		Page 1
1	IN THE SUPERIOR COURT OF T	HE 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,	SX-2016-CV-00650
10	and JAMIL YOUSUF,	
11	Defendants.	
12	and	
13	SIXTEEN PLUS CORPORATION,	
14	a nominal Defendant.	
15		
16	SIXTEEN PLUS CORPORATION,	
17	Plaintiff,	Consolidated with
18	v.	Civil No.
19	MANAL MOHAMMAD YOUSEF,	SX-2016-CV-00065
20	Defendant,	
21	and	
22	MANAL MOHAMMAD YOUSEF,	

		Page 2
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 YSUF,	
22	Third-Party Defendant.	

		Page 3
1		VIDEOTAPED DEPOSITION OF
2		WALEED HAMED
3	DATE:	Thursday, August 10, 2023
4	TIME:	12:24 p.m.
5	LOCATION:	Remote Proceeding
6		Washington, DC 20005
7	REPORTED BY:	Shondra Dawson, Notary Public
8	JOB NO.:	6014366
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	Page 6
1	APPEARANCES (Cont'd.)
2	ALSO PRESENT:
3	Pam Bayless, Paralegal, Dudley Newman Feuerzeig
4	(by videoconference)
5	Walli Hamed, Plaintiff (by videoconference)
6	Ben Pelta-Heller, Videographer
7	(by videoconference)
8	Fathi Yusuf, Defendant (by videoconference)
9	
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14	Exhibit Y-4 Annual Filing	56
15	Exhibit Y-5 Consent of Directors	60
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17	* not in possession of reporter	
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22	Exhibit H-59 First Priority Mortgage	32

1

PROCEEDINGS

Τ	PROCEEDINGS	
2	THE VIDEOGRAPHER: Good afternoon. We	
3	are going on the record at 12:24 p.m. on Thursday,	
4	August 10, 2023. This is media unit 1 for the video	
5	recorded deposition of Waleen [sic] Hamed, taken by	
6	counsel in the matter of Hamed et al. v. Yusuf et al.,	
7	filed in the Superior Court of the Virgin Islands,	
8	Division of Saint Croix.	
9	My name is Ben Pelta-Heller	
10	representing Veritext. I'm the videographer. The	
11	court reporter is Shonda Dawson from the firm	
12	Veritext.	
13	Counsel and all present, including	
14	remotely, will now state their appearances and	
15	affiliations for the record, and will the reporter	
16	please swear in the witness.	
17	MR. HOLT: My name is Joel Holt and I'm	
18	counsel for Waleed Hamed.	
19	MR. HARTMANN: My name is Carl	
20	Hartmann. I'm counsel for Sixteen Plus Corporation.	
21	MS. PERRELL: My name is Charlotte	
22	Perrell. I am counsel for Fathi Yusuf.	

MR. HYMES: Good afternoon. 1 I'm James 2. Hymes, counsel for Manal Yousef, Jamil Yousuf, and Isam Yousuf. 3 MS. PERRELL: And just to clarify, I 4 also have present on the call, on this deposition, 5 Stefan Harpul, who is also counsel for Fathi Yusuf. 6 7 THE REPORTER: Thank you. I am the 8 reporter assigned by Veritext to take the record of 9 this proceeding. I am a notary authorized to take 10 acknowledge and administer oaths in the District of 11 Columbia. Parties agree that I will swear in the witness remotely outside of his or her presence. 12 13 Additionally, absent an objection on 14 the record before the witness is sworn, all parties 15 and the witness understand and agree that any 16 certified transcript produced from the recording virtually of this proceeding: 17 - is intended for all uses permitted 18 19 under applicable procedural and 2.0 evidentiary rules and laws in the same 2.1 manner as a deposition recorded by 22 stenographic means; and

- shall constitute written stipulation of such.

Now hearing no objection, I will now swear in the witness. Mr. Hamed? Will you please raise your right hand? Thank you very much.

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WALEED HAMED,

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

THE REPORTER: Thank you. You may proceed, Mr. Holt.

13 EXAMINATION

14 BY MS. PERRELL:

Q All right. Good afternoon, everybody.

Thank you, Mr. Hamed, for making yourself available today. We appreciate that. As you know, I represent Mr. Fathi Yusuf in this case. We've met before on other matters that we have pending. I want to ask you questions relating to the Sixteen Plus loan documentation to Manal Yousef and the subject of these cases relating to that loan.

1 You have provided a statement in this case 2 which has previously been marked as H-1, and I am 3 going to just ask you some questions about that statement and some of the information that you've 4 5 provided therein. My first question is, you have indicated that moneys that were transferred from Plaza 6 Extra were transferred to Saint Martin in various 7 8 accounts that were opened in your name, Mr. Yusuf's 9 name, and Hamdan Diamond. Is that correct? 10 (Exhibit H-1 was previously marked for 11 identification.) 12 Α Yes, ma'am. 13 Okay. And then you also indicated that that 14

- money was then transferred to Jordan. Correct?
- Transferred to Jordan and many other places, Α yes.
 - 0 Okay. Where are the other places?
- 18 Α Well, back to Saint Croix, to the Virgin 19 Islands.

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Okay. And of the moneys that came back to 0 Saint Croix after arriving in Saint Martin, how did those funds come back to Saint Croix?

A Well, they came through either check or wire transfer.

- Q Okay. And if they came through a check, where would they be deposited?
- A I don't recall exactly where they would be deposited, but they would be deposited maybe different accounts that we had.
- Q Okay. And when you say different accounts, would they have been deposited in accounts for Sixteen Plus?
- A I know there was -- there was a couple of transfers that were made that were deposited to Sixteen Plus, yes.
- Q And you're saying -- I'm just trying to understand the progression. Funds went into the -- your account, Fathi Yusuf's account, and the Hamdan Diamond account in Saint Martin, and then you're saying funds came from one of those three accounts directly back to the Virgin Islands?

A Well, the accounts that were open, it wasn't just Hamdan Diamond or Fathi Yusuf's or my account as well, but there was Isam's account as well that was

1 being used to launder the funds.

2.1

- Q Okay. How were funds -- in your testimony, how were funds given to Isam?
 - A Yeah, they were given by cash, absolutely.
- Q Okay. And did you personally give Isam cash to deposit into his accounts in Saint Martin?
 - A Me as well as Fathi, yes.
- Q Okay. And when you gave him funds to deposit into the accounts in Saint Martin, were those payments for those -- when you gave him those funds, were those for payment of interest on the loan that we've discussed in this matter -- and the other depositions --
- A Absolutely -- absolutely not, ma'am.

 That -- those funds that were given to Isam -- so Isam was the central figure in laundering the money. He would make -- we would drop the money off, either me or Fathi. It would be delivered in multiple ways. It would be given to Isam. Isam -- including Isam's brother, including Isam's brother's wife, including other people that were in Saint Martin that deposited those moneys on different days, different occasions,

and different amounts. In those accounts were -- they would deposit the money in the Hamdan Diamond account. They would deposit in the Fathi Yusuf account. They would deposit in my account, and he would deposit it also in Island Appliances account that was different than the Island Appliances account that he kept for his business.

2.1

Q Okay. How did he receive the funds -- let's just talk about funds that you're claiming he deposited into, let's say, your account in Saint Martin. How did he physically receive those funds?

A The funds would be physically transported to him through cash. I would go over there, I would have the funds maybe -- I'm not too sure the quantity or the amount of the money that I would bring over, or the amount -- the quantity that Fathi would bring over, but it was always in cash -- his son would pick us up from the airport. Whether he picks me up or he picks up Fathi, or both of us, we give him the funds. We would go to his Island Appliance store, and from there on, he would do the deposits -- through associates that he had up there.

Q Okay. So let me ask you this. Of the times
that you would go to Saint Martin with cash, why did
you not simply go to the bank and make the deposits
with the cash?

2.1

A Well, sometime -- maybe there might have been a few times that I did, but it wasn't large amounts. With the larger amounts, he would do it.

And he would have other people help him in depositing those funds over a period of days.

Q Okay. Why would -- let me ask you this. If you were physically in Saint Martin, why would you have Isam deposit money into those accounts?

A Because it was really large amounts of money. And I don't go to Saint Martin to stay there for a week -- I would either stay for a day or maximum two days.

Q Okay. And when you say large amounts, is \$50,000 a large amount?

A It's much larger than that.

Q Okay. So would you go to one of the accounts and deposit, let's say \$50,000 to your account? Would you consider that to be a small amount

to deposit?

2.1

A Several times -- I'm not too sure. I mean, sometimes it's 50. Sometimes it's 100. And I'm pretty sure the documentation that was given by the French police and the FBI, it shows that there were certain deposits in certain amounts that were deposited over a period of time that reflect what I'm saying right now.

- Q Okay. All right. And so your point is is that money -- Isam would put them into your account, Fathi's account, and Hamdan Diamond account; correct?
 - A And his account as well --
- Q That was going to be my next question -sorry, let me just clarify. The next question is, in
 addition to those three, he would also -- your
 testimony is that he would also receive cash from
 Plaza Extra and deposit cash into his account;
 correct?
 - A Yes, ma'am.
- Q Okay. And with regard to moneys that were deposited into your account, Fathi's account, and the Hamdan Diamond account, were all of those -- once they

got to Saint Martin, were all of those funds then transferred to accounts in the Middle East?

A I'm not sure, but I know the FBI has done a significant accounting of where all those funds went.

Q Okay. Did -- and I'm just clarifying for the three accounts, the Fathi account, your account, and the Hamdan Diamond account, once they were in those accounts, once the moneys got into those accounts, did any of that money ever come back into Saint Croix, for example?

A I'm not quite sure, but I think the documentation the FBI has would show something. I don't know. This is over a period of -- I don't know all the details, but I know some of the details.

Q Okay. Well, that's what I'm trying to understand is, if the money -- however it got into in your account, Fathi's account, and Hamdan Diamond account, would you in your account, from Banco Francaise [ph], ever cut a check from the Banco Francaise [ph] account that you had back into a U.S. VI account?

A I'm not quite sure. If I see the documents,

- 1 | yeah, maybe. I'm not sure about that. A lot of
- 2 documents. It's been a number of years. There's, you
- 3 know, I mean, and significant -- significant amount of
- 4 documents all over the place.
- 5 Q Okay. But what would be the purpose of
- 6 sending the money and taking the time to get it to
- 7 | Saint Martin only to turn around and then send it back
- 8 to Saint Croix?
- 9 A To mask it -- to mask it. To show that it
- 10 came from outside sources. That's the plan --
- 11 | Fathi -- and we all discussed, we all knew that.
- 12 That's the scam. That's the laundering -- the
- 13 | laundering -- create another level --
- MR. HARTMANN: Charlotte, this is Carl.
- 15 | Could you stop interrupting him, please?
- MS. PERRELL: I'm sorry. I'm not
- 17 | trying to interrupt. I'm trying to --
- MR. HARTMANN: Yeah, I know, but you
- 19 | are, repeatedly.
- MS. PERRELL: Okay.
- 21 BY MS. PERRELL:
- 22 Q The funds that were coming back -- well, let

me just back up. Your testimony is that the various bank accounts and the FBI records would demonstrate what funds went where. Correct?

A Yes. I assume so, yes.

2.1

- Q Okay. Beyond the Diamond Keturah property, what other properties were purchased with Plaza Extra funds that first went to Saint Martin and then made their way back?
- A There might have, to my recollection, there might have been one or two other properties, but I'm not quite sure.
 - Q Which ones might that have been?
- A It might have been under -- it might have been under Sixteen Plus. I'm not sure if there was any other -- I mean, if you can show me any paperwork, you know -- refresh my recollection on that.
- Q Okay. Well, that's what I'm saying. Like in your testimony or in your affidavit, you indicate that moneys that were sent to Saint Martin were then used to purchase properties in foreign countries and also properties in the Virgin Islands, and I'm just trying to understand which other properties in the

Virgin Islands were used or were purchased with those funds that first went to Saint Martin.

