

IN THE DISTRICT COURT OF THE VIRGIN ISLANDS

DIVISION OF ST. CROIX

ELEANOR ABRAHAM ET AL.,

Plaintiff(s),

v.

ST. CROIX RENAISSANCE GROUP, LLLP,

Defendant(s).

CIVIL NO. 12-CV-0011

ACTION FOR DAMAGES

JURY TRIAL DEMANDED

PLAINTIFFS' MOTION FOR LEAVE TO FILE FIRST AMENDED COMPLAINT

Plaintiffs, by and through their undersigned Counsel, move to amend their Complaint to (1) remove names of Plaintiffs that were inadvertently duplicated, identify the proper Plaintiffs in interest for minors and others lacking the capacity to sue, and add Plaintiffs to the caption that were inadvertently omitted but identified in body of Complaint and vice versa; and (2) add facts and address other issues raised in Defendant's combined Motion for More Definite Statement and Motion for Severance¹ which is pending.

Plaintiffs have attached a red-lined version showing their proposed amendments to the Complaint and the nature of the changes. **Exhibit 1**, attached hereto, shows the changes to the names of the Plaintiffs. Additionally, **Exhibit 2**, attached hereto is a non-redlined view of the proposed First Amended Complaint.

I. Introduction

In this lawsuit, over 400 St. Croix residents and property owners seek compensatory damages, punitive damages, and injunctive relief from Defendant St. Croix Renaissance

Abraham et al. v. St. Croix Renaissance Group, CIVIL NO. 2012-11
PLAINTIFFS' MOTION FOR LEAVE TO FILE FIRST AMENDED COMPLAINT
Page 2

Group ("SCRG"), which has owned and/or operated the St. Croix Alumina Refinery since 2002 and has allowed (and continue to allow) fugitive toxic materials to escape its premises and bombard nearby neighborhoods, causing damage to persons and property. Defendant has moved this Court for a More Definite Statement and to sever the over 400 Plaintiffs' claims on the ground that the Complaint does not provide enough detail to put Defendant on notice of the claims against it. Plaintiffs maintain that the Complaint, when viewed in the light most favorable to Plaintiffs, provides sufficient factual detail such that FRCP 12(e) relief for a more definite statement is unwarranted. In addition, the facts and law show that severance of claims under Rule 21 is not judicially economical or legally sound. However, in order to clarify their claims and the common nucleus of occurrences that justify non-severance of this suit into over 400 separate lawsuits, Plaintiffs seek leave to add factual and legal allegations to address Defendant's motion for more definite statement and motion for severance because (1) the law encourages courts to permit plaintiffs facing dismissal the chance to amend their allegations so that their meritorious claims can be decided on their merits, and Plaintiffs' proposed amendments would address Defendant's challenges; (2) an amendment at this stage would not unduly prejudice Defendant; and (3) the Plaintiffs wish to correct the identities of each Plaintiff. In addition, this litigation is still in its infancy. The initial Complaint was filed a little more than three months ago on December 9, 2011. Discovery has not taken place.

¹ See Defendant St. Croix Renaissance Group, LLLP's ("SCRG") Motion for More Definite Statement and Motion for Severance (Doc. No. 1, Exhibit C).

Abraham et al. v. St. Croix Renaissance Group, CIVIL NO. 2012-11
PLAINTIFFS' MOTION FOR LEAVE TO FILE FIRST AMENDED COMPLAINT
Page 3

II. Argument and Authorities

Rule 15(a) provides, in relevant part, that "a party may amend its pleading only with the opposing party's written consent or the court's leave. The court should freely give leave when justice so requires." FED. R. CIV. P. 15(A). "[M]otions to amend have been allowed at different stages of litigation." *Ali v. Intertek Testing Servs. Caleb Brett*, 332 F. Supp. 2d 827, 829 (D.V.I. 2004).

As the Supreme Court has explained, leave to amend must be granted unless certain equitable factors would make it unfair or unjust:

In the absence of any apparent or declared reason -- such as undue delay, bad faith or dilatory motive on the part of the movant, repeated failures to cure deficiencies by amendments previously allowed, undue prejudice to the other party by virtue of allowance of the amendment, futility of amendment, etc. -- the leave sought should, as the rules require, be "freely given."

Foman v. Davis, 371 U.S. 178, 182 (1962); see also *Lorenz v. CSX Corp.*, 1 F.3d 1406, 1414 (3d Cir. 1993). In the Third Circuit, "prejudice to the non-moving party is the touchstone for the denial of an amendment." *Cornell & Co., Inc. v. Occupational Safety & Health Review Comm'n*, 573 F.2d 820, 823 (3d Cir. 1978); see also *Eddy v. V.I. Water & Power Auth.*, 256 F.3d 204, 209 (3d Cir. 2001) ("Unless the opposing party will be prejudiced, leave to amend should generally be allowed.") (quoting *Charpentier v. Godsil*, 937 F.2d 859, 864 (3d Cir. 1991)). In particular, courts consider "whether allowing an amendment would result in additional discovery, cost, and preparation to defend against new facts or new theories." *Cureton v. Nat'l Collegiate Athletic Ass'n*, 252 F.3d 267, 273 (3d Cir. 2001). In one case, the Third Circuit permitted plaintiffs to raise a new legal theory based upon the same facts as the old legal theory, which was rejected after an interlocutory

Abraham et al. v. St. Croix Renaissance Group, CIVIL NO. 2012-11
PLAINTIFFS' MOTION FOR LEAVE TO FILE FIRST AMENDED COMPLAINT
Page 4

appeal, because the defendants had not yet tried the facts or legal theories of the case. See *Adams v. Gould, Inc.*, 739 F.2d 858, 868 (3d Cir. 1984). These authorities support allowing Plaintiffs to amend the Complaint at this juncture of the lawsuit to fix errors in the naming of Plaintiffs, and add factual and legal allegations to overcome Defendant's motions for a more definite statement and for severance.

A. Amendments Relating to the Identities of Plaintiffs

The amendments relating to the names of the Plaintiffs in the caption and body of the Complaint are necessary and will satisfy the Defendant's contentions that errors exist in the matching up of names. Plaintiffs' counsel has diligently worked on collecting documentary proof of each Plaintiff's identity and location as indicated by the Rohn Client Data Sheets attached to Defendant's Motion. Now, the amendments to the caption and body of Complaint updates and/or identifies the parties in interest for all Plaintiffs and any Plaintiff lacking capacity due to age or other condition. The proposed Amendments set out in **Exhibit 1**, attached hereto, reflect the corrections and complies with pleading requirements. Therefore, the amendments to the identities of the Plaintiffs are justified.

B. Amendments Relating to Causes of Action

Although Plaintiffs maintain that the Complaint contains enough detail and description of the causes of action to survive a motion for more definite statement and motion for severance, Defendant's motions claim that additional factual allegations might assist the parties and the Court throughout the development of this case. This is a unique stance since this case shares parties, facts and considerable evidence with the *Henry* and *Abednego* litigations, of which Defendant SCRG was once a party. Defendant SCRG has

Abraham et al. v. St. Croix Renaissance Group, CIVIL NO. 2012-11
PLAINTIFFS' MOTION FOR LEAVE TO FILE FIRST AMENDED COMPLAINT
Page 5

extensive prior knowledge of the facts of this case, the claims, the background and the documentary evidence already produced in the other cases that are relevant here.

Rather than entertain outright severance of every Plaintiff's claims, and risk wasteful and duplicative litigation, this Court should simply permit Plaintiffs to add the proposed amendments to the factual allegations to further establish that the Plaintiffs were all exposed to the same toxic materials emanating from Defendant's alumina refinery for the time period that SCRG owned it, 2002 to the present, and that this exposure was due to SCRG's negligence in maintaining its site despite knowing of the dangerous emissions. There were a continuous series of emissions similar to one big chemical spill that continued unabated over the years with the result being that all of the Plaintiffs in this action were exposed to the same dangerous toxic materials over the same period of time from the same source and Defendant's quibbling over how many blocks away each Plaintiff was located is irrelevant considering the expansive dispersion of the dust particulates across St. Croix. See First Amended Complaint, attached as **Exhibit 1**. Plaintiffs' amended allegations are not new, just explanatory, and will ensure that SCRG has more than adequate notice of Plaintiffs' claims under Rule 8(a) to avoid dismissal.² See *Shane v. Fauver*, 213 F.3d 113, 116 (3d Cir. 2000) (leave to amend should ordinarily be granted before dismissal with prejudice). Indeed, "[d]ismissal without leave to amend is justified only on the grounds of bad faith, undue delay, prejudice, or futility." *Alston v. Parker*, 363

² Plaintiffs will address the legal arguments against severance and a more definite statement in their concurrently filed Opposition to Defendant's Motion for More Definite Statement and Motion for Severance.

Abraham et al. v. St. Croix Renaissance Group, CIVIL NO. 2012-11
PLAINTIFFS' MOTION FOR LEAVE TO FILE FIRST AMENDED COMPLAINT
Page 6

F.3d 229, 236 (3d Cir. 2004). Id. at 115 (citing *In re Burlington Coat Factory Sec. Litig.*, 114 F.3d 1410, 1434 (3d Cir. 1997)).

The substantive amendments do not add any new legal theories or causes of action. Defendant will not be unduly prejudiced by Plaintiffs' new factual allegations because Defendant previously learned of these facts in the prior *Henry* and *Abednego* litigation, and Plaintiffs are merely expounding on the facts already contained within the Complaint. Additionally, discovery has not begun, so there is no prejudice to any discovery plans Defendant may have with this case. The liberal standard for amending pleadings and the fact that the proposed amendment would not cause any prejudice to the Defendant and the fact that the amendments address Defendant's own contentions with the Complaint as stated in its Motions for more definite statement and for severance, weigh in favor of granting Plaintiffs' motion for leave to amend the First Amended Complaint. In fact, the Court should find those Motions moot based on the new amended Complaint as the District Court similarly did in *Abednego v ALCOA*, SX-10-CV-0009. See Order, 10/04/10 and 12/30/10, both attached as **Exhibit 3**.

WHEREFORE, Plaintiffs respectfully request that the Court grant permission to file their attached First Amended Complaint.

Abraham et al. v. St. Croix Renaissance Group, CIVIL NO. 2012-11
PLAINTIFFS' MOTION FOR LEAVE TO FILE FIRST AMENDED COMPLAINT
Page 7

RESPECTFULLY SUBMITTED
LEE J. ROHN AND ASSOCIATES, LLC
Attorneys for Plaintiff(s)

DATED: March 15, 2012

BY: s/ Lee J. Rohn
Lee J. Rohn, Esq.
VI Bar No. 52
1101 King Street
Christiansted, St. Croix
U.S. Virgin Islands 00820
Telephone: (340) 778-8855
Fax: (340) 773-2954

CERTIFICATE OF SERVICE

THIS IS TO CERTIFY that on March 15, 2012, I electronically filed the foregoing with the Clerk of the court using the CM/ECF system, which will send a notification of such filing (NEF) to the following:

Joel Holt, Holt, Esquire
Law Offices of Joel Holt
Quinn House
2132 Company Street, Suite 2
Christiansted, VI 00820
Attorney For: SCRG

BY: s/ Lee J. Rohn (dr)

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v.

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ORDER

THIS MATTER having come before the Court on Plaintiffs' and the Court having been advised in it premises, it is;

ORDERED that Plaintiff's Motion is **GRANTED**, and further;

ORDERED that Plaintiffs First Amended Complaint shall be deemed filed and entered as the date of this order.

SO ORDERED this _____ day of _____ 2012.

Judge of the District Court

IN THE DISTRICT COURT OF THE VIRGIN ISLANDS

DIVISION OF ST. CROIX

Abraham, Eleanor; Abraham, Phillip; Abraham, Ratcliffe; Abreu, Elizabeth; Acosta, Edelmiro; Acosta, Martha; Acosta, Tomas J.; Acosta, Tomas Jr.; Acosta, Yamaris; Albert, Charmaine N. individually and as parent to minors Andre, Austin B. Andre, Bevington R., Andre, Chris L. and Andre, Felisha C; Aldonza, Davidson, individually and as parent to minors Aldonza, Abigail, Aldonza, Brianner Aldonza, Bryson and Aldonza, Ruthlin,; Alexander, Christina; Alexander, Olive; Alphonse, Anastasia; Alphonse, Brian; Alphonse, Kelvin; Andrew, Julita; Anthony, Jerome; Anthony, Violet; Antoine, Priscilla; Arjune, Camille; Arjune, Ian; Arroyo, Hector M. Jr.; Arroyo, Hector M. Sr.; Arroyo, Maria C.; Arroyo, Marilyn; Arroyo, Paula; Arroyo, Petra; Athill, Christopher; Auguste, Merkey R.; Augustine, Denis J.; Ayala, Awilda; Ayala, Carmela; Ayala, Evangelista J. Jr.; Ayala, Evangelista J. Sr.; Ayala, Jahaira; Ayala, Jesus M.; Ayala, Manuel; Ayala, Rosanda individually and as parent to minors Ayala, Jason A. and Ayala, Jesus JB., citizens of St. Croix U.S. Virgin Islands; Barnard, Melvina A.; Barnard, Sandra individually and as parent to minor Concepcion, Trejuan,; Barnard, Shawn; Barnard-Liburd, Leonor individually and as parent to minor Parris, Millina,; Benjamin, Akima; Benjamin, Alie; Benjamin, Ashsba; Benjamin, Yvette individually and as parent to minors Harris, Ashema and Harris, Joseph N.,; Beras, Catherine; Beras, Lulila; Bonit, Andria; Bonit, Timothy; Boulogne, Carlo J.; Bright, Alexis; Brooks, Edred; Bright, Lestroy; Brown, Iva T.; Browne, Gweneth; Browne, Sylvia; Bryan, George O. Jr.; Burgos, Kayla K.; Caines, Imogen; Candelario, Aura E.; Carmona, Francisco J.; Carmona, Wilfredo Jr.; Carrasquillo, Lao Carmen; Carrasquillo, Amparo individually and as parent to minor Navarro, Jahvan J.,; Carrasquillo, Angel Mario; Carrasquillo, Julio A.; Carrasquillo, Leisha L. individually and as parent to minors Nolasco, Marcus A. Jr. and Villanueva, Edilberto III Anthony,; Cartier, Shermaine; Ceden, Valentin; Cepeda, Johanna; Cepeda, Luz individually and as parent to minor Cepeda, Anthony,; Cepeda, Regalado III; Cepeda, Regalado IV; Cepeda, Regalado, Jr.; Chassana, Vitalienne A.;

CIVIL NO. 12-CV-0011

ACTION FOR DAMAGES

JURY TRIAL DEMANDED

Abraham et al. v. St. Croix Renaissance LLLP

FIRST AMENED COMPLAINT- MARK UP

Page 2

Christophe, Joseph; Christophe, Maryanna; Cirlio, Ana; Cirlio, Sonia N.; Clarke, Tuwanda; **Clercin, Skitter**; Clovis, Celestin; Clovis, Regina J.; **Cobb, Theophilus**; **Cobb, Veronica**; Codrington, Raymond; **Colon, Ivette**; Colon, Luis R.; Cordice, Lendale Jr.; Coron, Domingo; Correa, Maria P.; **Cruz, Christina**; **Cruz, Maria**; **Cruz, Orlando**; Cuencas, Alfredo Jr.; **Daniel, Adrea Y.**; Daniel, Cammie O.; Daniel, Cyril Jr.; **Daniel, Stanley**; Daniel, Suzette; **David, Francis**; **David, Ruby C.**; Davis, Enrique; Davis, Mercedes; Davis, Samuel; Davis-Feliz, Gladys individually and as parent to minor Davis, Eric O.; **DeJesus, Elie**; DeJesus, Theodore M.; deLande, Kevin F.; Denis, Matthew; **Dennie, Mary**; **Dennie, Nkosi B.**; Diaz, Elizabeth; Diaz, Fiadalizo; Drew, Maud; Durand, Benjamin; Durand, David; Durand, Fennella individually and as parent to minors Coureure, Jasi R. and Coureure, Shomalie C.; Durand, Gweneth; Durand, Jamal R.; Durand, Kishma R.; Durand, Rudolph; Durand, Rudolph Jr.; Duvivier, Brandon C.; Edward, Leara individually and as parent to minor Cooper, Neges; Edward, Patrick; **Estephane, Virginia**; Ettienne, Carlton; Ettienne, Madona individually and as parent to minors Ettienne, Kareem and Sylvain, Jady; Evelyn, Sylvia; Felix, Alane K.; Felix, Alvin; Felix, Domingo; Felix, Edymarie; Felix, Hyacinth M.; Felix, Isabel; Felix, Isidoro; Felix, Jasmine; Felix, Maria B.; Felix, Marius F.; Felix, Mathilda; Felix, Sasha Marie individually and as parent to minors Felix, Taheyrah, Hospedales, Dani Marie; Hospedales, Dennis K. and Hospedales, Destani L.; Ferdinand, Neeshawn; Ferdinand, Pearline; Ferdinand, Renee; Ferdinand, Rinel; Fulgencio, Jose Antonio; **Flavien, Delia**; **Fontenelle, Kenyan**; Fulgencio, Luis M.; Fulgencio, Nilsa Cruz; Garcia, Martha; **George, Alcanta**; **George, Amos**; **George, Charles**; George, Inez; George, Lucia M.; Gill, Sharon E.; Glasgow, George; Glasgow, Wilhemina; Gomez, Angel Luis; **Green, Vernon**; Greenaway, Charles; Greenaway, Veronica; Grouby, Wendell; Guadalupe, Margarita; Guerrero, Alcides; Guerrero, Casiano; Hanes, Veronica; Hendrickson, Kenisha C. individually and as parent to minors Almestica, Zaquan, Jonas, Jahi and Jonas, Zaryah; Henry, Josephat; Henry, Lucille; Henry, Mary; Hepburn, Maria; Hodge, Edmond; Irwin, Vera; **Isaac, Stella B.**; **Isaac, Verrall**; Jacobs, Janet C. individually and as parent

Abraham et al. v. St. Croix Renaissance LLLP

FIRST AMENED COMPLAINT- MARK UP

Page 3

to minor Joseph, Justin J.; **Jairam, Barbara;**
Jairam, Kelman; James, Akeem; James, Kareem;
 James, Sybil; Jean-Baptiste, George; Jean-
 Baptiste, Lisa; Jean-Baptiste, Magdalena
 individually and as parent to minors Jean-Baptiste,
 Tamera and Jean-Baptiste, Tia; **John, Alfred Jr.;**
John, Estrellita Marie; John, Ignatius; **John,**
Yahmillia; **Jordan, John;** Khan, Ingema; Kiture,
 Emily J. individually and as parent to minors
 Carmona, Kish'Marie V., Carmona, Wilmarice S.
 and Carmona, E'Marley; Kiture, Janice; Kiture,
 Lucina; **Knight, Barbara;** LaForce, Cassandra;
 LaForce, Joseph Jr.; Lebron, Fermin Jr.; Lebron,
 Mariluz; Leo, John B.; Leonce, Herbert; Liburd,
 Leonard; Llanos, Veronica individually and as
 parent to minor Llanos, Veronique; Lopez, Carmen
 M. individually and as parent to minors Lopez,
 Jashira M. and Allen, Alloy O. Jr.; Lopez,
 Maishaleen; Lopez, Miguel A.; Lopez, Miguel A. Jr.;
 Lopez, Myrna; Lubin, Apreel; Lubin, Joel Patrick;
 Lubin, Jonah Newell; Lubin-Duman, Beverly Ann;
Lugo, Corali individually and as parent to minors
Lugo, Giselle and **Lugo, Marc A.;** **Lugo, Jerge L.;**
Lugo, Krystal; Malaykhan, Ejajie; Malaykhan,
 Sham; Malaykhan, Suraj; **Maldonado, Ana;** **Mark,**
Cynthia; Martinez, Humberto; **Martinez, Andrea;**
Martinez, Conception; Martinez, Lynnette
 individually and as parent to minor Vazquez, Jose
 E. Jr.; Martinez, Ramon; Matthew, Alford; Matthew,
 Asiah; Matthew, Estine; **Matthew, Euphelie;**
Matthew, Maria; **Matthew, Martin;** Matthew,
 Michael L.; **Matthew, Shirley (La Force);** Maynard,
 Chamarie ; Maynard, Maria; Maynard, Nadeen V.
 individually and as parent to minor Walters,
 Nadean V.; Melendez, Jose Reyes; Miranda,
 Andrea; Miranda, Miguel; Mitchell, Claire-Mina;
 Mitchell, Clarie-Mina A.; Mitchell, Janice
 individually and as parent to minor Mitchell,
 Queana; Mitchell, Nancy; **Mitchell, Sharon;** **Moe,**
Melwyn; Morales, Maria Luz; Morris, Ersilie; Morris,
 Sennet E.; Morton, Catherine; **Morton, Julian E. Jr.;**
 Morton, Monroe; Navarro, Carmen, individually and
 as parent to minor Ruiz, Cristina; Navarro, Luz D.;
 Navarro, Marco A.; **Navarro, Maria** individually and
 as parent to minors **Navarro, Gilberto** and **Navarro,**
Gilmarie; Navarro, Maria Mercedes; Navarro,
 Nelson; Nicholas, Joan; **Nicholas, Latoya Y.;**
Nicholas, Sandy; Noorhasan, Dorette F.;
 Noorhasan, Lennox E.; Noorhasan, Shane Antonio;

