



**Tab (2) Schedules**

GEC was victim of a ransomware attack in early 2025 and lost some of its records permanently. Following are all schedules that were not lost in the ransomware attack.

## DECLARATION OF ZAKEE ABDURRASHEED

The undersigned, pursuant to V.I.R.Civ.P. 84, declare as follows:

1. My name is Zakee Abdurrasheed. I am an adult resident of the Virgin Islands, and have personal knowledge of the facts herein stated, except as they may be declared under information and belief.
2. I am an IT consultant retained by GEC, LLC ("GEC") for the purposes of maintaining its computer and digital records systems, and have been retained in that capacity since 2009.
3. On or about February 14, 2025, GEC was the victim of a ransomware attack upon its two domain controllers, its email exchange server, the server for its Sage accounting software, its file server, and its Veeam backup server. All data on these controllers and servers were encrypted and made unavailable to GEC. GEC was unable to negotiate a resolution that would result in decryption.
4. Subsequently, GEC engaged a data recovery service company to attempt recovery of its digital business records. Recovery was only partially successful, recovering only about 75% of the emails in selected accounts deemed important, and approximately 75% of the data on the file server. The following data could not be recovered and is no longer available to GEC from those servers (without limitation):

a. Sage Accounting Software files:

- i. Payroll records (hours, wages, overtime, etc.);
- ii. Job Cost records;
- iii. Accounts receivable;
- iv. Accounts payable;
- v. Cash receipts;
- vi. Pay estimates submitted to customers;
- vii. Subcontractor billings;
- viii. Subcontractor payments;
- ix. All other digital accounting and financial records and data prior to 2/14/25. (Note: Sage Accounting Software is no longer used by GEC).

b. File Server:

- i. All construction records;
- ii. Constructions schedules;
- iii. Material Submittals;

**Declaration of Zakee Abdurrasheed**  
**Page 2 of 2**

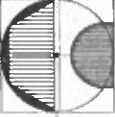
- iv. Shop drawings;
- v. Certified Payroll records;
- vi. Redlined record drawings;
- vii. Meeting minutes;
- viii. Material takeoffs;
- ix. As-built dimensions;
- x. Subcontractor drawings and submittals;
- xi. Price quotes from vendors;
- xii. Cost projections;
- xiii. Construction planning records.

5. Notwithstanding the foregoing, some very limited records and data were recoverable if they were attachments to recovered emails.

I declare under penalty of perjury that the foregoing is true and correct.

Date: 12-5-25

  
\_\_\_\_\_  
Zakee Abdurrasheed



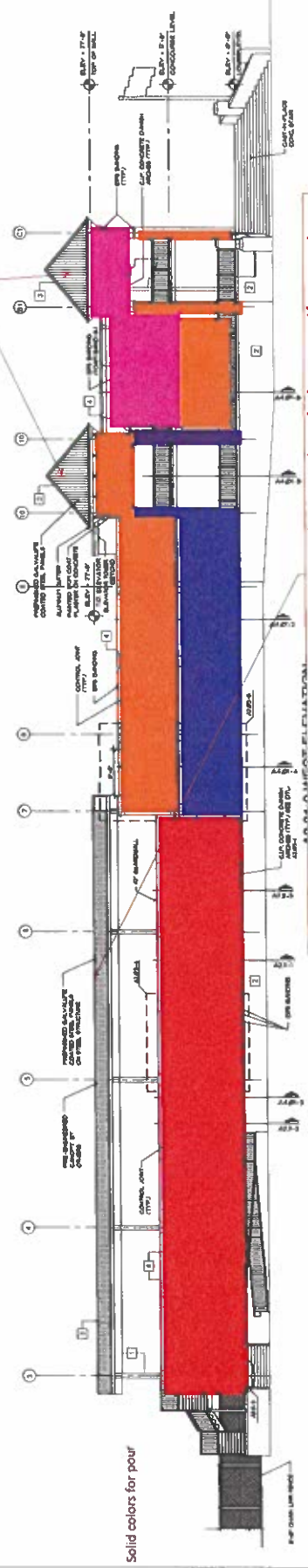
STEVEN E. HUTCHINS AIA ARCHITECTS  
 108-113 ESTATE CASTLE COMPLEX  
 CHRISTIANSTOWN, ST. CROIX  
 U.S. VIRGIN ISLANDS 00822  
 TEL 340-778-8898 FAX 340-778-7754

