

“SS Tax Evaders Issues SOS”



Lee Rohn

DemMansay.com has obtained a copy of the lawsuit filed by Attorney Lee “Pothead” Rohn on behalf of Sen. Alicia “Tradewind” Hansen against Hugh Pemberton, Reef Broadcasting, and Jamila Russell. A reading of the complaint shows why it should be “illegal” for people to be allowed to clog up the Court’s docket with such rubbish.

We struggled with deciding whether or not to give this team any validation by even publishing this nonsense. In the end, we felt obligated to let the world know just how asinine they are. Furthermore, it seems like this complaint was composed while these two pathological liars were under the influence of a narcotic. We know of the hazards of second-hand smoke. It seems like that Hansen may have induced a large amount of such smoke, while in the presence of “Pothead” during her daily marijuana sessions. So, we thank both for providing material for a “This is what continued use of drugs can do” Public Service Announcement.

It is public knowledge that DeWolf gave “Tradewind” Chucky over \$50,000 to pay for radio spots during her last campaign. It’s also public knowledge that, true to her reputation as a “Bad-Pay”, Chucky pocketed a portion of the funds and ran up a bill with several radio stations, until they threatened to pull the spots from their rotation. It’s also public knowledge that DeWolf then had to have his co-conspirators come up with additional monies to pay off the debt.

It is a fact that Chucky and her husband were involved in a scheme that defrauded the government out of large sums of money. By the way Chuckster, have you completed your community service?

Between these two, they owe the People of the US Virgin Islands in excess of \$1 Million in taxes. We suggest that you take your asses down to IRB and pay unto the people of the US Virgin Islands what is rightfully ours, and stop wasting the Court's time with this rubbish. If you insist on continuing with this nonsense there are a number of glaring omissions from your complaint. We're more than happy to point them out to you.

- Lee Rohn is an attorney in St Croix, VI still practicing despite her admission in documents that she filed in the Superior Court of the VI that she was smuggling marijuana, a controlled substance, through the Rohlson airport
- Lee Rohn is a document pathological liar as documented by the Courts
- Lee Rohn owes the Government of the VI over \$800,000 in taxes
- Lee Rohn was also facing drug issues in Texas
- Lee Rohn continues to hold a valid Driver's License in violation of VI Law relating to persons convicted of drug possession
- Alicia "Tradewind" Hansen is the reigning VI Queen of Rhetoric
- Alicia "Tradewind" Hansen is a tax-evader
- Alicia "Tradewind" Hansen has stolen \$\$ from the people of the USVI by not filing and paying her taxes
- Alicia "Tradewind" Hansen is a sitting VI Senator in direct violation of VI Law
- Alicia "Tradewind" Hansen doesn't have, and never had, a solution for the LEAC
- Alicia "Tradewind" Hansen's relatives have received employment, for which they are not qualified, from the DeWolf administration

Nuff said !!!

SUMMONS

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

ALICIA "CHUCKY" HANSEN,

Plaintiff,

v.

JAMILA RUSSELL, HUGH
PEMBERTON, REEF BROADCASTING,
INC. d/b/a WDHP,

Defendants.

CIVIL NO. 11-CV-500


ACTION FOR DAMAGES

JURY TRIAL DEMANDED

TO: JAMILA RUSSELL
ADDRESS: #79 A CASTLE COAKLEY
CHRISTIANSTED, VI 00820

Within the time limited by law (see note below) you are hereby required to appear before this Court and answer to a complaint filed against you in this action and in case of your failure to appear or answer, judgment by default will be taken against you as demanded in the complaint, for damages.

Witness my hand and the Seal of the Court this 7 day of NOV., 2011.



Lee J. Rohn, Esquire
VI Bar No. 52
Law Offices of Rohn and Carpenter, LLC
1101 King Street
Christiansted, VI 00820
Telephone: (340) 778-8855
Facsimile: (340) 773-2954

VENETIA H. VELAZQUEZ
Clerk of the Court

By: 

Court Clerk II

Note: The defendant, if served personally, is required to file his answer or other defense with the Clerk of this Court, and to serve a copy thereof upon the plaintiff's attorney within twenty (20) days after service of this summons, excluding the date of service. The defendant, if served by publication or by personal service outside the jurisdiction, is required to file his answer or other defense with the Clerk of this Court, and to serve a copy thereof upon the attorney for the plaintiff within thirty (30) days after the completion of the period of publication or personal service outside of the jurisdiction.