Abraham et al. v. St. Croix Renaissance LLLP

FIRST AMENED COMPLAINT- MARK UP

Page 4

Nyack, Marilyn; O'Reilly, Wilburn; Paige, Alvin; Paige, Ara individually and as parent to minor Burke, Ian; Parrilla, Carmen Amaro individually and as parent to minors Parrilla, Christian Jr., Parrilla, Miguel J. and Parrilla, Natacha; Parrilla, Delores I., individually and as parent to minor Parrilla, Roberto Jr.; Parrilla, Joel; Parrilla, Juan; Parrilla, Orlando; Parrilla, Raquel; Parrilla, Pedro Juan; Parrilla, Roberto Sr.; Parrilla, Sonia M.; Parrilla, Tara; Parrilla, Wilfredo; Parrilla, Orlimagelys; Parrilla-Ferdinand, Delores; Pemberton, Candis M.; Pemberton, Majarie C.; Pena, Marco Garcia; Perez, Carlos A.; Perez, Carlos Alberto; Perez, Carmen L.; Perez, Jorge A.; Perez, Jose M.; Perez, Naishma K.; Perez, Nydia, individually and as parent to minor Perez, Paula Y.; Perez, Tuwanda; Perez, Victor M.; Perez, Xavier M.; Perez, Yamileisy; Perez, Yaritza; Perez, Ylonis J.; Perez, Yomar A.; Perez, Zalemie Y.; Perez-Ayala, America individually and as parent to minors Perez, Neishalee and Perez, Victor Manuel III; Phillip, Arthur; Phillip, Martial; Phillip, Marva; Phillip, Marvin; Phillip, Terry M.; Picart, Jose; Pilier, Demetrio A. individually and as parent to minors Pilier, Lizandro and Pilier, Lizangel; Plaskett, Cripson; Plaskett, Dilia individually and as parent to minor Ventura, Angela S.; Plaskett, William A.; Polidore, Cornelia; Polidore, Keriscia; Polydore, Lawrence; Prescott, Miscelda; President, Kimbel; President, Kimberly; Preville, Godfrey G.; Profil, Migdalia; Pryce, David; Pryce, Philbert Jr.; Quildan, Isabella N.; Quildan, Kareem; Quinones, Iris M.; Quinones, Jose William; Quinones, Ruth A.; Quinones, Sila; Ramirez, Andres Mercado; Ramos, Brunilda; Ramos, Daniel; Ramos, Gabriel; Ramos, Jorge; Ramos, Josefina; Ramos, Marcela; Reyes, Eridania; Reyes, Evaristo; Reyes, Francisca C., individually and as parent to minor Reyes, Nayoshe; Reyes, Juan A.; Reyes, Juanico; Reyes, Maximo Guerrero; Reyes, Wanda J.; Richardson, Laurencea; Richardson, Marilyn, individually and as parent to minor Gonzague, Jovon; Rios, Cecilia; Rivera, Ana Celia; Rivera, Beatrice; Rivera, Belkis; Rivera, Ebony; Rivera, Miriam; Rivera, Sandro; Robles Jessica C.; Robles, Benjamin Jr.; Robles, Benjamin Sr.; Robles, Elise; Robles, Ismael ; Robles, Ivette; Robles, Jose Luis; Rodney, Martina L.; Rodriguez, Julio; Rodriguez, Lillian R. individually and as parent to minor Rodriguez,

Abraham et al. v. St. Croix Renaissance LLLP

FIRST AMENED COMPLAINT- MARK UP

Page 5

Miguel A.; Rodriguez, Miguely; Rogers, Akeel; Rojas, Pablo; Roldan, Frenando L.; Roldan, Jeremy L.; Rosario, Angela Pagan; Ross, Neelia; Ruiz, Joanne, individually and as parent to minors Carmona, Angelo J., Greenidge, Alaika E., Greenidge, Allen H., Jr., Greenidge, Talaiya A. and Ruiz, Takima T.; Ruiz, Rut individually and as parent to minor Leo, Jahliah T.; Saldana, Carmen; Saldana, Eddie Adner; Saldana, Edwin; Saldana, Raquel individually and as parent to minor Maragh, Krystal; Sanchez, Angel Alberto; Sanchez, Edith; Sanchez, Jose Alberto; Sanchez, Jose E.; Sanchez, Jose Roberto; Sanes, Angel L.; **Sanes, Joshua**; Sanes, Miguel Angel; Santana, Yadira; Santiago, Jose Lanso; Santiago, Artemia; Santiago, Carlos L.; Santiago, Chayanne; Santiago, Eliever; Santiago, Lydia; Santiago, Maynaly; Santos, Angelica; Santos, Ramona; Santos, Theresita; Serrano, Maria; Serrano, Martha; Serrano, Martin Jr.; Shalto, Greta; Shaw-Jacobs, Jeanette; Shirley, Helen; Slater, Ramisha individually and as parent to minor Wilson, Brandon T.B. II; Smith, Keisha P.; Smith, Kevin E.; Smith, Natasha; Soto, Jennifer; Soto, Jeremy; Soto, Jorge; Soto, Luis Enrique individually and as parent to minor Soto, Luis E.; Soto, Maria L.; Soto, Rosa; St. Brice, Anthony; Stevens, Claudia; Stubbs, Jeremiah C. individually and as parent to minor Stubbs, Mariah C.; Taylor, Annette J.; Taylor, Beryl E.; Taylor, Debbie R.; Theophilus, Alita V.; **Thomas, Marsha individually and as parent to minors Tanis, Tamirea N. and Tanis, Nahomey**; Torres, Jose Manuel, Jr.; Torres, Linda; Valentine, Carmen; Valentine, Santiago O. Jr.; Vasquez, Noemi S.; Vega, Efrain; Vega, Luis Felix Jr.; Vega, Luz Delia individually and as parent to minors, Vega, Shanley T. and Vega, Fransheska citizens of St. Croix U.S. Virgin Islands; Vega, Luis Felix; Vegas Lebron, Fermin; Velez, Carmen R.; Velez, Corporina; Velez, Jose R.; Velez, Jose Ramon; Velez, Margarita; **Velez, Miguel Angel**; **Velez, Norma**; **Velez, Yesenia**; Ventura, Angel L.; Ventura, Anna Maria; **Ventura, Carlos Jr.**; **Ventura, Carmen L.**; Ventura, Edna; Ventura, Jose Miguel; Ventura, Karla Jeanette; Ventura, Noelia Soto; Ventura, Xiomara I. individually and as parent to minor Denis, Diane N.; Villanueva, Shelia L.; Williams, Clayton; Williams, Idelfonsa; Williams, Urma; Wilson, Alfred; Wilson, Brandon T.B.;

Abraham et al. v. St. Croix Renaissance LLLP

FIRST AMENED COMPLAINT- MARK UP

Page 6

Wilson, Cindy, individually and as parent to minor Rivera, Justin; Wilson, Diana N., individually and as parent to minor Roldan, Shaedean N., ~~citizens of St. Croix U.S. Virgin Islands~~; Wiltshire, Dunn; Wiltshire, Ethelbert; Wiltshire, Gregg; Wiltshire, Hermine, individually and as guardian to minor Wiltshire, Christina, and Wiltshire, Peter,

Plaintiffs,

v.

St. Croix Renaissance Group LLLP,

Defendant.

COMPLAINT

COME NOW, the Plaintiffs by and through their undersigned counsel, and file their Complaint and respectfully represent to the Court as follows:

1. This Court has jurisdiction pursuant to 4 V.I.C Section 76, *et seq.*
2. Abraham, Eleanor is a citizen of St. Croix, United States Virgin Islands.
3. Abraham, Phillip is a citizen of St. Croix, United States Virgin Islands.
4. Abraham, Ratcliffe is a citizen of St. Croix, United States Virgin Islands.
5. Abreu, Elizabeth is a citizen of St. Croix, United States Virgin Islands.
6. Acosta, Edelmiro is a citizen of St. Croix, United States Virgin Islands.
7. Acosta, Martha is a citizen of St. Croix, United States Virgin Islands.
8. Acosta, Tomas J. is a citizen of St. Croix, United States Virgin Islands.
9. Acosta, Tomas Jr. is a citizen of St. Croix, United States Virgin Islands.
10. Acosta, Yamaris is a citizen of St. Croix, United States Virgin Islands.

Abraham et al. v. St. Croix Renaissance LLLP

FIRST AMENED COMPLAINT- MARK UP

Page 7

11. Albert, Charmaine N. individually and as parent to minors Andre, Austin B. Andre, Bevington R., Andre, Chris L. and Andre, Felisha C., citizens of St. Croix U.S. Virgin Islands;
12. Aldonza, Davidson, individually and as parent to minors Aldonza, Abigail, Aldonza, Brianner Aldonza, Bryson and Aldonza, Ruthlin, citizens of St. Croix U.S. Virgin Islands;
13. Alexander, Christina is a citizen of St. Croix, United States Virgin Islands.
14. Alexander, Olive is a citizen of St. Croix, United States Virgin Islands.
15. Alphonse, Anastasia is a citizen of St. Croix, United States Virgin Islands.
16. Alphonse, Brian is a citizen of St. Croix, United States Virgin Islands.
17. Alphonse, Kelvin is a citizen of St. Croix, United States Virgin Islands.
18. Andrew, Julita is a citizen of St. Croix, United States Virgin Islands.
19. Anthony, Jerome is a citizen of St. Croix, United States Virgin Islands.
20. Anthony, Violet is a citizen of Miramar, Florida.
21. Antoine, Priscilla is a citizen of St. Croix, United States Virgin Islands.
22. Arjune, Camille is a citizen of Tampa, Florida.
23. Arjune, Ian is a citizen of St. Croix, United States Virgin Islands.
24. Arroyo, Hector M. Jr. is a citizen of St. Croix, United States Virgin Islands.
25. Arroyo, Hector M. Sr. is a citizen of St. Croix, United States Virgin Islands.
26. Arroyo, Maria C. is a citizen of St. Croix, United States Virgin Islands.
27. Arroyo, Marilyn is a citizen of St. Croix, United States Virgin Islands.
28. Arroyo, Paula is a citizen of St. Croix, United States Virgin Islands.
29. Arroyo, Petra is a citizen of St. Croix, United States Virgin Islands.

Abraham et al. v. St. Croix Renaissance LLLP

FIRST AMENED COMPLAINT- MARK UP

Page 8

30. Athill, Christopher is a citizen of St. Croix, United States Virgin Islands.
31. Auguste, Merkey R. is a citizen of St. Croix, United States Virgin Islands.
32. Augustine, Denis J. is a citizen of St. Croix, United States Virgin Islands.
33. Ayala, Awilda is a citizen of St. Croix, United States Virgin Islands.
34. Ayala, Carmela is a citizen of St. Croix, United States Virgin Islands.
35. Ayala, Evangelista J. Jr. is a citizen of St. Croix, United States Virgin Islands.
36. Ayala, Evangelista J. Sr. is a citizen of St. Croix, United States Virgin Islands.
37. Ayala, Jahaira is a citizen of St. Croix, United States Virgin Islands.
38. Ayala, Jesus M. is a citizen of St. Croix, United States Virgin Islands.
39. Ayala, Manuel is a citizen of Oviedo, Florida.
40. Ayala, Rosanda individually and as parent to minors Ayala, Jason A. and Ayala, Jesus JB., citizens of St. Croix U.S. Virgin Islands;
41. Barnard, Melvina A. is a citizen of St. Croix, United States Virgin Islands.
42. Barnard, Sandra individually and as parent to minor Concepcion, Trejuan, citizens of St. Croix U.S. Virgin Islands;
43. Barnard, Shawn is a citizen of St. Croix, United States Virgin Islands.
44. Barnard-Liburd, Leonor individually and as parent to minor Parris, Millina, citizens of St. Croix U.S. Virgin Islands;
45. Benjamin, Akima is a citizen of St. Croix, United States Virgin Islands.
46. Benjamin, Alie is a citizen of St. Croix, United States Virgin Islands.
47. Benjamin, Ashsba is a citizen of St. Croix, United States Virgin Islands.
48. Benjamin, Yvette individually and as parent to minors Harris, Ashema and Harris, Joseph N., residents of St. Croix U.S. Virgin Islands.

Abraham et al. v. St. Croix Renaissance LLLP

FIRST AMENED COMPLAINT- MARK UP

Page 9

49. Beras, Catherine is a citizen of St. Croix, United States Virgin Islands.
50. Beras, Lulila is a citizen of St. Croix, United States Virgin Islands.
51. Bonit, Andria is a citizen of St. Croix, United States Virgin Islands.
52. Bonit, Timothy is a citizen of St. Croix, United States Virgin Islands.
53. Boulogne, Carlo J. is a citizen of St. Croix, United States Virgin Islands.
54. Bright, Alexis is a citizen of St. Croix, United States Virgin Islands.
55. Brooks, Edred is a citizen of St. Croix, United States Virgin Islands.
56. Bright, Lestroy is a citizen of St. Croix, United States Virgin Islands.
57. Brown, Iva T. is a citizen of St. Croix, United States Virgin Islands.
58. Browne, Gweneth is a citizen of St. Croix, United States Virgin Islands.
59. Browne, Sylvia is a citizen of St. Croix, United States Virgin Islands.
60. Bryan, George O. Jr. is a citizen of St. Croix, United States Virgin Islands.
61. Burgos, Kayla K. is a citizen of St. Croix, United States Virgin Islands.
62. Caines, Imogen is a citizen of St. Croix, United States Virgin Islands.
63. Candelario, Aura E. is a citizen of St. Croix, United States Virgin Islands.
64. Carmona, Francisco J. is a citizen of St. Croix, United States Virgin Islands.
65. Carmona, Wilfredo Jr. is a citizen of St. Croix, United States Virgin Islands.
66. Carrasquillo Lao Carmen is a citizen of St. Croix, United States Virgin Islands.
67. Carrasquillo, Amparo individually and as parent to minor Navarro, Jahvan J., citizens of St. Croix U.S. Virgin Islands;
68. Carrasquillo, Angel Mario is a citizen of St. Croix, United States Virgin Islands.
69. Carrasquillo, Julio A. is a citizen of St. Croix, United States Virgin Islands.

Abraham et al. v. St. Croix Renaissance LLLP

FIRST AMENED COMPLAINT- MARK UP

Page 10

70. Carrasquillo, Leisha L. individually and as parent to minors Nolasco, Marcus A. Jr. and Villanueva, Edilberto III Anthony, citizens of Charlotte, North Carolina.
71. Cartier, Shermaine is a citizen of St. Croix, United States Virgin Islands.
72. Cedeno, Valentin is a citizen of St. Croix, United States Virgin Islands.
73. Cepeda, Johanna is a citizen of St. Croix, United States Virgin Islands.
74. Cepeda, Luz individually and as parent to minor Cepeda, Anthony, citizens of St. Croix U.S. Virgin Islands;
75. Cepeda, Regalado III is a citizen of St. Croix, United States Virgin Islands.
76. Cepeda, Regalado IV is a citizen of St. Croix, United States Virgin Islands.
77. Cepeda, Regalado, Jr. is a citizen of St. Croix, United States Virgin Islands.
78. Chassana, Vitalienne A. is a citizen of St. Croix, United States Virgin Islands.
79. Christophe, Joseph is a citizen of St. Croix, United States Virgin Islands.
80. Christophe, Maryanna is a citizen of St. Croix, United States Virgin Islands.
81. Cirlio, Ana is a citizen of St. Croix, United States Virgin Islands.
82. Cirlio, Sonia N. is a citizen of St. Croix, United States Virgin Islands.
83. Clarke, Tuwanda is a citizen of St. Croix, United States Virgin Islands.
84. Clercin, Skitter is a citizen of St. Croix, United States Virgin Islands.
85. Clovis, Celestin is a citizen of St. Croix, United States Virgin Islands.
86. Clovis, Regina J. is a citizen of St. Croix, United States Virgin Islands.
87. Cobb, Theophilus is a citizen of St. Croix, United States Virgin Islands.
88. Cobb, Veronica is a citizen of St. Croix, United States Virgin Islands.
89. Codrington, Raymond is a citizen of St. Croix, United States Virgin Islands.
90. Colon, Ivette is a citizen of Kissimmee, Florida

Abraham et al. v. St. Croix Renaissance LLLP

FIRST AMENED COMPLAINT- MARK UP

Page 11

91. Colon, Luis R. is a citizen of St. Croix, United States Virgin Islands.
92. Cordice, Lendale Jr. is a citizen of St. Croix, United States Virgin Islands.
93. Coron, Domingo is a citizen of St. Croix, United States Virgin Islands.
94. Correa, Maria P. is a citizen of St. Croix, United States Virgin Islands.
95. Cruz, Christina is a citizen of St. Croix, United States Virgin Islands.
96. Cruz, Maria is a citizen of St. Croix, United States Virgin Islands.
97. Cruz, Orlando is a citizen of St. Croix, United States Virgin Islands.
98. Cuencas, Alfredo Jr. is a citizen of St. Croix, United States Virgin Islands.
99. Daniel, Adrea Y. is a citizen of St. Croix, United States Virgin Islands.
100. Daniel, Cammie O. is a citizen of St. Croix, United States Virgin Islands.
101. Daniel, Cyril Jr. is a citizen of St. Croix, United States Virgin Islands.
102. Daniel, Stanley is a citizen of St. Croix, United States Virgin Islands.
103. Daniel, Suzette is a citizen of St. Croix, United States Virgin Islands.
104. David, Francis is a citizen of St. Croix, United States Virgin Islands.
105. David, Ruby C. is a citizen of St. Croix, United States Virgin Islands.
106. Davis, Enrique is a citizen of Kissimmee, Florida.
107. Davis, Mercedes is a citizen of St. Croix, United States Virgin Islands.
108. Davis, Samuel is a citizen of St. Cloud, Florida.
109. Davis-Feliz, Gladys individually and as parent to minor Davis, Eric O., citizen of Kissimmee, Florida.
110. DeJesus, Elie is a citizen of Kissimmee, Florida.
111. DeJesus, Theodore M. is a citizen of St. Croix, United States Virgin Islands.
112. deLande, Kevin F. is a citizen of St. Croix, United States Virgin Islands.

Abraham et al. v. St. Croix Renaissance LLLP

FIRST AMENED COMPLAINT- MARK UP

Page 12

113. Denis, Matthew is a citizen of St. Croix, United States Virgin Islands.
114. Dennie, Mary is a citizen of St. Croix, United States Virgin Islands.
115. Dennie, Nkosi B. is a citizen of St. Croix, United States Virgin Islands.
116. Diaz, Elizabeth is a citizen of St. Croix, United States Virgin Islands.
117. Diaz, Fiadalizo is a citizen of St. Croix, United States Virgin Islands.
118. Drew, Maud is a citizen of St. Croix, United States Virgin Islands.
119. Durand, Benjamin is a citizen of St. Croix, United States Virgin Islands.
120. Durand, David is a citizen of St. Croix, United States Virgin Islands.
121. Durand, Fennella individually and as parent to minors Coureure, Jasi R. and Coureure, Shomalie C. citizens of St. Croix U.S. Virgin Islands;
122. Durand, Gweneth is a citizen of St. Croix, United States Virgin Islands.
123. Durand, Jamal R. is a citizen of St. Croix, United States Virgin Islands.
124. Durand, Kishma R. is a citizen of St. Croix, United States Virgin Islands.
125. Durand, Rudolph is a citizen of St. Croix, United States Virgin Islands.
126. Durand, Rudolph Jr. is a citizen of St. Croix, United States Virgin Islands.
127. Duvivier, Brandon C. is a citizen of St. Croix, United States Virgin Islands.
128. Edward, Leara individually and as parent to minor Cooper, Neges, citizens of St. Croix U.S. Virgin Islands.
129. Edward, Patrick is a citizen of St. Croix, United States Virgin Islands.
130. Estephane, Virginia is a citizen of West Palm Beach, Florida.
131. Ettienne, Carlton is a citizen of St. Croix, United States Virgin Islands.
132. Ettienne, Madona individually and as parent to minors Ettienne, Kareem and Sylvain, Jady, citizens of St. Croix U.S. Virgin Islands;

Abraham et al. v. St. Croix Renaissance LLLP

FIRST AMENED COMPLAINT- MARK UP

Page 13

133. Evelyn, Sylvia is a citizen of Miami, Florida.
134. Felix, Alane K. is a citizen of St. Croix, United States Virgin Islands.
135. Felix, Alvin is a citizen of St. Croix, United States Virgin Islands.
136. Felix, Domingo is a citizen of St. Croix, United States Virgin Islands.
137. Felix, Edymarie is a citizen of St. Croix, United States Virgin Islands.
138. Felix, Hyacinth M. is a citizen of St. Croix, United States Virgin Islands.
139. Felix, Isabel is a citizen of St. Croix, United States Virgin Islands.
140. Felix, Isidoro is a citizen of St. Croix, United States Virgin Islands.
141. Felix, Jasmine is a citizen of St. Croix, United States Virgin Islands.
142. Felix, Maria B. is a citizen of St. Croix, United States Virgin Islands.
143. Felix, Marius F. is a citizen of St. Croix, United States Virgin Islands.
144. Felix, Mathilda is a citizen of St. Croix, United States Virgin Islands.
145. Felix, Sasha Marie individually and as parent to minors Felix, Taheyrah, Hospedales, Dani Marie, Hospedales, Dennis K. and Hospedales, Destani L., citizens of St. Croix U.S. Virgin Islands;
146. Ferdinand, Neeshawn is a citizen of Orlando, Florida.
147. Ferdinand, Pearline is a citizen of St. Croix, United States Virgin Islands.
148. Ferdinand, Renee is a citizen of St. Croix, United States Virgin Islands.
149. Ferdinand, Rinel is a citizen of St. Croix, United States Virgin Islands.
150. Fulgencio, Jose Antonio is a citizen of St. Croix, United States Virgin Islands.
151. Flavien, Delia is a citizen of St. Croix, United States Virgin Islands.
152. Fontenelle, Kenyan is a citizen of St. Croix, United States Virgin Islands.
153. Fulgencio, Luis M. is a citizen of St. Croix, United States Virgin Islands.

