yes, it's still correct.

20 BY MR. HOLT:

21 Q Do you know how many times these discussions
22 took place?

1 A I was once -- just once, discussed this
2 matter with my father.

3 Q And did you participate in the discussions
4 or did you just listen?

5 A Isam informed me, and my father told me
6 about it.

7 Q Okay. Were you actually present when the
8 discussions took place?

9 A They used to discuss that matter, but I was
10 just close to -- just close to listen.

11 Q Can you tell me what you heard -- can you
12 tell me what you heard Fathi Yusuf say during these
13 meetings?

14 A I hear that they're trying to establish a
15 company and they will buy land and so on. And they --
16 I mean, they will use my money.

17 Q Did you hear Waleed Hamed say anything
18 during these meetings?

19 A Everybody was talking, but certainly I don't
20 know who and what they are saying exactly.

21 Q So can you recall any specific statements
22 that Waleed Hamed made during these meetings?

1 A I don't remember anything.

2 Q Okay. Showing you Exhibit number 5. In
3 response to interrogatory number 2 sent to you in this
4 case asking about any discussion regarding the
5 specific detail of the loan transaction to Sixteen
6 Plus, you stated: "I had discussion with my father
7 and my brother Isam at or about the time I loaned the
8 money to Sixteen Plus Corporation. These discussions
9 took place in person and occurred sometime shortly
10 before February 16, 1997. The gist of the discussions
11 were that I would loan approximately 4.5 million
12 dollars to Sixteen Plus Corporation from money which
13 had been given to me by my father for investment
14 purposes, and that the corporation would execute a
15 promissory note and mortgage to secure the repayment
16 of the loan proceeds to me, plus interest."

17 Is that statement correct?

18 (Exhibit 5 was marked for
19 identification.)

20 THE INTERPRETER: She wants me to
21 repeat again and do it slowly.

22 MR. HOLT: That's fine, and just --

1 could the exhibit be moved up so she can also see the
2 Arabic in full --

3 Go ahead and start all over again.
4 That's fine.

5 THE INTERPRETER (FOR THE WITNESS):
6 It's not obvious for me. I cannot read it.

7 MR. HOLT: All right. So go ahead and
8 just read it again. That's fine.

9 THE INTERPRETER (FOR THE WITNESS):
10 Yes. It's correct.

11 BY MR. HOLT:

12 Q And where did these discussions take place?

13 A I think in Saint Martin.

14 Q And do you know how many times you had these
15 discussions with your father and Isam?

16 A I don't know.

17 Q More than one time?

18 A Of course -- more -- a lot.

19 Q Was the 4.5 million mentioned in this answer
20 the amount of funds your father had provided to you?

21 THE INTERPRETER: Say again, Mr. Holt?

22 //

1 BY MR. HOLT:

2 Q Was the 4.5 million mentioned in this answer
3 the funds that your father had provided to you?

4 A Mr. Holt, maybe I'm confused about your
5 question. Can you rephrase it?

6 Q The 4.5 million mentioned in this answer, is
7 that the money that your father gave to Isam to hold
8 for you?

9 A Yes, correct.

10 Q Do you know what a promissory note is?

11 THE INTERPRETER: What's the name?
12 Sorry?

13 BY MR. HOLT:

14 Q Do you know what a promissory note is?

15 A I think I guess it's something like to
16 approve, something like that.

17 Q Do you know what a mortgage is?

18 A Yes.

19 Q What is a mortgage?

20 A Like the same in my situation. I give the
21 money and they give me something to guarantee my
22 money.

1 Q Okay. Showing you Exhibit number 6. In
2 response to interrogatory number 4, you stated: "The
3 money which I loaned to Sixteen Plus Corporation was
4 transferred on my behalf by my brother Isam, who had
5 control and management authority of my money which had
6 been given to me by my father for my benefit and for
7 investment purposes."

8 Is this true?

9 (Exhibit 6 was marked for
10 identification.)

11 A Yes, correct.

12 Q And was this authority to control and
13 management authority you gave Isam in writing or just
14 verbally?

15 A It was verbally, because my father he gave
16 him the authorization also for that.

17 Q I'm showing you Exhibit number 7. In
18 response to interrogatory number 8 sent you in this
19 case asking about the negotiations for the terms of
20 the loan to Sixteen Plus, you stated: "All of the
21 terms and conditions of the promissory note and
22 accompanying mortgage were negotiated on my behalf by

1 my father and my brother Isam."