IN THE SUPERIOR COURT OF THE VIRGIN ISLANDS

DIVISION OF ST. CROIX

ALICIA "CHUCKY" HANSEN,

Plaintiff,

v.

JAMILA RUSSELL, HUGH
PEMBERTON, REEF BROADCASTING,
INC. d/b/a WDHP

Defendants.

CIVIL NO.

SK.11.CV.502

ACTION FOR DEFAMATION,
SLANDER AND DAMAGES

JURY TRIAL DEMANDED

COMPLAINT

COMES NOW Plaintiff, Alicia "Chucky" Hansen, by and through her undersigned counsel, and files her Complaint against Defendants, and alleges the following:

1. This Court has jurisdiction over this matter pursuant to 4 V.I.C. §76.
2. Alicia "Chucky" Hansen is a citizen of the U.S. Virgin Islands.
3. Defendant Reef Broadcasting, Inc. ("Reef Broadcasting") is a U.S. Virgin Islands corporation that does business in the Virgin Islands as WDHP.
4. Defendant Hugh Pemberton is a citizen of St. Croix, U.S. Virgin Islands.
5. Hugh Pemberton so runs Reef Broadcasting, Inc such that it is really his alter ego. He fails to adhere to corporate requirements, pay corporate fees, and hold corporate meetings such that he is legally personally liable for the actions of Reef Broadcasting.
6. Defendant Jamila Russell is a citizen of St. Croix, U.S. Virgin Islands.

7. Reef Broadcasting and Pemberton operate Station 1620 am "The Reef" as a political soap box to air their political beliefs either personally or through persons designated to call in and speak on the radio. They use the station as a tool to harm persons they have malice against. They fail to adhere to FCC Rules and Regulations in their conduct. Said Defendants fraudulently deceives the public that it has open call in shows when in reality many of the shows limit who can call in so that only the view's Defendants want aired are expressed.
8. Defendant Jamila Russell, a former employee of the V.I. Department of Licensing and Consumer Affairs who pleaded guilty to illegally issuing licenses to contractors, was previously sentenced to two years probation and ordered to pay \$5,000.00 restitution to the government after her conviction on five counts of making fraudulent claims upon the Government of the Virgin Islands.
9. Defendant Jamila Russell, on her own and on behalf of Defendants Reef Broadcasting and Hugh Pemberton, knowingly, regularly, and maliciously publishes false statements about others, such as the false statements about the Plaintiff that form the basis for this lawsuit.
10. Prior to the election of 2010, Hugh Pemberton and the Reef used his radio station to advise the public not to vote for Celestino White, Louls Hill, Carlton

Dowe and Samuel Sanes in violation of FCC rules and regulations as part of his personal vendetta and malice against them.

11. Prior the 2010 election, Pemberton and the Reef improperly used their radio station to maliciously malign John deJongh in their vendetta not to have him elected. In doing so,, Defendants Pemberton and the Reef believed and published that the Plaintiff was in support and aiding deJongh which resulted in Defendants Pemberton and Reef making malicious false statements about Plaintiff to include but not be limited to:

That Plaintiff's campaign was supported by John deJongh.

12. After the 2010 election and the Majority of the Senate was formed, there was a determination that if Ronnie Russell was to become President of the Senate he would not be allowed to employ Jamila Russell in any capacity for the Senate as a result of her association with Pemberton and the Reef and her participation in a course of conduct of making maliciously defamatory statements about senators.
13. Ronnie Russell had previously, as compensation to Jamila Russell for prior defamatory statements made about Russell's opponents on the radio station, promised her that when he was elected he would hire her at a significant salary at the legislature.
14. After the meetings with the Majority of the Senate about Jamila Russell, and as a result of Ronnie Russell wanting to be President of the Senate, Russell

falsely represented that he had never promised to hire Jamila Russell and would never hire her for any capacity at the Senate. He further indicated that he held her in such disregard that he would never allow her to be near his Senate office or even his children.

