

IN THE SUPERIOR COURT OF THE VIRGIN ISLANDS  
DIVISION OF ST. THOMAS/ST. JOHN

UNITED CORPORATION,

*Plaintiff,*

v.

WALEED HAMED,  
*(a/k/a Wally Hamed),*

*Defendant.*

Case No.: SX-13-CV-3

ACTION FOR DAMAGES

JURY TRIAL DEMANDED

**PLAINTIFF UNITED CORPORATION'S RESPONSES TO  
DEFENDANT WALEED HAMED'S FIRST REQUEST FOR  
PRODUCTION OF DOCUMENTS**

COMES NOW, Plaintiff **United Corporation**, (hereinafter referred to as "United" or "Plaintiff" or "Responding Party"), by and through undersigned counsel, **The DeWood Law Firm**, by **Nizar A. DeWood, Esq.**, and respectfully responds as follows to the Defendant **Waleed Hamed's** First Request for Production of Documents.

Subject to the objections set forth below, Plaintiff responds as follows to Defendant's First Request for Production of Documents.

**PRELIMINARY STATEMENT**

These responses and objections are made solely for the purpose of this action. Each response is subject to any and all objections as to competence, relevance, materiality, propriety, and admissibility; and any and all objections and grounds that would require the exclusion of any statement contained in any response, if such request were asked of, or any statement contained therein were made by, a witness present and testifying in court, all of which objections and grounds are hereby reserved and may be interposed at the time of trial.

The following responses are based upon information presently available to Plaintiff and, except for explicit facts admitted herein, no incidental or implied admissions are intended hereby. The fact that Plaintiff has responded or objected to any Request should not be taken as an admission that Plaintiff accepts or admits the existence of any facts set forth or assumed by such Request, or that such response constitutes admissible evidence. The fact that Plaintiff has responded to part or all of any such Request is not intended and shall not be construed to be a waiver by Defendant of all or any part of any objection to any such Request.

#### **GENERAL OBJECTIONS**

Plaintiff makes the following general objections to Defendant Waleed Hamed's First Request for Production of Documents. These general objections apply to all or so many of the Requests, for convenience, they are set forth herein and are not necessarily repeated after each Request objected to. The assertion of the same, similar, or additional objections in the individual objections to these Request, or the failure to assert any additional objections to any Request does not waive any of Plaintiff's objections as set forth below:

1. Plaintiff objects to each request that uses the words "any" and "all" as being overbroad, unduly burdensome, immaterial, irrelevant, and not reasonably calculated to lead to the discovery of admissible evidence.
2. Plaintiff objects to each request to the extent it seeks the production of documents or information protected by the attorney-client, work product or other privileges. Only non-privileged documents, or portions thereof, will be produced.

3. Plaintiff objects to each request that uses the term "document," as defined, as overbroad, unduly burdensome, irrelevant, and immaterial to the extent that it calls for material unrelated to this case.

4. Plaintiff objects to each request to the extent that it uses terms or phrases that are vague, ambiguous, or undefined. Plaintiff's response to each such request is based upon its understanding of the request.

5. Plaintiff objects in part to each request that asks for responses or documents that fall outside the scope of this litigation. To the extent the requests seek production of such documents; the requests impose an undue burden and expense. Further, such documents are irrelevant, immaterial, and not reasonably calculated to lead to the discovery of admissible evidence.

6. Plaintiff objects to each request to the extent it requires information outside of its possession, custody or control.

7. Plaintiff is continuing its efforts to identify non-privileged documents that are responsive to Defendant's First Request for Production of Documents. Consequently, information may be supplemented by subsequently discovered documents.

8. Each response the Plaintiff gives is subject to all of the above general objections and all specific objections listed below. Inadvertent production of privileged documents shall not be deemed a waiver.

**SPECIFIC OBJECTIONS AND RESPONSES**

Subject to and incorporating by reference each of the General Objections set forth above, Plaintiff responds to Defendant Waleed Hamed's First Request for Production of Documents to Plaintiff United Corporation as follows:

**REQUESTS:**

1. All documents and other physical evidence supporting United's averment in paragraph 11 of the Complaint that:

11. Sometime in 1986, Plaintiff United, through its shareholder and then President, Fathi Yusuf, entered into an oral agreement, whereby Plaintiff United and Defendant Hamed's father, Mohammed Hamed, agreed to operate a grocery store business.

**RESPONSE TO REQUEST NO. 1:**

As the Agreement was oral, there is no Agreement document(s) to produce.