Abraham et al. v. St. Croix Renaissance LLLP

FIRST AMENED COMPLAINT- MARK UP

Page 14

154. Fulgencio, Nilsa Cruz is a citizen of St. Croix, United States Virgin Islands.
155. Garcia, Martha is a citizen of St. Croix, United States Virgin Islands.
156. George, Alcenta is a citizen of St. Croix, United States Virgin Islands.
157. George, Amos is a citizen of St. Croix, United States Virgin Islands.
158. George, Charles is a citizen of St. Croix, United States Virgin Islands.
159. George, Inez is a citizen of St. Croix, United States Virgin Islands.
160. George, Lucia M. is a citizen of St. Croix, United States Virgin Islands.
161. Gill, Sharon E. is a citizen of St. Croix, United States Virgin Islands.
162. Glasgow, George is a citizen of St. Croix, United States Virgin Islands.
163. Glasgow, Wilhemina is a citizen of St. Croix, United States Virgin Islands.
164. Gomez, Angel Luis is a citizen of St. Croix, United States Virgin Islands.
165. Green, Vernon is a citizen of St. Croix, United States Virgin Islands.
166. Greenaway, Charles is a citizen of St. Croix, United States Virgin Islands.
167. Greenaway, Veronica is a citizen of St. Croix, United States Virgin Islands.
168. Grouby, Wendell is a citizen of St. Croix, United States Virgin Islands.
169. Guadalupe, Margarita is a citizen of St. Croix, United States Virgin Islands.
170. Guerrero, Alcides is a citizen of St. Croix, United States Virgin Islands.
171. Guerrero, Casiano is a citizen of St. Croix, United States Virgin Islands.
172. Hanes, Veronica is a citizen of St. Croix, United States Virgin Islands.
173. Hendrickson, Kenisha C. individually and as parent to minors Almestica, Zaquan, Jonas, Jahi and Jonas, Zaryah , citizens of St. Croix U.S. Virgin Islands;
174. Henry, Josephat is a citizen of St. Croix, United States Virgin Islands.
175. Henry, Lucille is a citizen of Mableton, Georgia.

Abraham et al. v. St. Croix Renaissance LLLP

FIRST AMENED COMPLAINT- MARK UP

Page 15

176. Henry, Mary is a citizen of St. Croix, United States Virgin Islands.
177. ~~Henry, Mary is a citizen of St. Croix, United States Virgin Islands.~~
178. Hepburn, Maria is a citizen of St. Croix, United States Virgin Islands.
179. Hodge, Edmond is a citizen of St. Croix, United States Virgin Islands.
180. Irwin, Vera is a citizen of St. Croix, United States Virgin Islands.
181. Isaac, Stella B. is a citizen of St. Croix, United States Virgin Islands.
182. Isaac, Verrall is a citizen of St. Croix, United States Virgin Islands.
183. Jacobs, Janet C. individually and as parent to minor Joseph, Justin J., citizens of St. Croix U.S. Virgin Islands.
184. Jairam, Barbara is a citizen of St. Croix, United States Virgin Islands.
185. Jairam, Kelman is a citizen of St. Croix, United States Virgin Islands.
186. James, Akeem is a citizen of St. Croix, United States Virgin Islands.
187. James, Kareem is a citizen of St. Croix, United States Virgin Islands.
188. James, Sybil is a citizen of St. Croix, United States Virgin Islands.
189. Jean-Baptiste, George is a citizen of St. Croix, United States Virgin Islands.
190. Jean-Baptiste, Lisa is a citizen of St. Croix, United States Virgin Islands.
191. Jean-Baptiste, Magdalena individually and as parent to minors Jean-Baptiste, Tamera and Jean-Baptiste, Tia, citizens of St. Croix U.S. Virgin Islands.
192. John, Alfred Jr. is a citizen of St. Croix, United States Virgin Islands.
193. John, Estrellita Marie is a citizen of St. Croix, United States Virgin Islands.
194. John, Ignatius is a citizen of St. Croix, United States Virgin Islands.
195. John, Yahmillia is a citizen of St. Croix, United States Virgin Islands.
196. Jordan, John is a citizen of St. Croix, United States Virgin Islands.

Abraham et al. v. St. Croix Renaissance LLLP

FIRST AMENED COMPLAINT- MARK UP

Page 16

197. Khan, Ingema is a citizen of St. Croix, United States Virgin Islands.
198. Kiture, Emily J. individually and as parent to minors Carmona, Kish'Marie V., Carmona, Wilmarice S. and Carmona, E'Marley residents of St. Croix U.S. Virgin Islands.
199. Kiture, Janice is a citizen of St. Croix, United States Virgin Islands.
200. Kiture, Lucina is a citizen of St. Croix, United States Virgin Islands.
201. Knight, Barbara citizens of St. Croix U.S. Virgin Islands.
202. LaForce, Cassandra is a citizen of St. Croix, United States Virgin Islands.
203. LaForce, Joseph Jr. is a citizen of St. Croix, United States Virgin Islands.
204. Lebron, Fermin Jr. is a citizen of St. Croix, United States Virgin Islands.
205. Lebron, Mariluz is a citizen of St. Croix, United States Virgin Islands.
206. Leo, John B. is a citizen of St. Croix, United States Virgin Islands.
207. Leonce, Herbert is a citizen of St. Croix, United States Virgin Islands.
208. Liburd, Leonard is a citizen of St. Croix, United States Virgin Islands.
209. Llanos, Veronica individually and as parent to minor Llanos, Veronique, citizens of St. Croix U.S. Virgin Islands.
210. Lopez, Carmen M. individually and as parent to minors Lopez, Jashira M. and Allen, Alloy O. Jr., citizens of St. Croix U.S. Virgin Islands;
211. Lopez, Maishaleen is a citizen of St. Croix, United States Virgin Islands.
212. Lopez, Miguel A. is a citizen of St. Croix, United States Virgin Islands.
213. Lopez, Miguel A. Jr. is a citizen of St. Croix, United States Virgin Islands.
214. Lopez. Myrna is a citizen of St. Croix, United States Virgin Islands.
215. Lubin, Apreel is a citizen of St. Croix, United States Virgin Islands.

Abraham et al. v. St. Croix Renaissance LLLP

FIRST AMENED COMPLAINT- MARK UP

Page 17

216. Lubin, Joel Patrick is a citizen of Charlotte, NC.
217. Lubin, Jonah Newell is a citizen of St. Croix, United States Virgin Islands.
218. Lubin-Duman, Beverly Ann is a citizen of St. Croix, United States Virgin Islands.
219. Lugo, Corali individually and as parent to minors Lugo, Giselle and Lugo, Marc A. is a citizen of St. Croix, United States Virgin Islands.
220. Lugo, Jerge L. Is a citizen of St. Croix, United States Virgin Islands.
221. Lugo, Krystal is a citizen of St. Croix, United States Virgin Islands.
222. Malaykhan, Ejajie is a citizen of St. Croix, United States Virgin Islands.
223. Malaykhan, Sham is a citizen of St. Croix, United States Virgin Islands.
224. Malaykhan, Suraj is a citizen of St. Croix, United States Virgin Islands.
225. Maldonado, Ana is a citizen of St. Croix, United States Virgin Islands.
226. Mark, Cynthia is a citizen of St. Croix, United States Virgin Islands.
227. Martinez, Humberto is a citizen of St. Croix, United States Virgin Islands.
228. Martinez, Andrea is a citizen of St. Croix, United States Virgin Islands.
229. Martinez, Conception is a citizen of St. Croix, United States Virgin Islands.
230. Martinez, Lynnette individually and as parent to minor Vazquez, Jose E. Jr., citizens of Longwood, Florida.
231. Martinez, Ramon is a citizen of St. Croix, United States Virgin Islands.
232. Matthew, Alford is a citizen of St. Croix, United States Virgin Islands.
233. Matthew, Asiah is a citizen of St. Croix, United States Virgin Islands.
234. Matthew, Estine is a citizen of Baytown, Texas.
235. Matthew, Euphelie is a citizen of St. Croix, United States Virgin Islands.
236. Matthew, Maria is a citizen of St. Croix, United States Virgin Islands.

Abraham et al. v. St. Croix Renaissance LLLP

FIRST AMENED COMPLAINT- MARK UP

Page 18

237. Matthew, Martin is a citizen of St. Croix, United States Virgin Islands.
238. Matthew, Michael L. is a citizen of St. Croix, United States Virgin Islands.
239. Matthew, Shirley (La Force) is a citizen of St. Croix, United States Virgin Islands.
240. Maynard, Chamarie is a citizen of St. Croix, United States Virgin Islands.
241. Maynard, Maria is a citizen of St. Croix, United States Virgin Islands.
242. Maynard, Nadeen V. individually and as parent to minor Walters, Nadean V., citizens of St. Croix U.S. Virgin Islands.
243. Melendez, Jose Reyes is a citizen of St. Croix, United States Virgin Islands.
244. Miranda, Andrea is a citizen of St. Croix, United States Virgin Islands.
245. Miranda, Miguel is a citizen of St. Croix, United States Virgin Islands.
246. Mitchell, Claire-Mina is a citizen of St. Croix, United States Virgin Islands.
247. Mitchell, Clarie-Mina A. is a citizen of St. Croix, United States Virgin Islands.
248. Mitchell, Janice individually and as parent to minor Mitchell, Queana, citizen of St. Croix U.S. Virgin Islands.
249. Mitchell, Nancy is a citizen of St. Croix, United States Virgin Islands.
250. Mitchell, Sharon is a citizen of St. Croix, United States Virgin Islands.
251. Moe, Melwyn is a citizen of St. Croix, United States Virgin Islands.
252. Morales, Maria Luz is a citizen of St. Croix, United States Virgin Islands.
253. Morris, Ersilie is a citizen of St. Croix, United States Virgin Islands.
254. Morris, Sennet E. is a citizen of St. Croix, United States Virgin Islands.
255. Morton, Catherine is a citizen of St. Croix, United States Virgin Islands.
256. Morton, Julian E. Jr. is a citizen of St. Croix, United States Virgin Islands.
257. Morton, Monroe is a citizen of St. Croix, United States Virgin Islands.

Abraham et al. v. St. Croix Renaissance LLLP

FIRST AMENED COMPLAINT- MARK UP

Page 19

258. Navarro, Carmen, individually and as parent to minor Ruiz, Cristina, residents of St. Croix U.S. Virgin Islands.
259. Navarro, Luz D. is a citizen of St. Croix, United States Virgin Islands.
260. Navarro, Marco A. is a citizen of St. Croix, United States Virgin Islands.
261. Navarro, Maria individually and as parent to minors Navarro, Gilberto and Navarro, Gilmarie citizens of St. Croix, United States Virgin Islands.
262. Navarro, Maria Mercedes is a citizen of St. Croix, United States Virgin Islands.
263. Navarro, Nelson is a citizen of St. Croix, United States Virgin Islands.
264. Nicholas, Joan is a citizen of St. Croix, United States Virgin Islands.
265. Nicholas, Latoya Y. is a citizen of St. Croix, United States Virgin Islands.
266. ~~Nucholas~~ Nicholas, Sandy is a citizen of St. Croix, United States Virgin Islands.
267. Noorhasan, Dorette F. is a citizen of St. Croix, United States Virgin Islands.
268. Noorhasan, Lennox E. is a citizen of St. Croix, United States Virgin Islands.
269. Noorhasan, Shane Antonio is a citizen of St. Croix, United States Virgin Islands.
270. Nyack, Marilyn is a citizen of St. Croix, United States Virgin Islands.
271. O'Reilly, Wilburn is a citizen of St. Croix, United States Virgin Islands.
272. Paige, Alvin is a citizen of St. Croix, United States Virgin Islands.
273. Paige, Ara individually and as parent to minor Burke, Ian, citizens of St. Petersburg, Florida.
274. Parrilla, Carmen Amaro individually and as parent to minors Parrilla, Christian Jr., Parrilla, Miguel J. and Parrilla, Natacha, citizens of St. Croix U.S. Virgin Islands;
275. Parrilla, Delores I., individually and as parent to minor Parrilla, Roberto Jr., citizens of St. Croix U.S. Virgin Islands.

Abraham et al. v. St. Croix Renaissance LLLP

FIRST AMENED COMPLAINT- MARK UP

Page 20

276. Parrilla, Joel is a citizen of St. Croix, United States Virgin Islands.
277. Parrilla, Juan is a citizen of St. Croix, United States Virgin Islands.
278. Parrilla, Orlando is a citizen of St. Croix, United States Virgin Islands.
279. Parrilla, Raquel is a citizen of St. Croix, United States Virgin Islands.
280. Parrilla, Pedro Juan is a citizen of St. Croix, United States Virgin Islands.
281. Parrilla, Roberto Sr. is a citizen of St. Croix, United States Virgin Islands.
282. Parrilla, Sonia M. is a citizen of St. Croix, United States Virgin Islands.
283. Parrilla, Tara is a citizen of Orlando, Florida.
284. Parrilla, Wilfredo is a citizen of St. Croix, United States Virgin Islands.
285. Parrilla, Orlimagelys is a citizen of St. Croix, United States Virgin Islands.
286. Parrilla-Ferdinand, Delores is a citizen of St. Croix, United States Virgin Islands.
287. Pemberton, Candis M. is a citizen of St. Croix, United States Virgin Islands.
288. Pemberton, Majarie C. is a citizen of St. Croix, United States Virgin Islands.
289. Pena, Marco Garcia is a citizen of St. Croix, United States Virgin Islands.
290. Perez, Carlos A. is a citizen of St. Cloud, Florida.
291. Perez, Carlos Alberto is a citizen of St. Cloud, Florida.
292. Perez, Carmen L. is a citizen of St. Cloud, Florida.
293. Perez, Jorge A. is a citizen of Atlanta, Georgia.
294. Perez, Jose M. is a citizen of St. Croix, United States Virgin Islands.
295. Perez, Naishma K. is a citizen of St. Cloud, Florida.
296. Perez, Nydia, individually and as parent to minor Perez, Paula Y., citizens of San Antonio, Texas.
297. Perez, Tuwanda is a citizen of St. Croix, United States Virgin Islands.

Abraham et al. v. St. Croix Renaissance LLLP

FIRST AMENED COMPLAINT- MARK UP

Page 21

298. Perez, Victor M. is a citizen of St. Croix, United States Virgin Islands.
299. Perez, Xavier M. is a citizen of St. Croix, United States Virgin Islands.
300. Perez, Yamileisy is a citizen of St. Croix, United States Virgin Islands.
301. Perez, Yaritza is a citizen of St. Croix, United States Virgin Islands.
302. Perez, Ylonis J. is a citizen of St. Croix, United States Virgin Islands.
303. Perez, Yomar A. is a citizen of St. Cloud, Florida.
304. Perez, Zalemie Y. is a citizen of San Antonio, Texas.
305. Perez-Ayala, America individually and as parent to minors Perez, Neishalee and Perez, Victor Manuel III, residents of St. Croix U.S. Virgin Islands.
306. Phillip, Arthur is a citizen of St. Croix, United States Virgin Islands.
307. Phillip, Martial is a citizen of St. Croix, United States Virgin Islands.
308. Phillip, Marva is a citizen of St. Croix, United States Virgin Islands.
309. Phillip, Marvin is a citizen of St. Croix, United States Virgin Islands.
310. Phillip, Terry M. is a citizen of St. Croix, United States Virgin Islands.
311. Picart, Jose is a citizen of St. Croix, United States Virgin Islands.
312. Pilier, Demetrio A. individually and as parent to minors Pilier, Lizandro and Pilier, Lizangel, citizens of St. Croix U.S. Virgin Islands.
313. Plaskett, Cripson is a citizen of St. Croix, United States Virgin Islands.
314. Plaskett, Dilia individually and as parent to minor Ventura, Angela S., citizens of St. Croix U.S. Virgin Islands.
315. Plaskett, William A. is a citizen of St. Croix, United States Virgin Islands.
316. Polidore, Cornelia is a citizen of St. Croix, United States Virgin Islands.
317. Polidore, Keriscia is a citizen of St. Croix, United States Virgin Islands.

Abraham et al. v. St. Croix Renaissance LLLP

FIRST AMENED COMPLAINT- MARK UP

Page 22

318. Polydore, Lawrence citizens of St. Croix U.S. Virgin Islands.
319. Prescott, Miscelda is a citizen of Mattapan, Massachusetts.
320. President, Kimbel is a citizen of St. Croix, United States Virgin Islands.
321. President, Kimberly is a citizen of St. Croix, United States Virgin Islands.
322. Preville, Godfrey G. is a citizen of St. Croix, United States Virgin Islands.
323. Profil, Migdalia is a citizen of St. Croix, United States Virgin Islands.
324. Pryce, David is a citizen of St. Croix, United States Virgin Islands.
325. Pryce, Philbert Jr. is a citizen of St. Croix, United States Virgin Islands.
326. Quildan, Isabella N. is a citizen of St. Croix, United States Virgin Islands.
327. Quildan, Kareem is a citizen of St. Croix, United States Virgin Islands.
328. Quinones, Iris M. is a citizen of St. Croix, United States Virgin Islands.
329. Quinones, Jose William is a citizen of St. Croix, United States Virgin Islands.
330. Quinones, Ruth A. is a citizen of St. Croix, United States Virgin Islands.
331. Quinones, Sila is a citizen of St. Croix, United States Virgin Islands.
332. Ramirez, Andres Mercado is a citizen of St. Croix, United States Virgin Islands.
333. Ramos, Brunilda is a citizen of St. Croix, United States Virgin Islands.
334. Ramos, Daniel is a citizen of St. Croix, United States Virgin Islands.
335. Ramos, Gabriel is a citizen of St. Croix, United States Virgin Islands.
336. Ramos, Jorge is a citizen of St. Croix, United States Virgin Islands.
337. Ramos, Josefina is a citizen of St. Croix, United States Virgin Islands.
338. Ramos, Marcela is a citizen of St. Croix, United States Virgin Islands.
339. Reyes, Eridania is a citizen of St. Croix, United States Virgin Islands.
340. Reyes, Evaristo is a citizen of St. Croix, United States Virgin Islands.

Abraham et al. v. St. Croix Renaissance LLLP

FIRST AMENED COMPLAINT- MARK UP

Page 23

341. Reyes, Francisca C., individually and as parent to minor Reyes, Nayoshe, citizens of St. Croix U.S. Virgin Islands.
342. Reyes, Juan A. is a citizen of St. Croix, United States Virgin Islands.
343. Reyes, Juanico is a citizen of St. Croix, United States Virgin Islands.
344. Reyes, Maximo Guerrero is a citizen of St. Croix, United States Virgin Islands.
345. Reyes, Wanda J. is a citizen of St. Croix, United States Virgin Islands.
346. Richardson, Laurencea is a citizen of St. Croix, United States Virgin Islands.
347. Richardson, Marilyn, individually and as parent to minor Gonzague, Jovon, citizens of St. Croix U.S. Virgin Islands.
348. Rios, Cecilia is a citizen of St. Croix, United States Virgin Islands.
349. Rivera, Ana Celia is a citizen of St. Croix, United States Virgin Islands.
350. Rivera, Beatrice is a citizen of St. Croix, United States Virgin Islands.
351. Rivera, Belkis is a citizen of St. Croix, United States Virgin Islands.
352. Rivera, Ebony is a citizen of St. Croix, United States Virgin Islands.
353. Rivera, Miriam is a citizen of St. Croix, United States Virgin Islands.
354. Rivera, Sandro is a citizen of St. Croix, United States Virgin Islands.
355. Robles Jessica C. is a citizen of St. Croix, United States Virgin Islands.
356. Robles, Benjamin Jr. is a citizen of St. Croix, United States Virgin Islands.
357. Robles, Benjamin Sr. is a citizen of St. Croix, United States Virgin Islands.
358. Robles, Elise is a citizen of St. Croix, United States Virgin Islands.
359. Robles, Ismael is a citizen of St. Croix, United States Virgin Islands.
360. Robles, Ivette is a citizen of St. Croix, United States Virgin Islands.
361. Robles, Jose Luis is a citizen of St. Croix, United States Virgin Islands.