2 Is that sworn statement true?

3 (Exhibit 7 was marked for
4 identification.)

5 A Yes, correct.

6 Q Did you give them any specific instructions
7 as to the amount of interest to charge?

8 A No. It was something agreed between my
9 father and Isam, and it was something like -- it was
10 \$360,000 -- every year.

11 Q Did you tell them to do that, or did they
12 just negotiate that themselves?

13 A No, it was Isam, and he was negotiating
14 about the terms. He was doing everything.

15 Q Have you ever heard the name --

16 MR. HOLT: You can take down that
17 exhibit for right now.

18 BY MR. HOLT:

19 Q Have you ever heard of the name Diamond
20 Keturah?

21 A Yes.

22 Q And what does that name mean to you?

1 A It's a land, and I guess this was a land
2 against my money, as a secure -- my money.

3 Q And where was the land located?

4 A Virgin Island, but where exactly I don't
5 know.

6 Q I'm showing you Exhibit number 8. Have you
7 seen this document before?

8 (Exhibit 8 was marked for
9 identification.)

10 A It's not very clear to me.

11 Q I'll make it look bigger, maybe. Have you
12 seen this document before?

13 A Yes, I saw that before.

14 Q Do you know the first time that you saw this
15 document?

16 THE INTERPRETER: Sorry, Mr. Holt?

17 BY MR. HOLT:

18 Q Can you tell me the first time that you
19 recall seeing this document?

20 A 1997.

21 Q Okay. And can you read this document in
22 English?

1 A Yes, I can read.

2 Q So you can read English?

3 A Yes, I can, but not perfect.

4 Q Have you read this document before?

5 A My -- the one that I am authorized -- he was
6 explaining to me everything.

7 Q Going to Exhibit number --

8 THE VIDEOGRAPHER: Excuse me, Joel.

9 Can we take a quick break to change media units?

10 MR. HOLT: Of course --

11 MR. HYMES: Let's take five minutes, if
12 you don't mind.

13 MR. HOLT: I don't mind. Just so you
14 know, I'm well over halfway through.

15 MR. HYMES: Okay, good.

16 THE VIDEOGRAPHER: Going off of the
17 record. The time is 10:30 a.m.

18 (Off the record.)

19 THE VIDEOGRAPHER: We are back on the
20 video record. The time is 10:38 a.m. This begins
21 media unit number 2.

22 MR. HOLT: I would like the witness to

1 be shown Exhibit number 9.

2 (Exhibit 9 was marked for
3 identification.)

4 BY MR. HOLT:

5 Q My question is, have you seen this document
6 before?

7 A Yes.

8 Q And do you remember about the first time you
9 saw this document?

10 A I remember it was September 1997.

11 Q All right. And going to the very last page
12 of this document, if we could. This is a description
13 of the property. Have you ever seen that document
14 before?

15 A I think yes.

16 MR. HOLT: Okay. We can take that down
17 for right now.

18 BY MR. HOLT:

19 Q You may have answered this question, but
20 have you ever been to this property on Saint Croix?

21 A No, I never been in that estate.

22 Q Do you know if this property is on the north

1 shore of Saint Croix or the south shore of Saint
2 Croix?

3 A No.

4 Q Do you know if this property has a beach?

5 A Yes, I think so.

6 Q Does it have more than one beach?

7 A I don't know.

8 Q Have you ever seen photos of this property?

9 A No.

10 Q Have you ever seen a map of this property?

11 A No.

12 Q Do you know how many acres are on this
13 property?

14 A I think it's -- I know that it was really
15 large or big area -- I don't know how much, but I
16 remember it was really big property.

17 Q Do you know what an appraisal is?

18 A No.

19 THE INTERPRETER: Mr. Joel -- this is
20 very particular. Now I am interpreter, and I want to
21 ask you. Do you want me to say the appraisal in
22 Arabic or in English?