FRYDERIKSTED REVITALIZATION PROJECT  
 PAUL E. JOSEPH BASEBALL STADIUM  
 AND SPORT COMPLEX

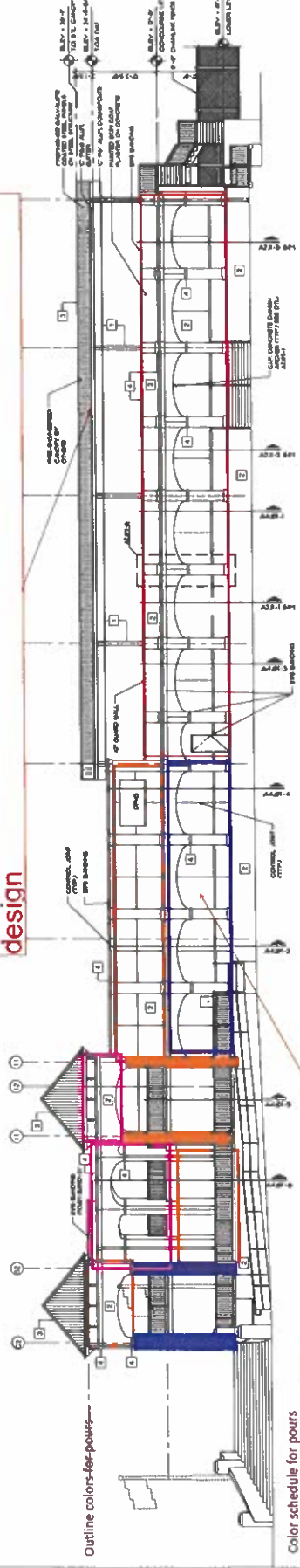
WEST, SOUTH AND  
 ENTRANCE ELEVATIONS  
 DRAWN BY: CSM/MS/ST/ST  
 DATE: 08-06-2022

SHEET NUMBER  
**A2.01**

Stair roof framing 9-1-22  
 to 10-1-22 - Metal 10-1 to 31

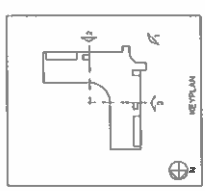


Seating roof design and construction schedule contingent on receipt of permits for GVI requested change to concrete steps and risers with benches followed by revised roof design



**PAINT COLOR LEGEND**

1	BENJAMIN MOORE PROCLAIMER (UNDERBONE CANOPY STEEL)
2	BENJAMIN MOORE CHANTRETT (DIMMER THE WALL)
3	BENJAMIN MOORE ADVANTURE (STAIR RISERS)
4	BENJAMIN MOORE WHITE (TRUSS)



A2.01-2 SOUTH ELEVATION

A2.01-1 ENTRANCE ELEVATION

Wall rub and EFIS 9-1-22 to 10-1-22  
 Paint 10-1-22 to 10-31-22




















Stair concrete from and pour 9-10-22 through 10-31-22

GFC notes to Triviana Nicholas re Facade schedule PEJ 8-15-22

**PAUL E. JOSEPH STADIUM  
FACADE SCHEDULE**

ID	Task Name	Duration	Start	Finish	st	8/7	8/14	8/21	8/28	9/4	9/11	9/18	9/25	10/2	10/9	10/16	10/23	10/30	11/6	
1	Field Level Part Plan B Walls and left Tower columns	8 days	Mon 8/15/22	Wed 8/24/22																
2	Mezzanine Level Part Plan B Walls & Left Tower	9 days	Fri 8/19/22	Wed 8/31/22																
3	Mezzanine Level Plan B Walls @ Tower Arches	15 days	Mon 8/22/22	Fri 9/9/22																
4	Plan B Tower stairs & Main Entry	36 days	Mon 9/12/22	Mon 10/31/22																
5	Wall Rub & EFIS	22 days	Thu 9/1/22	Fri 9/30/22																
6	Paint	21 days	Mon 10/3/22	Mon 10/31/22																

Project: PEJ Facade Schedule -01  
Date: Mon 8/15/22

	Task		Manual Summary Rollup
	Split		Manual Summary
	Milestone		Start-only
	Summary		Finish-only
	Project Summary		External Tasks
	Inactive Task		External Milestone
	Inactive Milestone		Deadline
	Inactive Summary		Progress
	Manual Task		Manual Progress
	Duration-only		