Abraham et al. v. St. Croix Renaissance LLLP

FIRST AMENED COMPLAINT- MARK UP

Page 24

362. Rodney, Martina L. is a citizen of St. Croix, United States Virgin Islands.
363. Rodriguez, Julio is a citizen of St. Croix, United States Virgin Islands.
364. Rodriguez, Lillian R. individually and as parent to minor Rodriguez, Miguel A. , citizens of St. Croix U.S. Virgin Islands.
365. Rodriguez, Miguely is a citizen of St. Croix, United States Virgin Islands.
366. Rogers, Akeel is a citizen of St. Croix, United States Virgin Islands.
367. Rojas, Pablo is a citizen of St. Croix, United States Virgin Islands.
368. Roldan, Frenando L. is a citizen of St. Croix, United States Virgin Islands.
369. Roldan, Jeremy L. is a citizen of St. Croix, United States Virgin Islands.
370. Rosario, Angela Pagan is a citizen of St. Croix, United States Virgin Islands.
371. Ross, Neelia is a citizen of St. Cloud, Florida.
372. Ruiz, Joanne, individually and as parent to minors Carmona, Angelo J., Greenidge, Alaika E., Greenidge, Allen H., Jr., Greenidge, Talaiya A. and Ruiz, Takima T., citizens of St. Croix U.S. Virgin Islands.
373. Ruiz, Rut individually and as parent to minor Leo, Jahliah T., citizens of St. Croix U.S. Virgin Islands.
374. Saldana, Carmen is a citizen of St. Croix, United States Virgin Islands.
375. Saldana, Eddie Adner is a citizen of St. Croix, United States Virgin Islands.
376. Saldana, Edwin is a citizen of Bronx, NY.
377. Saldana, Raquel individually and as parent to minor Maragh, Krystal, citizens of St. Croix U.S. Virgin Islands.
378. Sanchez, Angel Alberto is a citizen of St. Croix, United States Virgin Islands.
379. Sanchez, Edith is a citizen of St. Croix, United States Virgin Islands.

Abraham et al. v. St. Croix Renaissance LLLP

FIRST AMENED COMPLAINT- MARK UP

Page 25

380. Sanchez, Jose Alberto is a citizen of St. Croix, United States Virgin Islands.
381. Sanchez, Jose E. is a citizen of St. Croix, United States Virgin Islands.
382. Sanchez, Jose Roberto is a citizen of St. Croix, United States Virgin Islands.
383. Sanes, Angel L. is a citizen of St. Croix, United States Virgin Islands.
384. Sanes, Joshua citizens of St. Croix U.S. Virgin Islands.
385. Sanes, Miguel Angel is a citizen of St. Croix, United States Virgin Islands.
386. Santana, Yadira is a citizen of St. Croix, United States Virgin Islands.
387. Santiago, Jose Lanso is a citizen of St. Croix, United States Virgin Islands.
388. Santiago, Artemia is a citizen of St. Croix, United States Virgin Islands.
389. Santiago, Carlos L. is a citizen of St. Croix, United States Virgin Islands.
390. Santiago, Chayanne is a citizen of St. Croix, United States Virgin Islands.
391. Santiago, Eliever is a citizen of St. Croix, United States Virgin Islands.
392. Santiago, Lydia is a citizen of St. Croix, United States Virgin Islands.
393. Santiago, Maynalys is a citizen of St. Croix, United States Virgin Islands.
394. Santos, Angelica is a citizen of St. Croix, United States Virgin Islands.
395. Santos, Ramona is a citizen of St. Croix, United States Virgin Islands.
396. Santos, Theresita is a citizen of St. Croix, United States Virgin Islands.
397. Serrano, Maria is a citizen of Sanford, Florida.
398. Serrano, Martha is a citizen of San Antonio, Texas.
399. Serrano, Martin Jr. is a citizen of San Antonio Texas.
400. Shalto, Greta is a citizen of St. Croix, United States Virgin Islands.
401. Shaw- Jacobs, Jeanette is a citizen of St. Croix, United States Virgin Islands.
402. Shirley, Helen is a citizen of St. Croix, United States Virgin Islands.

Abraham et al. v. St. Croix Renaissance LLLP

FIRST AMENED COMPLAINT- MARK UP

Page 26

403. Slater, Ramisha individually and as parent to minor Wilson, Brandon T.B. II, citizens of St. Croix U.S. Virgin Islands.
404. Smith, Keisha P. is a citizen of St. Croix, United States Virgin Islands.
405. Smith, Kevin E. is a citizen of St. Croix, United States Virgin Islands.
406. Smith, Natasha is a citizen of St. Croix, United States Virgin Islands.
407. Soto, Jennifer is a citizen of Camden, New Jersey.
408. Soto, Jeremy is a citizen of St. Croix, United States Virgin Islands.
409. Soto, Jorge is a citizen of St. Croix, United States Virgin Islands.
410. Soto, Luis Enrique individually and as parent to minor Soto, Luis E., citizens of St. Croix U.S. Virgin Islands.
411. Soto, Maria L. is a citizen of Miramar, Florida.
412. Soto, Rosa is a citizen of St. Croix, United States Virgin Islands.
413. St. Brice, Anthony is a citizen of St. Croix, United States Virgin Islands.
414. Stevens, Claudia is a citizen of St. Petersburg, Florida.
415. Stubbs, Jeremiah C. individually and as parent to minor Stubbs, Mariah C., citizens of St. Croix U.S. Virgin Islands.
416. Taylor, Annette J. is a citizen of St. Croix, United States Virgin Islands.
417. Taylor, Beryl E. is a citizen of Dundee, Florida.
418. Taylor, Debbie R. is a citizen of St. Croix, United States Virgin Islands.
419. Theophilus, Alita V. is a citizen of St. Croix, United States Virgin Islands.
420. Thomas, Marsha individually and as parent to minors Tanis, Tamireia N. and Tanis, Nahomey citizens of St. Croix U.S. Virgin Islands.
421. Torres, Jose Manuel, Jr. is a citizen of St. Croix, United States Virgin Islands.

Abraham et al. v. St. Croix Renaissance LLLP

FIRST AMENED COMPLAINT- MARK UP

Page 27

422. Torres, Linda is a citizen of St. Croix, United States Virgin Islands.
423. Valentine, Carmen is a citizen of St. Croix, United States Virgin Islands.
424. Valentine, Santiago O. Jr. is a citizen of St. Croix, United States Virgin Islands.
425. Vasquez, Noemi S. is a citizen of St. Croix, United States Virgin Islands.
426. Vega, Efrain is a citizen of St. Croix, United States Virgin Islands.
427. Vega, Luis Felix Jr. is a citizen of St. Croix, United States Virgin Islands.
428. Vega, Luz Delia individually and as parent to minors, Vega, Shanley T. and Vega, Fransheska citizens of St. Croix U.S. Virgin Islands.
429. Vega, Luis Felix is a citizen of St. Croix, United States Virgin Islands.
430. Vegas Lebron, Fermin is a citizen of St. Croix, United States Virgin Islands.
431. Velez, Carmen R. is a citizen of St. Croix, United States Virgin Islands.
432. Velez, Corporina is a citizen of St. Croix, United States Virgin Islands.
433. Velez, Jose R. is a citizen of St. Croix, United States Virgin Islands.
434. Velez, Jose Ramon is a citizen of St. Croix, United States Virgin Islands.
435. Velez, Margarita is a citizen of St. Croix, United States Virgin Islands.
436. Velez, Miguel Angel citizens of St. Croix U.S. Virgin Islands.
437. Velez, Norma citizens of St. Croix U.S. Virgin Islands.
438. Velez, Yesenia citizens of St. Croix U.S. Virgin Islands.
439. Ventura, Angel L. is a citizen of St. Croix, United States Virgin Islands.
440. Ventura, Anna Maria is a citizen of St. Croix, United States Virgin Islands.
441. Ventura, Carlos Jr. citizens of St. Croix U.S. Virgin Islands.
442. Ventura, Carmen L. citizens of St. Croix U.S. Virgin Islands.
443. Ventura, Edna is a citizen of Boston, Massachusetts.

Abraham et al. v. St. Croix Renaissance LLLP

FIRST AMENED COMPLAINT- MARK UP

Page 28

444. Ventura, Jose Miguel is a citizen of St. Croix, United States Virgin Islands.
445. Ventura, Karla Jeanette is a citizen of St. Croix, United States Virgin Islands.
446. Ventura, Noelia Soto is a citizen of Carolina, Puerto Rico.
447. Ventura, Xiomara I. individually and as parent to minor Denis, Diane N., citizens of St. Croix U.S. Virgin Islands.
448. Villanueva, Shelia L. is a citizen of Charlotte, North Carolina.
449. Williams, Clayton is a citizen of St. Croix, United States Virgin Islands.
450. Williams, Idelfonsa is a citizen of St. Cloud, Florida.
451. Williams, Urma is a citizen of St. Croix, United States Virgin Islands.
452. Wilson, Alfred is a citizen of St. Croix, United States Virgin Islands.
453. Wilson, Brandon T.B. is a citizen of St. Croix, United States Virgin Islands.
454. Wilson, Cindy, individually and as parent to minor Rivera, Justin citizens of St. Croix U.S. Virgin Islands.
455. Wilson, Diana N., individually and as parent to minor Roldan, Shaedean N., residents of St. Croix U.S. Virgin Islands.
456. Wiltshire, Dunn is a citizen of St. Croix, United States Virgin Islands.
457. Wiltshire, Ethelbert is a citizen of St. Croix, United States Virgin Islands.
458. Wiltshire, Gregg is a citizen of St. Croix, United States Virgin Islands.
459. Wiltshire, Hermine individually and as guardian to minor Wiltshire, Christina, citizens of St. Croix U.S. Virgin Islands.
460. Wiltshire, Peter is a citizen of St. Croix, United States Virgin Islands.

Abraham et al. v. St. Croix Renaissance LLLP

FIRST AMENED COMPLAINT- MARK UP

Page 29

461. At all times relevant to this action, and within the time period of 2002 to the present, all Plaintiffs were residents of or guests staying in close proximity to the Defendant's alumina refinery on the south shore of St. Croix.

FACTUAL BACKGROUND

462. For about thirty years, an alumina refinery located near thousands of homes on the south shore of the island of St. Croix was owned and/or operated by a number of entities. The facility refined a red ore called bauxite into alumina, creating enormous mounds of the by-product, bauxite residue, red mud, or red dust.

463. St. Croix Renaissance Group LLLP ("SCRG") upon information is a Limited Liability Limited Partnership and is deemed to be a citizen of Delaware, Florida, Massachusetts, Puerto Rico and St. Croix, U.S. Virgin Islands. In or about 2002, Alcoa World Alumina, LLC ("ALCOA") and St. Croix Alumina, LLC ("SCA") entered into a Purchase and Sale Agreement ("PSA") for the refinery with Brownfields Energy Recovery Corporation ("BRC") and Energy Answers Corporation of Puerto Rico ("EAPR") and BRC and EAPR immediately transferred their interests in the refinery to St. Croix Renaissance Group ("SCRG").

464. SCRG has owned and/or operated the refinery from 2002 to the present.

465. Alumina is extracted from a naturally-occurring ore called bauxite. Bauxite is red in color. The Material Safety Data Sheets ("MSDS") for bauxite warn that it can cause irritation of the eyes, skin and upper respiratory tract.

466. The byproduct of the alumina refining process used at the St. Croix refinery is a

Abraham et al. v. St. Croix Renaissance LLLP

FIRST AMENDED COMPLAINT- MARK UP

Page 30

red substance called bauxite residue, or “red mud” or “red dust,” which is indistinguishable in color and texture from bauxite. Red mud causes damages to real and personal property.

467. Red mud causes significant physical injuries. The MSDS for red mud states that it can cause “severe irritation and burns [of eyes], especially when wet,” “can cause severe irritation [of skin], especially when wet,” “can cause irritation of the upper respiratory tract,” and that is a “cancer hazard.” The MSDS also advises against skin and eye exposure to red mud.

468. From the beginning of the alumina refinery’s operations, hazardous materials, including chlorine, fluoride, TDS, aluminum, arsenic, molybdenum, and selenium, as well as coal dust and other particulates were buried in the red mud, and the red mud was stored outdoors in open piles that at times were as high as approximately 120 feet and covered up to 190 acres of land. The piles of red mud erode into the environment if they are not secured by vegetation or retaining walls. For years, the uncovered piles often emitted fugitive dust when winds blew across the refinery and on the frequent occasions when bulldozers ran over them.

469. In addition, the refinery contained asbestos and other particulates and hazardous substances in various conditions that were never removed from the premises, in violation of law.

470. The bauxite was stored in a steel A-frame structure with plastic sheets hung down the sides, called the bauxite storage shed. In 1995, Hurricane Marilyn hit St. Croix and damaged the roof of the bauxite storage shed, which allowed the

Abraham et al. v. St. Croix Renaissance LLLP

FIRST AMENED COMPLAINT- MARK UP

Page 31

dusty bauxite to be blown out of the shed.

471. Previous owners ALCOA and St. Croix Alumina added red dust, coal dust and other particulates to the materials left behind by Virgin Islands Alumina Company, Glencore, Ltd., Glencore International AG, and Century Aluminum Company, the former owners and/or operators of the refinery, and continued to stack and store them in huge uncovered piles.

472. When SCRG purchased the refinery it had knowledge of the potential for red mud releases. It was aware of the loose bauxite and piles of red mud and knew that those substances had the propensity for particulate dispersion when exposed to wind and that the refinery was in close proximity to thousands of residential dwellings. **Indeed, all of the Plaintiffs lived or were staying or still live in close proximity to the dangerous dispersion of the red dust particulates. SCRG** # knew that every time there was a strong wind the toxic substances in the piles would be dispersed into the air, where they were inhaled by Plaintiffs, deposited onto Plaintiffs' persons and real and personal properties, and deposited into the cisterns that are the primary source of potable water for many Plaintiffs. **This dispersion of toxic materials occurred continuously from the same source, the red mud piles at the alumina refinery, and SCRG, owner of the refinery from 2002, did nothing to abate it, and instead, allowed the series of continuous transactions to occur like an ongoing chemical spill. Each Plaintiff's exposure occurred out of the same dispersions of toxic materials including the coal dust, which is buried in the red mud, and which was stored outdoors.**

473. Despite that knowledge SCRG failed to take proper measures to control those

Abraham et al. v. St. Croix Renaissance LLLP

FIRST AMENED COMPLAINT- MARK UP

Page 32

emissions ever since it took control of the refinery from 2002 to the present.

474. In addition, SCRG took actions related to the red mud piles that increased the disbursement of the toxic substances into Plaintiffs' properties and further resulted in Plaintiffs' additional exposure to those toxic substances.

475. Red mud contains caustic soda, crystalline silica, iron oxide, titanium dioxide, and other toxic substances that make it a health risk to Plaintiffs and exposes Plaintiffs to toxic injuries.

476. SCRG discovered that ALCOA had not abated the asbestos in the property on or about 2006 when it was informed by DPNR.

477. SCRG attempted to conceal the fact it had friable asbestos in the plant and left it there for years.

478. SCRG knew that friable asbestos was being blown into Plaintiffs' homes and being inhaled by Plaintiffs but failed to disclose its knowledge or warn Plaintiffs.

479. During its operation and/or ownership of the alumina refinery, SCRG failed to remove the asbestos from the refinery for years and upon information asbestos remains in the property.

480. Upon information the asbestos has been friable and in an extremely dangerous condition for at least 10 years but Plaintiffs had no way of knowing or discovering that. In particular, Defendant concealed the existence of the friable asbestos from Plaintiffs until 2010, when DPNR produced documents, indicating the presence of asbestos in discovery in the Bennington v. SCRG matter indicating that unencapsulated asbestos fibers were permitted to hang and blow about freely.

Abraham et al. v. St. Croix Renaissance LLLP

FIRST AMENED COMPLAINT- MARK UP

Page 33

481. Upon information SCRG hid the fact that it had friable asbestos not only from the Plaintiffs but also from Department of Natural Resources (DPR) and Environmental Protection Agency (EPA) and in fact, made false reports concerning the same.
482. SCRG has done nothing to remove that asbestos to the present.
483. As a result of Defendant's conduct, Plaintiffs suffered and continue to suffer physical injuries, medical expenses, damage to their properties and possessions, loss of income, loss of capacity to earn income, mental anguish, pain and suffering and loss of enjoyment of life, a propensity for additional medical illness, and a reasonable fear of contracting illness in the future, all of which are expected to continue into the foreseeable future.
484. To this date, Defendant is continuing to expose Plaintiffs to red dust, bauxite, asbestos and other particulates and hazardous substances. Defendants' conduct is also continuing to prevent Plaintiffs from freely enjoying their properties.

COUNT I: Abnormally Dangerous Condition

485. Plaintiffs repeat and re-allege each allegation of Paragraph 1-483 as if set forth herein verbatim.
486. The actions of the Defendant constitute maintaining an abnormally dangerous condition.
487. The St. Croix alumina refinery is located in a known hurricane zone at the head of the Kraus Lagoon Channel at Port Alucroix, which leads to the Caribbean Sea. The natural resources of the Virgin Islands are particularly sensitive and

Abraham et al. v. St. Croix Renaissance LLLP

FIRST AMENED COMPLAINT- MARK UP

Page 34

precious.

488. Thousands of residential dwellings are located in close proximity to the refinery and all of the Plaintiffs lived or stayed at or still live in close proximity to the refinery and certainly within range of the dispersion of the toxic materials from the refinery.

489. Defendant's use, storage, disposal and failure to remediate the bauxite, red dust and/or red mud, asbestos, coal dust, and other particulates and hazardous materials at the refinery is solely for Defendant's own business purposes.

490. Defendant knows and understands that there is a high risk that strong winds could blow bauxite, red mud, asbestos and other particulates and hazardous materials into Plaintiffs' neighborhoods.

491. Defendant's ongoing storage, disposal, and failure to remediate the bauxite, red mud, asbestos, and other particulates and hazardous materials presented and continues to present a high risk of great harm to Plaintiffs' health, chattel, and properties. Bauxite and red mud can irritate the skin, respiratory tract, and eyes and can permanently stain, clog, and otherwise damage property and objects. Friable asbestos is also a known carcinogen that can cause a variety of respiratory illnesses.

492. Defendant's ongoing use, storage, disposal and failure to remediate bauxite, red mud, asbestos and other particulates and hazardous materials at the alumina refinery caused and continue to cause serious harm to Plaintiffs' persons, chattel, and properties. As a result, the Plaintiffs suffered damages as alleged herein.

Abraham et al. v. St. Croix Renaissance LLLP

FIRST AMENED COMPLAINT- MARK UP

Page 35

COUNT II: Public Nuisance

493. Plaintiffs repeat and re-allege each allegation of Paragraph 1-491 as if set forth herein verbatim.
494. The actions of Defendant constitute a public nuisance.
495. Specifically, the ongoing release of harmful dusts, including bauxite, red mud, coal dust, asbestos, and other particulates and hazardous materials, from the alumina refinery unreasonably threatens and interferes with the public rights to safety, health, peace, comfort, and the enjoyment of private land and public natural resources.
496. The actions of Defendant violated the statutes of the Virgin Islands (including, but not limited to, 12 V.I.R. & R. § 204-20(d) & (e), §§ 204-25(a)(2) & (3), § 204-25(c), and § 204-27(a)) and constitute nuisance *per se*.
497. Defendant knows or has reason to know that its conduct has a significant effect on the public rights.
498. Plaintiffs are entitled to damages as a result, thereof.
499. The Plaintiffs are further entitled to an injunction requiring Defendant to desist all activities that allow the release of pollutants, further requiring Defendant to remove the piles of “red dust”, coal dust and other particulates and hazardous materials, to remove all such pollutants, “red dust”, coal dust and other particulates and hazardous materials including asbestos from the island of St. Croix, and to refrain from allowing said substances from accumulating again on St. Croix.