1 MR. HOLT: I want you to say it in
2 Arabic.

3 THE INTERPRETER: Okay.

4 THE INTERPRETER (FOR THE WITNESS):

5 Exact, no. But Isam, he is the one who authorize and
6 he is know better about these things.

7 BY MR. HOLT:

8 Q Okay. Do you know if any experts have ever
9 studied the property and given a formal opinion as to
10 its value?

11 A I just authorized this to Isam and he's
12 doing everything on my behalf.

13 Q Okay. Showing you Exhibit number 10. In
14 response to interrogatory number 11, you stated: "In
15 the years 1998, 1999, and 2000, payments were made to
16 me by the Sixteen Plus Corporation in the amount of
17 \$360,000 in each of those years. In 1998, the payment
18 was made by Waleed Hamed in cash. I do not know the
19 form of payment of \$360,000 in 1999 or 2000."

20 (Exhibit 10 was marked for
21 identification.)

22 MR. HOLT: Can you just read that to

1 her?

2 THE INTERPRETER: Yes.

3 MR. HOLT: I think that's all that I
4 read. You got to the word "2000."

5 BY MR. HOLT:

6 Q Is that portion of the statement that was
7 just read to you correct?

8 A Yes. Correct.

9 Q Regarding the \$360,000 payment in 1998, how
10 do you know Waleed Hamed made that payment in cash?

11 A Can you repeat the question, Mr. Holt?

12 Q Yes. Regarding the statement that the
13 \$360,000 paid in 1998 was made by Waleed Hamed, how do
14 you know that?

15 A Because Isam say that he received that.

16 Q Okay. So Isam received that payment, not
17 you?

18 A Yes. He received and he gave it to me.

19 Q Okay. Was all of the \$360,000 paid at one
20 time?

21 A No.

22 Q How many payments were made for the first

1 \$360,000?

2 A Maybe two, three times, or maybe whenever
3 that I need money, he send me something. He give me
4 something.

5 Q Okay. Were all the payments made in cash?

6 A I received from Isam.

7 Q When Isam would give you money, he would
8 give it to you in cash?

9 A So at the beginning, we owe Isam some money,
10 so we have to pay him. So it was -- because we bought
11 a supermarket from him. So this was a part of that.
12 So he got what he owe.

13 Q How much did you pay him for the
14 supermarket?

15 A It was -- I think, maybe 200,000.

16 Q Okay. And did you ever receive the rest of
17 the \$360,000 payment, above the \$200,000 that he kept
18 for the payment of the business?

19 A Yes, I received the rest of the money.

20 Q And did you receive it in cash?

21 A Yes, and I did -- something in my
22 supermarket -- in the supermarket with that money.

1 Q Okay. Did you put any of the cash into a
2 bank account in your name?

3 A No. No, because I was -- the way was I
4 was -- every time I want to spend something, I need
5 something, I ask for that.

6 Q Okay. Do you have any records showing when
7 you would receive funds from him and how much you
8 would receive each time?

9 A No.

10 Q Did anyone keep a record of that, or was
11 that just a verbal understanding between you and Isam?

12 A I don't know. I don't know.

13 Q Regarding the 360,000 -- well, let me ask
14 you this question. The first payment of \$360,000 in
15 1998, is any of that money left?

16 A No.

17 Q Regarding the \$360,000 payment in 1999, did
18 you actually receive any of these funds?

19 A Yes, of course. I received it all.

20 Q And did you receive it directly from one of
21 the Hameds or did you receive it from Isam?

22 A From Isam.

1 Q And did he give it to you in cash?

2 A I get it as a cash and I spend it as a
3 payment. I started a new business, I mean like a
4 supermarket -- No, I started a new business for the
5 car parts, and I was spending on this subject. Every
6 time I need, I ask him for that.

7 Q What was the new business?

8 A It was auto parts.

9 Q And that was in Saint Martin?

10 A Yes.

11 Q And was that in your name?

12 A No, but it is my money.

13 Q Whose name was the business in?

14 A My husband.

15 Q And did you -- are there any records showing
16 the payments of the \$360,000 from Isam to you?

17 A No. I think -- official, no.

18 Q Is there any record of the second payment of
19 \$360,000 made in 1999?

20 A No. All my business with Isam, just like
21 that. Whenever I need something.

22 Q Okay. And regarding the auto business that

1 you bought in Saint Martin, is that still an active
2 business?