2. With regard to averments 18 and 19 of the Complaint, produce all documents that support these two averments, including the referenced tax returns and attachments (please note that it is not sufficient to state these documents are equally available to the defendant as he is entitled to see the actual documents you are relying upon):

18. During a search of the documents and files delivered by the U.S. Government, Plaintiff United reviewed documents comprising tax returns for Defendant Hamed. An examination of Defendant Hamed's tax returns revealed the following significant assets:

- a. Tax Year 1992 (Stocks & Investments) ..... \$ 408,572.00
- b. Tax Year 1993 (Stocks & Investments) ..... \$7,587,483.00

19. The detailed stock acquisitions, which were listed meticulously by date of acquisition, price and number of shares purchased, could only have been acquired by Defendant Hamed through his unlawful access to monies and other properties belonging to Plaintiff United. Defendant Hamed never held any other employment since 1986, other than through his employment with Plaintiff United.

**RESPONSE TO REQUEST NO. 2:**

See Documents produced hereto as Waleed Hamed's Tax Returns for Years 1991, 1992, 1993, 1994, 1995, 1996 and 1997. (118 pp.) - Bates® Stamp UC 000001 - UC 000118.

3. With regard to averments 21 and 22 of the Complaint, produce the tax returns you reference for 1992 and 1993 (please note that it is not sufficient to state these documents are equally available to the defendant as he is entitled to see the actual documents you are relying upon).

**RESPONSE TO REQUEST NO. 3:**

See Documents produced in Response to Request No. 2.

4. Please provide copies of any documents or other tangible evidence that refer to the response allegedly given by Waleed Hamed, as referenced in averment 23 regarding "Hamdan Diamond."

**RESPONSE TO REQUEST NO. 4:**

None. The Response by Waleed Hamed was made orally.

5. With regard to averments 25 and 26 of the Complaint, produce the tax returns you reference for 1991 through 1999 (please note that it is not sufficient to state these documents are

equally available to the defendant as he is entitled to see the actual documents you are relying upon).

**RESPONSE TO REQUEST NO. 5:**

See Documents produced in Response No. 2. See Also See Documents produced hereto as Waleed Hamed's Tax Returns for Years 1998, 1999 and 2000. (34 pp.) - **Bates® Stamp UC 000119 - UC 000153.**

- 1998 Tax Returns (13 pp.) - **Bates® Stamp UC 000119 – UC 000131.**
- 1999 Tax Returns (13 pp.) - **Bates® Stamp UC 000132 – UC 000144.**
- 2000 Tax Returns (9 pp.) - **Bates® Stamp UC 000145 – UC 000153.**

6. With regard to the averment 27(a) of the Complaint, produce all documents that show the loans approved by Waleed Hamed as well as all document supporting your contention that these loans were presumably repaid to Waleed Hamed, as alleged in paragraph 27 (a) as follows (please note that it is not sufficient to state these documents are equally available to the defendant as he is entitled to see the actual documents you are relying upon):

27. In October of 2011, a review of the U.S. Government records and files further revealed the following defalcation of funds:
- a. Loans totaling \$430,500.00, approved by Defendant Hamed, presumably repaid to Defendant Waleed Hamed.

**RESPONSE TO REQUEST NO. 6:**

See Documents produced hereto regarding Loan documentation by Waleed Hamed from 04-10-1997 to 05-23-2000. (25 pp.) - **Bates® Stamp UC 000154 - UC 000179.**

7. With regard to the averment 27(b) of the Complaint, produce all documents that show the payments in question as referenced in paragraph 27(b) as follows, (please note that it is

not sufficient to state these documents are equally available to the defendant as he is entitled to see the actual documents you are relying upon):

27. In October of 2011, a review of the U.S. Government records and files further revealed the following defalcation of funds:

....

b. Payments made with respect to the construction of Defendant Hamed's home amounting to \$481,000.00.

**RESPONSE TO REQUEST NO. 7:**

See Documents produced hereto regarding Waleed Hamed's Record of Payments on House Construction in 1997. (25 pp.) - Bates® Stamp UC 000180 - UC 000192.

8. With regard to the averment 27(c) of the Complaint, produce the front and the back of the 6 checks that support the following averment in paragraph 27(c) (please note that it is not sufficient to state these documents are equally available to the defendant as he is entitled to see the actual documents you are relying upon):

27. In October of 2011, a review of the U.S. Government records and files further revealed the following defalcation of funds:

....

c. Six checks totaling \$135,000, drawn on the operating account of Plaintiff United's Plaza Extra supermarket, and made payable to "Waleed Hamed" personally.