A Yeah. I'm not quite sure if there's any other properties in the Virgin Islands that was done that way besides Sixteen Plus. I think there might have been some other properties with Sixteen Plus.

Maybe smaller lots, but I'm not sure if that was purchased that way.

Q Okay. All right. And just to be clear, does Sixteen Plus own any other property besides the Diamond Keturah property?

A Yes. There's I believe two other lots in Saint Thomas.

O And where are those located?

A I don't know the area. Don't know the name of the area, but I know it's in Saint Thomas. I think it's not large parcels anyway. It's a small -- small --

Q Okay. So it's fair to say that the -- let me say 98 percent of the assets owned by Sixteen Plus is the Diamond Keturah property; is that fair?

A Yes, ma'am.

2.1

Q Okay. All right. With regard to the moneys that were to be used for the purpose of the Diamond Keturah property, how did the money -- your testimony is that the money went to Saint Martin, and then the money to got to Isam. How did the money for the Diamond Keturah property make its way to Isam?

2.1

A We used several methods of transporting funds. One of them was through me taking a flight, whether I would have a briefcase or I would have the moneys -- initially the moneys would be put aside, in 50s and 100s. Be easily transported -- that was -- that's the instructions that we got from Mr. Yusuf. I would instruct Mike Yusuf to go ahead and put the 50s and the 100s on the side. Fathi would say, "Look, we need to do this -- we need to do this or we need to do that. We need to transfer money. We need to send money."

He would instruct me, and I would instruct
Mike, we'll put it in an envelope or in a box. I
would travel to Saint Martin. Isam would be there to
pick me up, or maybe Isam's brother would pick me up,
and I would give it to him in cash. Now if it's --

sometimes maybe I would go and if it's \$50,000, it's \$100,000, I would actually go ahead and go to the bank myself and deposit that, or I would go with Isam -- Isam would go in and he would do his transaction, and I would do my transaction. Fathi Yusuf would also do the same thing.

At one time or another, maybe more than one occasion also, Fathi, under the disguise of "Oh, we're going to take a family trip," he took a charter flight with his wife, and I'm not too sure if any of the kids were with him, or maybe the kids were grown at that time, and I believe I was on that same flight, and we took a box -- I'm not sure how many millions of it, how many millions were in those boxes, but it was under the disguise of a family trip.

- Q And was that before or after the Diamond Keturah purchase? Was that in like 1998 or '99, or was it before?
- A It could be. It could be prior to the -- prior to the Diamond Keturah purchase.
- Q Is it possible that it was after the Diamond Keturah purchase?

A Could be as well because he did that not just once but multiple times.

O All right.

- A Another way would be, me and Fathi would go, we would -- every time that we went either Isam picked up or Ayed picked us up, and we would go and stay at Isam's house with Fathi's daughter and her husband.

 Me and him will sleep in Isam's downstairs apartment.

 We would hang out, we would have dinner, and sometimes we ended up at the casino at night -- me, Fathi, and his son.
- Q All right. You've been present for the various depositions we've had in this case. Is that right?
 - A Yes, ma'am.
- Q Okay. So with regard to the testimony that there was a conversation between Fathi Yusuf, Isam, and Fathi Yusuf's brother Mohamad Hamdan, were you present for that?
 - A No, ma'am, I wasn't.
- 21 Q Okay. Have you met Mohaman Hamdan, Fathi's 22 brother?

2.1

A I met Mr. Mohamad Hamdan in maybe early on in life, maybe in '93, '92. And I know Mr. Hamdan is the one who helped me open the Jordanian account under Fathi's instruction, to open the Cairo Amman Bank, and I believe that bank -- that account was open in '96. Me and Mr. Hamdan went to Cairo Amman Bank and I opened the Cairo Amman Bank with his help, because I didn't know how to speak Arabic or write Arabic.

Q All right. There's been testimony that Mr. Hamdan Diamond had, you know, properties and resources available. Do you know anything about his financial worth?

A I know his financial worth is not what I've heard today or the other day. Definitely not. Fathi threw out -- we've been -- I've been involved with the Plaza Extra business since 1986, and I know Fathi at one time or another, and I believe part of the chits that we had in the so-called black book, he would send money to his brother on different occasions, maybe 7,000, 10,000, 15,000, and those would be the chits against each other. So if he has so much money, and if he has so wealthy, why would he send him money? To

help him out -- I know he had modest living. He
wasn't needy, so to speak, but he wasn't as wealthy
and they showed up to say right now that, "Oh, he's so
wealthy."

Q All right. Let me ask you specifically about the moneys that were used to purchase the Diamond Keturah property. Were you present for any conversations between Fathi Yusuf and Isam about the purchase of the Diamond Keturah property?

A Well, no, I wasn't, because Fathi Yusuf -there was no need for him to even discuss the purchase
with him. Isam was being used as the go-to man in
Saint Martin. We had discussion -- me and Fathi had
discussion about buying the property. The property
was introduced to us by Joel Jabber [ph]. Joel Jabber
[ph] was supposed to be involved in that purchase,
from Nova Scotia. Fathi thought it was a good idea, a
good investment, to go ahead and buy the property. I
agreed with him. So we had to find a way how to pay
for the money.

Now at the time, we were skimming money. It was after the hurricane. We just opened back the

Plaza East store. Hurricane Marilyn just hit Saint There was a lot of business. We had one of Thomas. our competition go out of business, so we had a lot of business, a lot of cash. He instructed us to go ahead and put money aside. We opened different accounts. mean, this is a huge huge money laundering operation that we ended it on. We had open accounts in Pleasant. We had open account in -- what is it, Peter's Farm. We had open accounts in my name, in Mahar's [ph] name. We had open in Mufid's [ph] name, just to launder the cash. And we would take the money at the time -- what's his name? Mahar [ph] was in charge of the cash room. I had no keys to the safe. He would instruct people to go ahead and deposit, sevens, five, seven, eight, nine thousand -everything was always below \$10,000, so we don't, you know, raise a flag.

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Over in Saint Thomas, they would be doing the same thing. They would be buying -- we would be buying money orders. We would be depositing cash in different accounts that we would use and, you know, amass the total and then write a check from our

accounts to go ahead and deposit in other places or do other transactions. We would pay our vendors by cash, so we don't pay the gross receipt. It was a massive operation.

Q Okay. I'm asking, though, specifically with regard to the purchase of the Diamond Keturah property, you were not present for conversations between Mr. Fathi Yusuf and Isam Yousuf; correct?

A -- there was, I wasn't there, no.

Q Okay. So you don't know if they had conversations about that property?

A No. I just said no.

2.1

Q Okay. And did you have conversations with Isam Yousuf about the Diamond Keturah property and the purchase?

A Isam had no right to anything about the purchase, so I had no -- there was no need for me to talk to him.

Q Okay. And then did you have any conversations with Mr. Mohamed Hamdan relating to the purchase of the Diamond Keturah property?

A Absolutely not. He wasn't involved in the

- 1 business.
- Q Okay. But you were not present for any conversations between him and Fathi Yusuf relating to the Diamond Keturah property?
- A They said that they had conversations. I
 can't say I was there. No, I wasn't there if they had
 it.
- MS. PERRELL: Okay. Pam, if you could pull up -- if you could pull up exhibits H-58 and H
 10 59?
- Give us just a second. We're going to

 be pulling up some documents. Here we go. All right.
- Exhibit -- I can't see the number. Okay. Sorry. My
 people are on -- okay.
- 15 BY MS. PERRELL:
- Q Okay. Exhibit H-58. This is the promissory
 note given to Manal Yousef for 4.5 million. Are you
 familiar with this document?
- 19 (Exhibit H-58 was previously marked for identification.)
- 21 A Yes, ma'am.
- MS. PERRELL: Okay. Pam, if you could

- 1 | scroll down to the bottom of the document, the
- 2 | signature page? Well, first, let me ask you -- Pam,
- 3 | while you're there -- it's too late.
- 4 BY MS. PERRELL:
- 5 Q All right. Is this your signature on the
- 6 | bottom?
- 7 A Yes, ma'am.
- 8 Q Okay. And did you sign it on or about
- 9 | September 15, 1997?
- 10 A Yes, ma'am.
- 11 Q Okay. And is that Fathi Yusuf's signature
- 12 | below?
- 13 A Yes, ma'am.
- 14 Q Okay. And did you instruct an attorney to
- 15 prepare this document on behalf of Sixteen Plus?
- 16 A I specifically don't recall that I did, but
- 17 maybe I did.
- 18 Q Okay. Do you know which attorney prepared
- 19 | this document?
- 20 A No, ma'am. Don't remember.
- 21 Q All right. Would you have been the primary
- 22 person -- I know you don't remember, but would you

have been the person making those arrangements, or is
that something that Mr. Yusuf would have been
arranging?

- A It could have been -- it could have been -- look. Fathi Yusuf is the one who created all this, okay? He created all this web, and we would discuss it and we'll talk about it, but to remember or recall who instructed the attorney to do it, I really don't remember.
- Q Okay. All right. And this promissory -I'm sorry, which document is this one? This is the
 promissory note. 58 is the promissory note. Do you
 know -- this evidences that Manal gave a loan to
 Sixteen Plus for 4.5 million dollars. Is that
 correct?
- A It's a promissory note and it's a sham promissory note.
- Q Okay. When you signed it in 1997, did you believe at the time that it was, as you call it, a sham promissory note?
- 21 A Yes. That was all agreed upon between me, 22 Fathi, and all the people who were involved, whether

1 it was Isam, Manal, or Ayed, or any of those guys.
2 This was created to create a second level of

2.1

Q Okay. But you testified a moment ago that you never had and were never present for any conversations between Isam Yousuf and Fathi Yusuf relating to this purchase; correct?

protection, so it shows the money came from outside.

- A You said to the purchase, not the promissory note and all that stuff --
- Q Okay. Were you ever present for any conversations between Fathi Yusuf and Isam Yousuf relating to the promissory note?
- A I don't recall exactly if it is or if it happened a that time, but this was all set up.

 Obviously there had to be a conversation that was had between all of us, because Isam would have to have -- he would have to agree to use his sister's name for that.
- Q I understand that you believe that there would have had to have been. My question is, as we sit here today, do you recall being present for a conversation between yourself and Isam Yousuf and

- 1 Fathi Yusuf relating to the promissory note?
- 2 A I don't recall that, no.
- Q Okay. Same question with regard to the mortgage. Do you recall being present for a conversation between Isam Yousuf, Fathi Yusuf, and yourself relating to the mortgage given by Sixteen Plus?
- 8 A No, ma'am -- no.
- 9 MS. PERRELL: Okay. Pam, can you
 10 please pull up Exhibit 59? All right. Exhibit 59.
 11 This is a First Priority mortgage. Pam, if you could
 12 scroll down to the bottom. The signature page, I
- guess. Sorry. I'm not sure which page that would be.
- 14 There we go.
- 15 (Exhibit H-59 was previously marked for
- identification.)
- 17 BY MS. PERRELL:
- 18 Q Mr. Hamed, again, that's your signature on 19 this page of the mortgage?
- 20 A Yes, ma'am.
- Q Okay. And you signed it at or about
- 22 | September 15, 1997?

A Yes.

Q Okay. And it's your testimony, however, that this is a sham mortgage; correct?

A Yes, ma'am.

Q Okay. When you signed this document, you intended for these documents to be filed with the appropriate recorders' offices and so forth and to be made a public record; correct?

A Yes -- to create a second level of protection that it doesn't show that the money came from us -- laundering money. That's the whole plan that Fathi and I concocted.