3 A Yes.

4 Q So that's still open today?

5 A Yes.

6 Q But the supermarket that you bought from
7 Isam has since been sold; correct?

8 A Yes.

9 Q Okay. And other than the auto business you
10 mentioned, are there any other businesses in Saint
11 Martin that you have any interest in?

12 A No.

13 Q Regarding the \$360,000 payment the third
14 year, in 2000, did you actually receive those funds?

15 A Yes.

16 Q And did you receive it all at one time, or
17 did you receive it as needed?

18 A Payments.

19 Q And did you -- was it all in cash, the
20 payments?

21 A Yes.

22 Q And are there any records showing the amount

1 of the payments and when they're made?

2 A No. Official thing, no.

3 Q Okay. And did you put any of that money
4 into a bank account, or did you just keep it as cash?

5 A I was -- I mean, use it in my business.

6 Q And is there anything left of that money?

7 A No. Like something left in Isam, no.

8 Q Do you recall about when the last payment
9 from Isam would have been, the last time you got money
10 from him for these funds here?

11 A I think maybe in 2002.

12 Q Did you ever report any of these three
13 interest payments of \$360,000 as income on any tax
14 return or other form filed with a government agency
15 anywhere?

16 A No.

17 Q Do you know if Isam ever reported these
18 interest payments on any tax return or any type of
19 form filed with any government agency?

20 A I don't know.

21 Q All right. Showing you Exhibit number 11.
22 There are like five items on here. I'm going to read

1 each one and then stop and ask if that response is
2 true. So I'll start off at the beginning.

3 (Exhibit 11 was marked for
4 identification.)

5 THE INTERPRETER: Can you give me just
6 one minute to bring it in my computer, please?

7 MR. HOLT: Absolutely.

8 THE INTERPRETER: Thank you. I got it.
9 Okay.

10 BY MR. HOLT:

11 Q All right. Showing you Exhibit 11. In
12 requests 1 through 5, you were asked, as a defendant
13 in this case, for all documents related to this
14 transaction and you stated in your response as
15 follows -- and I'm going to go through each one one-
16 by-one.

17 Document request number 1. You were asked
18 to produce "All documents evidencing the source of any
19 and all funds used by Defendant" -- that's you -- "To
20 loan any money to Sixteen Plus Corporation as
21 consideration for the execution of the Promissory Note
22 attached hereto as Exhibit 1."

1 Your response was "None." Is that correct?

2 A Can you explain to me ...

3 Q Yes. We've asked you to provide to us all
4 documents in your possession which would show the
5 source of all the funds that you loaned to Sixteen
6 Plus. And we've been told no such documents exist.
7 Is that correct?

8 A Yes, correct.

9 Q And in document request number 2, you were
10 asked for "All documents showing the transfer of any
11 and all funds from the Defendant to Sixteen Plus
12 Corporation as consideration for the execution of the
13 Promissory Note attached to this document," and you've
14 answered "None." Is that correct?

15 A Can you explain again?

16 Q In this request, we asked you to provide us
17 with copies of all documents that would show funds
18 being transferred from you to Sixteen Plus in
19 consideration for the note that you identified, and
20 you answered there were no such documents. Is that
21 correct?

22 A I don't have it, but maybe with Isam, maybe.

1 Q Okay. And item number 3, you were asked to
2 produce "All documents evidencing your ownership of
3 any funds loaned to Sixteen Plus Corporation as
4 consideration for the execution of the Promissory
5 Note," and you answered "None." Is that correct?

6 A Correct.

7 Q And item, number 4, you were asked to
8 produce "All documents evidencing your control over
9 any funds loaned to Sixteen Plus as consideration for
10 the execution of the Promissory Note," and you
11 indicated "None." Is that correct?

12 A Yes, correct.

13 Q All right. And document request number 5,
14 you were asked to produce "All documents evidencing
15 the consideration you provided in exchange for the
16 Promissory Note regarding the property known as
17 Diamond Keturah as stated in your Counterclaim, to
18 wit: 'On September 15, 1997, for good and valuable
19 consideration, executed a promissory note secured by a
20 First Priority Mortgage,'" and your response was
21 "None."

