

**IN THE DISTRICT COURT OF THE VIRGIN ISLANDS
DIVISION OF ST. CROIX**

LARRY WILLIAMS and LnL PUBLISHING, INC

Plaintiffs,

v.

GENESIS FINANCIAL TECHNOLOGIES, INC.,
GLEN LARSON and PETE KILMAN

Defendants.

CIVIL NO. 105/2012

**BREACH OF CONTRACT
INTENTIONAL MISREPRESENTATION
(FRAUD)
TRESPASS TO PERSONAL PROPERTY
TORTUOUS DESTRUCTION OF PROPERTY
VIOLATION OF 18 USC 1030
CIVIL CONSPIRACY TO VIOLATE 18 USC §1030,
TO DESTROY PERSONAL PROPERTY AND TO
COMMIT TRESPASS TO PERSONAL PROPERTY
CONVERSION OF INTELLECTUAL PROPERTY
RESTRAINING ORDER REQUEST**

**ACTION FOR DAMAGES
JURY TRIAL DEMANDED**

MOTION FOR *PRO HAC VICE* ADMISSION OF SCOTT JOHNSON, ESQ.

1. This motion for admission *pro hac vice* is being filed pursuant to Local Rule of Civil Procedure 83.1 on behalf of:

Scott Johnson
Sparks Willson Borges Brandt & Johnson, P.C.
24 South Weber, Suite 400
Colorado Springs, Colorado 80903-1928
Tel: (719) 634-5700
Fax: (719) 633-8477
swj@sparkswillson.com

2. The applicant represents Defendants, Genesis Financial Technologies, Inc., Glen Larson and Pete Kilman.

3. The applicant is a member in good standing of the bar of the State of Colorado, is not the subject of any disciplinary matters, and will abide by the rules of the United States District Court of the United States Virgin Islands (“District Court”).

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Motion for Pro Hac Vice Admission

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4. Applicant shall be associated in this case with the following attorney who is a member of the Bar of the Virgin Islands and of the District Court: Lisa Michelle Kömives.

5. Applicant and associated local counsel have read and shall comply with all applicable rules, including the Local Rules of Civil Procedure.

6. Applicant has never been admitted *pro hac vice* to this Court.

7. The requisite declaration of applicant, to which is appended: 1) the completed District Court Pro Hac Vice Application; and 2) proof of current eligibility to practice law in the State of Colorado by the highest court of those districts, is attached as **Exhibit 1**.

8. The requisite declaration of undersigned local counsel is attached as **Exhibit 2**.

9. A proposed order is attached for the Court's consideration as **Exhibit 3**.

Respectfully Submitted,

Dated: December 18, 2012.

s/ Lisa Michelle Kömives

Ravinder Nagi

V.I. Bar No.: 1034

Lisa Michelle Kömives

V.I. Bar No.: 1171

BOLTNAGI PC

5600 Royal Dane Mall, Suite 21

St. Thomas, VI 00802

(T) 340-774-2944

(F) 340-776-1639

rnagi@vilaw.com

lkomives@vilaw.com

CERTIFICATE OF SERVICE

I hereby certify under the penalty of perjury that I served the foregoing, MOTION FOR PRO HAC VICE ADMISSION OF SCOTT JOHNSON, ESQ., this the 18th day of December, 2012, on:

Joel H. Holt, Esq.
Joel H. Holt, Esq., PC
2132 Company Street
Christiansted, St. Croix
USVI 00820
holtvi@aol.com

via: CM/ECF | Mail | Fax | Hand Delivery | Email

s/ Lisa Michelle Kömives
Lisa Michelle Kömives

EXHIBIT 1

**IN THE DISTRICT COURT OF THE VIRGIN ISLANDS
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**DECLARATION OF SCOTT JOHNSON, ESQ. IN SUPPORT OF
MOTION FOR PRO HAC VICE ADMISSION**

STATE OF COLORADO)
) ss:
COUNTY OF EL PASO)