Abraham et al. v. St. Croix Renaissance LLLP

FIRST AMENED COMPLAINT- MARK UP

Page 36

COUNT III: Private Nuisance

500. Plaintiffs repeat and re-allege each allegation of Paragraph 1-498 as if set forth herein verbatim.
501. Defendant's actions constitute a private nuisance in violation of 28 V.I.C. § 331 and Virgin Islands common law against each Plaintiff as they all lived within close proximity to the refinery and were subjected to the dangerous ongoing emissions.
502. Defendant's recurring releases of massive quantities of bauxite, red mud, asbestos, and other particulates and hazardous substances have stained, clogged, and otherwise significantly damaged and/or destroyed Plaintiffs' homes and yards, and the damages and destruction continue to date.
503. Defendant's recurring releases of massive quantities of bauxite, red mud, asbestos, and other particulates and hazardous substances have exposed and continue to expose Plaintiffs' bodies to toxic and/or irritating dusts.
504. By so doing, Defendant has wrongfully and unreasonably interfered with Plaintiffs' private use and enjoyment of their homes and properties. As a result, Plaintiffs have been damaged, and continue to be damaged, as alleged, herein.
505. Pursuant to 28 V.I.C. § 331, in addition to damages, Plaintiffs are entitled to a warrant to abate the nuisance and/or an injunction to prevent the continuance of the nuisance.

COUNT IV: Intentional Infliction of Emotional Distress

506. Plaintiffs repeat and re-allege each allegation of Paragraph 1-504 as if set forth herein verbatim.
507. The actions of Defendant constitute the intentional infliction of emotional distress

Abraham et al. v. St. Croix Renaissance LLLP

FIRST AMENED COMPLAINT- MARK UP

Page 37

on Plaintiffs.

508. Defendant knows and understands that exposure to bauxite, red mud, asbestos, and other particulates and hazardous substances presented and continues to present serious risks to the health and property of thousands of St. Croix residents. Defendant also understands that the emissions posed and continue to pose serious threats to the local environment and natural resources.

509. Defendant knows that wind, rain and/or flooding, and other physical disturbances could release bauxite, red mud, asbestos and other particulates and hazardous substances from the alumina refinery into Plaintiffs' neighborhoods.

510. Defendant understands that St. Croix is a hurricane-prone area and that local residents rely on cisterns as their primary source of potable water.

511. Since at least 2006, Defendant SCRG also knew that dangerous friable asbestos was present at the refinery and could, along with the red mud and related particulates and hazardous substances, be blown by winds into Plaintiffs' neighborhoods, **and that it did in fact do so.**

512. Despite this knowledge, Defendant has knowingly and intentionally failed to take precautions to prevent bauxite, red mud, asbestos and other particulates and hazardous substances from blowing into Plaintiffs' neighborhoods, **where it did blow and was dispersed exposing each Plaintiff to the harmful emissions and toxic substances continuously.**

513. After Defendant permitted Plaintiffs to be exposed to bauxite, red mud, asbestos and other particulates and hazardous substances emissions from the alumina refinery, Defendant purposefully concealed and/or misrepresented the health

Abraham et al. v. St. Croix Renaissance LLLP

FIRST AMENED COMPLAINT- MARK UP

Page 38

risks associated with exposure to the emissions from Plaintiffs.

514. Years after learning that emissions from the alumina refinery presented high risk of serious injury to Plaintiffs and the natural resources of the Virgin Islands, Defendant continues to allow bauxite, red mud, asbestos and other particulates and hazardous substances to blow into Plaintiffs' neighborhoods and cause significant harm to Plaintiffs' minds, bodies, and property.

515. As a result of Defendant's callous disregard for the health, safety, well-being and property of Plaintiffs, Plaintiffs have suffered damages as alleged herein, including severe emotional distress and physical ailments resulting from such distress.

COUNT V: Negligent Infliction of Emotional Distress

516. Plaintiffs repeat and re-allege each allegation of Paragraph 1-514 as if set forth herein verbatim.

517. In the alternative to intentional infliction of emotional distress, the actions of Defendant constitute the negligent infliction of emotional distress.

518. As a result, Plaintiffs have been damaged as alleged, herein.

COUNT VI: Negligence as to Defendant

519. Plaintiffs repeat and re-allege each allegation of Paragraph 1-517 as if set forth herein verbatim.

520. The actions of Defendant constitute negligence.

521. SCRG has owned and/or operated the alumina refinery from 2002 to the present.

522. SCRG has failed and continues to fail to properly store and/or secure bauxite, red mud, related particulates, hazardous substances, and asbestos on the

Abraham et al. v. St. Croix Renaissance LLLP

FIRST AMENDED COMPLAINT- MARK UP

Page 39

premises.

523. SCRG knew and/or should have known that its failure to secure these dangerous materials would allow them to blow freely into Plaintiffs' neighborhoods and harm Plaintiffs and their properties.

524. SCRG's failure to properly secure, store and/or maintain the bauxite, red mud, related particulates, hazardous substances, and asbestos at the alumina refinery has allowed and continues to allow these materials to blow into the nearby areas and harm Plaintiffs and their properties.

525. As a result Plaintiffs have been damaged as alleged, herein.

COUNT VII: Punitive Damages

526. Plaintiffs repeat and re-allege each allegation of Paragraph 1-524 as if set forth herein verbatim.

527. The actions of Defendant ~~was~~ **were** and are so callous and done with such extreme indifference to the rights and interests of the Plaintiffs and the citizens of St. Croix so as to entitle Plaintiffs to an award of punitive damages.

WHEREFORE, Plaintiffs pray for damages as they may appear, compensatory and punitive, an injunction requiring that Defendant cease and desist all activities that result in pollutants being discharged and, further requiring a cleanup of all pollutants and removal of the piles of "Red Dust", coal dust and particulates and hazardous substances, costs and fees and such other relief as this Court deems fair and just.

Abraham et al. v. St. Croix Renaissance LLLP

FIRST AMENED COMPLAINT- MARK UP

Page 40

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

DATED: March 15, 2012

BY: _____

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U.S. Virgin Islands 00820
Telephone: (340) 778-8855
Fax: (340) 773-2954

IN THE DISTRICT COURT OF THE VIRGIN ISLANDS

DIVISION OF ST. CROIX

Abraham, Eleanor; Abraham, Phillip; Abraham, Ratcliffe; Abreu, Elizabeth; Acosta, Edelmiro; Acosta, Martha; Acosta, Tomas J.; Acosta, Tomas Jr.; Acosta, Yamaris; Albert, Charmaine N. individually and as parent to minors Andre, Austin B. Andre, Bevington R., Andre, Chris L. and Andre, Felisha C; Aldonza, Davidson, individually and as parent to minors Aldonza, Abigail, Aldonza, Brianner Aldonza, Bryson and Aldonza, Ruthlin,; Alexander, Christina; Alexander, Olive; Alphonse, Anastasia; Alphonse, Brian; Alphonse, Kelvin; Andrew, Julita; Anthony, Jerome; Anthony, Violet; Antoine, Priscilla; Arjune, Camille; Arjune, Ian; Arroyo, Hector M. Jr.; Arroyo, Hector M. Sr.; Arroyo, Maria C.; Arroyo, Marilyn; Arroyo, Paula; Arroyo, Petra; Athill, Christopher; Auguste, Merkey R.; Augustine, Denis J.; Ayala, Awilda; Ayala, Carmela; Ayala, Evangelista J. Jr.; Ayala, Evangelista J. Sr.; Ayala, Jahaira; Ayala, Jesus M.; Ayala, Manuel; Ayala, Rosanda individually and as parent to minors Ayala, Jason A. and Ayala, Jesus JB.; Barnard, Melvina A.; Barnard, Sandra individually and as parent to minor Concepcion, Trejuan,; Barnard, Shawn; Barnard-Liburd, Leonor individually and as parent to minor Parris, Millina,; Benjamin, Akima; Benjamin, Alie; Benjamin, Ashsba; Benjamin, Yvette individually and as parent to minors Harris, Ashema and Harris, Joseph N.,; Beras, Catherine; Beras, Lulila; Bonit, Andria; Bonit, Timothy; Boulogne, Carlo J.; Bright, Alexis; Brooks, Edred; Bright, Lestroy; Brown, Iva T.; Browne, Gweneth; Browne, Sylvia; Bryan, George O. Jr.; Burgos, Kayla K.; Caines, Imogen; Candelario, Aura E.; Carmona, Francisco J.; Carmona, Wilfredo Jr.; Carrasquillo, Lao Carmen; Carrasquillo, Amparo individually and as parent to minor Navarro, Jahvan J.,; Carrasquillo, Angel Mario; Carrasquillo, Julio A.; Carrasquillo, Leisha L. individually and as parent to minors Nolasco, Marcus A. Jr. and Villanueva, Edilberto III Anthony,; Cartier, Shermaine; Ceden, Valentin; Cepeda, Johanna; Cepeda, Luz individually and as parent to minor Cepeda, Anthony,; Cepeda, Regalado III; Cepeda, Regalado IV; Cepeda, Regalado, Jr.; Chassana, Vitalienne A.; Christophe, Joseph; Christophe, Maryanna; Cirlio,

CIVIL NO. 12-CV-0011

ACTION FOR DAMAGES

JURY TRIAL DEMANDED

Abraham et al. v. St. Croix Renaissance LLLP

FIRST AMENED COMPLAINT

Page 2

Ana; Cirlio, Sonia N.; Clarke, Tuwanda; Clercin, Skitter; Clovis, Celestin; Clovis, Regina J.; Cobb, Theophilus; Cobb, Veronica; Codrington, Raymond; Colon, Ivette; Colon, Luis R.; Cordice, Lendale Jr.; Coron, Domingo; Correa, Maria P.; Cruz, Christina; Cruz, Maria; Cruz, Orlando; Cuencas, Alfredo Jr.; Daniel, Adrea Y.; Daniel, Cammie O.; Daniel, Cyril Jr.; Daniel, Stanley; Daniel, Suzette; David, Francis; David, Ruby C.; Davis, Enrique; Davis, Mercedes; Davis, Samuel; Davis-Feliz, Gladys individually and as parent to minor Davis, Eric O.; DeJesus, Elie; DeJesus, Theodore M.; deLande, Kevin F.; Denis, Matthew; Dennie, Mary; Dennie, Nkosi B.; Diaz, Elizabeth; Diaz, Fiadalizo; Drew, Maud; Durand, Benjamin; Durand, David; Durand, Fennella individually and as parent to minors Coureure, Jasi R. and Coureure, Shomalie C.; Durand, Gweneth; Durand, Jamal R.; Durand, Kishma R.; Durand, Rudolph; Durand, Rudolph Jr.; Duvivier, Brandon C.; Edward, Leara individually and as parent to minor Cooper, Neges; Edward, Patrick; Estephane, Virginia; Ettienne, Carlton; Ettienne, Madona individually and as parent to minors Ettienne, Kareem and Sylvain, Jady; Evelyn, Sylvia; Felix, Alane K.; Felix, Alvin; Felix, Domingo; Felix, Edymarie; Felix, Hyacinth M.; Felix, Isabel; Felix, Isidoro; Felix, Jasmine; Felix, Maria B.; Felix, Marius F.; Felix, Mathilda; Felix, Sasha Marie individually and as parent to minors Felix, Taheyrah, Hospedales, Dani Marie, Hospedales, Dennis K. and Hospedales, Destani L.; Ferdinand, Neeshawn; Ferdinand, Pearline; Ferdinand, Renee; Ferdinand, Rinel; Fulgencio, Jose Antonio; Flavien, Delia; Fontenelle, Kenyan; Fulgencio, Luis M.; Fulgencio, Nilsa Cruz; Garcia, Martha; George, Alcenta; George, Amos; George, Charles; George, Inez; George, Lucia M.; Gill, Sharon E.; Glasgow, George; Glasgow, Wilhemina; Gomez, Angel Luis; Green, Vernon; Greenaway, Charles; Greenaway, Veronica; Grouby, Wendell; Guadalupe, Margarita; Guerrero, Alcides; Guerrero, Casiano; Hanes, Veronica; Hendrickson, Kenisha C. individually and as parent to minors Almestica, Zaquan, Jonas, Jahi and Jonas, Zaryah; Henry, Josephat; Henry, Lucille; Henry, Mary; Hepburn, Maria; Hodge, Edmond; Irwin, Vera; Isaac, Stella B.; Isaac, Verrall; Jacobs, Janet C. individually and as parent to minor Joseph, Justin J.; Jairam, Barbara;

Abraham et al. v. St. Croix Renaissance LLLP

FIRST AMENED COMPLAINT

Page 3

Jairam, Kelman; James, Akeem; James, Kareem; James, Sybil; Jean-Baptiste, George; Jean-Baptiste, Lisa; Jean-Baptiste, Magdalena individually and as parent to minors Jean-Baptiste, Tamera and Jean-Baptiste, Tia; John, Alfred Jr.; John, Estrellita Marie; John, Ignatius; John, Yahmillia; Jordan, John; Khan, Ingema; Kiture, Emily J. individually and as parent to minors Carmona, Kish'Marie V., Carmona, Wilmarice S. and Carmona, E'Marley; Kiture, Janice; Kiture, Lucina; Knight, Barbara; LaForce, Cassandra; LaForce, Joseph Jr.; Lebron, Fermin Jr.; Lebron, Mariluz; Leo, John B.; Leonce, Herbert; Liburd, Leonard; Llanos, Veronica individually and as parent to minor Llanos, Veronique; Lopez, Carmen M. individually and as parent to minors Lopez, Jashira M. and Allen, Alloy O. Jr.; Lopez, Maishaleen; Lopez, Miguel A.; Lopez, Miguel A. Jr.; Lopez, Myrna; Lubin, Apreel; Lubin, Joel Patrick; Lubin, Jonah Newell; Lubin-Duman, Beverly Ann; Lugo, Corali individually and as parent to minors Lugo, Giselle and Lugo, Marc A.; Lugo, Jerge L.; Lugo, Krystal; Malaykhan, Ejajie; Malaykhan, Sham; Malaykhan, Suraj; Maldonado, Ana; Mark, Cynthia; Martinez, Humberto; Martinez, Andrea; Martinez, Conception; Martinez, Lynnette individually and as parent to minor Vazquez, Jose E. Jr.; Martinez, Ramon; Matthew, Alford; Matthew, Asiah; Matthew, Estine; Matthew, Euphelie; Matthew, Maria; Matthew, Martin; Matthew, Michael L.; Matthew, Shirley (La Force); Maynard, Chamarie; Maynard, Maria; Maynard, Nadeen V. individually and as parent to minor Walters, Nadean V.; Melendez, Jose Reyes; Miranda, Andrea; Miranda, Miguel; Mitchell, Claire-Mina; Mitchell, Clarie-Mina A.; Mitchell, Janice individually and as parent to minor Mitchell, Queana; Mitchell, Nancy; Mitchell, Sharon; Moe, Melwyn; Morales, Maria Luz; Morris, Ersilie; Morris, Sennet E.; Morton, Catherine; Morton, Julian E. Jr.; Morton, Monroe; Navarro, Carmen, individually and as parent to minor Ruiz, Cristina; Navarro, Luz D.; Navarro, Marco A.; Navarro, Maria individually and as parent to minors Navarro, Gilberto and Navarro, Gilmarie; Navarro, Maria Mercedes; Navarro, Nelson; Nicholas, Joan; Nicholas, Latoya Y.; Nicholas, Sandy; Noorhasan, Dorette F.; Noorhasan, Lennox E.; Noorhasan, Shane Antonio; Nyack, Marilyn; O'Reilly, Wilburn; Paige, Alvin;

Abraham et al. v. St. Croix Renaissance LLLP

FIRST AMENED COMPLAINT

Page 4

Paige, Ara individually and as parent to minor Burke, Ian; Parrilla, Carmen Amaro individually and as parent to minors Parrilla, Christian Jr., Parrilla, Miguel J. and Parrilla, Natacha; Parrilla, Delores I., individually and as parent to minor Parrilla, Roberto Jr.; Parrilla, Joel; Parrilla, Juan; Parrilla, Orlando; Parrilla, Raquel; Parrilla, Pedro Juan; Parrilla, Roberto Sr.; Parrilla, Sonia M.; Parrilla, Tara; Parrilla, Wilfredo; Parrilla, Orlimagelys; Parrilla-Ferdinand, Delores; Pemberton, Candis M.; Pemberton, Majarie C.; Pena, Marco Garcia; Perez, Carlos A.; Perez, Carlos Alberto; Perez, Carmen L.; Perez, Jorge A.; Perez, Jose M.; Perez, Naishma K.; Perez, Nydia, individually and as parent to minor Perez, Paula Y.; Perez, Tuwanda; Perez, Victor M.; Perez, Xavier M.; Perez, Yamileisy; Perez, Yaritza; Perez, Ylonis J.; Perez, Yomar A.; Perez, Zalemie Y.; Perez-Ayala, America individually and as parent to minors Perez, Neishalee and Perez, Victor Manuel III; Phillip, Arthur; Phillip, Martial; Phillip, Marva; Phillip, Marvin; Phillip, Terry M.; Picart, Jose; Pilier, Demetrio A. individually and as parent to minors Pilier, Lizandro and Pilier, Lizangel; Plaskett, Cripson; Plaskett, Dilia individually and as parent to minor Ventura, Angela S.; Plaskett, William A.; Polidore, Cornelia; Polidore, Keriscia; Polydore, Lawrence; Prescott, Miscelda; President, Kimbel; President, Kimberly; Preville, Godfrey G.; Profil, Migdalia; Pryce, David; Pryce, Philbert Jr.; Quildan, Isabella N.; Quildan, Kareem; Quinones, Iris M.; Quinones, Jose William; Quinones, Ruth A.; Quinones, Sila; Ramirez, Andres Mercado; Ramos, Brunilda; Ramos, Daniel; Ramos, Gabriel; Ramos, Jorge; Ramos, Josefina; Ramos, Marcela; Reyes, Eridania; Reyes, Evaristo; Reyes, Francisca C., individually and as parent to minor Reyes, Nayoshe; Reyes, Juan A.; Reyes, Juanico; Reyes, Maximo Guerrero; Reyes, Wanda J.; Richardson, Laurencea; Richardson, Marilyn, individually and as parent to minor Gonzague, Jovon; Rios, Cecilia; Rivera, Ana Celia; Rivera, Beatrice; Rivera, Belkis; Rivera, Ebony; Rivera, Miriam; Rivera, Sandro; Robles Jessica C.; Robles, Benjamin Jr.; Robles, Benjamin Sr.; Robles, Elise; Robles, Ismael ; Robles, Ivette; Robles, Jose Luis; Rodney, Martina L.; Rodriguez, Julio; Rodriguez, Lillian R. individually and as parent to minor Rodriguez, Miguel A.; Rodriguez, Miguely; Rogers, Akeel;

Abraham et al. v. St. Croix Renaissance LLLP

FIRST AMENED COMPLAINT

Page 5

Rojas, Pablo; Roldan, Frenando L.; Roldan, Jeremy L.; Rosario, Angela Pagan; Ross, Neelia; Ruiz, Joanne, individually and as parent to minors Carmona, Angelo J., Greenidge, Alaika E., Greenidge, Allen H., Jr., Greenidge, Talaiya A. and Ruiz, Takima T.; Ruiz, Rut individually and as parent to minor Leo, Jahliah T.; Saldana, Carmen; Saldana, Eddie Adner; Saldana, Edwin; Saldana, Raquel individually and as parent to minor Maragh, Krystal; Sanchez, Angel Alberto; Sanchez, Edith; Sanchez, Jose Alberto; Sanchez, Jose E.; Sanchez, Jose Roberto; Sanes, Angel L.; Sanes, Joshua; Sanes, Miguel Angel; Santana, Yadira; Santiago, Jose Lanso; Santiago, Artemia; Santiago, Carlos L.; Santiago, Chayanne; Santiago, Eliever; Santiago, Lydia; Santiago, Maynaly; Santos, Angelica; Santos, Ramona; Santos, Theresita; Serrano, Maria; Serrano, Martha; Serrano, Martin Jr.; Shalto, Greta; Shaw-Jacobs, Jeanette; Shirley, Helen; Slater, Ramisha individually and as parent to minor Wilson, Brandon T.B. II; Smith, Keisha P.; Smith, Kevin E.; Smith, Natasha; Soto, Jennifer; Soto, Jeremy; Soto, Jorge ; Soto, Luis Enrique individually and as parent to minor Soto, Luis E.; Soto, Maria L.; Soto, Rosa; St. Brice, Anthony; Stevens, Claudia; Stubbs, Jeremiah C. individually and as parent to minor Stubbs, Mariah C.; Taylor, Annette J.; Taylor, Beryl E.; Taylor, Debbie R.; Theophilus, Alita V.; Thomas, Marsha individually and as parent to minors Tanis, Tamirea N. and Tanis, Nahomey; Torres, Jose Manuel, Jr.; Torres, Linda; Valentine, Carmen; Valentine, Santiago O. Jr.; Vasquez, Noemi S.; Vega, Efrain; Vega, Luis Felix Jr.; Vega, Luz Delia individually and as parent to minors, Vega, Shanley T. and Vega, Fransheska; Vega, Luis Felix; Vegas Lebron, Fermin; Velez, Carmen R.; Velez, Corporina; Velez, Jose R.; Velez, Jose Ramon; Velez, Margarita; Velez, Miguel Angel; Velez, Norma; Velez, Yesenia; Ventura, Angel L.; Ventura, Anna Maria; Ventura, Carlos Jr.; Ventura, Carmen L.; Ventura, Edna; Ventura, Jose Miguel; Ventura, Karla Jeanette; Ventura, Noelia Soto; Ventura, Xiomara I. individually and as parent to minor Denis, Diane N.; Villanueva, Shelia L.; Williams, Clayton; Williams, Idelfonsa; Williams, Urma; Wilson, Alfred; Wilson, Brandon T.B.; Wilson, Cindy, individually and as parent to minor Rivera, Justin; Wilson, Diana N., individually and as

Abraham et al. v. St. Croix Renaissance LLLP

FIRST AMENDED COMPLAINT

Page 6

parent to minor Roldan, Shaedean N.; Wiltshire, Dunn; Wiltshire, Ethelbert; Wiltshire, Gregg; Wiltshire, Hermine, individually and as guardian to minor Wiltshire, Christina; and Wiltshire, Peter,

Plaintiffs,

v.