22 A Yes. It was -- I don't have it -- but the

1 promise note was there.

2 Q Okay. Thank you. Showing you Exhibit
3 number 12. Well, let me just go right to Exhibit
4 number 13. Exhibit number 13 is a real estate power
5 of attorney given by you to Fathi Yousef. Do you
6 recognize that document?

7 (Exhibit 12 and Exhibit 13 were marked
8 for identification.)

9 A Yeah, I think that is the same, but I did
10 real estate power of attorney.

11 Q So you gave Fathi Yousef a real estate power
12 of attorney to deal with the property Diamond Keturah;
13 is that correct?

14 A Yes, correct.

15 Q And you recall that you gave that to him
16 around 2009 in Saint Martin when you met with him?

17 A I don't remember if it's 2009 -- but I did
18 not meet him that time.

19 Q I thought the beginning of this deposition
20 you indicated you met him in 2009 to give him the
21 power of attorney.

22 A Yes, because I want to give the

1 authorization document.

2 Q So you met him in 2009 to give him the
3 authorization document so he could deal with the
4 property --

5 A At the time of -- issuing the real estate
6 power of attorney, I did not meet him.

7 Q So you're changing your testimony from
8 earlier this morning where you said you met him in
9 2009?

10 A Yes. I met him in 2009, but not the same
11 time of issuing the real estate power of attorney.

12 Q Where did you meet him in 2009?

13 A It wasn't like a meeting. He just -- like
14 saying hi, and then I gave him the power of
15 attorney -- real estate power of attorney. By the
16 way, I gave the real estate power of attorney to Isam,
17 and Isam handed this document to him.

18 Q Okay. Do you know if you've ever revoked
19 this power of attorney?

20 A Fathi -- my uncle did not want this real
21 estate power of attorney. I don't remember.

22 Q Okay. Since we began this deposition today,

1 have you talked to anybody other than perhaps your
2 lawyer about anything about this case?

3 A No, just my lawyer.

4 Q Showing you Exhibit number 14. Do you
5 recognize this document?

6 (Exhibit 14 was marked for
7 identification.)

8 A It's not clear to me.

9 Q Do you recall whether or not you ever gave
10 Jamil Isam Yousuf a power of attorney as well?

11 A Yes.

12 Q And why did you give him a power of
13 attorney?

14 A Because I am not an expert on this kind of
15 business, and I also not available all the time there.
16 And by the way, Isam, he did not want this power of
17 attorney.

18 Q Why not?

19 A (In English) He stopped doing -- it's hard
20 for him. So he -- give to his son. By then, at that
21 time --

22 A (Interpreter) During that time, he was

1 having some kind of problems, troubles to go to that
2 state.

3 Q And is that Isam who had trouble, or Jamil
4 who had trouble?

5 A Isam --

6 Q So you gave a power of attorney to Jamil?

7 A Yes.

8 Q Do you know whether or not he filed a
9 lawsuit for you?

10 A Yes, I know.

11 Q Does he provide information to you about
12 that lawsuit?

13 A Yes.

14 Q How often does he provide information to
15 you?

16 A Every time there's something new occurred.

17 Q Do you know what the current status of the
18 case is?

19 A Well, now we are dealing with it.

20 Q Do you know who has been paying the bills
21 that your lawyer has been sending?

22 A Jamil.

1 Q And do you know where Jamil is getting the
2 money from to pay the bills?

3 A Jamil, he's paying, but he's taking his --
4 the money from his father.

5 Q So you haven't been sending money to him?

6 A Isam, he is spending from my money that he's
7 holding in his position.

8 Q Okay. So Isam still is holding money for
9 you?

10 A There's no difference between me and Isam.
11 He spend money, and then I will -- I mean, dealing
12 with that later, how much I owe him.

13 Q Okay. Does Isam still have any money that
14 was given to him to hold for you? Is any of that
15 money still around?