15. While Plaintiff was not actively involved in this decision by the Majority, Jamila Russell and Ronnie Russell erroneously believed she was which created malice against Plaintiff. In addition, Jamila Russell has repeatedly falsely broadcast on her radio show that Plaintiff dislikes her personally; thus Jamila Russell has personal malice against Plaintiff as a result of her belief that Hansel dislikes her.
16. Despite Ronnie Russell's representations to the Senators and the public that he agreed Jamila Russell was not a proper person to be hired by the Senate, he secretly entered into a series of contracts with Jamila Russell to be paid from the Senate Budget.
17. These contracts consisted of three month contracts beginning in March 2011 for \$10,000 each contract to work outside of Senator Russell's office as a "media aid" and supposedly required her to work 40 hours a week.
18. Contemporaneous with these contracts, Jamila Russell began to prevent persons on her radio show from making negative comments about Ronnie Russell and simultaneously used her radio show to attack and/or defend any

persons who were taking positions contrary to Ronnie Russell or whom she had malice towards.

19. She took these actions with the full knowledge and approval and authorization by Pemberton and the Reef.
20. Once the biased behavior began by Jamila Russell, members of the Senate Majority began to question Ronnie Russell as to whether he had any financial agreements using Senate funds with Jamila Russell. On one occasion, he was so confronted by Senator Sanes and Ronnie Russell's response was "I don't think so but I will check into it" (at that point in time Jamila Russell was into her second contract).
21. Thereafter at several other Senate Majority meetings, Senator Russell repeatedly falsely denied Jamila Russell was under contract and continued to represent that he held her in such disregard he would never hire her and falsely stated he never listened to 1620 am as the statements made on such station were so disgraceful that he wouldn't listen to them.
22. From March 2011 until October 2011, when Plaintiff would disagree with positions taken by Ronnie Russell, Defendants would make her the target of malicious defamatory attacks. These attacks included but were not limited to the following:

- a. When the 8% pay cut was sponsored by Russell, Plaintiff objected. Jamila Russell and Defendants attacked Plaintiff by falsely claiming she was grand standing, trying to fool the people;
 - b. That Plaintiff's motivation for her actions against Senator Russell's positions was because Plaintiff was running for Congress;
 - c. That Plaintiff's letter to the President made Plaintiff an embarrassment to the Virgin Islands.
23. Prior to September 14, 2011, an anonymous source provided Plaintiff with proof that Senator Russell indeed had his niece Jamila Russell under contracts paid for by Senate funds
 24. Plaintiff revealed these contracts to other Senate members at a Senate Majority meeting on September 14, 2011. (Exhibit 1).
 25. At that meeting, Ronnie Russell represented that he had "given her some little thing" because she was in financial trouble, because his family forced him to do so but kept falsely representing it was only a small amount of money.
 26. At that point, Defendants through Ronnie Russell were informed that Plaintiff was aware of the contracts and going to make trouble about him. As a result, Defendants increased their malicious defamation to attempt to discredit Plaintiff so that when she revealed the information she would be so discredited that she would not be taken seriously.

27. Defendants Jamila Russell, Hugh Pemberton and Reef Broadcasting make sure that the false statements they publish support the views of their supporters, those acting in concert with them, such as Ronald Russell, and the large corporations that are against Alicia "Chucky" Hansen.
28. On October 13, 2011, the Defendants published a series of defamatory statements that were malicious and slanderous and slanderous *per se* claiming that the Plaintiff, Alicia Hansen, is a thief and a convicted felon who stole from and defrauded the Government of the Virgin Islands when they know such statements are false.
29. The Defendants falsely claimed and inferred over the radio airwaves on October 13, 2011, through their agent, Jamila Russell, false statements concerning the Plaintiff, and the Defendants published the false statements as if they were true, when even a modicum of proper research would have disclosed they were not true, these false statements include but are not limited to:
- a. false statements that Plaintiff, Alicia Hansen, "thief plenty and "she trying to thief again [with PCG Global]";
 - b. false statements and remarks made to infer that Plaintiff, Alicia Hansen, committed criminal acts in connection with "Ashley Andrews" and the sewer project and that Ashley Andrews is in jail while Plaintiff

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 - a. false statements that Plaintiff, Alicia Hansen, "thief plenty and "she trying to thief again [with PCG Global]";
 - b. false statements and remarks made to infer that Plaintiff, Alicia Hansen, committed criminal acts in connection with "Ashley Andrews" and the sewer project and that Ashley Andrews is in jail while Plaintiff

is "getting away with it"; when actually Andrews charges and conviction were not related to Hansen;

- c. false statements that Plaintiff, Alicia Hansen, is a "convicted felon" and other slanderous statements and innuendo intended to defame and to discredit her when Defendants knew she has never been convicted of any felony;
- d. that she had failed to complete her community service when Defendants knew she performed far more community service than she was required to;
- e. that she had defaulted on her agreement with the Government to pay her back taxes when she is current on that agreement.

