

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

UNITED CORPORATION,

Plaintiff,

v.

**WAHEED HAMED,
(a/k/a Willy or Willie Hamed),**

Defendant.

Case No.:2013-CV-101

ACTION FOR DAMAGES

JURY TRIAL DEMANDED

**DEFENDANT HAMED'S
RESPONSES TO REQUEST FOR ADMISSIONS**

1. Admit that you are an employee of United Corporation, and have worked at the Plaza Extra -East Store and the Plaza Extra - Tutu Park Store from at least 1990 through present.

Compound.

Admit that you are an employee of United Corporation. **Deny.**

[Admit] you have worked at the Plaza Extra -East Store and the Plaza Extra - Tutu Park Store from at least 1990 through present. **Admit.**

2. Admit that you owe a duty of loyalty and care to United Corporation as its employee.

Deny.

3. Admit that you received an employee salary as the only form of compensation from United Corporation for the years of the year you began working through 1994.

Deny.

4. Admit that since 1986 you did not receive any payroll checks drawn on the account of any entity described as a partnership.

Deny.

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5. Admit that all inventory orders for the Plaza Extra stores you have ever placed as manager /employee were on behalf of United Corporation and not on behalf of any named partnership.

Deny.

6. Admit that when you were indicted in the case of United States v. Waheed Hamed.

Admit I was indicted in the action titled U.S. v. Fathi Yusuf et. al. Deny I was indicted in any other action.

7. Admit that during the criminal proceedings in your case, you never informed the United States government, the Virgin Islands government, the District Court, or your attorneys that you were an employee of a partnership.

Deny.

8. Admit that United Corporation d/b /a Plaza Extra is currently the custodian of all operating accounts of the operations of Plaza Extra Supermarkets.

Deny.

9. Admit that you received a salary as the only form of compensation from United Corporation for the years of 1995 through 1998.

Deny.

10. Admit that you received a salary as the only form of compensation from United Corporation for the years of 1999 through 2003.

Deny.

11. Admit that you received a salary as the only form of compensation from United Corporation for the years of 2004 through 2012.

Deny.

12. Admit that you have opened at least one brokerage account to trade securities with one or more brokerage firms since 1986.

Deny.

13. Admit that you have opened and maintained, or were an authorized signatory on

at least one bank account on the island of St. Maarten.

Compound. **Deny.**

14. Admit that you have opened at least one bank account in your name in the country of Jordan and/or the West Bank, Jordan.

Deny.

15. Admit that you have opened at least one bank account in the country of Jordan for which you have control.

Deny.

16. Admit that you signed and filed (or instructed a third party to file) your 1992 tax returns with the Virgin Islands Bureau of Internal Revenue.


Admit.

17. Admit that Schedule C of your Tax Return for the year 1992 is accurate as to amounts and properly reflects the status and name of your business as 5 Corners Mini Mart.

Deny.

RESPECTFULLY SUBMITTED,

Dated: February 12, 2014



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CERTIFICATE OF SERVICE

I hereby certify that on this 12th day of February, 2014, I served a copy of the foregoing Motion by email, as agreed by the parties, on :

Nizar A. DeWood
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