16 A No.

17 MR. HOLT: I'm sorry, did she answer
18 that "No"?

19 THE INTERPRETER: Yes. She answered
20 before I do an interpretation, so ...

21 MR. HOLT: Okay. Can we agree that the
22 answer to that question is no, then, Attorney Hymes?

1 THE INTERPRETER: I will repeat that
2 question.

3 THE INTERPRETER (FOR THE WITNESS): No.

4 MR. HOLT: We can take that document
5 down. And I have no more questions.

6 MS. PERRELL: Do you have any
7 questions? I have a few.

8 MR. HYMES: Go right ahead.

9 MS. PERRELL: Attorney Holt -- Attorney
10 Hymes. Okay.

11 MR. HYMES: Go right ahead, Charlotte.

12 EXAMINATION

13 BY MS. PERRELL:

14 Q Good morning, or afternoon, Ms. Yousef. My
15 name is Charlotte Perrell, and I represent Fathi
16 Yusuf. I have a few questions just to clarify some of
17 your earlier answers.

18 Okay. First question, when did you get
19 married?

20 A (In English) 1985.

21 Q Okay. I know this may be a sensitive topic.
22 Before you had your children, did you have any trouble

1 getting pregnant or having children?

2 A Yes, correct.

3 Q All right. And I'm sorry to ask. Did your
4 family -- did your father know of the troubles you
5 were having having children?

6 A Yes, of course.

7 Q And did he ever express to you any concern
8 about wanting to provide you funds for your wellbeing
9 if he were to pass?

10 THE INTERPRETER: He what?

11 MS. PERRELL: Pass away.

12 THE INTERPRETER (FOR THE WITNESS):

13 Yes, of course.

14 BY MS. PERRELL:

15 Q And what did he discuss with you about that
16 topic?

17 A I had really a major problem with my --
18 getting pregnant.

19 A (In English) I had five miscarriages -- six
20 miscarriages.

21 A (Interpreter) I had six miscarriages. And
22 my father was really worrying about me. So because

1 this issue took a long time from my life, he was
2 trying to make something for me to secure my marriage.
3 So even he was searching for any doctor in any place
4 to help me for that.

5 Q Did he discuss with you wanting to leave you
6 any money because of this issue?

7 A Of course, yes.

8 Q Before the discussion about buying the
9 Diamond Keturah property, had you had discussions with
10 your father about money that he wanted to leave you?

11 A Yes, correct.

12 Q Okay. And had he given the money that he
13 wanted to leave you to Isam before this property ever
14 came up?

15 A I'm not sure exactly, but it was really a
16 discussion about that.

17 Q When your father passed away, was there
18 money that was given to all of the siblings -- you,
19 your brothers, and so forth -- when he passed away?

20 A Yes. There were properties, there were real
21 estates, businesses, something like that.

22 Q Okay. And I apologize for prying into your

1 personal financial business, but it's the topic of
2 this case. Of the money that was divided amongst the
3 siblings, can you describe the properties in, let's
4 say, Jordan?

5 A Yes, correct.

6 Q Okay. How many properties did you and your
7 siblings inherit in Jordan?

8 A For me, I did not have a real estate or
9 property in Jordan.

10 Q Okay. Did your siblings inherit real estate
11 or properties in Jordan when your father passed?

12 A Yes, correct.

13 Q Okay. Do you know how many properties they
14 inherited in Jordan after he passed?

15 A I'm not sure, but there were houses and
16 lands like that. I'm not sure what is it.

17 Q Were there other properties in other
18 countries besides Jordan that they or you inherited
19 after your father passed?

20 A They were -- according to my knowledge, it
21 was Palestine and Jordan. Outside that, I'm not sure
22 yet. I'm not sure about it.

1 Q Okay. And again, I apologize for prying
2 into your financial matters, but could you give me --
3 do you have an idea of the value of the properties
4 inherited by your siblings from your father after he
5 passed that are in Jordan, the value?

6 A It's a lot. I don't know how much, really.
7 I don't know. I don't know.

8 Q Do you know if the property in Jordan that
9 was inherited by your siblings is worth more than,
10 total, five million dollars?

11 A Of course more than that.

12 Q Okay. Do you believe that property in
13 Jordan inherited by your siblings after your father
14 passed was more than 20 million dollars in value?

15 A I'm really not sure about the number.
16 You're talking about something six years ago. I don't
17 know anything. I mean, I don't remember.

18 Q Okay. To ask you about the property in
19 Palestine, the same question, the value of the
20 property inherited by you or your siblings in
21 Palestine after your father passed, is that property
22 valued more than five million dollars?