**RESPONSE TO REQUEST NO. 8:**

See Documents produced hereto of Six (6) 2002 Plaza Extra Checks written by Waleed Hamed. (6 pp.) - Bates® Stamp UC 000193 - UC 000198.

9. With regard to the averments of paragraph 31 of the Complaint, produce the documents upon which the averment is based:

31. Defendant Waleed Hamed has breached the following duties (the list of duties violated by Defendant Hamed. . . .

- a. Duty of Loyalty
- b. Duty of good faith and candor;
- c. Duty to manage the day-to-day operations of Plaintiff United's Plaza Extra supermarket for the benefit of United;
- d. Duty of full disclosure of all matters affecting his employer Plaintiff United;
- e. Duty to refrain from self-dealing, and/or general prohibition against the fiduciary using his relationship to benefit his personal interest; and
- f. Duty to manage any funds, assets, and/or property belonging to Plaintiff United by virtue of its operation of the Plaza Extra Supermarket stores in accordance with applicable laws

**RESPONSE TO REQUEST NO. 9:**

See all documents produced above in this matter and all documents to be supplemented.

10. With regard to the averments of paragraph 34 of the Complaint, produce the documents upon which the averment is based:

34. Defendant Hamed has engaged in systemic misappropriation of substantial and valuable assets of Plaintiff United causing substantial injury to Plaintiff United. As a result, Plaintiff United has sustained significant financial injury.

**RESPONSE TO REQUEST NO. 10:**

See all documents produced above in this matter and all documents to be supplemented.



11. With regard to the averments of paragraph 37 of the Complaint, produce the documents upon which the averment is based:

37. Defendant Waleed Hamed has knowingly converted substantial funds and assets belonging to Plaintiff United.

**RESPONSE TO REQUEST NO. 11:**

See all documents produced above in this matter and all documents to be supplemented.

12. With regard to the averments of paragraph 44 of the Complaint, produce the documents upon which the averment is based:

44. Defendant Hamed has breached his employment contractual agreement with Plaintiff United by mismanaging, misappropriating, and converting funds, monies, and other valuables to his personal use. As a result, Plaintiff United has sustained substantial financial damages.

**RESPONSE TO REQUEST NO. 12:**

The following Documents listed below being produced will be provided on a CD.

- A. See Analysis of Waleed Hamed's Tax Returns and Equity and supporting documents. (1 p.) - Bates® Stamp UC 000199.

**See Supporting Documents of Analysis:**

- 1993 Tax Returns (11 pp.) - Bates® Stamp UC 000200 – UC 000211.
- 1994 Tax Returns (12 pp.) - Bates® Stamp UC 000212 – UC 000223.
- 1995 Tax Returns (8 pp.) - Bates® Stamp UC 000224 – UC 000231.
- 1996 Tax Returns (17 pp.) - Bates® Stamp UC 000232 – UC 000248.
- 1997 Tax Returns (31 pp.) - Bates® Stamp UC 000249 – UC 000279.
- 1998 Tax Returns (31 pp.) - Bates® Stamp UC 000280 – UC 000293.
- 1999 Tax Returns (12 pp.) - Bates® Stamp UC 000280 – UC 000293.
- 2000 Tax Returns (9 pp.) - Bates® Stamp UC 000306 – UC 000314.
- 2001 Tax Returns (16 pp.) - Bates® Stamp UC 000315 – UC 000330.

- B. See Analysis of Waleed Hamed's Banque Francaise Commerciale Bank Account No. 40-60-3878-91, from 1996 to 1998. (1 p.) - **Bates® Stamp UC 000331.**

See Supporting Documents of Analysis:

- 1996-09-09 Bank Statement. (1 p.) - **Bates® Stamp UC 000332.**
- 1997-02-13 Bank Statement. (10 pp.) - **Bates® Stamp UC 000333 – UC 000342.**
- 1998-01-19 through 1998-12-01 Bank Statement. (6 pp.) - **Bates® Stamp UC 000343 – UC 000348.**

- C. See also Analysis of Waleed Hamed's Banque Francaise Commerciale Bank Account No. 40-60-3878-90, from 1996 to 1998. (2 pp.) - **Bates® Stamp UC 000348-1 – UC 000348-2.**