St. Croix Renaissance Group LLLP,

Defendant.

COMPLAINT

COME NOW, the Plaintiffs by and through their undersigned counsel, and file their Complaint and respectfully represent to the Court as follows:

1. This Court has jurisdiction pursuant to 4 V.I.C Section 76, *et seq.*
2. Abraham, Eleanor is a citizen of St. Croix, United States Virgin Islands.
3. Abraham, Phillip is a citizen of St. Croix, United States Virgin Islands.
4. Abraham, Ratcliffe is a citizen of St. Croix, United States Virgin Islands.
5. Abreu, Elizabeth is a citizen of St. Croix, United States Virgin Islands.
6. Acosta, Edelmiro is a citizen of St. Croix, United States Virgin Islands.
7. Acosta, Martha is a citizen of St. Croix, United States Virgin Islands.
8. Acosta, Tomas J. is a citizen of St. Croix, United States Virgin Islands.
9. Acosta, Tomas Jr. is a citizen of St. Croix, United States Virgin Islands.
10. Acosta, Yamaris is a citizen of St. Croix, United States Virgin Islands.
11. Albert, Charmaine N. individually and as parent to minors Andre, Austin B. Andre, Bevington R., Andre, Chris L. and Andre, Felisha C., citizens of St. Croix U.S. Virgin Islands;

Abraham et al. v. St. Croix Renaissance LLLP

FIRST AMENED COMPLAINT

Page 7

12. Aldonza, Davidson, individually and as parent to minors Aldonza, Abigail, Aldonza, Brianner Aldonza, Bryson and Aldonza, Ruthlin, citizens of St. Croix U.S. Virgin Islands;
13. Alexander, Christina is a citizen of St. Croix, United States Virgin Islands.
14. Alexander, Olive is a citizen of St. Croix, United States Virgin Islands.
15. Alphonse, Anastasia is a citizen of St. Croix, United States Virgin Islands.
16. Alphonse, Brian is a citizen of St. Croix, United States Virgin Islands.
17. Alphonse, Kelvin is a citizen of St. Croix, United States Virgin Islands.
18. Andrew, Julita is a citizen of St. Croix, United States Virgin Islands.
19. Anthony, Jerome is a citizen of St. Croix, United States Virgin Islands.
20. Anthony, Violet is a citizen of Miramar, Florida.
21. Antoine, Priscilla is a citizen of St. Croix, United States Virgin Islands.
22. Arjune, Camille is a citizen of Tampa, Florida.
23. Arjune, Ian is a citizen of St. Croix, United States Virgin Islands.
24. Arroyo, Hector M. Jr. is a citizen of St. Croix, United States Virgin Islands.
25. Arroyo, Hector M. Sr. is a citizen of St. Croix, United States Virgin Islands.
26. Arroyo, Maria C. is a citizen of St. Croix, United States Virgin Islands.
27. Arroyo, Marilyn is a citizen of St. Croix, United States Virgin Islands.
28. Arroyo, Paula is a citizen of St. Croix, United States Virgin Islands.
29. Arroyo, Petra is a citizen of St. Croix, United States Virgin Islands.
30. Athill, Christopher is a citizen of St. Croix, United States Virgin Islands.
31. Auguste, Merkey R. is a citizen of St. Croix, United States Virgin Islands.
32. Augustine, Denis J. is a citizen of St. Croix, United States Virgin Islands.

Abraham et al. v. St. Croix Renaissance LLLP

FIRST AMENED COMPLAINT

Page 8

33. Ayala, Awilda is a citizen of St. Croix, United States Virgin Islands.
34. Ayala, Carmela is a citizen of St. Croix, United States Virgin Islands.
35. Ayala, Evangelista J. Jr. is a citizen of St. Croix, United States Virgin Islands.
36. Ayala, Evangelista J. Sr. is a citizen of St. Croix, United States Virgin Islands.
37. Ayala, Jahaira is a citizen of St. Croix, United States Virgin Islands.
38. Ayala, Jesus M. is a citizen of St. Croix, United States Virgin Islands.
39. Ayala, Manuel is a citizen of Oviedo, Florida.
40. Ayala, Rosanda individually and as parent to minors Ayala, Jason A. and Ayala, Jesus JB., citizens of St. Croix U.S. Virgin Islands;
41. Barnard, Melvina A. is a citizen of St. Croix, United States Virgin Islands.
42. Barnard, Sandra individually and as parent to minor Concepcion, Trejuan, citizens of St. Croix U.S. Virgin Islands;
43. Barnard, Shawn is a citizen of St. Croix, United States Virgin Islands.
44. Barnard-Liburd, Leonor individually and as parent to minor Parris, Millina, citizens of St. Croix U.S. Virgin Islands;
45. Benjamin, Akima is a citizen of St. Croix, United States Virgin Islands.
46. Benjamin, Alie is a citizen of St. Croix, United States Virgin Islands.
47. Benjamin, Ashsba is a citizen of St. Croix, United States Virgin Islands.
48. Benjamin, Yvette individually and as parent to minors Harris, Ashema and Harris, Joseph N., residents of St. Croix U.S. Virgin Islands.
49. Beras, Catherine is a citizen of St. Croix, United States Virgin Islands.
50. Beras, Lulila is a citizen of St. Croix, United States Virgin Islands.
51. Bonit, Andria is a citizen of St. Croix, United States Virgin Islands.

Abraham et al. v. St. Croix Renaissance LLLP

FIRST AMENED COMPLAINT

Page 9

52. Bonit, Timothy is a citizen of St. Croix, United States Virgin Islands.
53. Boulogne, Carlo J. is a citizen of St. Croix, United States Virgin Islands.
54. Bright, Alexis is a citizen of St. Croix, United States Virgin Islands.
55. Brooks, Edred is a citizen of St. Croix, United States Virgin Islands.
56. Bright, Lestroy is a citizen of St. Croix, United States Virgin Islands.
57. Brown, Iva T. is a citizen of St. Croix, United States Virgin Islands.
58. Browne, Gweneth is a citizen of St. Croix, United States Virgin Islands.
59. Browne, Sylvia is a citizen of St. Croix, United States Virgin Islands.
60. Bryan, George O. Jr. is a citizen of St. Croix, United States Virgin Islands.
61. Burgos, Kayla K. is a citizen of St. Croix, United States Virgin Islands.
62. Caines, Imogen is a citizen of St. Croix, United States Virgin Islands.
63. Candelario, Aura E. is a citizen of St. Croix, United States Virgin Islands.
64. Carmona, Francisco J. is a citizen of St. Croix, United States Virgin Islands.
65. Carmona, Wilfredo Jr. is a citizen of St. Croix, United States Virgin Islands.
66. Carrasquillo Lao Carmen is a citizen of St. Croix, United States Virgin Islands.
67. Carrasquillo, Amparo individually and as parent to minor Navarro, Jahvan J., citizens of St. Croix U.S. Virgin Islands;
68. Carrasquillo, Angel Mario is a citizen of St. Croix, United States Virgin Islands.
69. Carrasquillo, Julio A. is a citizen of St. Croix, United States Virgin Islands.
70. Carrasquillo, Leisha L. individually and as parent to minors Nolasco, Marcus A. Jr. and Villanueva, Edilberto III Anthony, citizens of Charlotte, North Carolina.
71. Cartier, Shermaine is a citizen of St. Croix, United States Virgin Islands.
72. Ceden, Valentin is a citizen of St. Croix, United States Virgin Islands.

Abraham et al. v. St. Croix Renaissance LLLP

FIRST AMENED COMPLAINT

Page 10

73. Cepeda, Johanna is a citizen of St. Croix, United States Virgin Islands.
74. Cepeda, Luz individually and as parent to minor Cepeda, Anthony, citizens of St. Croix U.S. Virgin Islands;
75. Cepeda, Regalado III is a citizen of St. Croix, United States Virgin Islands.
76. Cepeda, Regalado IV is a citizen of St. Croix, United States Virgin Islands.
77. Cepeda, Regalado, Jr. is a citizen of St. Croix, United States Virgin Islands.
78. Chassana, Vitalienne A. is a citizen of St. Croix, United States Virgin Islands.
79. Christophe, Joseph is a citizen of St. Croix, United States Virgin Islands.
80. Christophe, Maryanna is a citizen of St. Croix, United States Virgin Islands.
81. Cirlio, Ana is a citizen of St. Croix, United States Virgin Islands.
82. Cirlio, Sonia N. is a citizen of St. Croix, United States Virgin Islands.
83. Clarke, Tuwanda is a citizen of St. Croix, United States Virgin Islands.
84. Clercin, Skitter is a citizen of St. Croix, United States Virgin Islands.
85. Clovis, Celestin is a citizen of St. Croix, United States Virgin Islands.
86. Clovis, Regina J. is a citizen of St. Croix, United States Virgin Islands.
87. Cobb, Theophilus is a citizen of St. Croix, United States Virgin Islands.
88. Cobb, Veronica is a citizen of St. Croix, United States Virgin Islands.
89. Codrington, Raymond is a citizen of St. Croix, United States Virgin Islands.
90. Colon, Ivette is a citizen of Kissimmee, Florida
91. Colon, Luis R. is a citizen of St. Croix, United States Virgin Islands.
92. Cordice, Lendale Jr. is a citizen of St. Croix, United States Virgin Islands.
93. Coron, Domingo is a citizen of St. Croix, United States Virgin Islands.
94. Correa, Maria P. is a citizen of St. Croix, United States Virgin Islands.

Abraham et al. v. St. Croix Renaissance LLLP

FIRST AMENED COMPLAINT

Page 11

95. Cruz, Christina is a citizen of St. Croix, United States Virgin Islands.
96. Cruz, Maria is a citizen of St. Croix, United States Virgin Islands.
97. Cruz, Orlando is a citizen of St. Croix, United States Virgin Islands.
98. Cuencas, Alfredo Jr. is a citizen of St. Croix, United States Virgin Islands.
99. Daniel, Adrea Y. is a citizen of St. Croix, United States Virgin Islands.
100. Daniel, Cammie O. is a citizen of St. Croix, United States Virgin Islands.
101. Daniel, Cyril Jr. is a citizen of St. Croix, United States Virgin Islands.
102. Daniel, Stanley is a citizen of St. Croix, United States Virgin Islands.
103. Daniel, Suzette is a citizen of St. Croix, United States Virgin Islands.
104. David, Francis is a citizen of St. Croix, United States Virgin Islands.
105. David, Ruby C. is a citizen of St. Croix, United States Virgin Islands.
106. Davis, Enrique is a citizen of Kissimmee, Florida.
107. Davis, Mercedes is a citizen of St. Croix, United States Virgin Islands.
108. Davis, Samuel is a citizen of St. Cloud, Florida.
109. Davis-Feliz, Gladys individually and as parent to minor Davis, Eric O., citizen of Kissimmee, Florida.
110. DeJesus, Elie is a citizen of Kissimmee, Florida.
111. DeJesus, Theodore M. is a citizen of St. Croix, United States Virgin Islands.
112. deLande, Kevin F. is a citizen of St. Croix, United States Virgin Islands.
113. Denis, Matthew is a citizen of St. Croix, United States Virgin Islands.
114. Dennie, Mary is a citizen of St. Croix, United States Virgin Islands.
115. Dennie, Nkosi B. is a citizen of St. Croix, United States Virgin Islands.
116. Diaz, Elizabeth is a citizen of St. Croix, United States Virgin Islands.

Abraham et al. v. St. Croix Renaissance LLLP

FIRST AMENED COMPLAINT

Page 12

117. Diaz, Fiadalizo is a citizen of St. Croix, United States Virgin Islands.
118. Drew, Maud is a citizen of St. Croix, United States Virgin Islands.
119. Durand, Benjamin is a citizen of St. Croix, United States Virgin Islands.
120. Durand, David is a citizen of St. Croix, United States Virgin Islands.
121. Durand, Fennella individually and as parent to minors Coureure, Jasi R. and Coureure, Shomalie C. citizens of St. Croix U.S. Virgin Islands;
122. Durand, Gweneth is a citizen of St. Croix, United States Virgin Islands.
123. Durand, Jamal R. is a citizen of St. Croix, United States Virgin Islands.
124. Durand, Kishma R. is a citizen of St. Croix, United States Virgin Islands.
125. Durand, Rudolph is a citizen of St. Croix, United States Virgin Islands.
126. Durand, Rudolph Jr. is a citizen of St. Croix, United States Virgin Islands.
127. Duvivier, Brandon C. is a citizen of St. Croix, United States Virgin Islands.
128. Edward, Leara individually and as parent to minor Cooper, Neges, citizens of St. Croix U.S. Virgin Islands.
129. Edward, Patrick is a citizen of St. Croix, United States Virgin Islands.
130. Estephane, Virginia is a citizen of West Palm Beach, Florida.
131. Ettienne, Carlton is a citizen of St. Croix, United States Virgin Islands.
132. Ettienne, Madona individually and as parent to minors Ettienne, Kareem and Sylvain, Jady, citizens of St. Croix U.S. Virgin Islands;
133. Evelyn, Sylvia is a citizen of Miami, Florida.
134. Felix, Alane K. is a citizen of St. Croix, United States Virgin Islands.
135. Felix, Alvin is a citizen of St. Croix, United States Virgin Islands.
136. Felix, Domingo is a citizen of St. Croix, United States Virgin Islands.

Abraham et al. v. St. Croix Renaissance LLLP

FIRST AMENED COMPLAINT

Page 13

137. Felix, Edymarie is a citizen of St. Croix, United States Virgin Islands.
138. Felix, Hyacinth M. is a citizen of St. Croix, United States Virgin Islands.
139. Felix, Isabel is a citizen of St. Croix, United States Virgin Islands.
140. Felix, Isidoro is a citizen of St. Croix, United States Virgin Islands.
141. Felix, Jasmine is a citizen of St. Croix, United States Virgin Islands.
142. Felix, Maria B. is a citizen of St. Croix, United States Virgin Islands.
143. Felix, Marius F. is a citizen of St. Croix, United States Virgin Islands.
144. Felix, Mathilda is a citizen of St. Croix, United States Virgin Islands.
145. Felix, Sasha Marie individually and as parent to minors Felix, Taheyrah, Hospedales, Dani Marie, Hospedales, Dennis K. and Hospedales, Destani L., citizens of St. Croix U.S. Virgin Islands;
146. Ferdinand, Neeshawn is a citizen of Orlando, Florida.
147. Ferdinand, Pearline is a citizen of St. Croix, United States Virgin Islands.
148. Ferdinand, Renee is a citizen of St. Croix, United States Virgin Islands.
149. Ferdinand, Rinel is a citizen of St. Croix, United States Virgin Islands.
150. Fulgencio, Jose Antonio is a citizen of St. Croix, United States Virgin Islands.
151. Flavien, Delia is a citizen of St. Croix, United States Virgin Islands.
152. Fontenelle, Kenyan is a citizen of St. Croix, United States Virgin Islands.
153. Fulgencio, Luis M. is a citizen of St. Croix, United States Virgin Islands.
154. Fulgencio, Nilsa Cruz is a citizen of St. Croix, United States Virgin Islands.
155. Garcia, Martha is a citizen of St. Croix, United States Virgin Islands.
156. George, Alcenta is a citizen of St. Croix, United States Virgin Islands.
157. George, Amos is a citizen of St. Croix, United States Virgin Islands.

Abraham et al. v. St. Croix Renaissance LLLP

FIRST AMENED COMPLAINT

Page 14

158. George, Charles is a citizen of St. Croix, United States Virgin Islands.
159. George, Inez is a citizen of St. Croix, United States Virgin Islands.
160. George, Lucia M. is a citizen of St. Croix, United States Virgin Islands.
161. Gill, Sharon E. is a citizen of St. Croix, United States Virgin Islands.
162. Glasgow, George is a citizen of St. Croix, United States Virgin Islands.
163. Glasgow, Wilhemina is a citizen of St. Croix, United States Virgin Islands.
164. Gomez, Angel Luis is a citizen of St. Croix, United States Virgin Islands.
165. Green, Vernon is a citizen of St. Croix, United States Virgin Islands.
166. Greenaway, Charles is a citizen of St. Croix, United States Virgin Islands.
167. Greenaway, Veronica is a citizen of St. Croix, United States Virgin Islands.
168. Grouby, Wendell is a citizen of St. Croix, United States Virgin Islands.
169. Guadalupe, Margarita is a citizen of St. Croix, United States Virgin Islands.
170. Guerrero, Alcides is a citizen of St. Croix, United States Virgin Islands.
171. Guerrero, Casiano is a citizen of St. Croix, United States Virgin Islands.
172. Hanes, Veronica is a citizen of St. Croix, United States Virgin Islands.
173. Hendrickson, Kenisha C. individually and as parent to minors Almestica, Zaquan, Jonas, Jahi and Jonas, Zaryah , citizens of St. Croix U.S. Virgin Islands;
174. Henry, Josephat is a citizen of St. Croix, United States Virgin Islands.
175. Henry, Lucille is a citizen of Mableton, Georgia.
176. Henry, Mary is a citizen of St. Croix, United States Virgin Islands.
177. Hepburn, Maria is a citizen of St. Croix, United States Virgin Islands.
178. Hodge, Edmond is a citizen of St. Croix, United States Virgin Islands.
179. Irwin, Vera is a citizen of St. Croix, United States Virgin Islands.

Abraham et al. v. St. Croix Renaissance LLLP

FIRST AMENED COMPLAINT

Page 15

180. Isaac, Stella B. is a citizen of St. Croix, United States Virgin Islands.
181. Isaac, Verrall is a citizen of St. Croix, United States Virgin Islands.
182. Jacobs, Janet C. individually and as parent to minor Joseph, Justin J., citizens of St. Croix U.S. Virgin Islands.
183. Jairam, Barbara is a citizen of St. Croix, United States Virgin Islands.
184. Jairam, Kelman is a citizen of St. Croix, United States Virgin Islands.
185. James, Akeem is a citizen of St. Croix, United States Virgin Islands.
186. James, Kareem is a citizen of St. Croix, United States Virgin Islands.
187. James, Sybil is a citizen of St. Croix, United States Virgin Islands.
188. Jean-Baptiste, George is a citizen of St. Croix, United States Virgin Islands.
189. Jean-Baptiste, Lisa is a citizen of St. Croix, United States Virgin Islands.
190. Jean-Baptiste, Magdalena individually and as parent to minors Jean-Baptiste, Tamera and Jean-Baptiste, Tia, citizens of St. Croix U.S. Virgin Islands.
191. John, Alfred Jr. is a citizen of St. Croix, United States Virgin Islands.
192. John, Estrellita Marie is a citizen of St. Croix, United States Virgin Islands.
193. John, Ignatius is a citizen of St. Croix, United States Virgin Islands.
194. John, Yahmillia is a citizen of St. Croix, United States Virgin Islands.
195. Jordan, John is a citizen of St. Croix, United States Virgin Islands.
196. Khan, Ingema is a citizen of St. Croix, United States Virgin Islands.
197. Kiture, Emily J. individually and as parent to minors Carmona, Kish'Marie V., Carmona, Wilmarice S. and Carmona, E'Marley residents of St. Croix U.S. Virgin Islands.
198. Kiture, Janice is a citizen of St. Croix, United States Virgin Islands.