Q Okay. All right. So your understanding of this being a sham mortgage, however, is because of conversations you had with Fathi; is that correct?

A Yes.

 Q Okay. And you never had any communications with Manal Yousef relating to the promissory note or the mortgage; is that correct?

A That's correct.

Q Okay. All right. Do you have any documents that demonstrate the moneys that came from Plaza --

Page 34

that you contend came from Plaza Extra and were given to Isam specifically for the purpose of purchasing the Diamond Keturah property?

- A Repeat the question?
- Q Sure. Do you have any documentation that shows the money that you contend is Plaza Extra money that was given to Isam Yousuf specifically to purchase the Diamond Keturah property?
- A I have no documentation, but, I mean, there's records of multiple deposit that went in -- large amount of money that just been deposited prior to him transferring two million dollars at one time and then two million dollars at another time.

 Where -- I mean, that money -- we delivered that money. That is the partnership money. That is my father's money and Fathi's money. And that's what we
- Q Okay. In your statement, I think this is maybe what you're referring to.

did. That's the way we laundered money.

MS. PERRELL: Pam, if you could pull up
21 Exhibit H-1. Okay.

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1 BY MS. PERRELL:

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- Q Just for identification purposes, this is a document that we received that is -- it's titled, "Waleed Hamed's Statement," and it's 23 pages long. Just wanted to get you to identify it. Have you seen this document before?
 - A Yes, ma'am.
- Q Okay. And have you reviewed it, and is this your testimony or statement as to the facts relating to this case?
- 11 A Yes, ma'am.
- MS. PERRELL: Okay. All right. Pam,
 if you could turn to page 10, which is paragraph 29
 and 30. Perfect. All right.
- 15 BY MS. PERRELL:
 - Q I was asking you specifically about moneys that you contend are Plaza Extra moneys that were to be used for or given ultimately to Isam Yousuf for the purchase of the Diamond Keturah property, and paragraph 30, I'm going to read it to you and ask you for some elaboration. In paragraph 30, you stated:

 "In a September 12, 1996, letter from Fathi to Mr.

Gumms [ph] at BFC, which I understand that's the

- 2 | Banco Francaise [ph] in Saint Martin -- "Fathi
- 3 directed the bank to pay a check for 2,000,000 'Issued
- 4 and signed' by me. He stated, 'Please pay check
- 5 | number 3633491 in the amount of \$2,000,000, drawn on
- 6 | Hamdan Diamond corporation account number -- ending in
- 7 8790.'" And then you say here: "Fathi Yusuf was
- 8 totally in control of the Hamdan Diamond account and
- 9 the funds as can be seen in an attached account
- 10 holder's authorization to pay these two withdrawals
- 11 out by me -- out to me from Hamdan Diamond. I then
- 12 gave the cash to Isam to use to purchase the land we
- 13 | were buying."
- 14 Is that an accurate statement of at least
- this \$2,000,000 transfer coming out of the Hamdan
- 16 Diamond account?
- 17 A It could be, but I'm not quite sure. I
- 18 mean, I know there was a lot of things happening and
- 19 there's a lot of statements, and my recollection is
- 20 | not specific to that time and space that I've done.
- 21 I'm not sure if that happened.
- 22 Q Okay. So did you ever give Isam Yousuf

\$2,000,000 that then he was to use to purchase the Diamond Keturah property that you recall?

A I know Isam Yousuf was given lots of money.

He was the money guy. He was the one who orchestrated depositing the moneys, the funds in cash, in all the four accounts.

Q Okay. I understand that that's your testimony, and I hear you. What I'm asking is, with regard specifically to this \$2,000,000 that was coming out of the Hamdan Diamond account, do you recall cashing that check for \$2,000,000 and giving it cash to Isam?

A I -- honestly I don't think that was -that's the way it happened, and I'm not sure
whereabout that \$2,000,000 eventually went -- it
doesn't make any sense for me to go ahead and cash a
check for \$2,000,000 and then give it to him that way.
What's the sense? It's already in the bank. Just
from my recollection right now, it just doesn't make
any sense.

Q Okay. So what I'm trying to understand is, your testimony is that you don't have a specific

document that will demonstrate this was the money that
we gave to Isam Yousuf that he was then to use to send
back to us so we could purchase the Diamond Keturah
property?

- A No, there's no document -- yeah, that's the question, yes.
- Q Okay. And it's also your testimony that you don't believe that this \$2,000,000 check from Hamdan Diamond was part of those funds that were given -- that you contend were given to Isam in order to purchase the Diamond Keturah property?
- A I'm not quite sure. It could have been -from memory, I really don't recall exactly how that
 worked out. I mean, it's possible that -- but I don't
 know. I don't know.
- Q All right. So did you communicate with Isam about sending the moneys to Sixteen Plus when the purchase was occurring?
- A Could you repeat the question? I don't quite understand.
- Q Sure. Yeah. Just the mechanics of the getting the funds from Isam into an account for

- Sixteen Plus. Did you communicate with him about

 coordinating and getting funds from Isam into Sixteen

 Plus so that the purchase could proceed?
 - A I know it's either I or Fathi instructed him to go ahead and do the transfer of the \$2,000,000 into Sixteen Plus account.
 - Q Okay. And the purchase price was 4.5 million; correct? 4.5 million 50, I think. Is that correct?
- 10 A Yes.

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- 11 Q All right. Do you have any recollection as 12 to how -- was there an initial down payment?
- 13 A I believe there were initial down payment,
 14 yes.
- 15 Q And do you know what the down payment was?
 - A Specifically how much, but it could have been maybe 100,000 or 400, 500,000. Something like that.
- 19 Q And did you make arrangements for that down 20 payment to be made?
- 21 A I know I've seen some documents in FBI file 22 that there was a \$100,000 check that says, "Attention:

Gloria, which is, Gloria was the business manager at the time of -- at the time of the purchase of Diamond Keturah at Scotia Bank.

2.1

- Q Okay. Do you believe that that 100,000 was the money that was used for the down payment?
- A I believe it is because there's no other -there was no other transaction at the time for her to
 get -- or for me to even say, "Attention, Gloria,
 there's \$100,000."
- Q All right. Do you know where that \$100,000 came from? In other words, was that part of the funds provided by Isam or was that moneys provided directly from Plaza -- where was the origin of that money?
- A It's -- I believe it was from the Saint

 Martin account. Which account, I don't recall, out of
 the four accounts, but it most likely -- most likely
 it's out of my account.
- Q Okay. All right. When Isam sent the initial \$2,000,000, why did he not just also send the full balance, the \$4,500,000, or however much was due?
- A I'm not too sure why, but I assume at the time -- I don't think we had enough funds in his

account to do the transaction. And I believe that the same time the moneys -- the closing on the property wasn't due until the end of the year or the beginning of the following year. I wasn't too sure on the timing, but the funds weren't available, and the closing date happened, so we had some time to go ahead and really send him some more money to go ahead and deposit into his account.

- Q Okay. And so but any communications with Isam about how much did he have available, how much had you guys put in, those were communications that Fathi had with him; is that fair?
 - A I would say, yes.

- Q Okay. All right. Did there come a point in time after the property was purchased that you communicated with Isam Yousuf about securing a power of attorney from Manal?
 - A No. Never had that conversation with him.
- Q Okay. Did you otherwise communicate with him, either in an email or some other means?
 - A No, ma'am.
 - Q Okay. You've heard the testimony from

various folks in this matter that you were present on Saint Martin when a power of attorney in the name of Fathi Yusuf was executed and that Isam physically gave that to you during your stay in Saint Martin. Do you recall that testimony?

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- A I recall the testimony, but I wasn't clear on what date, what's the day on that -- of what year was that.
- Q Okay. My question, though, is, do you recall -- I'll pull it up in a minute, but my question is, do you recall receiving a physical copy of a power of attorney from Isam, meaning he handed it to you during a trip in which you were in Saint Martin?
- A I don't recall that. I recall the testimony I believe today, but no -- no.
- Q Okay. Is it possible that that happened and you just don't recall as we sit here today?
- A Can you help me recall what year that was? Please?
 - MS. PERRELL: Pam, can we pull up the power of attorney -- I forget exactly what exhibit that is. All right. If you could scroll down, maybe

we can see some dates on the bottom. And I think we can mark this case as Exhibit -- we'll mark it right now. It's -- I don't know if we have Bates numbers on that but we will mark that as, say, Y-9.

(Exhibit Y-9 was marked for identification.)

BY MS. PERRELL:

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Q But it looks like here as if the date, at least the typed date on it, was 2010. I believe some of the testimony was a little vague, a little bit more in the 2009-2010 timeframe. Does that help refresh any recollection that you may have about this power of attorney?

A May 2010 --

Q There it is. Sorry, yeah. It looks like there's a notary seal, May 18, 2010.

A Okay. So now definitely I wasn't there, and at the same time, why would I give -- why would I, you know, do a power of attorney to give Fathi more power over me? Because at the time, I couldn't travel to Saint Martin. That's number one, because we were still under the indictment. Secondly, Fathi started

accusing us of doing things. That's why we're

stealing money and all that, and why would I give him

more power? Why would I give him power to give up my

right in Sixteen Plus? Why would I go there and

negotiate the power of attorney to give it to him?

When he was accusing me of stealing money.

- Q Okay. So just to be clear, your testimony is that you did not physically receive this document in Saint Martin from Isam Yousuf?
- A Definitely not. That's concocted by Fathi and his associates. His family, basically.
- Q Did you ever communicate with Isam Yousuf or Manal Yousef regarding a power of attorney in favor of you?
 - A Never.

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- Q Okay. Did you ever communicate with Isam
 Yousuf or Manal Yousef relating to the possible sale
 of the Diamond Keturah property at any point in time?
 - A Never.
- Q Okay. Did any member of the Hamed family, at your direction, communicate with Isam Yousuf or Manal Yousef regarding a potential sale of the Diamond

- 1 | Keturah property at any point?
- 2 A No.

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- Q Okay. Are you familiar with the possibility
 of a sale of the Diamond Keturah property at any point
 in time?
 - A Yes, I am aware.
 - Q Okay. And what is your recollection?
 - A Sometimes during the indictment with the federal government, we had -- I don't recall exactly who, but were in negotiation with I guess an individual for the sale of Diamond Keturah that never went through.
 - Q Okay. Were you communicating with the potential purchaser?
- 15 A I was in meetings and negotiations with 16 Fathi and --
- Q Okay. And do you recall the timeframe when this occurred?
- 19 A Exactly no, but I know it was during the 20 time of the indictment.
- Q Okay. Could it have been about, you know, in the 2009-2010 timeframe?

A I doubt if it would be around that time. I
think it might be a little bit earlier than that
because I believe the monitors were still in place.

- Q All right. And who was the individual who was the potential purchaser?
- A I don't recall exactly. I'm a little bit fuzzy on that. Not too sure who it was.
- Q All right. And do you recall, were there any numbers that were being discussed as possible amounts for the purchase?
- A -- recollection, it could have been up to 27-28 million dollars, maybe 30.
- Q All right. And did you -- I think you've already answered this, but I'm going to ask it again. I apologize if it's redundant. Did you communicate at all with Isam Yousuf or Manal Yousef about this potential purchase?
 - A Absolutely not.

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- Q Okay. Do you know if Mr. Fathi Yusuf communicated with them regarding this potential purchase?
- 22 A I'm not quite sure, but there would be no

1 reason for Fathi to even communicate with them --

MS. PERRELL: Okay. Someone is --

3 | someone's microphone is not muted. Okay.

BY MS. PERRELL:

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Q The purchase did not go forward. Do you know what the reason was that it did not go forward?

A I don't recall exactly, but I think Fathi, the way he negotiated, he was always wanting more. He would have -- that's his MO. That's the way he does things. He starts with one number and then he disagrees again, disagrees again. He always -- more and more and more.

