

Ocean Drive Properties N.V.
Attn. Jelle Hamstra
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Sint Maarten
by Marshall and by email: hamstra5533666@gmail.com

Mr. Theo Heyliger
Guana Bay Road
Sint Maarten.
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Mr. Peter Mirpuri
by Marshall and by email: petermirpuri@yahoo.com

Mr. Danny Ramchandani
Pigeon Road 3
Sint Maarten
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Mr. R. Elferink
Trumpetshell Road 4
Sint Maarten
by Marshall and by email: Eon_6233@hotmail.com

Haarlem, 17 December 2021

Re: Zebec vs. ODP et al

Dear Sirs,

I am writing on behalf of Zebec Development Company N.V. ("**Zebec**").

As you are aware, Zebec was the initial developer of a parcel of land located within the St. Maarten cruise terminal. It ultimately failed to successfully develop the property because Royal Caribbean Cruise Ltd. and St. Maarten Quarter Development Company N.V. (jointly: "**RCCL**") refused to approve of the project, unless (i) the retail area (including food & beverage) would be limited to just 10,000 square feet, and (ii) the project would provide for "incidental commercial features" only. Once Zebec had been removed as the developer and replaced by the first addressee of this letter ("**ODP**"), both of these conditions were dropped. The project as developed by ODP is purely commercial and provides for retail space in considerable excess of 10,000 square feet.



Over the past years, Zebec investigated the reasons behind RCCL's surprising posture. Despite various obstructions - including perjury by addressees of this letter - it meanwhile brought the truth to light: there was a criminal conspiracy to have Zebec replaced by ODP in order to be in a position to siphon from the proceeds of the development, proceeds which rightfully belong to the community of St. Maarten. The addressees of this letter have in the past participated in similar schemes, in particular in respect of 'Unit 8', and in doing so have partially used the same entities. Zebec now knows and is in a position to demonstrate in court that Frivol Realty N.V., Skylight Real Estate N.V. and Private Foundation Skyline all share the same ultimate beneficiary, namely Mr. Heyliger, the second addressee of this letter. You have made strenuous efforts to hide this fact, but those efforts have been in vain.

Your participation in the scheme to have Zebec replaced by ODP in order to illegally skim the rental proceeds of the development are wrongful towards Zebec. It is irrelevant in this respect what individual actions were committed by each of the individual addressees of this letter. The addressees of this letter were part of a common scheme and shared a common goal. They are, therefore, jointly and severally liable for the damage they jointly caused.

Zebec has commissioned an expert review of the quantum of damages it sustained as a result of the inability to proceed with the development of the parcel. According to the expert report and taking into account certain proceeds of a settlement concluded in 2015, damages for which the addressees of this letter are liable amount to USD 97,177,000. My firm was instructed to commence legal action to recover such damage. Such action will be commenced in the St. Maarten court of first instance unless I receive an unconditional admission of liability from each of the addressees of this letter within two weeks after the date hereof.

Yours sincerely,

Jacob M.K.P. Cornegoor