Abraham et al. v. St. Croix Renaissance LLLP

FIRST AMENED COMPLAINT

Page 16

199. Kiture, Lucina is a citizen of St. Croix, United States Virgin Islands.
200. Knight, Barbara citizens of St. Croix U.S. Virgin Islands.
201. LaForce, Cassandra is a citizen of St. Croix, United States Virgin Islands.
202. LaForce, Joseph Jr. is a citizen of St. Croix, United States Virgin Islands.
203. Lebron, Fermin Jr. is a citizen of St. Croix, United States Virgin Islands.
204. Lebron, Mariluz is a citizen of St. Croix, United States Virgin Islands.
205. Leo, John B. is a citizen of St. Croix, United States Virgin Islands.
206. Leonce, Herbert is a citizen of St. Croix, United States Virgin Islands.
207. Liburd, Leonard is a citizen of St. Croix, United States Virgin Islands.
208. Llanos, Veronica individually and as parent to minor Llanos, Veronique, citizens of St. Croix U.S. Virgin Islands.
209. Lopez, Carmen M. individually and as parent to minors Lopez, Jashira M. and Allen, Alloy O. Jr., citizens of St. Croix U.S. Virgin Islands;
210. Lopez, Maishaleen is a citizen of St. Croix, United States Virgin Islands.
211. Lopez, Miguel A. is a citizen of St. Croix, United States Virgin Islands.
212. Lopez, Miguel A. Jr. is a citizen of St. Croix, United States Virgin Islands.
213. Lopez, Myrna is a citizen of St. Croix, United States Virgin Islands.
214. Lubin, Apreel is a citizen of St. Croix, United States Virgin Islands.
215. Lubin, Joel Patrick is a citizen of Charlotte, NC.
216. Lubin, Jonah Newell is a citizen of St. Croix, United States Virgin Islands.
217. Lubin-Duman, Beverly Ann is a citizen of St. Croix, United States Virgin Islands.
218. Lugo, Corali individually and as parent to minors Lugo, Giselle and Lugo, Marc A. is a citizen of St. Croix, United States Virgin Islands.

Abraham et al. v. St. Croix Renaissance LLLP

FIRST AMENED COMPLAINT

Page 17

219. Lugo, Jerge L. Is a citizen of St. Croix, United States Virgin Islands.
220. Lugo, Krystal is a citizen of St. Croix, United States Virgin Islands.
221. Malaykhan, Ejajie is a citizen of St. Croix, United States Virgin Islands.
222. Malaykhan, Sham is a citizen of St. Croix, United States Virgin Islands.
223. Malaykhan, Suraj is a citizen of St. Croix, United States Virgin Islands.
224. Maldonado, Ana is a citizen of St. Croix, United States Virgin Islands.
225. Mark, Cynthia is a citizen of St. Croix, United States Virgin Islands.
226. Martinez, Humberto is a citizen of St. Croix, United States Virgin Islands.
227. Martinez, Andrea is a citizen of St. Croix, United States Virgin Islands.
228. Martinez, Conception is a citizen of St. Croix, United States Virgin Islands.
229. Martinez, Lynnette individually and as parent to minor Vazquez, Jose E. Jr., citizens of Longwood, Florida.
230. Martinez, Ramon is a citizen of St. Croix, United States Virgin Islands.
231. Matthew, Alford is a citizen of St. Croix, United States Virgin Islands.
232. Matthew, Asiah is a citizen of St. Croix, United States Virgin Islands.
233. Matthew, Estine is a citizen of Baytown, Texas.
234. Matthew, Euphelie is a citizen of St. Croix, United States Virgin Islands.
235. Matthew, Maria is a citizen of St. Croix, United States Virgin Islands.
236. Matthew, Martin is a citizen of St. Croix, United States Virgin Islands.
237. Matthew, Michael L. is a citizen of St. Croix, United States Virgin Islands.
238. Matthew, Shirley (La Force) is a citizen of St. Croix, United States Virgin Islands.
239. Maynard, Chamarie is a citizen of St. Croix, United States Virgin Islands.
240. Maynard, Maria is a citizen of St. Croix, United States Virgin Islands.

Abraham et al. v. St. Croix Renaissance LLLP

FIRST AMENDED COMPLAINT

Page 18

241. Maynard, Nadeen V. individually and as parent to minor Walters, Nadean V., citizens of St. Croix U.S. Virgin Islands.
242. Melendez, Jose Reyes is a citizen of St. Croix, United States Virgin Islands.
243. Miranda, Andrea is a citizen of St. Croix, United States Virgin Islands.
244. Miranda, Miguel is a citizen of St. Croix, United States Virgin Islands.
245. Mitchell, Claire-Mina is a citizen of St. Croix, United States Virgin Islands.
246. Mitchell, Clarie-Mina A. is a citizen of St. Croix, United States Virgin Islands.
247. Mitchell, Janice individually and as parent to minor Mitchell, Queana, citizen of St. Croix U.S. Virgin Islands.
248. Mitchell, Nancy is a citizen of St. Croix, United States Virgin Islands.
249. Mitchell, Sharon is a citizen of St. Croix, United States Virgin Islands.
250. Moe, Melwyn is a citizen of St. Croix, United States Virgin Islands.
251. Morales, Maria Luz is a citizen of St. Croix, United States Virgin Islands.
252. Morris, Ersilie is a citizen of St. Croix, United States Virgin Islands.
253. Morris, Sennet E. is a citizen of St. Croix, United States Virgin Islands.
254. Morton, Catherine is a citizen of St. Croix, United States Virgin Islands.
255. Morton, Julian E. Jr. is a citizen of St. Croix, United States Virgin Islands.
256. Morton, Monroe is a citizen of St. Croix, United States Virgin Islands.
257. Navarro, Carmen, individually and as parent to minor Ruiz, Cristina, residents of St. Croix U.S. Virgin Islands.
258. Navarro, Luz D. is a citizen of St. Croix, United States Virgin Islands.
259. Navarro, Marco A. is a citizen of St. Croix, United States Virgin Islands.

Abraham et al. v. St. Croix Renaissance LLLP

FIRST AMENED COMPLAINT

Page 19

260. Navarro, Maria individually and as parent to minors Navarro, Gilberto and Navarro, Gilmarie citizens of St. Croix, United States Virgin Islands.
261. Navarro, Maria Mercedes is a citizen of St. Croix, United States Virgin Islands.
262. Navarro, Nelson is a citizen of St. Croix, United States Virgin Islands.
263. Nicholas, Joan is a citizen of St. Croix, United States Virgin Islands.
264. Nicholas, Latoya Y. is a citizen of St. Croix, United States Virgin Islands.
265. Nicholas, Sandy is a citizen of St. Croix, United States Virgin Islands.
266. Noorhasan, Dorette F. is a citizen of St. Croix, United States Virgin Islands.
267. Noorhasan, Lennox E. is a citizen of St. Croix, United States Virgin Islands.
268. Noorhasan, Shane Antonio is a citizen of St. Croix, United States Virgin Islands.
269. Nyack, Marilyn is a citizen of St. Croix, United States Virgin Islands.
270. O'Reilly, Wilburn is a citizen of St. Croix, United States Virgin Islands.
271. Paige, Alvin is a citizen of St. Croix, United States Virgin Islands.
272. Paige, Ara individually and as parent to minor Burke, Ian, citizens of St. Petersburg, Florida.
273. Parrilla, Carmen Amaro individually and as parent to minors Parrilla, Christian Jr., Parrilla, Miguel J. and Parrilla, Natacha, citizens of St. Croix U.S. Virgin Islands;
274. Parrilla, Delores I., individually and as parent to minor Parrilla, Roberto Jr., citizens of St. Croix U.S. Virgin Islands.
275. Parrilla, Joel is a citizen of St. Croix, United States Virgin Islands.
276. Parrilla, Juan is a citizen of St. Croix, United States Virgin Islands.
277. Parrilla, Orlando is a citizen of St. Croix, United States Virgin Islands.
278. Parrilla, Raquel is a citizen of St. Croix, United States Virgin Islands.

Abraham et al. v. St. Croix Renaissance LLLP

FIRST AMENDED COMPLAINT

Page 20

279. Parrilla, Pedro Juan is a citizen of St. Croix, United States Virgin Islands.
280. Parrilla, Roberto Sr. is a citizen of St. Croix, United States Virgin Islands.
281. Parrilla, Sonia M. is a citizen of St. Croix, United States Virgin Islands.
282. Parrilla, Tara is a citizen of Orlando, Florida.
283. Parrilla, Wilfredo is a citizen of St. Croix, United States Virgin Islands.
284. Parrilla, Orlimagelys is a citizen of St. Croix, United States Virgin Islands.
285. Parrilla-Ferdinand, Delores is a citizen of St. Croix, United States Virgin Islands.
286. Pemberton, Candis M. is a citizen of St. Croix, United States Virgin Islands.
287. Pemberton, Majarie C. is a citizen of St. Croix, United States Virgin Islands.
288. Pena, Marco Garcia is a citizen of St. Croix, United States Virgin Islands.
289. Perez, Carlos A. is a citizen of St. Cloud, Florida.
290. Perez, Carlos Alberto is a citizen of St. Cloud, Florida.
291. Perez, Carmen L. is a citizen of St. Cloud, Florida.
292. Perez, Jorge A. is a citizen of Atlanta, Georgia.
293. Perez, Jose M. is a citizen of St. Croix, United States Virgin Islands.
294. Perez, Naishma K. is a citizen of St. Cloud, Florida.
295. Perez, Nydia, individually and as parent to minor Perez, Paula Y., citizens of San Antonio, Texas.
296. Perez, Tuwanda is a citizen of St. Croix, United States Virgin Islands.
297. Perez, Victor M. is a citizen of St. Croix, United States Virgin Islands.
298. Perez, Xavier M. is a citizen of St. Croix, United States Virgin Islands.
299. Perez, Yamileisy is a citizen of St. Croix, United States Virgin Islands.
300. Perez, Yaritza is a citizen of St. Croix, United States Virgin Islands.

Abraham et al. v. St. Croix Renaissance LLLP

FIRST AMENDED COMPLAINT

Page 21

301. Perez, Ylonis J. is a citizen of St. Croix, United States Virgin Islands.
302. Perez, Yomar A. is a citizen of St. Cloud, Florida.
303. Perez, Zalemie Y. is a citizen of San Antonio, Texas.
304. Perez-Ayala, America individually and as parent to minors Perez, Neishalee and Perez, Victor Manuel III, residents of St. Croix U.S. Virgin Islands.
305. Phillip, Arthur is a citizen of St. Croix, United States Virgin Islands.
306. Phillip, Martial is a citizen of St. Croix, United States Virgin Islands.
307. Phillip, Marva is a citizen of St. Croix, United States Virgin Islands.
308. Phillip, Marvin is a citizen of St. Croix, United States Virgin Islands.
309. Phillip, Terry M. is a citizen of St. Croix, United States Virgin Islands.
310. Picart, Jose is a citizen of St. Croix, United States Virgin Islands.
311. Pilier, Demetrio A. individually and as parent to minors Pilier, Lizandro and Pilier, Lizangel, citizens of St. Croix U.S. Virgin Islands.
312. Plaskett, Cripson is a citizen of St. Croix, United States Virgin Islands.
313. Plaskett, Dilia individually and as parent to minor Ventura, Angela S., citizens of St. Croix U.S. Virgin Islands.
314. Plaskett, William A. is a citizen of St. Croix, United States Virgin Islands.
315. Polidore, Cornelia is a citizen of St. Croix, United States Virgin Islands.
316. Polidore, Keriscia is a citizen of St. Croix, United States Virgin Islands.
317. Polydore, Lawrence citizens of St. Croix U.S. Virgin Islands.
318. Prescott, Miscelda is a citizen of Mattapan, Massachusetts.
319. President, Kimbel is a citizen of St. Croix, United States Virgin Islands.
320. President, Kimberly is a citizen of St. Croix, United States Virgin Islands.

Abraham et al. v. St. Croix Renaissance LLLP

FIRST AMENED COMPLAINT

Page 22

321. Preville, Godfrey G. is a citizen of St. Croix, United States Virgin Islands.
322. Profil, Migdalia is a citizen of St. Croix, United States Virgin Islands.
323. Pryce, David is a citizen of St. Croix, United States Virgin Islands.
324. Pryce, Philbert Jr. is a citizen of St. Croix, United States Virgin Islands.
325. Quildan, Isabella N. is a citizen of St. Croix, United States Virgin Islands.
326. Quildan, Kareem is a citizen of St. Croix, United States Virgin Islands.
327. Quinones, Iris M. is a citizen of St. Croix, United States Virgin Islands.
328. Quinones, Jose William is a citizen of St. Croix, United States Virgin Islands.
329. Quinones, Ruth A. is a citizen of St. Croix, United States Virgin Islands.
330. Quinones, Sila is a citizen of St. Croix, United States Virgin Islands.
331. Ramirez, Andres Mercado is a citizen of St. Croix, United States Virgin Islands.
332. Ramos, Brunilda is a citizen of St. Croix, United States Virgin Islands.
333. Ramos, Daniel is a citizen of St. Croix, United States Virgin Islands.
334. Ramos, Gabriel is a citizen of St. Croix, United States Virgin Islands.
335. Ramos, Jorge is a citizen of St. Croix, United States Virgin Islands.
336. Ramos, Josefina is a citizen of St. Croix, United States Virgin Islands.
337. Ramos, Marcela is a citizen of St. Croix, United States Virgin Islands.
338. Reyes, Eridania is a citizen of St. Croix, United States Virgin Islands.
339. Reyes, Evaristo is a citizen of St. Croix, United States Virgin Islands.
340. Reyes, Francisca C., individually and as parent to minor Reyes, Nayoshe, citizens of St. Croix U.S. Virgin Islands.
341. Reyes, Juan A. is a citizen of St. Croix, United States Virgin Islands.
342. Reyes, Juanico is a citizen of St. Croix, United States Virgin Islands.

Abraham et al. v. St. Croix Renaissance LLLP

FIRST AMENED COMPLAINT

Page 23

343. Reyes, Maximo Guerrero is a citizen of St. Croix, United States Virgin Islands.
344. Reyes, Wanda J. is a citizen of St. Croix, United States Virgin Islands.
345. Richardson, Laurencea is a citizen of St. Croix, United States Virgin Islands.
346. Richardson, Marilyn, individually and as parent to minor Gonzague, Jovon, citizens of St. Croix U.S. Virgin Islands.
347. Rios, Cecilia is a citizen of St. Croix, United States Virgin Islands.
348. Rivera, Ana Celia is a citizen of St. Croix, United States Virgin Islands.
349. Rivera, Beatrice is a citizen of St. Croix, United States Virgin Islands.
350. Rivera, Belkis is a citizen of St. Croix, United States Virgin Islands.
351. Rivera, Ebony is a citizen of St. Croix, United States Virgin Islands.
352. Rivera, Miriam is a citizen of St. Croix, United States Virgin Islands.
353. Rivera, Sandro is a citizen of St. Croix, United States Virgin Islands.
354. Robles Jessica C. is a citizen of St. Croix, United States Virgin Islands.
355. Robles, Benjamin Jr. is a citizen of St. Croix, United States Virgin Islands.
356. Robles, Benjamin Sr. is a citizen of St. Croix, United States Virgin Islands.
357. Robles, Elise is a citizen of St. Croix, United States Virgin Islands.
358. Robles, Ismael is a citizen of St. Croix, United States Virgin Islands.
359. Robles, Ivette is a citizen of St. Croix, United States Virgin Islands.
360. Robles, Jose Luis is a citizen of St. Croix, United States Virgin Islands.
361. Rodney, Martina L. is a citizen of St. Croix, United States Virgin Islands.
362. Rodriguez, Julio is a citizen of St. Croix, United States Virgin Islands.
363. Rodriguez, Lillian R. individually and as parent to minor Rodriguez, Miguel A. , citizens of St. Croix U.S. Virgin Islands.

Abraham et al. v. St. Croix Renaissance LLLP

FIRST AMENED COMPLAINT

Page 24

364. Rodriguez, Miguely is a citizen of St. Croix, United States Virgin Islands.
365. Rogers, Akeel is a citizen of St. Croix, United States Virgin Islands.
366. Rojas, Pablo is a citizen of St. Croix, United States Virgin Islands.
367. Roldan, Frenando L. is a citizen of St. Croix, United States Virgin Islands.
368. Roldan, Jeremy L. is a citizen of St. Croix, United States Virgin Islands.
369. Rosario, Angela Pagan is a citizen of St. Croix, United States Virgin Islands.
370. Ross, Neelia is a citizen of St. Cloud, Florida.
371. Ruiz, Joanne, individually and as parent to minors Carmona, Angelo J., Greenidge, Alaika E., Greenidge, Allen H., Jr., Greenidge, Talaiya A. and Ruiz, Takima T., citizens of St. Croix U.S. Virgin Islands.
372. Ruiz, Rut individually and as parent to minor Leo, Jahliah T., citizens of St. Croix U.S. Virgin Islands.
373. Saldana, Carmen is a citizen of St. Croix, United States Virgin Islands.
374. Saldana, Eddie Adner is a citizen of St. Croix, United States Virgin Islands.
375. Saldana, Edwin is a citizen of Bronx, NY.
376. Saldana, Raquel individually and as parent to minor Maragh, Krystal, citizens of St. Croix U.S. Virgin Islands.
377. Sanchez, Angel Alberto is a citizen of St. Croix, United States Virgin Islands.
378. Sanchez, Edith is a citizen of St. Croix, United States Virgin Islands.
379. Sanchez, Jose Alberto is a citizen of St. Croix, United States Virgin Islands.
380. Sanchez, Jose E. is a citizen of St. Croix, United States Virgin Islands.
381. Sanchez, Jose Roberto is a citizen of St. Croix, United States Virgin Islands.
382. Sanes, Angel L. is a citizen of St. Croix, United States Virgin Islands.

Abraham et al. v. St. Croix Renaissance LLLP

FIRST AMENED COMPLAINT

Page 25

383. Sanes, Joshua citizens of St. Croix U.S. Virgin Islands.
384. Sanes, Miguel Angel is a citizen of St. Croix, United States Virgin Islands.
385. Santana, Yadira is a citizen of St. Croix, United States Virgin Islands.
386. Santiago, Jose Lanso is a citizen of St. Croix, United States Virgin Islands.
387. Santiago, Artemia is a citizen of St. Croix, United States Virgin Islands.
388. Santiago, Carlos L. is a citizen of St. Croix, United States Virgin Islands.
389. Santiago, Chayanne is a citizen of St. Croix, United States Virgin Islands.
390. Santiago, Eliever is a citizen of St. Croix, United States Virgin Islands.
391. Santiago, Lydia is a citizen of St. Croix, United States Virgin Islands.
392. Santiago, Maynalys is a citizen of St. Croix, United States Virgin Islands.
393. Santos, Angelica is a citizen of St. Croix, United States Virgin Islands.
394. Santos, Ramona is a citizen of St. Croix, United States Virgin Islands.
395. Santos, Theresita is a citizen of St. Croix, United States Virgin Islands.
396. Serrano, Maria is a citizen of Sanford, Florida.
397. Serrano, Martha is a citizen of San Antonio, Texas.
398. Serrano, Martin Jr. is a citizen of San Antonio Texas.
399. Shalto, Greta is a citizen of St. Croix, United States Virgin Islands.
400. Shaw- Jacobs, Jeanette is a citizen of St. Croix, United States Virgin Islands.
401. Shirley, Helen is a citizen of St. Croix, United States Virgin Islands.
402. Slater, Ramisha individually and as parent to minor Wilson, Brandon T.B. II, citizens of St. Croix U.S. Virgin Islands.
403. Smith, Keisha P. is a citizen of St. Croix, United States Virgin Islands.
404. Smith, Kevin E. is a citizen of St. Croix, United States Virgin Islands.

Abraham et al. v. St. Croix Renaissance LLLP

FIRST AMENDED COMPLAINT

Page 26

405. Smith, Natasha is a citizen of St. Croix, United States Virgin Islands.
406. Soto, Jennifer is a citizen of Camden, New Jersey.
407. Soto, Jeremy is a citizen of St. Croix, United States Virgin Islands.
408. Soto, Jorge is a citizen of St. Croix, United States Virgin Islands.
409. Soto, Luis Enrique individually and as parent to minor Soto, Luis E., citizens of St. Croix U.S. Virgin Islands.
410. Soto, Maria L. is a citizen of Miramar, Florida.
411. Soto, Rosa is a citizen of St. Croix, United States Virgin Islands.
412. St. Brice, Anthony is a citizen of St. Croix, United States Virgin Islands.
413. Stevens, Claudia is a citizen of St. Petersburg, Florida.
414. Stubbs, Jeremiah C. individually and as parent to minor Stubbs, Mariah C., citizens of St. Croix U.S. Virgin Islands.
415. Taylor, Annette J. is a citizen of St. Croix, United States Virgin Islands.
416. Taylor, Beryl E. is a citizen of Dundee, Florida.
417. Taylor, Debbie R. is a citizen of St. Croix, United States Virgin Islands.
418. Theophilus, Alita V. is a citizen of St. Croix, United States Virgin Islands.
419. Thomas, Marsha individually and as parent to minors Tanis, Tamireia N. and Tanis, Nahomey citizens of St. Croix U.S. Virgin Islands.
420. Torres, Jose Manuel, Jr. is a citizen of St. Croix, United States Virgin Islands.
421. Torres, Linda is a citizen of St. Croix, United States Virgin Islands.
422. Valentine, Carmen is a citizen of St. Croix, United States Virgin Islands.
423. Valentine, Santiago O. Jr. is a citizen of St. Croix, United States Virgin Islands.
424. Vasquez, Noemi S. is a citizen of St. Croix, United States Virgin Islands.

