

IN THE SUPERIOR COURT OF THE VIRGIN ISLANDS
DIVISION OF ST. CROIX

LEE J. ROHN ,

Plaintiff,

v.

MICHAEL "REPO" SPRINGER,
CRUCIANS IN FOCUS, CLAUDE
GERARD, ADELBERT BRYAN, EDWIN
CALLWOOD, DWAYNE CALLWOOD, ,
JEFFREY MOOREHEAD and JOHN
DOES,

Defendant.

CIVIL NO. 342 2010

**ACTION FOR SLANDER
AND DEFAMATION**

JURY TRIAL DEMANDED

10 JUL 23
COMPLAINT

COMES NOW Plaintiff, by and through under signed counsel, and files her Complaint against the Defendants MICHAEL "REPO" SPRINGER, CRUCIANS IN FOCUS, CLAUDE GERARD, ADELBERT BRYAN, EDWIN CALLWOOD, DWAYNE CALLWOOD, JEFFREY MOOREHEAD and JOHN DOES as follows:

1. This Court has jurisdiction over this subject matter pursuant to 4 V.I.C. § 76.
2. Plaintiff Lee J. Rohn is a citizen of St. Croix, U.S. Virgin Islands.
3. Defendant Michael "Repo" Springer is a citizen of St. Croix, U.S. Virgin Islands.
4. Defendant, Crucians in Focus is a non-profit organization with its resident agent for service being Michael Springer. Upon information it is actually nothing more than a front for Defendant Michael "Repo" Springer.
5. Defendant Claude Gerard is a citizen of St. Croix, U.S. Virgin Islands.
6. Defendant Adelbert Bryan is a citizen of St. Croix, U.S. Virgin Islands.

7. Defendant Edwin Callwood is a citizen of St. Croix, U.S. Virgin Islands.
8. Defendant Dwayne Callwood is a citizen of St. Croix, U.S. Virgin Islands.
9. Defendant Jeffrey Moorehead is a citizen of St. Croix, U.S. Virgin Islands.
10. Defendants, John Does are others involved in DemManSay.com and/or Crucians in Focus and or have conspired and participated in the concerted efforts to defame Plaintiff and to ruin her reputation.
11. Defendant Springer in his individual capacity and as a representative of Crucians in Focus and/or Dem Man Say in mid-January 2010 attempted to extort money from Plaintiff. To wit he appeared at Plaintiff's office on a Saturday without an appointment. He came into Plaintiff's office uninvited and sat down and announced to Plaintiff that she needed to give him money. When asked why, he claimed he had a project for children he wanted to do. Plaintiff explained she had her own summer camp program for children. Plaintiff further explained to Defendant Springer that he was not the type of person Plaintiff would ever do business with or give money to given her understanding of Springer's past involvement in drug dealings and having been an informant against Virgin Islands citizens and invited Mr. Springer to leave the office and not return. Springer threatened Plaintiff she, "would be sorry."
12. Plaintiff refused to do business with Defendant Springer because he is a womanizer, abuses women, makes unwanted sexual comments to women, has a history of violence, HAS AN ALCOHOL PROBLEM and is well known not to be able to manage money, thus his nickname "Repo."

13. Plaintiff herself had been the subject of unwanted and repulsive verbal sexual assaults by Defendant Springer with graphic descriptions of desired sexual acts.
14. Upon information Defendant Springer's nickname "Repo" is a result of his frequent defaulting on car payments such that his vehicles are repossessed.
15. Plaintiff has been quite clear to Defendant Springer that she finds him unattractive and repulsive which has angered Springer and caused him to feel malice against her.
16. Defendant Adelbert Bryan has a long history of malice against Plaintiff.
17. Defendant Bryan is well aware that Plaintiff has in her possession the FBI investigation file of former Police Chief, Ramon Davila. Contained in that report is an FBI investigation into Ramon Davila's cover up of Adelbert Bryan's murder of his son with an illegal, unlicensed weapon. That report substantiates that the weapon used in the murder was stolen from the Police Department's Evidence Room and as such could not legally be licensed. The FBI report confirms that Davila issued a back dated permit for Defendant Bryan's unlicensed weapon to prevent his arrest. The report further verifies that the evidence against Davila and Bryan was given to the Attorney General who ordered the FBI agent out of his office and declared he would not be told who to prosecute. See Exhibit 1.
18. Defendant Bryan developed malice against Plaintiff based on her knowledge and evidence of his illegal acts and has historically attempted to defame and discredit her to attempt to protect his own reputation.