1 A Yes.

2 Q Okay. Do you know what the value of the
3 property, the Diamond Keturah property that is the
4 subject of this case, do you have any knowledge as to
5 the value of that property?

6 A I think about 30 millions. Maybe.

7 Q All right. Going back to your father, did
8 he ever, while he was back in the Middle East, was he
9 ever a mayor of a town or, you know, in charge of a
10 particular town, or an elected official?

11 A Yes. He was like a mayor.

12 Q Okay. And what was the name of that town?

13 A The city or the town called Silat Dar [ph].

14 Q All right. And where is that located?

15 A West Bank, Jenin.

16 Q Right. And do you know if your father ever
17 had any businesses in Brazil or South America?

18 A Yes.

19 Q Do you know if your father owned a
20 manufacturing business where he manufactured stoves or
21 ovens?

22 A Yes. It was in Cyprus.

1 Q And do you know of any of the type of
2 businesses that your father had when he was in Brazil
3 or South America?

4 A Textile, trading, shoes.

5 Q Do you know if your brother -- sorry, your
6 father was ever in business with Mr. Fathi Yusuf, his
7 brother, in the Virgin Islands?

8 A I'm not sure, honestly. This is between
9 them. I don't know -- certain things between them,
10 like as a business.

11 MS. PERRELL: Okay. If the court
12 reporter could pull up Exhibit number 13.

13 BY MS. PERRELL:

14 Q Okay. This is the Real Estate Power of
15 Attorney that was given to Fathi Yusuf. My question
16 is, how did this come about? How did this occur?

17 A The subject was arised because there's
18 someone was interested in this property, and -- this
19 kind of real estate power of attorney will help to
20 sell this property.

21 Q And how did you first hear about this?

22 A Which subject?

1 Q How did you first hear about someone wanting
2 to purchase the property?

3 A It was because Isam told me.

4 Q Okay. And then how did you come to learn
5 about this document that was needed?

6 A Isam.

7 Q Okay. And did you ever talk to Mr. Fathi
8 Yusuf about this document?

9 A No.

10 Q Okay. And did you --

11 MS. PERRELL: If the court reporter can
12 go down to the next page? Is the signature page part
13 of Exhibit 13?

14 MR. HOLT: No.

15 MS. PERRELL: It's not?

16 MR. HOLT: I circulated these
17 yesterday. I just have the translated part.

18 MS. PERRELL: I see. Okay. Can we --
19 let's mark an exhibit, then. We'll mark this as
20 Yousef Exhibit 1. And I will ask if we can have Pam
21 Bayless, my legal assistant, pull up the power of
22 attorney for Fathi. Okay. And can you scroll to the

1 bottom? Okay, wait. Stop right there.

2 (Yousef Exhibit 1 was marked for
3 identification.)

4 BY MS. PERRELL:

5 Q Ms. Yousef, is that your signature?

6 A Yes.

7 Q Okay. And do you know who the witnesses
8 are?

9 A It was Isam. He was with me.

10 Q Okay. And the other name?

11 A Waleed.

12 Q Waleed Hamed?

13 A (In English) Waleed Hamed.

14 Q Okay. So Waleed Hamed was present when you
15 signed it?

16 A I went with Isam to the notary place and
17 Waleed was close to this place, close by. And there
18 is -- there were a furniture shop there and --

19 THE INTERPRETER: I don't know -- I
20 have to ask her again.

21 THE INTERPRETER (FOR THE WITNESS):
22 Island.

1 BY MS. PERRELL:

2 Q Okay. So just to clarify. You're saying
3 that Waleed was present with you when you signed this
4 power of attorney?

5 A Isam was with me.

6 Q Okay. Was Waleed present with you at this
7 time?

8 A At the notary place, Isam was with me.

9 Q Okay. A minute ago you said something about
10 Waleed Hamed being present or involved. How -- I
11 don't understand. Can you clarify?