- 1996-06-26 through 1996-12-01 Bank Statement. (6 pp.) - **Bates® Stamp UC 000349 – UC 000354.**
- 1997-01-24 through 1997-12-17 Bank Statement. (11 pp.) - **Bates® Stamp UC 000355 – UC 000365.**
- 1998-01-19 through 1998-12-01 Bank Statement. (8 pp.) - **Bates® Stamp UC 000366 – UC 000373.**
- 1999-01-01 through 2002-04-19 Bank Statement. (1 p.) - **Bates® Stamp UC 000374.**

- D. Analysis of FBI Log of Scotia Bank Checks to Wally Hamed from 2002-04-13 to 2002-06-07. (1 p.) - **Bates® Stamp UC 000375.**

See Supporting Documents of Analysis:

- Checks payable to Wally Hamed from Yusef Jaber from April 2000 to June 2000. (5 p.) - **Bates® Stamp UC 000376 – UC 000380.**

- E. Promissory Note for \$35,000.00 from Tashin Hamed to Waleed Hamed, dated May 3, 1997. (3 pp.) - **Bates® Stamp UC 000381 – UC 000383.**

See Supporting Documents of Promissory Note:

- Payments on Note made by Tashin Hamed to Waleed Hamed for May, June and August 1997. (7 pp.) - **Bates® Stamp UC 000384 – UC 000390.**
- Payment on Note made by Tashin Hamed to Waleed Hamed, dated 02-11-2001. (1 p.) - **Bates® Stamp UC 000391.**

- Copy of Check for Payment on Note made by Tashin Hamed to Waleed Hamed, dated 02-11-2001. (1 p.) - **Bates® Stamp UC 000392.**

- F. Analysis of Loan Documents to Fawzi Asad from 02-05-1999 to 09-27-1999. (2 pp.) - **Bates® Stamp UC 000393 – UC 000394.**

See Supporting Documents of Analysis:

- Receipts (6) of Payments by Fawzi Asad to Wally Hamed on Loan, from 02-05-1999 to 09-27-1999. (6 pp.) - **Bates® Stamp UC 000395 – UC 000400.**

- G. Analysis of FBI Log of Scotia Bank Checks to Wally Hamed from 1999 to 2001. (2 pp.) - **Bates® Stamp UC 000401 – UC 000402.**

See Supporting Documents of Analysis:

- Receipts from Plaza Extra to Wally Hamed for 2001. (35 pp.) - **Bates® Stamp UC 000403 – UC 000437.**
- Receipts from Plaza Extra to Wally Hamed for 1999. (10 pp.) - **Bates® Stamp UC 000438 – UC 000447.**

- H. Analysis of FBI Log of Plaza Extra Receipts to Wally Hamed from 01-26-2000 to 09-27-2002. (2 pp.) - **Bates® Stamp UC 000448 – UC 000449.**

See Supporting Documents of Analysis:

- Receipts from Plaza Extra to Wally Hamed for 2000. (32 pp.) - **Bates® Stamp UC 000450 – UC 000481.**
- Receipts from Plaza Extra to Wally Hamed for 2001. (20 pp.) - **Bates® Stamp UC 000482 – UC 000501.**
- Receipts from Plaza Extra to Wally Hamed for 2002. (52 pp.) - **Bates® Stamp UC 000502 – UC 000553.**

- I. Analysis of FBI Log of Plaza Extra Receipts, Salaries, and various miscellaneous receipts regarding Waleed Hamed. (1 p.) - **Bates® Stamp UC 000554.**

See Supporting Documents:

- Notes (Handwritten) of a \$1,000. Salary and hours. (1 pp.) - **Bates® Stamp UC 000555.**