Q Okay. So your recollection is the reason that it didn't go through is that the parties never agreed on a number?

A Fathi couldn't sit down to get to a number, and I believe there was talk about, also with the federal government and them escrowing the account -- I mean, escrowing the funds. There was some talk about them not approving it because they wanted -- they knew that the mortgage was a sham, and they knew that the funds could not be given or paid off the mortgage

because the government wanted their money. At the end
of the day, it wasn't over with. You know, they knew
all that money was skimmed, and it was used to
purchase the property, the Diamond Keturah property.
So -- in my opinion, they were just trying to protect
the moneys that we laundered.

Q So at this point, your understanding is the reason it didn't go forward is there wasn't a purchase price agreed upon, and the criminal case was ongoing.

No moneys had been paid yet for the claims that were part of that criminal case; right?

A That's correct.

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Q Okay. All right.

14 | MR. HARTMANN: Charlotte?

MS. PERRELL: Yes?

MR. HARTMANN: Could I ask you a favor? If you're about to move on from this document, to save me having to go back on cross and get back to this document and ask questions, could you simply ask him if Manal testified that's his signature?

MS. PERRELL: Let me go up a little bit further. This one -- no, not this one. Go up a

- 1 | little bit -- thank you, Pam.
- 2 MR. HARTMANN: She testified that Isam
- 3 and Walli went with her, and that was his signature.
- 4 BY MS. PERRELL:
- Q I think -- Mr. Hamed, are any of the signatures on this page your signature?
- 7 A No, ma'am.
- MR. HARTMANN: Thank you, Charlotte.
- 9 BY MS. PERRELL:
- Q Did Isam Yousuf send this document to you?
- 11 Have you ever been in possession of this document,
- 12 | this power of attorney?
- 13 A I am not sure if I was in possession, but
- 14 I've seen the document before. And I believe -- I
- 15 believe Fathi Yusuf actually sent that over -- sent
- 16 | that over via express or FedEx to me. Basically in a
- 17 | threatening manner, to say, "Hey, I have power of
- 18 | attorney and we need to start paying her interest, " or
- 19 | some kind of thing, because he was really after us at
- 20 that time, and, I mean, we were arguing -- not
- 21 arguing, but he was accusing us of a lot of things
- 22 | happening from 2009 on up, and that's eventually when

1 | I filed the lawsuit in 2012.

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- Q Okay. I'm going to go back to -- there was testimony previously about the \$360,000 payments that were made and were delivered. Did you provide any of those \$360,000 payments to Isam Yousuf?
- A Absolutely not. All that is made up -- he's lying, because his uncle told him to lie.
- Q Okay. So was any moneys -- do you know if you delivered \$360,000 to Isam Yousuf in 1999?
- A I did not make a payment and I didn't deliver \$360,000 in interest to him. No -- moneys were delivered to Isam to deposit in the four accounts that we used to launder money. That's the money that he got, or I delivered to him, or Fathi delivered to him.
- Q But I thought you testified earlier that you also delivered cash to Isam Yousuf. Correct?
- A I said, cash.
- Q Okay. So it's true, then, that in 1998,
 1999, and 2000, you did deliver cash to Isam Yousuf;
 21 correct?
- 22 A If you look back at the record, ma'am, it

shows the deposits. I don't recall exactly if it was in '98, '99, or 2000, or '95, but throughout the duration of the money laundering operation that we got indicted for, it shows moneys were being deposited in cash in those four accounts.

- Q No, no, no. That's what I'm asking. We don't have the Isam Yousuf account, and so I don't have any documents --
 - A He should provide it, then.

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Q That may be. I don't have them. No one has them. And so that's my question to you is, did you provide any cash to Isam Yousuf in '98, '99, and 2000 that you know was then deposited into an Isam account?

A I know I provided moneys throughout the duration of the indictment for Isam to deposit, in cash, to the accounts that were earmarked to go ahead and launder money. Specifically '98, '99, or 2000, I have -- I don't have no documentation in front of me to refresh my memory, but the documentation should be there with the FBI files that you guys are -- it's in front of -- I'm pretty sure it's privy to you and to us.

1 Right, no, no -- and this is where -- I 0 don't mean to keep harping, but I want to be clear. 2 We have documentation relating to your account. 3 We have documentation relating to Fathi's account. 4 5 we have documentation relating to the Hamdan Diamond account in Saint Martin. We do not have documentation 6 7 relating to Isam Yousuf's accounts, whatever they may 8 be, and so that's what I'm trying to clarify is, I 9 understand you're claiming that Isam took cash and put 10 it into one of those three accounts -- yours, Fathi's, 11 and Hamdan Diamond. What I'm trying to understand is, 12 do you have any recollection of providing Isam Yousuf 13 cash that you know or understood he was to deposit into one of his accounts? 14

A It's possible, but the instructions were always to go ahead and deposit the funds in those four accounts.

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Q Okay. Which four accounts? That's what I'm trying to understand.

A There was the Island Appliance account that was used to launder money. The Mohamed Hamdan account. The Fathi Yusuf account, and the Waleed

- 1 Hamed account. Those four accounts were used to 2 launder money.
 - Q Okay. So to circle back, your testimony is that you recall cash moneys given to Isam, a portion of which was to go into the Island Appliance account, and that that would have occurred in '98, '99, and 2000 at the very least? Is that fair?
 - A I'm not saying it specifically went into
 '98, '99, or 2000. I have -- there's nothing really
 there to refresh my memory, but I know moneys -- cash
 was being deposited into those accounts as part of the
 money laundering operation.
 - MS. PERRELL: Okay. Pam, if you could pull up Exhibit Y-2. Okay.
- 15 (Exhibit Y-2 was marked for identification.)
- 17 BY MS. PERRELL:

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Q This is a document that is a document prepared either by the FBI or the Department of Justice listing the sort of summary of the review of the accounts that they had during the criminal case. Have you seen this document before? It's a long

- 1 | document -- I'm sorry?
- 2 A Yes, I have.

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- Q Okay. All right. And in the document, it lists everybody's accounts that they were aware of -- your accounts, Fathi's accounts, everyone's accounts. And here, for example, they have your Banco Francaise [ph] commercial account and so forth. And so it's showing the deposits into that account and the various dates. Do you see that?
- A Yes, ma'am.
- MS. PERRELL: Okay. Pam, if you could go to page -- I believe it is page 25.
- 13 BY MS. PERRELL:
- Q Okay. Did you have an account -- I think
 you testified about this earlier. You had an account
 at Cairo Amman Bank?
- 17 A Yes, ma'am.
- 18 Q Okay. And do you recall when you opened it?
- 19 A I recall opening that particular account in 20 1996, I believe.
- Q Okay. This seems to indicate that there was a deposit of \$20,000 on July 27, 1996. Does that

- comport with your recollection of about when you opened it?
- A Yes, ma'am. That was in the summer, yes.
- 4 MS. PERRELL: Okay. All right. Pam,
- 5 | if you could go down just a little bit. All right.
- 6 BY MS. PERRELL:

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- Q Do you see in October 8, 1996, there were three deposits into your personal account at Cairo Amman for 400,000, 400,000, and \$2,000,000?
- 10 A Yes.
- 11 Q Okay. And the \$2,000,000 was deposited from 12 Hamdan Diamond. Do you see that?
 - A Yes.
 - Q Okay. And then 400 from your account and 400 from Fathi's. You understand that these were amounts that came out of the Banco Française [ph] accounts; correct?
- 18 A Yes, ma'am.
- Q Okay. All right. Let me go to Exhibit Y-4,
 please. Okay. Y-4 is a -- I believe this is the -- I
 think it's the annual reports that are filed with the
 lieutenant governor's office for Sixteen Plus. Are

- Okay. And then is that Fathi Yusuf's 1 0 2 signature there as treasurer?
- Yes, ma'am. 3 Α
- Okay. Pam, if you could 4 MS. PERRELL: scroll down a little bit further?
- BY MS. PERRELL: 6

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- Here, it says here addresses of all of the 0 directors and officers of the company, and it lists Mahar Yousef, Fawzyeh Yousef and Fathi Yusuf, but the two that are -- I'm asking you about is the Mahar Yousef and the Fawzyeh Yousef. Is that information that you would have included in this document?
- Α Absolutely not.
- MS. PERRELL: Okay. All right. Can you scroll down a little bit further?
- BY MS. PERRELL: 16
 - So just to be clear, that is not correct; 0 Mahar Yousef and Fawzyeh Yousef are not either the president or the vice president of Sixteen Plus?
 - That's correct. Α
 - Okay. And that inclusion of them on this 0 document is incorrect; is that right?

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A That is correct, yes.

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Q Okay. And is this your signature at the bottom?

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That is my signature, but it's scratched Α And that exclamation mark, that's my exclamation That's when Fathi Yusuf tried to attempt to turn this whole thing around, because that's when the lawsuit was filed. Remember, I filed the lawsuit for the partnership in 2012. This document that Fathi's trying to manipulate and put his son and wife as successors or, I mean, as directors, I initially signed it, but it was never filed. I never agreed to it, and if you look at the other document, that exclamation mark was mine, sending it back to his accountant and whoever dropped it off at my office to sign, because I disagreed with his assessment of turning the shareholder loan into an outside mortgage, because after many years with the sham mortgage that Fathi and I created back when we purchased Diamond Keturah, it was always listed as shareholder loan, which the loan was from my father and Fathi so it could be filed correctly.

Page 59

Now he's trying to attempt to put it as a mortgage so he can cover and backtrack all the stuff, and -- I caught it. I initially signed it thinking it might be the right thing that we normally do every year, but when I looked at it, I see that he tried to pass a good one on me, but he didn't pass, and this wasn't even recorded because I didn't agree to it.

- Q Okay. So just to be clear, you're saying -- when you said, "Exclamation mark," I think you mean the question marks that are next to --
- A Oh, yes, I'm sorry. Yes, the question marks, sorry.
- Q That's okay. The question marks next to

 Mahar and Fawzyeh Yusuf [ph] you say are your question

 marks and that that is incorrect and that your

 signature on it, you're saying yes, it's your

 signature, but there's a line through it scratching

 it. Correct?
 - A I scratched it out, yes.
- MS. PERRELL: Okay. Could you go down to the next page?

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BY MS. PERRELL:

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- Q And you said the accountant prepared this?
- A I'm not too sure who prepared it, but it was
- 4 on Fathi's part. Fathi had it delivered to my office
- 5 or to somewhere where -- or maybe to the attorney.
- 6 | I'm not too sure how it got to me, but I know it was
- 7 delivered to me for signature and I refused to sign
- 8 it, or agree with the assessment that he asked.
- 9 Q Okay. So you marked through your signature
- 10 above, but on this page where it says, "Loans from
- 11 related party for 4.5 million," you didn't make any
- 12 questions or comments about that?
- 13 A I didn't sign it either, because I disagree
- 14 with it. He's trying to change it. All of a sudden,
- after 15-whatever years, it went from "Shareholder" --
- 16 | what you call it -- I don't remember exactly what it
- 17 says, but "Loan" to "All related party"? No. He was
- 18 trying to play a fast one.
- 19 MS. PERRELL: All right. Can we take a
- 20 look at Exhibit Y-5?
- 21 (Exhibit Y-5 was marked for
- 22 identification.)

1 BY MS. PERRELL:

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- Q Y-5 is a consent of the directors in lieu of a meeting. Do you recall this document? Have you seen this before?
- 5 A No, I don't recall that one. No.

MS. PERRELL: Okay. Can you make it just a little bit bigger? All right.