12 A Isam handed this power of attorney to him.

13 Q Okay. I just want to make sure I'm clear.
14 Waleed Hamed handed this power of attorney to Isam?

15 A No. Isam handed this document to Waleed.

16 Q Okay. Where?

17 A Waleed was waiting at the furniture place,
18 Island something, to take this power of attorney.

19 Q Okay . All right. Was Mr. Fathi Yusuf there
20 for when you signed it for -- at all?

21 A No, he wasn't there.

22 MS. PERRELL: Okay. All right. We can

1 bring that down now, Pam. Thank you.

2 BY MS. PERRELL:

3 Q With regard to the moneys that you received,
4 the \$360,000 per year for three years, do you know why
5 the payments stopped?

6 A I hear they were having problems.

7 Q Do you know what allegations are being made
8 now about the mortgage that was signed by Sixteen Plus
9 on behalf of Waleed Hameed?

10 THE INTERPRETER: What's the name,
11 sorry, Ms. Charlotte?

12 MS. PERRELL: Waleed Hamed.

13 THE INTERPRETER (FOR THE WITNESS): Can
14 you rephrase the question?

15 BY MS. PERRELL:

16 Q Okay. The allegation -- let me ask you
17 this. Are you aware that an allegation has been made
18 that the mortgage document is not valid because it was
19 not your money that was lent?

20 A Yes, I hear that.

21 Q Okay. What is your response? Is that true
22 or false?

1 A -- the document that they were signed
2 against these properties, right?

3 MS. PERRELL: Okay. That's her answer?

4 THE INTERPRETER: Yes, this is her
5 answer.

6 BY MS. PERRELL:

7 Q Okay. Let me ask you this. Was it your
8 money that was used and lent to Sixteen Plus?

9 A Of course. Yes. This is my father's money
10 sent to me.

11 Q Okay. You said that there were some kind of
12 problems as to why the money, the payments, stopped
13 coming. What kind of problems did you understand?

14 A They had problems with the United States
15 government.

16 MS. PERRELL: All right. I don't think
17 I have any further questions. Thank you.

18 MR. HYMES: I have a couple.

19 EXAMINATION

20 BY MR. HYMES:

21 Q Good morning. Is it your testimony here
22 today that your father told you that he was making

1 money available for your benefit?

2 THE INTERPRETER: She's asking to
3 repeat the question.

4 BY MR. HYMES:

5 Q Is it your testimony that your father told
6 you that he was going to make some of his money
7 available to you for your benefit?

8 A Yes.

9 Q And is it your testimony that he gave that
10 money to Isam to invest for your future benefit?

11 A Yes.

12 Q Is it your testimony that you agreed to loan
13 4.5 million dollars to the Sixteen Plus Corporation
14 the Virgin Islands?

15 A Yes.

16 Q And is it your testimony that the Sixteen
17 Plus Corporation gave you a note and mortgage to
18 secure the repayment of that loan?

19 A Yes.

20 Q Earlier today, Attorney Holt showed you
21 Exhibits 8 and 9, which are the promissory note and
22 mortgage. Do you remember seeing those documents?

1 A Yes.

2 Q And are those the note and mortgage that the
3 Sixteen Plus gave to you to secure the repayment of
4 your loan to them of 4.5 million dollars?

5 A Yes.

6 Q And is it your testimony here today that the
7 Sixteen Plus Corporation made three payments of
8 \$360,000 for interest in accordance with the terms of
9 the promissory note?

10 A Yes.

11 Q And were those three payments received in
12 1998, 1999, and the year 2000?

13 A Yes.

14 Q Since the year 2000, has the Sixteen Plus
15 Corporation made any further payments to you to repay
16 the loan which you made to them?

17 A No.

18 MR. HYMES: Thank you. I have no
19 further questions.

20 Let's just -- can we take a break for a
21 minute? I'll be right back.

22 THE VIDEOGRAPHER: The time is 11:48

1 a.m.

2 THE REPORTER: We are off the record at
3 11:48 a.m.

4 (Off the record.)

5 MR. HYMES: I have no other questions.

6 THE INTERPRETER: I'm sorry. Do I have
7 to stay, or should I leave?

8 THE VIDEOGRAPHER: We're off the
9 record. The time is 11:54 a.m.

10 (Signature waived.)

11 (Whereupon, at 11:54 a.m., the
12 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

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CERTIFICATE OF TRANSCRIBER

I, RICHARD GOODNESS, 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.



RICHARD GOODNESS

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