I, Scott W. Johnson, Esq., pursuant to 28 U.S.C. § 1746, hereby affirm that the following is true and correct under the penalty of perjury:

1. I am a resident of the state of Colorado and my professional address is 24 South Weber, Suite 400, Colorado Springs, Colorado 80903-1928.
2. I am seeking admission to this Court in the above-captioned matter.
3. I am licensed to practice law by the state of Colorado and am admitted to the full practice of law therein. A Certificate of Good Standing from the highest court in Colorado evidencing my eligibility to practice law in that state is attached hereto as **Exhibit A**.
4. I have never been denied *pro hac vice* admission to any court or jurisdiction.

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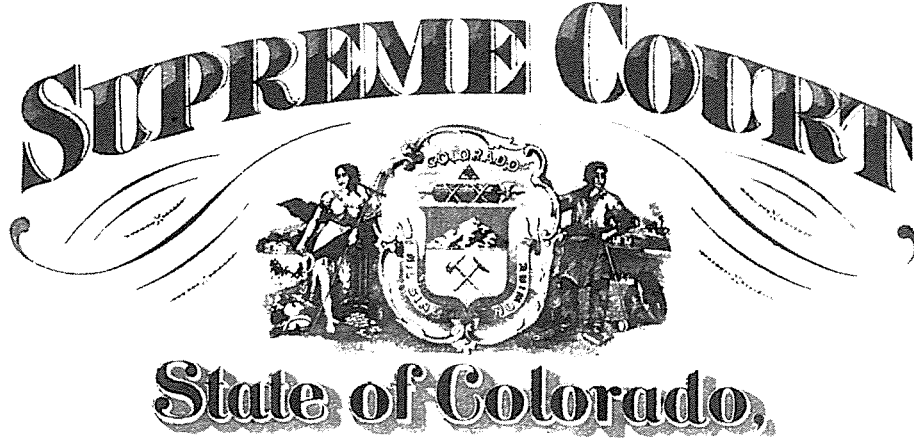
5. I have completed and executed the United State District Court of the United States Virgin Islands' "Pro Hac Vice Application." A copy is attached hereto as **Exhibit B**.

6. I acknowledge by this declaration that the United States District Court of the Virgin Islands, or it designee, may make further inquiry with any government or private entity or individual concerning myself, in furtherance of this application.

DATED: December 14, 2012.


Scott W. Johnson

EXHIBIT A



STATE OF COLORADO, ss:

I, Christopher T. Ryan Clerk of the Supreme Court of the State of Colorado, do hereby certify that

SCOTT W JOHNSON

has been duly licensed and admitted to practice as an

ATTORNEY AND COUNSELOR AT LAW

within this State; and that his/her name appears upon the Roll of Attorneys and Counselors at Law in my office of date the 25th

day of May A. D. 1983 and that at the date hereof

the said SCOTT W JOHNSON

is in good standing at this Bar.



IN WITNESS WHEREOF, I have hereunto subscribed my name and affixed the Seal of said Supreme Court, at Denver, in said State, this

28th day of November A. D. 2012

Christopher T. Ryan

Clerk

By Carla Trujillo

Deputy Clerk

EXHIBIT B

DISTRICT COURT OF THE VIRGIN ISLANDS

PRO HAC VICE APPLICATION

You must fill in all blanks and answer all questions. If a particular question does not apply to you, write "none" or "N/A". Applications which are not properly completed will be returned.

NAME: Scott W. Johnson
FIRM: SPARKS WILLSON BORGES BRANDT & JOHNSON PC
ADDRESS: 24 S. Weber St., Suite 400, Colorado Springs, CO 80903
MAIN PHONE: (719) 634-5700
FAX NO.: (719) 633-8477
EMAIL: swj@sparkswillson.com

Case caption for which admission is sought: *Larry Williams, et al. v. Genesis Financial Technologies, Inc., et al.*, Civil No. 105/2012
Motion made by: Lisa Michelle K mives, V.I. Bar No.: 1171
Party applicant represents: Defendants

A. BACKGROUND QUESTIONNAIRE

Please answer these questions yes or no. If you answer yes to any of these questions you must submit a statement under the penalties of perjury which includes the relevant facts, court, charge, date, whether the occurrence was disclosed to the highest court of the state(s) in which you are admitted, disposition, whether the occurrence was an isolated incident, and any other facts you deem relevant.