19. The malice is so extreme that at a hearing in the St. Thomas District Court in the matter of Anderson v. VIPD, Defendant Bryan threatened to throw Plaintiff over the third floor balcony and had to be restrained.
20. Plaintiff further represented the St. Croix Horsemen at a period of time when Adelbert Bryan was employed by Traxco. Adelbert Bryan was abusive to the Horsemen and assaulted and/or threatened to assault the Horsemen. As a result, Plaintiff complained about Bryan and requested his termination. Bryan was terminated. He then threatened again to assault and batter Plaintiff.
21. Defendant Bryan has repeatedly and systematically defamed Plaintiff ever since learning of Plaintiff's knowledge as to his illegal acts and attempts to cover up those acts to get special treatment
22. Defendant Bryan both on the various radio shows and with others in the community and on TV has repeatedly made false accusations against Plaintiff to include but not be limited to that Plaintiff is a drug dealer, that Plaintiff has engaged in a cover up of her actions, that Plaintiff should be imprisoned.
23. Defendants Springer, Moorhead, Gerard, Edwin and Dwayne Callwood and Crucians in Focus and upon information Defendants John Does and Dem Man Say caused to be published on the internet false "stories" and e-mails. The stories included a particularly unflattering photograph of Plaintiff and text that falsely stated Plaintiff had plead guilty to possession of crack cocaine. It also falsely stated that Plaintiff had unethically abandoned her client Adlah "Foncie" Donastorg in order to obtain probation on her crack cocaine charges and other similarly defamatory statements.

24. Upon information Defendants "Repo" Springer and upon information Claude Gerard , Edwin Callwood, Dwayne Callwood, Jeffrey Moorhead, and John Doe Defendants also caused to be published on the website, DemManSay.com, knowingly false and defamatory statements against Plaintiff to include but not be limited to: that Plaintiff was filing this suit as the request of the Governor deJongh; Plaintiff was involved in drugs and almost arrested in Santo Domingo; Plaintiff is going to plead guilty to crack cocaine charges; Plaintiff is a cocaine addict/dealer. That Plaintiff is going to ditch her client Senator Adlah "Foncie" Donastorg; that the Governor required Plaintiff to bring this law suit. That Plaintiff was smuggled out of a hotel room in Santo Domingo just as the room was about to be raided. That Plaintiff hired a pilot to smuggle Plaintiff out of Santo Domingo; that Plaintiff is a fugitive from criminal charges filed against her in Santo Domingo; that Plaintiff had agreed to plea; that Plaintiff caused to have the plea on a non plea day; that Plaintiff received preferential treatment by being allowed to pay a fine; and other similar defamatory and slanderous statements such as Plaintiff arranged for a pardon from the Governor if she stopped representing her client Senator Adlah Donastorg; that Plaintiff faced 15 years incarceration for drug charges. All these statements were made while Defendants knew full well Plaintiff had paid a fine for two (2) joints to take to her "husband" in Puerto Rico whose father had been terminally injured in a hit and run accident and the charges brought against her had been politically arranged by Jeffrey Prosser and Kenneth Mapp.

25. Upon Information and belief all Defendants have made similar such statements to the public over the past two (2) years.
26. The motive of the defamation *per se* was to irretrievably ruin Plaintiff's reputation in the community such as to satisfy the malice Defendants have against Plaintiff.
27. The actions of the Defendants have and will continue to ruin Plaintiff's reputation in the community such that without a restraining order the damage cannot be rectified by any other means. Monetary damages are incapable of returning Plaintiff reputation to her.
28. In addition, Defendants' actions have damaged Plaintiff economically, caused her mental anguish, pain and suffering and loss of enjoyment of life which are likely to continue into the foreseeable future.
29. The actions of Defendants constitute intentional infliction of emotional distress.
30. The actions of Defendants are so outrageous and done with such malice as to entitle Plaintiff to an award of punitive damages.


WHEREFORE, Plaintiff prays for a restraining order, preliminary injunction, and permanent injunction prohibiting Defendants from making any similar statements about of regarding Plaintiff.

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RESPECTFULLY SUBMITTED
LAW OFFICES OF ROHN AND CARPENTER, LLC
Attorneys for Plaintiff

DATED: July 23, 2010

BY: _____


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