BY MS. PERRELL:

Q This document indicates: "Pursuant to the provisions of various statues, the undersigned, constituting the directors of Sixteen Plus, hereby unanimously consent to the actions set forth below," and the third one is that "The company agrees to borrow 4.5 million from Manal Yousef in accordance with the terms of the promissory note," and the date of it is September 15, 1997, which is also the date of the promissory and the mortgage.

So my question to you is, is this your signature both at the very bottom --

- A Yes, ma'am.
- Q Okay. And is it your signature, the middle signature as well?

- 1 A Yes, ma'am.
- Q Okay. And do you recall executing this document on or about September 15, 1997?
- A I don't recall, but I believe I signed it,

 so I guess it's there. It should be part of the

 documents that we did, yes.
- MS. PERRELL: Okay. All right. Pam,

 if you could go to Exhibit Y-3. Okay. If you can let

 us see a little bit more of it -- there you go.
- 10 (Exhibit Y-3 was marked for identification.)
- 12 BY MS. PERRELL:
- Q Y-3 is various tax returns for Sixteen Plus
 filed in February of 2013. Have you seen these
 before?
- 16 A I don't recall seeing that.
- MS. PERRELL: Okay. Can you go to --
- THE WITNESS: -- 2013, you know, that's
- 19 after I filed the lawsuit and Fathi like shut us out
- 20 of everything.
- 21 BY MS. PERRELL:
- Q Okay. Let me ask you this. Isn't it true

- that after the criminal case was resolved, that all of the parties ultimately filed supplemental corrective tax returns with the VIBIR?
- A I know we filed, yes, a bunch of different things that -- through our attorneys and accountants, yes.
 - Q Right. And the accountants were the folks at Freed Maxick, is that right?
 - A Yes, through them, yes.
- MS. PERRELL: Okay. So Pam, if you
- 11 | could scroll down a little further to the next page.
- 12 There. Sorry. Can you go back -- yeah. There we go.
- Okay. Is there -- yeah. That. Can you increase that
- 14 just a bit?

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- 15 BY MS. PERRELL:
- Q Do you recall this language included in the documents and the draft tax returns prepared by Freed
- 18 | Maxick?
- 19 A I really don't recall, but I guess it's a
 20 document that was there, so I don't --
- MS. PERRELL: Okay. All right. Can we

- 1 | little bit further? Okay. I think it's line 20, so I
- 2 | think we can just go to the next page. One more.
- 3 | There we go. All right.
- 4 BY MS. PERRELL:

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- Q In this document, it shows at line 20,

 "Mortgages, notes, bonds payable in one year or more."
- 7 It shows 4.5 million. Do you see that?
- 8 A Yes, ma'am.
 - Q Okay. And then it shows, "Loans from shareholders: 208,467." What loans do the shareholders of Sixteen Plus have that equals --
 - A I don't know. This document was -- prepared by Fathi, signed by Fathi. I don't remember seeing any of that, and then all of a sudden we have a mortgage from somebody, where all of a sudden things change after the lawsuit. Of course. You know, that's why -- what a trick. That's a nice one.
 - Q Okay. Do you know whether in fact these documents were in fact drafted by the attorney -- excuse me, the accountants for Freed Maxick?
 - A I'm not too sure who did, but it's possible.
- 22 Q Okay. All right.

Page 65

1	A Besides, I mean, if to find out that it's
2	Freed Maxick, they're supposed to when they were
3	submitted, they should say who prepared. Who's the
4	preparer, right?
5	MS. PERRELL: I think I may be
6	finished, but I need just a quick little break. Can
7	we just take a quick five-minute break, and I think I
8	may be done.
9	MR. HARTMANN: Fine with me.
10	THE VIDEOGRAPHER: Going off the video
11	record. The time is 1:40 p.m.
12	THE REPORTER: We're off the record at
13	1:40 p.m.
14	(Off the record.)
15	THE VIDEOGRAPHER: We are back on the
16	video record. The time is 1:44 p.m. This begins
17	media unit number 2.
18	MS. PERRELL: Okay. I'll just state on
19	the record, I don't have any further questions. Thank
20	you, Mr. Hamed.
21	MR. HOLT: Just briefly.
22	//

Page 66 1 EXAMINATION 2 BY MR. HOLT: Mr. Hamed, you were asked questions about 3 0 offers that were being made to buy the Diamond Keturah 4 property by various third parties while United 5 Corporation was in the criminal proceedings. Do you 6 remember that? 7 8 Δ Yes. 9 Okay. And isn't it correct that firm offers 10 were made in excess of 25 million dollars to buy the 11 property at that time? 12 Yes. Eventually after multiple negotiations 13 back and forth, we came to a number that was 14 applicable -- that was a good price that we negotiated 15 on. 16 And at that particular time, the federal 0 17 government had placed a lien against the property? 18 Α Yes. 19 So the property couldn't be sold without the 0

- Q So the property couldn't be sold without the permission of the United States Attorney or whatever authority was over top the liens?
- A That is correct. That had control over it,

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1 yes.

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- Q Did you go to them and ask them if they would withdraw the liens so the sale could take place?
- A Yes, we did.
 - Q And were they agreeable to doing that so long as the money was placed in escrow?
 - A That is correct.
 - Q But they wouldn't allow it to happen if the money was going to be used to pay off the mortgage; correct?
 - A They wanted the money to be in escrow because the way I understood it is they didn't feel that particular mortgage was -- it was a sham mortgage. They knew that the moneys were used from the Plaza Extra or the partnership -- the Plaza Extra proceeds were used to buy that property.
 - Q And that's why the lien had been --
- A Yes, sir.
 - Q Okay. And would Fathi Yusuf agree to do the sale and place the money in escrow without paying off the mortgage?
- 22 A No. Fathi didn't agree to that.

- 1 Q And therefore the sale fell through?
 - A The sale never went through because of that.
- MR. HOLT: No other questions.
- 4 MS. PERRELL: Just one follow-up.

5 EXAMINATION

6 BY MS. PERRELL:

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- Q When was this offer -- the one that you're talking about, the one that's in excess of the 25 million, do you remember what timeline it was, timeframe?
- 11 A The timeframe is between the federal
 12 indictment, which was --
 - Q That was ten years, so it's a long time.
 - A Yeah, well, it was through that. Specific what year, ma'am, I really don't recall exactly. But I'm pretty sure there's documentation out there in the federal file or in the files that everybody has that you could find them and the request was in writing. The request was spelled out. The deal was there. I don't recall exactly what year.
 - MS. PERRELL: Okay.
- MR. HOLT: I'll follow up with one

	Page 69
1	question.
2	EXAMINATION
3	BY MR. HOLT:
4	Q Did Fathi Yusuf indicate in his
5	interrogatory answers that it was somewhere in the
6	2005-2006 time period?
7	A I believe so.
8	MR. HOLT: No other questions.
9	MR. HARTMANN: Is everyone else done?
10	I have a few.
11	MR. HOLT: Go ahead.
12	EXAMINATION
13	BY MR. HARTMANN:
14	Q Good afternoon, Mr. Hamed.
15	MS. PERRELL: Carl, I'm sorry. Who are
16	you representing?
17	MR. HARTMANN: Sixteen Plus.
18	MS. PERRELL: Isn't Joel representing
19	Sixteen Plus?
20	MR. HARTMANN: No, he's representing
21	Mr. Hamed.
22	MS. PERRELL: But yesterday he was

1 | representing Sixteen Plus?

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MR. HARTMANN: That's correct. We both represent Sixteen Plus, but we didn't want to have two attorneys representing the same person.

MS. PERRELL: Okay. Well, I mean, as we've stated before, we object to that, but proceed.

MR. HARTMANN: Do you want to place the grounds for the objection on the record?

MS. PERRELL: I think we've stated the grounds for we don't believe that there is authority for the attorneys that are also representing the Hameds to represent Sixteen Plus because it's not been authorized by the various folks at Sixteen Plus, or there is a dispute as to that. But go ahead. Ask the questions.

MR. HARTMANN: Okay.

BY MR. HARTMANN:

Q All right. Mr. Hamed, first let's talk about the power of attorney. You stated that on that date in 2010, that the power of attorney was witnessed and signed. You were not on Saint Martin. Is that correct?

A That is correct.

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Q And were you here earlier today when Manal Yousef swore under oath that you were both present on Saint Martin on that day and waiting off-site from where the POA was notarized?

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A Yes, I heard that. Yes.

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Q Okay. And can you tell me why that's a

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physical impossibility?

A Well, first of all, Fathi had already

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started accusing us of certain things, so we didn't have that rapport, so to speak, for me to go ahead and

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give him total power of attorney for something that I

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owned 50 percent of. And at the same time, we still

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had the federal indictment, and I couldn't travel

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anywhere, and Fathi Yusuf couldn't travel anywhere.

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But I believe -- I couldn't travel because I would

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have to get permission from the federal government,

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and during that time, we weren't able to travel. I

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could travel to the States if it was for business-

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related matters, but you think I'm crazy to go ahead

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and ask the federal government, "I want to go to Saint

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Martin, when I've already been indicted for improper

1 | money laundering procedures in Saint Martin?

- Q Could you explain how that ban on travel worked?
- A Look. I have -- I had a monitor -- I had a monitor on me for the duration of the criminal case -- to the Court, I believe -- I don't think it was -- initially it was weekly and then I think eventually it was monthly. Any time I had to travel anywhere off island, I have to get permission. The Court has to -- I have to get permission first from the federal government. I had to get permission -- and signed permission slip by the judge, and also permission -- and I had to go to the, what do you call them? I forgot what they call them.
 - O The monitors?
- A The monitor's office so they could remove the bracelet off of me so I can travel.
- Q Okay. Sir, explain what you mean when you say they would have to remove the bracelet.
- A I had a bracelet -- I have a monitoring bracelet on my ankle.
- Q Okay. Explain how that worked.

A Well, when I was -- when we were arrested and we were released on bail, part of the conditions of being arrested for money laundering and everything that we've done, Fathi Yusuf had an ankle bracelet and I had an ankle bracelet.

2.1

Q And if you had traveled with an ankle bracelet -- that was monitored by the U.S. Marshals Office; is that correct?

A Yes, yes -- you can't go through the airport without permission. I have to show them my documentation -- travel.

Q And if you had traveled through the airport and traveled to Saint Martin with a monitoring bracelet placed on your leg by the U.S. Marshals, what would have been the effect of that?

A I honestly never ventured to find out, but
I'm pretty sure it would be frowned upon and put back
in jail and I won't be released until the case is over
with. I assume that would be the problem.

Q Okay. And so when Manal Yousef also testified that you signed that POA as a witness earlier today, was that incorrect as well?

A That is totally untrue. That's not my signature.

- Q Okay. And you were asked about when you first saw that POA. Did you know that Fathi was getting that POA at that time?
 - A No, sir.

- Q Okay. And you believed that the way that you ultimately got a copy of the POA is that at some later time, Fathi Yusuf sent it to you to threaten you?
- A I believe so, yes, because I -- remember distinctly that he sent -- I had to go to DHL, I believe. I had a document or an envelope signed, and it was from an attorney in Saint Martin demanding certain documents -- not documents, demanding certain things, and I believe that the attorneys have that letter and they have that demand, and I believe at one time or another Mr. Holt spoke to him and he backed off.
- Q Okay. So that was quite a bit after you brought your 2012 case; is that correct?
- 22 A Around -- it could be around that. Yes.

Yes. And possibly yes.

2.1

Q Okay. So you've read the POA, and I'll represent to you that it gives Mr. Yusuf complete control over that property, and not only that but indemnifies him for anything he does with regard to that. During the years 2010 to 2012, can you explain to me why that -- you would never have provided that sort of permission to Mr. Yusuf?

A Fathi Yusuf was trying to steal our share of our livelihood for the past 30 years, since 1986 -- since 1984, partnership that he had with my father. For me to go ahead and give him full authority to steal from me Diamond Keturah, I'll never do that.