1. Are there any disciplinary proceedings pending against you?
 YES NO
2. Have you ever been denied admission to practice, disbarred, suspended from practice, or disciplined by any court or bar authority?
 YES NO
3. If you have been suspended or disbarred from the practice of law by any court or bar authority, have you been reinstated?
 YES NO N/A
4. Have you ever resigned from the practice of law in any court?
 YES NO

5. Excluding traffic violations punishable by fine only, have you ever been convicted of, or entered a plea of no contest to, any crime or are any criminal charges pending against you?

YES NO

6. Have you ever been held in contempt of court?

YES NO

7. Have you ever been denied *pro hac vice* admission in a jurisdiction?

YES NO

B. APPLICANT'S CERTIFICATION

1. I have been admitted to practice law in the following jurisdictions (states, territories, or the District of Columbia):

COURT	DATE OF ADMISSION/BAR NO.
COLORADO	MAY 25, 1983/12830

2. Unless otherwise indicated in Section A, I am a member in good standing of the bars of each of the jurisdictions listed above.

3. I am familiar with the Rules of Professional Conduct, the Federal Rules of Civil and Criminal Procedure, the Federal Rules of Evidence, and the Local Rules of the District Court of the Virgin Islands.

4. My principal law office is located in Colorado Springs, CO.

5. I am a member of the bar of the following United States Courts:

U.S. COURT	DATE OF ADMISSION/BAR NO.
U.S. DISTRICT COURT – COLORADO	JUNE 1, 1983
10 TH CIRCUIT COURT OF APPEALS	JUNE 6, 1983

6. Have you ever been admitted *pro hac vice* in any previous matters in the District Court of the Virgin Islands?

YES NO

If yes, please indicate the case name, case number, date of previous pro hac vice admission to this Court.

CASE NAME / NUMBER	DATE OF PRO HAC VICE ADMISSION	CASE STATUS
_____	_____	_____

7. I understand that it is my responsibility to notify the Attorney Admission Coordinator of any change in my address.
8. I understand that I submit myself to the jurisdiction of this Court for any disciplinary action to which I may be subject.

I hereby certify under the penalties of perjury that the foregoing statements and answers are true and correct.



 Signature _____ 12-14-12

For Court Use Only

Fee: Check Cash Amount: _____

Staff Notes

(THIS APPLICATION SHOULD ACCOMPANY THE MOTION FOR ADMISSION AND BE ATTACHED TO ALL COPIES FORWARDED TO THE COUNSEL OF RECORD.)

EXHIBIT 2

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4. I have provided a copy of the Local Rule of Civil Procedure to Attorney Johnson and will provide him with assistance and counsel regarding all applicable local rules.

5. The requisite declaration of Scott Johnson, Esq., as well as the requisite United States District Court of the U.S. Virgin Islands *Pro Hac Vice* Application completed and signed by Attorney Johnson, are being submitted contemporaneously herewith.

DATED: December 18, 2012.



Lisa Michelle Kömives

EXHIBIT 3

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ORDER ADMITTING COUNSEL *PRO HAC VICE*

Upon consideration of the Motion for *Pro Hac Vice* Admission of Scott Johnson, Esq. to the Bar of the United States District Court in and for the United States Virgin Islands ("Motion"), it is **ORDERED** that the Motion is hereby **GRANTED** and Scott Johnson, Esq. is hereby admitted, *pro hac vice*, to appear before this Court in all proceedings in this case.

DATED: _____, 20____.

HON. WILMA A. LEWIS
United States District Court Judge

ATTEST:
Glenda Lake, Esq., Clerk of the Court

By: _____
Deputy Clerk