- Receipt for \$300.00, dated 04-14-2000. (2 pp.) - **Bates® Stamp UC 000556 – UC 000557.**
  - Receipts from Plaza Extra to Wally Hamed for \$720.00, dated 02-08-2001. (2 pp.) - **Bates® Stamp UC 000558 – UC 000559.**
  - Receipt from Plaza Extra to Wally H., but no amount, dated 12-31-1999. (1 p.) - **Bates® Stamp UC 000560.**
  - Receipt from Oscar Refrigeration for Cash (\$31.95) to Wally, dated 03-31-2000. (2 p.) - **Bates® Stamp UC 000561 – UC 000562.**
  - Receipt Gallows Bay Hardware for \$49.99, dated 04-18-2001. (1 p.) - **Bates® Stamp UC 000563.**
  - Receipt for Gallows Bay Hardware for \$60.81 for Wally, dated 04-01-2000. (2 pp.) - **Bates® Stamp UC 000564 – UC 000565.**
  - Receipt from Pet-Lock Electrical to Wally Hamed, dated 03-31-2000. (2 pp.) - **Bates® Stamp UC 000566 – UC 000567.**
  - Receipts (Various) for Wally Hamed, 2000 through 2001. (56 pp.) - **Bates® Stamp UC 000568 – UC 000623.**
  - Receipt from Crane Rooftops for \$1,004.45, dated 07-20-2001. (1 p.) - **Bates® Stamp UC 000624.**
  - Receipts from Glidden Pants and Rooftops, dated 05-01-2001. (2 pp.) - **Bates® Stamp UC 000625 – UC 000627.**
  - Receipts from Rooftops, dated 04-24-2001 and 04-26-2001. (4 pp.) - **Bates® Stamp UC 000628 – UC 000631.**
  - Receipts (Various) for Wally Hamed – Mainly Construction supplies, for 2000 and 20001. (44 pp.) - **Bates® Stamp UC 000632 – UC 000675.**
  - Receipt from Rooftops, dated 07-20-2001. (1 p.) - **Bates® Stamp UC 000676.**
  - Receipts from Rooftops with handwritten notes, dated 05-01-2001. (3 pp.) - **Bates® Stamp UC 000677 – UC 000679.**
  - Receipts from Rooftops, dated 04-25-2001 and 04-26-2001. (6 pp.) - **Bates® Stamp UC 000680 – UC 000685.**
  - Receipts from Plaza Extra to Wally Hamed for House Repairs, dated 04-21-2001. (2 pp.) - **Bates® Stamp UC 000686 – UC 000687.**
  - Receipts from Gallows Bay Hardware and Plaza Extra for 1999 and 2000. (2 pp.) - **Bates® Stamp UC 000688 – UC 000689.**
- J. Analysis of Visa of Wally Hamed for Banco Popular for 1997. (2 pp.) - **Bates® Stamp UC 000690 – UC 000691.**

See Supporting Documents:

- Banco Popular Visa Bank Statement for Wally Hamed for November and December 1997. (2 pp.) - **Bates® Stamp UC 000692 – UC 000693.**
- K. Checks (6) to Plaza Extra for Loan Payments in 1997 and 2000. (6 pp.) - **Bates® Stamp UC 000694 – UC 000699.**
- L. Analysis of FBI Log of Plaza Extra Receipts and/or Tickets regarding Waleed Hamed from 08-13-1999 through 07-20-2001. (1 p.) - **Bates® Stamp UC 000700.**

Supporting Documents to Analysis:

- Receipts (Plaza Extra) for Monies either to Juan Rosario or Wally Hamed, signed by Juan Rosario, dated 1999 to 2000. (7 pp.) - **Bates® Stamp UC 000701 – UC 000707.**
- Receipt (Plaza Extra) for Money \$500.00 to Wally Hamed from Juan Rosario, dated 02-22-2000. (1 p.) - **Bates® Stamp UC 000708.**
- Receipts (Plaza Extra) for Loans from Juan Rosario to Juan Rosario, dated 04-02-2001; 05-08-2001 and 07-20-2001. (3 pp.) - **Bates® Stamp UC 000709 – UC 000711.**
- M. Analysis of Visa Credit Card No. 4549-8700-0511-2319 for Wally Hamed for Banco Popular for 1998. (2 pp.) - **Bates® Stamp UC 000712 – UC 000713.**

Supporting Documents to Analysis:

- Visa Credit Card Statements for Wally Hamed from 03-22-1998 through 09-23-1998. (7 pp.) - **Bates® Stamp UC 000714 – UC 000720.**
- Visa Credit Card Statement for Wally Hamed from 10-21-1998 through 12-21-1998. (3 pp.) - **Bates® Stamp UC 000721 – UC 000723.**
- N. Analysis of Visa Credit Card No. 4549-8700-0511-2319 for Wally Hamed for Banco Popular for 1999. (2 pp.) - **Bates® Stamp UC 000724 – UC 000725.**

Supporting Documents to Analysis:

- Visa Credit Card Statement for Wally Hamed from 02-21-1999 through 05-23-1999. (3 pp.) - **Bates® Stamp UC 000726 – UC 000728.**
- Visa Credit Card Statement for Wally Hamed from 06-21-1999 through 12-21-1999. (3 pp.) - **Bates® Stamp UC 000729 – UC 000731.**