Q Okay. And just to be clear, you were asked a series of questions about when exactly you were receiving those offers. I will represent to you that in 2005 and 2006, there were communications about offers on Diamond Keturah property, and that there was an exchange of communications with the U.S. Attorney's Office. Would that be -- the 2005 and 2006 transactions, would those be the ones that you were referring to?

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A Yes.

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Q Okay. And there were no such transactions happening in 2009 and 2010; were there?

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A To my recollection, none whatsoever.

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Q Okay. Would you and Fathi in 2009 and 2010, when you were in the middle of that type of dispute,

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have been talking about mutually selling that

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property?

A Not to my recollection. No, sir.

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Q Okay. You were also asked if you were

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present at discussions between you, Fathi Yusuf, and

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Isam with regard to a number of things -- the note,

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the mortgage, the shifting of funds and stuff like

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that, and you answered that you were not at any such

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meeting. I'm going to ask you about communications

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during that period of time not in a single meeting

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where all three of you were present but rather in your

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individual communication with Fathi Yusuf and Isam.

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Okay?

A Yes.

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Q Okay. Did you and Fathi Yusuf repeatedly

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discuss the purchase of this property?

A Yes.

Q Okay. And you said that that started with Jabber [ph]?

A Yeah. Joel Jabbar [ph].

Q Okay. Could you explain to me what that transaction was? What did Joel Jabbar [ph] say and who did he say it to?

A Joel Jabbar [ph] was a -- he was a real estate agent, so to speak. I'm not sure if he had his real estate license, but he was involved in real estate situation. He had contacts at the banks, with Nova Scotia, and he told us that -- I think maybe he probably mentioned it to Fathi first, that there's -- Diamond Keturah is -- was being repossessed by the bank, and there's a timeframe that it's going to be on auction very soon, and the bank is going to purchase it and they're going to sell it.

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Fathi told me about the situation. I

didn't -- I don't recall exactly how many meetings or

when we sat down with Joel Jabber [ph] and he

explained everything, how the process would work, and

how much money we should go for it and how much -- you

1 | question was accurate, would you respond "Yes"?

A Yes.

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MR. HARTMANN: Okay. I'm proffering the document and the -- its exhibits, in toto is his testimony in this matter.

BY MR. HARTMANN:

Q I'd like you to look now at paragraph --

MS. PERRELL: I mean, I would --

MR. HARTMANN: You can object.

MS. PERRELL: I would object only to the extent that I believe some of his testimony has contradicted the statements therein, and so his testimony would include all of the deposition question and answers. If you want to include this, that's fine. It's a statement that he gave --

MR. HARTMANN: That's fine -- I asked him if it was -- he believed it was true and accurate at the time he signed it. You obviously went over one of his affirmations and found that it was somewhat inaccurate.

MS. PERRELL: Okay.

MR. HARTMANN: Okay. But this

testimony is appended to and made part of his
testimony in this deposition.

BY MR. HARTMANN:

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Q And so I'd like to look at paragraph 25.

And paragraph 25 says that the July '96 BFC statement for the Hamdan Diamond account correctly shows several deposits of 50 and \$200,000. Is that correct?

A Yes.

Q Okay. And attached to that is the exhibit H-25, which is in fact that bank account statement showing that and showing the deposits. Now Ms. Perrel asked you a series of questions about why would you send cash to Isam Yousuf and have him deposit it as opposed to you're just going over and depositing. So let me ask you this question. Why could you not walk into the bank and simply give that \$400,000 in cash that you deposited in July of 1996 to the bank? Why did you run it through Isam?

A Because Isam was the point man and I don't stay over -- because there was only one location for PFC -- PFC, that's what it's called, right? And it's only one location. It was on the French side. And

- 1 | there's no way I would walk in with \$400,000 in cash.
- 2 The maximum probably I ever walked in or deposited was
- 3 | 100. Or if you look at the deposits that were made
- 4 through the -- with the FBI report, most of those
- 5 deposits don't exceed 100,000, I believe, and I stand
- 6 to be corrected if you show me the documents -- but I
- 7 | would go ahead and I would just deposit whatever I
- 8 | carried on, and the rest of the money goes to Isam.
- 9 And then Isam would use his people, which is him, his
- 10 brother Ayed, Ayed's wife, and probably some other
- 11 people that I'm not aware of.
- 12 Q Okay. And could -- why would Isam split it
- 13 up between several different couriers to make those
- 14 deposits?
- 15 A Well, it's less suspicious.
- 16 Q Okay. And why could they not -- why could
- 17 | Isam not walk in and deposit \$400,000?
- 18 A Because it would be -- I mean, it's
- 19 impossible to carry that amount of cash to go on and
- 20 | do that --
- 21 Q So the purpose -- the purpose of sending it
- 22 | to Isam Yousuf and having him divide it between a

number of people was to make it appear as though a
number of people were depositing smaller amounts so it
wouldn't trigger the bank's money laundering
provisions. Is that --

A Absolutely. Absolutely. That's exactly what the plan was.

- Q Okay. And you said that when you went down there to give this money to Isam, when you traveled with Fathi, that you stayed at the house where Isam, Isam's -- Fathi's daughter Yusa [ph], and Fathi's daughter Yusa's [ph] husband Ayer [ph], they all lived in the same house and you and Fathi stayed with them?
 - A Yes, sir, we did.

- Q Okay. And did they know that they were getting this money to deposit into these different accounts when you were there and Fathi was there for a day and brought all this money?
- A Absolutely. Absolutely. I mean, you could see the signatures. You could see the different signatures on the deposit slips.
- Q Okay. Let's talk about that. I don't believe it's an exhibit to this statement, but I

believe that you looked at a file that has over a
hundred of these deposit slips in them -- is that
correct?

A Yes, sir.

- Q And then all those deposit slips, many of the deposit slips are for your account, and handwritten -- sometimes in print, but sometimes in signature, occurs your name. Is that correct?
 - A Yes, sir.
- Q And except for the one or two occasions, you said that you went and you signed. Were any of those your signatures?
- A It's only maybe a couple of them or a few of them, but many of them are not mine.
- Q So all of the rest of those signature, both in Hamdan Diamond and to your account and to Fathi's account that represented that you were making deposits, were not -- well, they were forgeries. If they wrote your name, it was not you actually doing it. Is that correct?
- A That is not my signature, sir. Somebody else did it.

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O Okay. And who was it that was doing this?

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A The person who was in charge in doing -- or

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just really putting all that stuff together, based on

Fathi's instructions, it's Isam Yousuf, Ayed Yusuf,

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and Yusrai Yusuf [ph], and maybe some other cousins or

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family. All these people that are involved are Fathi

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Yusuf's family, direct family. He always told me they

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will do anything for him. They will do anything for

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him. They trust him. He's their uncle.

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Q Okay. And did you -- when you were first

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setting up this money laundering operation with Fathi

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Yusuf, who suggested that they used his family members

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in Saint Martin to do this laundering?

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A Fathi Yusuf.

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Q And who told you that Fathi -- that Isam

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would be the guy directing the money and that he would

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use the rest of the Fathi Yusuf family members to be

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the couriers for depositing and moving this money?

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became part of this whole -- he's not just like came

You have to understand that Isam not just

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and pop -- that, oh, all of a sudden he knows Fathi

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Yusuf. Isam was the original -- one of the original

partners in the Plaza Extra partnership. So he is known. He is Fathi Yusuf's nephew. He was involved in the Plaza Extra initial partnership, and then Isam left. Khalid Ali [ph], which is another nephew of Fathi left, and then there was I think Mr. Hanun [ph], who was also left. I believe he was involved, but I'm not quite sure. So the only two people that stayed behind was my father, Mohamed Hamed, and Fathi Yusuf in the partnership. So Isam is known. Isam, as matter of fact, actually bought Fathi Yusuf furniture store that he used to run. Fathi Yusuf at one time, before he went into the supermarket business, had a furniture store. Sam I believe at one time or other was working for Fathi. Isam bought the furniture store from Fathi.

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Now Fathi trusted him, number one. He'd known him for a long time. He is his nephew. And he is the perfect person to do that. So all this cash money, all that stuff, Fathi trusted him with it. And then -- this time -- excuse me, let me finish, sir. And at the same time, it's not just that. Isam is his nephew. Ayed is his nephew. And his daughter is

- 1 married to Ayed. So it's all family, nice,
- 2 trustworthy money laundering operation that we were 3 all involved in.
 - Q So Fathi Yusuf, when he set up this money laundering down there, he told you specifically that the money would go to Isam and Isam would use family members to distribute it and move it. Is that correct?
 - A Yes, sir.

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- Q Okay. Now you were also shown a document, I believe, that was just a small portion of a federal audit that was done by the Department of Justice and the FBI, and I believe you were directed to your own deposits and movement of money in that document. Do you recall?
 - A Yes.
- Q Okay. Do you also recall that in that document, there is a discussion about the movement of funds from Isam Yousuf to the Cairo Amman bank for millions and millions of dollars?
- A Yes.
- Q Okay. And could you tell me where Isam

Yousuf might have gotten millions of dollars to transfer from his account to the Cairo Amman bank?

MS. PERRELL: Objection. Calls for

4 | speculation.

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MR. HARTMANN: No it doesn't.

BY MR. HARTMANN:

O Go ahead. You can answer.

A The money was delivered to him via me, Fathi, out of the Plaza Extra partnership funds.

- Q And his job was to take the money that you had delivered to him and distribute it to different places, including Amman, Jordan, and to Saint Croix. Is that correct?
 - A Yes, sir.
- Q Okay. And would Isam Yousuf have access to millions and millions of dollars to transfer to that Cairo Amman bank listed in that DOJ document had it not been for this money laundering -- do you know of any independent funds he had?

A Absolutely not. He never had any funds.

Fathi Yusuf actually loaned or allowed Sam to use some funds, and Fathi came to me and asked me if it would

1 be okay -- or not really asked me. He told me, "This is what -- we need to help Isam out, " and he used to 2 3 make fun of Isam. He always used to say -- he'd make fun about Isam. "Isam, why can't you get your stuff 4 5 together? You're stuck in this furniture place. 6 need to get better. Aren't you jealous of your 7 cousins? Your cousins are -- not millionaires, but 8 they're doing much better than you. You don't have no 9 eagerness. You have no nothing, and he just always 10 talked about him that way. He told me he said that to 11 him.

- O Okay. So now let's talk --
- A -- so that was like a payoff to Isam to get his stuff together.
- Q Okay. So now let's return for a moment to the discussions that you had. Again, you were asked about three-way discussions with you, Fathi, and Isam. But you and Fathi independently repeatedly discussed the purchase and sale of the Sixteen Plus property; correct?
 - A Yes, sir.

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22 Q Okay. And when Isam was being directed to

send the money funding that property, he was told what the purpose was; wasn't he?

A Yes, sir.

MS. PERRELL: Objection -- wait, wait.

Objection. Misstates testimony. He said he never spoke to Isam about that.

MR. HARTMANN: No, he didn't. You asked him whether he talked to Isam, Fathi, and himself in a three-way conversation. In any case, it's what it says -- he just testified that he did speak to Isam about it.

BY MR. HARTMANN:

Q And when Isam was transferring 2.5 million dollars -- excuse me, \$2,000,000 from the money laundering -- what you said was his Island Appliances money laundering account to the Sixteen Plus account on Saint Croix, isn't it true that you have reviewed French police documents that show he was making ten consecutive deposits into that account that totaled 1.5 million dollars in January of 1997?

- A Yes, sir.
- O Okay. And those French documents that I

just relied to, did Fathi Yusuf ever bring those documents to you and show them and endorse those as the truth?