30. The Defendants published these false statements and remarks concerning the Plaintiff on October 13, 2011 with actual malice and with reckless disregard for whether they were true or false and in fact with knowledge they were false.

31. Upon information, Defendants have had persons call into the radio show as if they were persons they are not and make false statements as if they represent Senator Hansen or her staff.

32. Defendants have also had persons call into the radio station as if they are "independent callers" who are actually making statements to benefit Defendants and to discredit Plaintiff.

- 33. The Defendants acted with reckless disregard for the truth or falseness of the outrageous statements that they published concerning the Plaintiff. This includes but is not limited to:**
- a. knowing and/or failing to ascertain the actual facts concerning past unsuccessful prosecution of the Plaintiff by the United States Government which resulted in absolutely no felony convictions against the Plaintiff and the Court dismissing the same;**
 - b. knowing that there is no support whatsoever to justify referring to the Plaintiff as a "thief" but nonetheless calling her a thief on the radio and claiming that she has "thief plenty" and is "trying to thlef again [with PCG Global]";**
 - c. knowing false statements that Plaintiff, Alicia Hansen, committed criminal acts in connection with "Ashley Andrews" and the sewer project and that while Andrews is in jail the Plaintiff is "getting away with it" when Plaintiff was in no way associated with that prosecution;**
 - d. false statements that Plaintiff, Alicia Hansen, is a "convicted felon" which she has never been convicted of a felony and other slanderous statements.**
- 34. Such reasonable investigation into the truth of the allegations should have included reviewing the court files to ascertain what allegation were made against Alicia Hansen by the United States Government, which allegatlons**

Involving any alleged felony were in fact dismissed by the Court *with prejudice* with no felony convictions against the Plaintiff whatsoever.

35. Defendants Reef Broadcasting and Hugh Pemberton ratified, aided and abetted, encouraged, allowed, and approved Defendant Jamila Russell's conduct and the publication of the false statements and defamatory statements that are the subject of in this lawsuit.
36. Defendants Reef Broadcasting and Pemberton allowed Defendant Jamila Russell to publish statements concerning the Plaintiff on the radio when it was well known to those defendants that Jamila Russell has long-standing personal animosity and malice toward the Plaintiff as does the Reef and Pemberton.
37. The actions of the Defendants caused the Plaintiff to suffer humiliation, loss and ruination of reputation, severe emotional distress, mental anguish, pain and suffering and loss of enjoyment of life, all of which are expected to continue into the foreseeable future.

COUNT I

38. Plaintiff realleges the allegations in Paragraphs 1 through 38 above as through fully set forth herein.
39. The actions of Defendants constitute defamation, slander, and slander *per se*.

40. As a result, the Plaintiff has been damaged as alleged herein.

COUNT II

41. Plaintiff realleges the allegations in Paragraphs 1 through 41 above as through fully set forth herein.

42. The actions of Defendants constitute intentional infliction of emotional distress.

43. If not intentional then they constitute negligent infliction of emotional distress.

44. As a result, the Plaintiff has been damaged as alleged herein.

COUNT III

45. Plaintiff realleges the allegations in Paragraphs 1 through 45 above as through fully set forth herein.

46. The actions of the Defendants were so illegal, and done with such outrageous and/or reckless disregard for the rights and interests of the Plaintiff, as to entitle her to an award of punitive damages.


WHEREFORE, the Plaintiff prays for damages as they may appear, compensatory and punitive pre and post judgment interest, punitive damages, costs and fees and such other relief as this court deems fair and just.

Alicia "Chucky" Hansen v. Jamila Russell, et al. Civil No. _____
COMPLAINT
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LAW OFFICES OF ROHN AND CARPENTER, LLC
Attorneys for Plaintiff

DATED: November 4, 2011

BY: _____


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