- O. Analysis of Visa Credit Card No. 4549-8700-0511-2319 for Wally Hamed for Banco Popular for 2000. (2 pp.) - **Bates® Stamp UC 000732 – UC 000734.**

Supporting Documents to Analysis:

- Visa Credit Card Statement for Wally Hamed from 01-23-2000 through 04-23-2000. (4 pp.) - **Bates® Stamp UC 000735 – UC 000738.**
- Visa Credit Card Statement for Wally Hamed from 05-15-00 through 11-15-2000. (6 pp.) - **Bates® Stamp UC 000739 – UC 000744.**

- P. Analysis of Visa Credit Card No. 4549-8700-0511-2319 for Wally Hamed for Banco Popular for 2001. (3 pp.) - **Bates® Stamp UC 000745 – UC 000747.**

Supporting Documents to Analysis:

- Visa Credit Card Statement for Wally Hamed from 01-15-2001 to 12-16-2001. (6 pp.) - **Bates® Stamp UC 000748 – UC 000758.**

- Q. Analysis of Visa Credit Card No. 4549-8700-0511-2319 for Wally Hamed for Banco Popular for 2002. (5 pp.) - **Bates® Stamp UC 000759 – UC 000763.**

Supporting Documents to Analysis:

- Visa Credit Card Statement for Wally Hamed from 01-15-2002 to 12-16-2002. (15 pp.) - **Bates® Stamp UC 000764 – UC 000778.**

- R. Analysis of Visa Credit Card No. 4549-8700-0511-2319 for Wally Hamed for Banco Popular for 2003. (4 pp.) - **Bates® Stamp UC 000779 – UC 000782.**

Supporting Documents to Analysis:

- Visa Credit Card Statement for Wally Hamed from 01-15-2003 to 12-16-2003. (15 pp.) - **Bates® Stamp UC 000783 – UC 000788.**

- S. Analysis of Visa Credit Card No. 4549-2700-9778-2204 for Wally Hamed for Banco Popular for 1996. (2 pp.) - **Bates® Stamp UC 000789 – UC 000790.**

Supporting Documents to Analysis:

- Visa Credit Card Statement for Wally Hamed from 10-21-1996 to 11-21-1996. (2 pp.) - **Bates® Stamp UC 000791 – UC 000792.**

- Visa Credit Card Statement for Wally Hamed from 12-22-1996. (1 p.) - **Bates® Stamp UC 000793.**
- T. Analysis of Visa Credit Card No. 4549-2700-9778-2204 for Wally Hamed for Banco Popular for 1997. (2 pp.) - **Bates® Stamp UC 000794 – UC 000796.**
- Supporting Documents to Analysis:
- Visa Credit Card Statement for Wally Hamed from 12-23-1997 to 12-21-1997. (11 pp.) - **Bates® Stamp UC 000797 – UC 000807.**
- U. Analysis of Visa Credit Card No. 4549-2700-9778-2204 for Wally Hamed for Banco Popular for 1998. (2 pp.) - **Bates® Stamp UC 000808 – UC 000809.**
- Supporting Documents to Analysis:
- Visa Credit Card Statement for Wally Hamed from 01-21-1998 to 10-21-1998. (10 pp.) - **Bates® Stamp UC 000810 – UC 000819.**
- V. Analysis of Visa Credit Card No. 4549-2700-9778-2204 for Wally Hamed for Banco Popular for 1999. (2 pp.) - **Bates® Stamp UC 000808 – UC 000809.**
- Supporting Documents to Analysis:
- Visa Credit Card Statement for Wally Hamed from 02-21-1999 to 09-21-1999. (6 pp.) - **Bates® Stamp UC 000822 – UC 000827.**
- W. Analysis of Visa Credit Card No. 4549-2700-9778-2204 for Wally Hamed for Banco Popular for 2000. (2 pp.) - **Bates® Stamp UC 000828 – UC 000829.**
- Supporting Documents to Analysis:
- Visa Credit Card Statement for Wally Hamed from 09-15-2000 to 10-16-2000. (2 pp.) - **Bates® Stamp UC 000830 – UC 000831.**
- X. Analysis of Visa Credit Card No. 4549-2700-9778-2204 for Wally Hamed for Banco Popular for 2001. (2 pp.) - **Bates® Stamp UC 000832 – UC 000833.**

Supporting Documents to Analysis:

- Visa Credit Card Statement for Wally Hamed from 09-15-2001 to 10-16-2001. (2 pp.) - **Bates® Stamp UC 000834 – UC 000835.**
- Y. Analysis of Visa Credit Card No. 4549-2700-9778-2204 for Wally Hamed for Banco Popular for 2002. (3 pp.) - **Bates® Stamp UC 000836 – UC 000838.**

Supporting Documents to Analysis:

- Visa Credit Card Statements for Wally Hamed from 04-15-2002 to 12-16-2002. (9 pp.) - **Bates® Stamp UC 000839 – UC 000847.**
- Z. Analysis of Visa Credit Card No. 4549-2700-9778-2204 for Wally Hamed for Banco Popular for 2003. (3 pp.) - **Bates® Stamp UC 000848 – UC 000849.**

Supporting Documents to Analysis:

- Visa Credit Card Statements for Wally Hamed from 01-15-2003 to 03-18-2003. And, List of Haddon House Order List, dated 11-13-2013. (6 pp.) - **Bates® Stamp UC 000850 – UC 000855.**
- AA. Analysis DOJ Log for Merrill Lynch Account for Waleed Hamed, from 12-31-1999 to 12-29-2000. (4 pp.) - **Bates® Stamp UC 000856 – UC 000859.**

Supporting Documents to Analysis:

- Merrill Lynch Statements and Portfolio for Waleed Hamed, from 12-31-1999 to 12-29-2000. (106 pp.) - **Bates® Stamp UC 000860 – UC 000965.**
- BB. Analysis DOJ Log for Merrill Lynch Account for Waleed Hamed, from 05-25-2000 to 09-26-2001. (9 pp.) - **Bates® Stamp UC 000966 – UC 000974.**

Supporting Documents to Analysis:

- Merrill Lynch Statements and Portfolio for Waleed Hamed, from 05-25-2000 to 09-26-2001. (135 pp.) - **Bates® Stamp UC 000975 – UC 001109.**



- CC. Analysis DOJ Log for Merrill Lynch Account for Waleed Hamed, from 01-31-2002 to 12-31-2002. (10 pp.) - **Bates® Stamp UC 001110 – UC 001119.**

Supporting Documents to Analysis:

- Merrill Lynch Statements and Portfolio for Waleed Hamed, from 01-31-2002 to 12-31-2002. (98 pp.) - **Bates® Stamp UC 001120 – UC 001217**

- DD. Analysis DOJ Log for Merrill Lynch Account for Waleed Hamed, from 01-31-2003 to 07-31-2003. (3 pp.) - **Bates® Stamp UC 001218 – UC 001220.**

Supporting Documents to Analysis:

- Merrill Lynch Statements and Portfolio for Waleed Hamed, from 01-31-2003 to 07-31-2003. (28 pp.) - **Bates® Stamp UC 001221 – UC 001248.**

- EE. Analysis of ScotiaBank Personal Checking Acct No. 308313 for Waleed Hamed from 1997 through 2001. (3 pp.) - **Bates® Stamp UC 001249 – UC 001251.**

Supporting Documents to Analysis:

- Bank Statements from for Waleed Hamed's ScotiaBank Personal Checking Acct. No. 308313, dated 02-15-1997 to 03-08-2001. (115 pp.) - **Bates® Stamp UC 001252 – UC 001366.**

- FF. Analysis of VI Community Bank Personal Checking Acct No. 0182556086 for Waleed Hamed from 1995 through 2002. (7 pp.) - **Bates® Stamp UC 001367 – UC 001373.**

Supporting Documents to Analysis:

- Bank Statements from for Waleed Hamed's VI Community Bank Personal Checking Acct. No. 0182556086, dated 11-06-1995 to 08-10-2002. (66 pp.) - **Bates® Stamp UC 001374 – UC 001439.**

- GG. Analysis of Banco Popular Personal Checking Acct No. 194-602753 for Waleed Hamed from 1996. (4 pp.) - **Bates® Stamp UC 001400 – UC 001405.**

Supporting Documents to Analysis:

- Bank Statements from for Waleed Hamed's Banco Popular Personal Checking Acct. No. 194-602753, dated 01-02-1996 to 12-09-1996. (12 pp.) - **Bates® Stamp UC 001405 – UC 001416.**

- HH. Analysis of Banco Popular Personal Checking Acct No. 194-602753 for Waleed Hamed from 1997. (3 pp.) - **Bates® Stamp UC 001417 – UC 001421.**

Supporting Documents to Analysis:

- Bank Statements from for Waleed Hamed's Banco Popular Personal Checking Acct. No. 194-602753, dated 01-12-1997 to 12-11-1997. (12 pp.) - **Bates® Stamp UC 001422 – UC 001433.**

- II. Analysis of Banco Popular Personal Checking Acct No. 194-602753 for Waleed Hamed from 1998. (3 pp.) - **Bates® Stamp UC 001434 – UC 001436.**

Supporting Documents to Analysis:

- Bank Statements from for Waleed Hamed's Banco Popular Personal Checking Acct. No. 194-602753, dated 01-12-1998 to 12-10-1998. (12 pp.) - **Bates® Stamp UC 001437 – UC 001448.**

- JJ. Analysis of Banco Popular Personal Checking Acct No. 194-602753 for Waleed Hamed from 1999. (2 pp.) - **Bates® Stamp UC 001449 – UC 001450.**

- Supporting Documents to Analysis:

- Bank Statements from for Waleed Hamed's Banco Popular Personal Checking Acct. No. 194-602753, dated 01-11-1999 to 12-13-1999. (12 pp.) - **Bates® Stamp UC 001451 – UC 001462.**

- KK. Analysis of Banco Popular Personal Checking Acct No. 194-602753 for Waleed Hamed from 2000. (2 pp.) - **Bates® Stamp UC 001463 – UC 001464.**

- Supporting Documents to Analysis:

- Bank Statements from for Waleed Hamed's Banco Popular Personal Checking Acct. No. 194-602753, dated 01-05-2000 to 12-05-2000. (12 pp.) - **Bates® Stamp UC 001465 – UC 001476.**

LL. Analysis of Banco Popular Personal Checking Acct No. 194-602753 for Waleed Hamed from 2001. (3 pp.) - Bates® Stamp UC 001477 – UC 001479.

Supporting Documents to Analysis:

- Bank Statements from for Waleed Hamed's Banco Popular Personal Checking Acct. No. 194-602753, dated 01-08-2001 to 12-11-2001. (12 pp.) - Bates® Stamp UC 001480 – UC 001491.

MM. Analysis of Banco Popular Personal Checking Acct No. 194-602753 for Waleed Hamed from 2002. (3 pp.) - Bates® Stamp UC 001492 – UC 001494.

Supporting Documents to Analysis:

- Bank Statements from for Waleed Hamed's Banco Popular Personal Checking Acct. No. 194-602753, dated 01-02-2002 to 12-10-2002. (12 pp.) - Bates® Stamp UC 001495 – UC 001506.

13. With regard to the Relief requested in the Complaint, produce the documents that show the basis for the relief, the calculations of the amount and type of relief sought in the Complaint for the following alleged damages suffered by the Plaintiff:

a. Actual damages:

b. Punitive damages

c. Any accounting done by United of funds, assets, opportunities, and other valuables converted and or misappropriated by Defendant Waleed Hamed.

d. Costs to date of all professional fees for the audit and investigation of this matter.

**RESPONSE TO REQUEST NO. 13:**

a) Actual Damages at this time are estimated to be in excess of \$10 million dollars, excluding interests. This Answer will be supplemented once discovery is complete and an accounting is performed by a retained expert.

- b) Plaintiff is seeking punitive damages of at least treble actual damages or as may be determined by a jury.
- c) See response to (a).
- d) Cost at this time is undetermined but, such cost already exceeds \$50,000.000

14. Please produce any and all documents which support the claims asserted against Waleed Hamed in the complaint which were not submitted in response to any of the preceding document requests.

**RESPONSE TO REQUEST NO. 14:**

There no other undisclosed documents at this time. Plaintiff intends to subpoena records from Third-Parties to this action and as document become available this response will be supplement.

In addition, all documents seized by the Federal Government in the Criminal matter has not yet been returned and examined, as these documents become available, this response will be supplemented

Dated: January 14<sup>th</sup>, 2014

Respectfully Submitted,

**THE DEWOOD LAW FIRM**

  
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*Counsel for Plaintiff*

**CERTIFICATE OF SERVICE**

**IT IS HEREBY CERTIFIED THAT** a true and exact copy of the foregoing *Plaintiff United Corporation's Responses to Defendant Waleed Hamed's First Requests For Production of Documents to Plaintiff United Corporation* was served via U.S. Mail, postage prepaid, fax, electronic mail or hand delivery on this the 14<sup>th</sup> day of January 2014 to wit:

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