A Oh, yes. That's the documents that Fathi
Yusuf went through, in and out, page by page, sentence
by sentence, and that's what he relied upon to say
that I stole money and my father stole money from him.

Q Okay. If you would please, in the documents that's in front of you, your statement?

A Yes.

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Q Okay. If you would please go to paragraph number 76. I'm sorry, 77. No, let's start at 76.

A Yes.

Q Okay. 76 relates your statement that Fathi received those French reports translated into English, and he drew up a four-page handwritten analysis based on the French investigative reports, and could you tell me a little bit about that and particularly could you refer to what's shown in paragraph 77?

A Right. So Fathi -- after Fathi went through this document, he started making notes and he was referring certain transaction that happened, and, you

- 1 know, for instance, like number 1, that's his
- 2 | handwriting, that's his --
- 3 | MS. PERRELL: I've lost --
- 4 BY MR. HARTMANN:
- 5 Q Walli, you have to slow down.
- MS. PERRELL: Hold on just a second. I
- 7 | lost some of the -- I lost some of -- the internet
- 8 | messed up for a moment. I apologize. It semes to be
- 9 stable now. It just popped up for a second. I
- 10 apologize. Go ahead.
- 11 BY MR. HARTMANN:
- 12 Q Okay. I'll ask the question again.
- 13 A Please.
- Q Could you explain to me about his coming and
- 15 talking to you about those French documents and saying
- 16 that the numbers in there were accurate and put that
- in context of what's shown in paragraph 77?
- 18 A Okay. Well, after Fathi received -- after
- 19 he went through the French government documents that
- 20 was supplied by our attorneys, I guess, at the time,
- 21 and he did a complete analysis of what was
- 22 transferred, what's in them, and in a handwritten --

yellow pad, four pages or five pages tracking all the movement and all the accounting, and he accounted for all the transactions that happened so he can know where the money went. The money that we -- Fathi received the, what you call it, the Cairo Amman bank account statements went to him in Saint Thomas. He was in control of it. He was in control.

Eventually, I believe, the French -- not the French, but the Saint Martin account eventually found their way to his desk because he kept track of the money that was being deposited and being handled. So, you know -- I mean, if -- in looking at it, he kept real good record of what was stated in these documents, and he used those things to start saying that my father stole and I stole.

Q Okay. So this is, as you say in paragraph 76, this was really an accurate accounting to him, using the French documents as the information, an accurate accounting of funds that had been laundered. Is that correct?

- A Yes, according to him, yes.
- Q And he was trying to show you that in the

funds that were laundered, that the Hameds had received more than the Yusufs; is that correct?

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A Well, not necessarily that we received more, no. This wasn't that. This was an accounting of all the money that being laundered -- through Saint Martin, or really tracking. It's an accounting of what happened.

Q Okay. So in his handwriting accounting in which he is discussing the money laundered back and forth, this entry that he has labeled 1, dated 2/13/1997, says, "\$2,000,000 from account," and it gives an account number, "From Isam Yousuf to Sixteen Plus." So was he explaining to you that Isam had sent \$2,000,000 of laundered funds to Sixteen Plus?

A That's exactly --

MS. PERRELL: Objection. Objection.

Calls for speculation --

MR. HARTMANN: No, no, I'm sorry --

MS. PERRELL: Yeah, it does.

MR. HARTMANN: He was part of it -- no.

He was part of a two-person conversation in which

Fathi made specific representations about what this

MR. HYMES: -- whole deposition is

can object -- you can object to that.

2.1

going to be you testifying and not the witness. So

I'll have a --

MR. HARTMANN: Okay. You get to recross, remember? You can point that out if you'd like.

BY MR. HARTMANN:

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Q I'll ask the question a different way, Mr. Hamed. What is this entry represent -- what did he represent this entry to be to you when you and he were sitting down and he was making these demands of you based on the French documents?

A This document -- like I said, after he went through the first document, he went line-by-line, and if you look to the left of that entry, for instance, number 1, the circled number 1 entry which is 2/13/1997, there's reference to 9-2, and there's another page that he referred to which is the document, the French documents. So basically it was on page 9, line 2. And the other one, D-3. It shows up again in the French documents as D-3. I believe it was either paragraph or page 3. It all is put together systematically.

1 And what he was saying is there's \$2,000,000 2 that went from Isam's bank account, moneys that we gave him, that went to Sixteen Plus. Why would he 3 keep record of Isam's account when it's not his 4 5 That money is our money. We gave Isam that 6 money to purchase Diamond Keturah. That -- why would he keep account of it? Why? Because he like Isam or 7 8 Isam can't count or can't keep account in his name? 9 This was a thing to show that the moneys that was sent 10 shows where it came from and where it went to. Where 11 it went to and where it came from. And so on and so 12 forth, and if you look at the 3,000,000 or \$300,000 13 item number 3, A-4, you know, page A-4, paragraph A-4 14 on the French governmental -- French police, and so on and so forth. 15 16 0 Okay. So now if you turn to paragraph 17 73 ...

18 A 73?

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Q Yeah. You said that information in the investigation was provided to the French banking commission --

22 A Yes.

- Q But this is the document that you're talking about Fathi Yusuf using; right?
 - A Yes, sir.
 - Q And he was referring to it and stating that it was an accurate account of the financial exchanges between you and him. Is that correct?
- 7 A Yes, sir.
- MS. PERRELL: Same objection.
- 9 MR. HARTMANN: I'll withdraw that
- 10 question.

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- 11 BY MR. HARTMANN:
- Q Why did he represent to you that he was using the French numbers?
- 14 A These are --
- MS. PERRELL: Same objection.
- 16 BY MR. HARTMANN:
- 17 O Go ahead.
- 18 A These documents that he received from the
 19 French government was accurate, and they represent
 20 what he's accusing us and telling us where the money
 21 went to.
- Q Okay. Now turning to paragraph 75, I

believe there was a second French document also in the ones that Fathi Yusuf was dealing with. Could you tell me -- just read paragraph 75, please, of your prior statement.

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Okay. "On May 14, 2003, as a result, the Saint Martin police -- a Saint Martin police investigation was carried out and reporting on the matter. The police lieutenant investigated stated, 'Our investigation and hearing allowed us to determine that, one, with respect to the bank accounts open, the different bank requisitions sent to Saint Martin branch of the PFC allowed us to determine that your account -- I guess ending in 8690 was opened in the name of Yousuf, Isam, trade name Island Appliance on February 13, 1995. The attached documents were signature card for account number 63541 dollar, and 20186 francs, open on February 13, 1995. A copy of the passport of Isam Mohamad Yousuf, born February 20, 1952, in Jordan. Copy of a portfolio transfer sheet, account number -- I guess ending in 69000, Isam Yousuf -- I mean, Yousuf, Isam, and number 6063541 9040 Island Appliance."

Q Okay. And I'd ask you again. This is the document that Fathi Yusuf was relying on in making his demands of you?

A Yes.

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Q Okay. And if you'd skip down below to where the heading says, "Dollar account"?

A Yes.

O Number 6063541. You see that?

A Yes, sir. Yes.

Q Okay. And that says that it was opened in the name of Isam Yousuf, trade name Island Appliance, on February 13, '95, and it says, "The attached documents were" -- and down below it says, "Account statements mentioning several large cash transfers." Could you read just those two lines please?

A Okay. "Account statements mentioned several large cash transfers. This amount was credited -- this account was credited 8,782,962 U.S. dollars on 4/19/2002. This account was debited 8,859,309 U.S. dollars on 4/19/2002."

Q And could you tell me, you noticed that those two numbers are slightly different; right?

1 A Yes.

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- Q So if I were trying to trace along numbers,
 3 I couldn't do it; could I?
- 4 A That's correct.
 - Q Explain what that means.
 - A I honestly don't know. I don't know how to explain it.
 - Q Okay. And you see that the date that occurred was 4/19/2002 -- why is 4/19/2022 an important date?
 - A 2002, the indictment that we got -- well, the stores got raided and the homes were raided in 2001.
 - Q Okay. Tell me about that.
 - A We are raided -- the stores -- after

 September 11, all the stores and all the homes were
 raided, I believe it was October something. I don't
 remember the date was, in October that same year.

 They took all documents, they did whatever it is -and then in 2003, we had indictment that came down. I
 believe that was in September or October of 2003.
 - Q Okay. So after the store was raided, were

1 | you able to transfer any more cash down to Isam --

A Oh, no. Oh, no. I mean, right after -right after the raids, we seized all operations. We
seized everything. We knew we were being watched. We
knew that something was up. So most of that stuff,
nothing happened. I don't think I even traveled.

Maybe -- I'm not sure if I even traveled or Fathi
traveled.

Q And so at that point, what happened to all the money that had been built up that was down there?

A I don't recall specifically, but the money had to be sent out or done with or we had to get rid of it or we just left it, but I believe most of that money or those accounts were really transferred to Jordan.

Q Okay. And so there would be corresponding deposits in those DOJ accounts that Attorney Perrell showed you part of earlier; is that correct?

A Yes.

Q Okay. And again, would Isam have had eight million dollars of his own money to play around with?

A Absolutely not. Absolutely not.

1 Attorney Perrell also asked you or 0 Okav. 2 suggested to you through a series of questions that 3 Isam didn't know that the money -- that the note and mortgage were a sham mortgage because you and Fathi 4 5 and Isam had never talked about it specifically. Isam -- whatever Isam knew, would Isam have known that 6 that was proceeds of criminal money laundering? 7

A Yes, he would have known. He was part of it. And for him to sit there and just lie -- boldfaced lie that he didn't do anything -- he didn't deposit anything. He wasn't involved in anything -- where facts are there against him, I don't understand how people could do that. I don't understand how he could sit there and lie and lie.

- Q Well, speaking of people sitting there and lying and lying, were you sitting present at the deposition of Mayor Mike Yusuf?
 - A No, I wasn't.

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- Q Okay. Well, I'll represent to you that Mike Yusuf testified that he never assembled any money for transport to Saint Martin.
 - A Oh, my God. Mike was in charge of the cash

1 room at that time. Remember, this is 30 years ago. Ι was only 35 or 36 years old. Mike was younger than 2 He was in charge. His job was part to take care 3 of the cash and the safe at the Plaza East store. 4 5 Willy [ph] was in charge of the safe and the cash at the 22 Park store. We didn't have the west store. 6 only had two stores at that time -- Mike -- direct 7 8 people, AJ [ph] would direct people, Willy [ph] would 9 direct people, Fathi Yusuf would direct people to go 10 buy money orders. We would hold onto 50s and 100s. 11 We would hold on to company -- good company checks. 12 And we would do that. And for him to sit there and 13 say that? That's a big -- I'm sorry. I don't need 14 to ...

- Q Okay. So you said that Mike was in charge of the cash room on Saint Croix, but Willy [ph] was in charge of the cash room on Saint Thomas; is that correct?
 - A That is correct, sir.

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Q So those same instructions to collect money and assemble it and ready it for your and Fathi
Yusuf's transport down to Saint Martin would have also

1 gone to Willy [ph]; is that correct?

A Yes.

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- Q So Willy [ph] would know about this operation as well?
- A Absolutely. I mean, the instructions from Fathi Yusuf used to come from Saint Thomas to Saint Croix, which he often did maybe twice a month, maybe -- I could be wrong. Maybe once a month. He would bring whatever cash that they had with them, that they collected and they would bring it over to Saint Croix, because Saint Croix was the point of departure for most of that money -- and -- and Fathi at times would take the money directly from Saint Thomas to Saint Martin, whether in boxes, whether in briefcases or whatever it is.
- Q And when Sixteen Plus Corporation was being set up as a shell corporation in 1996, could you explain who the primary incorporator of that company was?
- A At the time -- at the time it was me, Mahar Yousef, and my brother Willy [ph].
 - Q So why was Mike Yusuf incorporating it?

1 He was involved with it. I'm not too sure 2 what's the circumstances because Fathi knows about it and for him -- I heard his testimony and for him to, 3 "Oh, I don't know" -- another big lie. How could a 4 grown man like that sit there and just twist the He knew about it -- directed us to exactly do 7 so.

- 0 And at the initial formation of the company, who was planned to be the president of the company originally?
 - Α I believe me.
- 0 Okay. Do you know if there were discussions where Mike Yusuf was going to be the president?
 - Α It could have been, yes.
- Okay. And did you and Mike have discussions 0 with the CPAs about setting up the accounting for the company?
- Α I believe we talked -- we talked to him under the directions of Fathi Yusuf, yes.
- Okay. Fathi Yusuf has testified -- were you 0 present at Fathi Yusuf's deposition?
- 22 Α Yes.

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- Q Do you recall a question where he was asked how much money he could safely say in cash got sent to Saint Martin?
- A I believe it's either ten million or above ten million, in the range of that.
 - Q That's my recollection too. Would that be your recollection?
 - A Yes.
 - Q That it was just ten million?
- 10 A Yes.

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- 11 Q Okay. And do you know where that ten
 12 million went?
 - A Went several places. Went to -- went to Amman. It went to Saint Croix, back to Saint Croix.
 - Q Okay. And you're absolutely sure that neither you nor anybody employed by your or known to you deposited any of that ten million dollars in any of those accounts?
 - A I'm sorry?
 - Q Are you absolutely certain that neither you nor anybody in your employ, as opposed to the Fathi
 Yusuf family members, put that money -- that ten

1 | million dollars into those four accounts?

A No, absolutely -- I mean, I might have put in some money but, I mean, it shows what -- which ones I deposited, but the rest of it is Fathi Yusuf's family.

MR. HARTMANN: Okay. I have no further questions.

MS. PERRELL: All right. I'm going to have some follow-up now.

EXAMINATION

BY MS. PERRELL:

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Q Mr. Hamed, you're saying that you believe that the total amount of money that went through Saint Martin was ten million dollars that was part of the Plaza Extra funds?

A Yes, ma'am. According to Fathi Yusuf, yes.

Q Okay. And you agree with that, though; right?

A I don't have no accounting. I've never really done the accounting for those accounts, but Fathi Yusuf did, and he stated under oath that it was around ten million. I believe him.

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- Q Okay. And so of the ten million that went through Saint Martin, you're saying that's ten million from the total time that you guys started sending money through Saint Martin through the raid in 2001; right?
 - A That's possible, yeah.
- Q Okay. But you're also saying that -- well, I mean, you didn't send any money through after October of 2001 when the raid happened; right?
 - A No -- yes.

- Q That's correct? Okay. And so of the ten million in that timeframe, from 1996 through let's say October of 2001, that would be a total of ten million for that period of time; correct?
 - A According to what Fathi said, yes.
- Q Right. And your testimony is that, of the total ten million that went through in all of those years, 4.5 of it was deposited before the end of 1997 when the Diamond Keturah purchase went through; is that correct?
 - A Repeat the question, because I -- I mean ...
 - O So this ten million dollars that was

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deposited between 1996 when you guys started depositing into Saint Martin, and October of 2001 when you stopped depositing into Saint Martin; right?

A Mm-hm.

Q Your testimony is that 4.5 million of that total ten was deposited between 1996 and the end of December 1997, because that was what was used to purchase the Diamond Keturah property; is that fair?

A Well, I know that we deposited the moneys to purchase the Diamond Keturah. Whether the accountant -- if whoever -- I mean Fathi testified there was ten million, so I assume it's the four-and-a-half is part of the ten million dollars, if that's the question you're asking me. But the only transfers that I've seen is two and two. I don't see the 5.5 -- I mean 550,000.

Q I had asked you before, "Where was the balance of that?" and I think you said you weren't sure.

A I'm not sure.

Q Okay. All right. So you were looking earlier at page -- the French report --

MS. PERRELL: And Pam, if you could

pull it up, it's page 263 of the combined document -
I believe it's your statement, and I want to say it's

paragraphs 73. Pam, if you could pull it up.

My earphones just died on me. Just a second. Can someone say something -- there we go.

Okay. I can hear -- my earphones died, so I just want to make sure. Okay. There it is.

BY MS. PERRELL:

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- Q So on the bottom here, it says something about money, the eight million, seven hundred and some odd thousand going into Isam Mohamad's account on 4/19/2002. Remember, we were discussing that earlier?
 - A Yes.
- Q Okay. But you stated that Plaza Extra never deposited any moneys after the raid in 2001; correct?
- A If my recollection serves me right, yeah. I don't think we did that.
- Q Right. Okay. And so the \$8,782,000 that got deposited into Isam's account, you're not testifying that that is Plaza Extra money that went in there in April of 2002; are you?

- A It doesn't say, "Cash deposit." It says,

 2 "Cash transfers."
 - Q Okay. It just simply says the account was credited \$8,782,962 on April 19, 2002.
 - A Well, it says, "Account statement," mentions several large cash transfers. I don't know what that means -- it says transfers. It doesn't say deposits.

 Yes -- one of them that's credited and one of them that's debited.
 - Q Correct. My question to you is this. Is any of this -- do you understand any of the \$8,782,000 that was credited on April 19, 2002, to be Plaza Extra money?
 - A I have no idea.

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- Q And it's clear that you'd never directed \$8,782,962 to be deposited on or about April 19, 2002, to any of the Isam accounts in Saint Martin; isn't that correct?
 - A That's true, yes.
- Q Okay. And so you've testified a lot to your dispute with the various testimony that has occurred with the other witnesses, and so just so that I'm

- clear, it's your testimony that Fathi Yusuf, Mahar
 Yousef, Isam Yousuf, and Manal Yousef are all lying
 about the 4.5 million dollar Diamond Keturah loan and
 purchase? Is that correct?
 - A That is correct. It's a sham mortgage.
 - Q All right. And to clarify, did you have any conversations just with you and Isam Yousuf relating to the mortgage from Manal Yousef?
- 9 A Directly, individually, between me and Isam, 10 no.
 - Q Okay. And did you likewise have any conversations individually between yourself and Manal Yousef relating to the note and mortgage?
 - A Never.

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- Q A little further up on this page it says,
 "Yousuf, Isam," it's a copy of a transfer order dated
 February 13, 1997, for an amount of two million from
 the account of Isam Yousuf in favor of Sixteen Plus.
 Isn't that the two million dollars that was the first
 transfer in order to purchase the Diamond Keturah
 property?
 - A Well, that's what it says, but I know there

is a document that says -- a transfer document that shows that, if that's what they're referring to.

- Q Right. And what I'm saying is nobody's disputing that Isam Yousuf sent two million dollars from his Island Appliance account for Sixteen Plus to Sixteen Plus's Bank of Nova Scotia account for two million dollars in February of 1997. Correct?
- A That is correct, but that money is Plaza Extra money.
 - Q Right --

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- A He was a tool in doing that, so we can keep an arm-length transaction. We don't go back and the government goes after us.
- Q Okay. So if the whole point of keeping an arm's-length transaction, why would it be that tax documents would say things like, "Loans from shareholder," if you were trying to keep everything at arm's length?
- A Which tax documents would say that? For the past -- since the creation of Sixteen Plus, it never had that. Never said a mortgage or anything like that -- show me where it says a mortgage --

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What I'm asking you is, if the whole point of the sham mortgage, as you describe it, was to keep an arm's length and to create distance between the Plaza Extra partners, family members of the Hameds and the Yusufs, then why would the tax returns reflect shareholder, meaning the Plaza Extra family members, instead of a loan from Manal? Why would you, if you were trying to keep the distance, why would the tax returns reflect otherwise?

Α Because that's exactly how Fathi used to set it up. I understand the question. I'm sorry earlier. It's just shareholder loan which is who are the shareholders? The Hameds and the Yusufs. So now after the statute of limitation is done, we don't have to go back and change what we've been saying all along.

So the elaborate scheme to set up the sham mortgage, to sign the promissory note and the mortgage, to shift money all the way to Saint Martin, to get it all the way back -- all of that was done to create the distance, the different deposits and so forth -- but all of that was done, and at the same

time the tax returns were filed with "Loans to
shareholders," which is what you're saying is really
the truth all along?

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A Yes. It's our money. It wasn't Manal's money, because if it was Manal's money, it would be listed as a mortgage.

Q So it's your testimony that the tax returns filed during this timeframe, that all had to be refiled as to all of the various members of the Yusuf and Hamed families and for United and so forth, that that's really what really happened, and all the other documents are a sham? Is that correct?

A You're telling me about a lot of documents, and I'm not seeing them, but if I can see them I can elaborate or confirm --

Q I mean -- okay. So the other documents, meaning the consent of the directors, the note, and the mortgage -- that's all not true, but you're saying that the tax returns that were filed at that time that ultimately end up -- those were the correct documents; correct?

A If that's what they state, but I know for

sure the promissory note, the mortgage, the other document that you showed me, all that is a sham just to cover up the transaction. That was our money. We sent that money over to Isam. He sent it back via that so it could be an ongoing transaction.

- Q Okay. And so you said that the reason that Fathi Yusuf trusted Isam and all of the other family members in Saint Martin is because Isam is his nephew and that Isam and the other folks are all family members of Mr. Yusuf. Is that right?
 - A Right.

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- Q Right. And you're Mr. Yusuf's nephew as well; right?
 - A Well, I'm not his nephew.
- 15 O You're not his nephew?
- 16 A No, I'm not his nephew.
 - Q Isn't it true that your brothers are also married, or two were married to two of Mr. Yusuf's daughters?
 - A At one time or another there were two of them, yes, but that doesn't mean I'm his nephew.
 - Q Okay. Isn't it also true that your mother

1 | and Mr. Yusuf's wife are sisters?

- A That's true.
- O Okay. And so she is your aunt; correct?
- 4 A Right.

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- Q Right. And he is married to her, so doesn't that make him your uncle?
- A Well, that might be -- I won't say that. It just depends on how you look at it. You look at Middle Eastern, or you look at Western -- things how they look at things. Sam Yousuf and Ayed Yusuf are Fathi's -- so to speak, they're directly related to him because that's his brother's children --
- Q Right. Go ahead. I'm sorry. I didn't mean to interrupt.
- A That's what I said. They're his direct -- directly relation.
- Q Did you discuss this with your father before the promissory note and the mortgage were executed?
- A I don't recall exactly, but I know my father back in probably 1996, '95, where he thought about retiring and he started giving me more responsibility in dealing with the financial things with Fathi, and

Page 120

that's how things became in place. I'm not too sure about it could have been mentioned, or maybe after we made the transaction. He knew about it.

Q All right. Are you saying that there is moneys that were sitting in Isam Yousuf's Island Appliances account at the time of the raid that is really Plaza Extra money that you guys never received?

A I'm not saying that because I have no idea, and I have no recollection, and I know I'm no accountant. Fathi Yusuf would be able to answer that, because he kept an accounting detail of all the laundered money into those accounts. Even my accountant at Cairo Amman Bank, Fathi received the accounting. Fathi was in control of that account.

MS. PERRELL: Okay. I don't have any further questions.

MR. HOLT: No questions.

MR. HYMES: No questions.

THE VIDEOGRAPHER: We're off the video

record. The time is 2:51 p.m.

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	Page 121
1	(Signature waived.)
2	(Whereupon, at 2:51 p.m., the
3	proceeding was concluded.)
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CERTIFICATE	$\sim E$		
(, P, R P (, A P,	ししょ	DEPOSITION	しょうしいがん

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 Daws

SHONDRA DAWSON

Notary Public in and for the District of Columbia

1 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.

MIM

15 RICHARD GOODNESS

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