Abraham et al. v. St. Croix Renaissance LLLP

FIRST AMENDED COMPLAINT

Page 27

425. Vega, Efrain is a citizen of St. Croix, United States Virgin Islands.
426. Vega, Luis Felix Jr. is a citizen of St. Croix, United States Virgin Islands.
427. Vega, Luz Delia individually and as parent to minors, Vega, Shanley T. and Vega, Fransheska citizens of St. Croix U.S. Virgin Islands.
428. Vega, Luis Felix is a citizen of St. Croix, United States Virgin Islands.
429. Vegas Lebron, Fermin is a citizen of St. Croix, United States Virgin Islands.
430. Velez, Carmen R. is a citizen of St. Croix, United States Virgin Islands.
431. Velez, Corporina is a citizen of St. Croix, United States Virgin Islands.
432. Velez, Jose R. is a citizen of St. Croix, United States Virgin Islands.
433. Velez, Jose Ramon is a citizen of St. Croix, United States Virgin Islands.
434. Velez, Margarita is a citizen of St. Croix, United States Virgin Islands.
435. Velez, Miguel Angel citizens of St. Croix U.S. Virgin Islands.
436. Velez, Norma citizens of St. Croix U.S. Virgin Islands.
437. Velez, Yesenia citizens of St. Croix U.S. Virgin Islands.
438. Ventura, Angel L. is a citizen of St. Croix, United States Virgin Islands.
439. Ventura, Anna Maria is a citizen of St. Croix, United States Virgin Islands.
440. Ventura, Carlos Jr. citizens of St. Croix U.S. Virgin Islands.
441. Ventura, Carmen L. citizens of St. Croix U.S. Virgin Islands.
442. Ventura, Edna is a citizen of Boston, Massachusetts.
443. Ventura, Jose Miguel is a citizen of St. Croix, United States Virgin Islands.
444. Ventura, Karla Jeanette is a citizen of St. Croix, United States Virgin Islands.
445. Ventura, Noelia Soto is a citizen of Carolina, Puerto Rico.

Abraham et al. v. St. Croix Renaissance LLLP

FIRST AMENED COMPLAINT

Page 28

446. Ventura, Xiomara I. individually and as parent to minor Denis, Diane N., citizens of St. Croix U.S. Virgin Islands.
447. Villanueva, Shelia L. is a citizen of Charlotte, North Carolina.
448. Williams, Clayton is a citizen of St. Croix, United States Virgin Islands.
449. Williams, Idelfonsa is a citizen of St. Cloud, Florida.
450. Williams, Urma is a citizen of St. Croix, United States Virgin Islands.
451. Wilson, Alfred is a citizen of St. Croix, United States Virgin Islands.
452. Wilson, Brandon T.B. is a citizen of St. Croix, United States Virgin Islands.
453. Wilson, Cindy, individually and as parent to minor Rivera, Justin citizens of St. Croix U.S. Virgin Islands.
454. Wilson, Diana N., individually and as parent to minor Roldan, Shaedean N., residents of St. Croix U.S. Virgin Islands.
455. Wiltshire, Dunn is a citizen of St. Croix, United States Virgin Islands.
456. Wiltshire, Ethelbert is a citizen of St. Croix, United States Virgin Islands.
457. Wiltshire, Gregg is a citizen of St. Croix, United States Virgin Islands.
458. Wiltshire, Hermine individually and as guardian to minor Wiltshire, Christina, citizens of St. Croix U.S. Virgin Islands.
459. Wiltshire, Peter is a citizen of St. Croix, United States Virgin Islands.
460. At all times relevant to this action, and within the time period of 2002 to the present, all Plaintiffs were residents of or guests staying in close proximity to the Defendant's alumina refinery on the south shore of St. Croix.

FACTUAL BACKGROUND

461. For about thirty years, an alumina refinery located near thousands of homes on

Abraham et al. v. St. Croix Renaissance LLLP

FIRST AMENDED COMPLAINT

Page 29

the south shore of the island of St. Croix was owned and/or operated by a number of entities. The facility refined a red ore called bauxite into alumina, creating enormous mounds of the by-product, bauxite residue, red mud, or red dust.

462. St. Croix Renaissance Group LLLP ("SCRG") upon information is a Limited Liability Limited Partnership and is deemed to be a citizen of Delaware, Florida, Massachusetts, Puerto Rico and St. Croix, U.S. Virgin Islands. In or about 2002, Alcoa World Alumina, LLC ("ALCOA") and St. Croix Alumina, LLC ("SCA") entered into a Purchase and Sale Agreement ("PSA") for the refinery with Brownfields Energy Recovery Corporation ("BRC") and Energy Answers Corporation of Puerto Rico ("EAPR") and BRC and EAPR immediately transferred their interests in the refinery to St. Croix Renaissance Group ("SCRG").

463. SCRG has owned and/or operated the refinery from 2002 to the present.

464. Alumina is extracted from a naturally-occurring ore called bauxite. Bauxite is red in color. The Material Safety Data Sheets ("MSDS") for bauxite warn that it can cause irritation of the eyes, skin and upper respiratory tract.

465. The byproduct of the alumina refining process used at the St. Croix refinery is a red substance called bauxite residue, or "red mud" or "red dust," which is indistinguishable in color and texture from bauxite. Red mud causes damages to real and personal property.

466. Red mud causes significant physical injuries. The MSDS for red mud states that it can cause "severe irritation and burns [of eyes], especially when wet," "can

Abraham et al. v. St. Croix Renaissance LLLP

FIRST AMENDED COMPLAINT

Page 30

cause severe irritation [of skin], especially when wet,” “can cause irritation of the upper respiratory tract,” and that is a “cancer hazard.” The MSDS also advises against skin and eye exposure to red mud.

467. From the beginning of the alumina refinery’s operations, hazardous materials, including chlorine, fluoride, TDS, aluminum, arsenic, molybdenum, and selenium, as well as coal dust and other particulates were buried in the red mud, and the red mud was stored outdoors in open piles that at times were as high as approximately 120 feet and covered up to 190 acres of land. The piles of red mud erode into the environment if they are not secured by vegetation or retaining walls. For years, the uncovered piles often emitted fugitive dust when winds blew across the refinery and on the frequent occasions when bulldozers ran over them.

468. In addition, the refinery contained asbestos and other particulates and hazardous substances in various conditions that were never removed from the premises, in violation of law.

469. The bauxite was stored in a steel A-frame structure with plastic sheets hung down the sides, called the bauxite storage shed. In 1995, Hurricane Marilyn hit St. Croix and damaged the roof of the bauxite storage shed, which allowed the dusty bauxite to be blown out of the shed.

470. Previous owners ALCOA and St. Croix Alumina added red dust, coal dust and other particulates to the materials left behind by Virgin Islands Alumina Company, Glencore, Ltd., Glencore International AG, and Century Aluminum Company, the former owners and/or operators of the refinery, and continued to

Abraham et al. v. St. Croix Renaissance LLLP

FIRST AMENDED COMPLAINT

Page 31

stack and store them in huge uncovered piles.

471. When SCRG purchased the refinery it had knowledge of the potential for red mud releases. It was aware of the loose bauxite and piles of red mud and knew that those substances had the propensity for particulate dispersion when exposed to wind and that the refinery was in close proximity to thousands of residential dwellings. Indeed, all of the Plaintiffs lived or were staying or still live in close proximity to the dangerous dispersion of the red dust particulates. SCRG knew that every time there was a strong wind the toxic substances in the piles would be dispersed into the air, where they were inhaled by Plaintiffs, deposited onto Plaintiffs' persons and real and personal properties, and deposited into the cisterns that are the primary source of potable water for many Plaintiffs. This dispersion of toxic materials occurred continuously from the same source, the red mud piles at the alumina refinery, and SCRG, owner of the refinery from 2002, did nothing to abate it, and instead, allowed the series of continuous transactions to occur like an ongoing chemical spill. Each Plaintiff's exposure occurred out of the same dispersions of toxic materials including the coal dust, which is buried in the red mud, and which was stored outdoors.

472. Despite that knowledge SCRG failed to take proper measures to control those emissions ever since it took control of the refinery from 2002 to the present.

473. In addition, SCRG took actions related to the red mud piles that increased the disbursement of the toxic substances into Plaintiffs' properties and further resulted in Plaintiffs' additional exposure to those toxic substances.

474. Red mud contains caustic soda, crystalline silica, iron oxide, titanium dioxide,

Abraham et al. v. St. Croix Renaissance LLLP

FIRST AMENDED COMPLAINT

Page 32

and other toxic substances that make it a health risk to Plaintiffs and exposes Plaintiffs to toxic injuries.

475. SCRG discovered that ALCOA had not abated the asbestos in the property on or about 2006 when it was informed by DPNR.

476. SCRG attempted to conceal the fact it had friable asbestos in the plant and left it there for years.

477. SCRG knew that friable asbestos was being blown into Plaintiffs' homes and being inhaled by Plaintiffs but failed to disclose its knowledge or warn Plaintiffs.

478. During its operation and/or ownership of the alumina refinery, SCRG failed to remove the asbestos from the refinery for years and upon information asbestos remains in the property.

479. Upon information the asbestos has been friable and in an extremely dangerous condition for at least 10 years but Plaintiffs had no way of knowing or discovering that. In particular, Defendant concealed the existence of the friable asbestos from Plaintiffs until 2010, when DPNR produced documents, indicating the presence of asbestos in discovery in the Bennington v. SCRG matter indicating that unencapsulated asbestos fibers were permitted to hang and blow about freely.

480. Upon information SCRG hid the fact that it had friable asbestos not only from the Plaintiffs but also from Department of Natural Resources (DPNR) and Environmental Protection Agency (EPA) and in fact, made false reports concerning the same.

481. SCRG has done nothing to remove that asbestos to the present.

Abraham et al. v. St. Croix Renaissance LLLP

FIRST AMENDED COMPLAINT

Page 33

482. As a result of Defendant's conduct, Plaintiffs suffered and continue to suffer physical injuries, medical expenses, damage to their properties and possessions, loss of income, loss of capacity to earn income, mental anguish, pain and suffering and loss of enjoyment of life, a propensity for additional medical illness, and a reasonable fear of contracting illness in the future, all of which are expected to continue into the foreseeable future.

483. To this date, Defendant is continuing to expose Plaintiffs to red dust, bauxite, asbestos and other particulates and hazardous substances. Defendants' conduct is also continuing to prevent Plaintiffs from freely enjoying their properties.

COUNT I: Abnormally Dangerous Condition

484. Plaintiffs repeat and re-allege each allegation of Paragraph 1-483 as if set forth herein verbatim.

485. The actions of the Defendant constitute maintaining an abnormally dangerous condition.

486. The St. Croix alumina refinery is located in a known hurricane zone at the head of the Kraus Lagoon Channel at Port Alucroix, which leads to the Caribbean Sea. The natural resources of the Virgin Islands are particularly sensitive and precious.

487. Thousands of residential dwellings are located in close proximity to the refinery and all of the Plaintiffs lived or stayed at or still live in close proximity to the refinery and certainly within range of the dispersion of the toxic materials from the refinery.

Abraham et al. v. St. Croix Renaissance LLLP

FIRST AMENDED COMPLAINT

Page 34

488. Defendant's use, storage, disposal and failure to remediate the bauxite, red dust and/or red mud, asbestos, coal dust, and other particulates and hazardous materials at the refinery is solely for Defendant's own business purposes.
489. Defendant knows and understands that there is a high risk that strong winds could blow bauxite, red mud, asbestos and other particulates and hazardous materials into Plaintiffs' neighborhoods.
490. Defendant's ongoing storage, disposal, and failure to remediate the bauxite, red mud, asbestos, and other particulates and hazardous materials presented and continues to present a high risk of great harm to Plaintiffs' health, chattel, and properties. Bauxite and red mud can irritate the skin, respiratory tract, and eyes and can permanently stain, clog, and otherwise damage property and objects. Friable asbestos is also a known carcinogen that can cause a variety of respiratory illnesses.
491. Defendant's ongoing use, storage, disposal and failure to remediate bauxite, red mud, asbestos and other particulates and hazardous materials at the alumina refinery caused and continue to cause serious harm to Plaintiffs' persons, chattel, and properties. As a result, the Plaintiffs suffered damages as alleged herein.

COUNT II: Public Nuisance

492. Plaintiffs repeat and re-allege each allegation of Paragraph 1-491 as if set forth herein verbatim.
493. The actions of Defendant constitute a public nuisance.
494. Specifically, the ongoing release of harmful dusts, including bauxite, red mud, coal dust, asbestos, and other particulates and hazardous materials, from the

Abraham et al. v. St. Croix Renaissance LLLP

FIRST AMENDED COMPLAINT

Page 35

alumina refinery unreasonably threatens and interferes with the public rights to safety, health, peace, comfort, and the enjoyment of private land and public natural resources.

495. The actions of Defendant violated the statutes of the Virgin Islands (including, but not limited to, 12 V.I.R. & R. § 204-20(d) & (e), §§ 204-25(a)(2) & (3), § 204-25(c), and § 204-27(a)) and constitute nuisance *per se*.

496. Defendant knows or has reason to know that its conduct has a significant effect on the public rights.

497. Plaintiffs are entitled to damages as a result, thereof.

498. The Plaintiffs are further entitled to an injunction requiring Defendant to desist all activities that allow the release of pollutants, further requiring Defendant to remove the piles of “red dust”, coal dust and other particulates and hazardous materials, to remove all such pollutants, “red dust”, coal dust and other particulates and hazardous materials including asbestos from the island of St. Croix, and to refrain from allowing said substances from accumulating again on St. Croix.

COUNT III: Private Nuisance

499. Plaintiffs repeat and re-allege each allegation of Paragraph 1-498 as if set forth herein verbatim.

500. Defendant’s actions constitute a private nuisance in violation of 28 V.I.C. § 331 and Virgin Islands common law against each Plaintiff as they all lived within close proximity to the refinery and were subjected to the dangerous ongoing emissions.

501. Defendant’s recurring releases of massive quantities of bauxite, red mud,

Abraham et al. v. St. Croix Renaissance LLLP

FIRST AMENDED COMPLAINT

Page 36

asbestos, and other particulates and hazardous substances have stained, clogged, and otherwise significantly damaged and/or destroyed Plaintiffs' homes and yards, and the damages and destruction continue to date.

502. Defendant's recurring releases of massive quantities of bauxite, red mud, asbestos, and other particulates and hazardous substances have exposed and continue to expose Plaintiffs' bodies to toxic and/or irritating dusts.

503. By so doing, Defendant has wrongfully and unreasonably interfered with Plaintiffs' private use and enjoyment of their homes and properties. As a result, Plaintiffs have been damaged, and continue to be damaged, as alleged, herein.

504. Pursuant to 28 V.I.C. § 331, in addition to damages, Plaintiffs are entitled to a warrant to abate the nuisance and/or an injunction to prevent the continuance of the nuisance.

COUNT IV: Intentional Infliction of Emotional Distress

505. Plaintiffs repeat and re-allege each allegation of Paragraph 1-504 as if set forth herein verbatim.

506. The actions of Defendant constitute the intentional infliction of emotional distress on Plaintiffs.

507. Defendant knows and understands that exposure to bauxite, red mud, asbestos, and other particulates and hazardous substances presented and continues to present serious risks to the health and property of thousands of St. Croix residents. Defendant also understands that the emissions posed and continue to pose serious threats to the local environment and natural resources.

508. Defendant knows that wind, rain and/or flooding, and other physical disturbances

Abraham et al. v. St. Croix Renaissance LLLP

FIRST AMENED COMPLAINT

Page 37

could release bauxite, red mud, asbestos and other particulates and hazardous substances from the alumina refinery into Plaintiffs' neighborhoods.

509. Defendant understands that St. Croix is a hurricane-prone area and that local residents rely on cisterns as their primary source of potable water.

510. Since at least 2006, Defendant SCRG also knew that dangerous friable asbestos was present at the refinery and could, along with the red mud and related particulates and hazardous substances, be blown by winds into Plaintiffs' neighborhoods, and that it did in fact do so.

511. Despite this knowledge, Defendant has knowingly and intentionally failed to take precautions to prevent bauxite, red mud, asbestos and other particulates and hazardous substances from blowing into Plaintiffs' neighborhoods, where it did blow and was dispersed exposing each Plaintiff to the harmful emissions and toxic substances continuously.

512. After Defendant permitted Plaintiffs to be exposed to bauxite, red mud, asbestos and other particulates and hazardous substances emissions from the alumina refinery, Defendant purposefully concealed and/or misrepresented the health risks associated with exposure to the emissions from Plaintiffs.

513. Years after learning that emissions from the alumina refinery presented high risk of serious injury to Plaintiffs and the natural resources of the Virgin Islands, Defendant continues to allow bauxite, red mud, asbestos and other particulates and hazardous substances to blow into Plaintiffs' neighborhoods and cause significant harm to Plaintiffs' minds, bodies, and property.

514. As a result of Defendant's callous disregard for the health, safety, well-being and

Abraham et al. v. St. Croix Renaissance LLLP

FIRST AMENDED COMPLAINT

Page 38

property of Plaintiffs, Plaintiffs have suffered damages as alleged herein, including severe emotional distress and physical ailments resulting from such distress.

COUNT V: Negligent Infliction of Emotional Distress

515. Plaintiffs repeat and re-allege each allegation of Paragraph 1-514 as if set forth herein verbatim.

516. In the alternative to intentional infliction of emotional distress, the actions of Defendant constitute the negligent infliction of emotional distress.

517. As a result, Plaintiffs have been damaged as alleged, herein.

COUNT VI: Negligence as to Defendant

518. Plaintiffs repeat and re-allege each allegation of Paragraph 1-517 as if set forth herein verbatim.

519. The actions of Defendant constitute negligence.

520. SCRG has owned and/or operated the alumina refinery from 2002 to the present.

521. SCRG has failed and continues to fail to properly store and/or secure bauxite, red mud, related particulates, hazardous substances, and asbestos on the premises.

522. SCRG knew and/or should have known that its failure to secure these dangerous materials would allow them to blow freely into Plaintiffs' neighborhoods and harm Plaintiffs and their properties.

523. SCRG's failure to properly secure, store and/or maintain the bauxite, red mud, related particulates, hazardous substances, and asbestos at the alumina refinery has allowed and continues to allow these materials to blow into the nearby areas

Abraham et al. v. St. Croix Renaissance LLLP

FIRST AMENDED COMPLAINT

Page 39

and harm Plaintiffs and their properties.

524. As a result Plaintiffs have been damaged as alleged, herein.

COUNT VII: Punitive Damages

525. Plaintiffs repeat and re-allege each allegation of Paragraph 1-524 as if set forth herein verbatim.

526. The actions of Defendant were and are so callous and done with such extreme indifference to the rights and interests of the Plaintiffs and the citizens of St. Croix so as to entitle Plaintiffs to an award of punitive damages.

WHEREFORE, Plaintiffs pray for damages as they may appear, compensatory and punitive, an injunction requiring that Defendant cease and desist all activities that result in pollutants being discharged and, further requiring a cleanup of all pollutants and removal of the piles of "Red Dust", coal dust and particulates and hazardous substances, costs and fees and such other relief as this Court deems fair and just.

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

DATED: March 15, 2012

BY: _____

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

LAURIE L.A. ABEDNEGO, et al. : CIVIL ACTION
 : :
 : :
 : :
ALCOA INC., et al. : NO. 10-9

ORDER

AND NOW, this 4th day of October, 2010, it is hereby
ORDERED that:

(1) the motion of plaintiffs to file a second amended
complaint is GRANTED;

(2) the second amended complaint is deemed filed as of
this date;

(3) the motion of plaintiffs to remand the action for
lack of federal subject matter jurisdiction to the Superior Court
of the Virgin Islands is DENIED without prejudice now that the
plaintiffs have been granted leave to file a second amended
complaint; and

(4) the motion of defendants St. Croix Alumina, LLC,
Alcoa Inc. and Glencore Ltd. to dismiss for failure to state a
claim or in the alternative for a more definite statement (Doc.
#5) and the motion of defendant St. Croix Renaissance, LLLP to
dismiss (Doc. #6) are DENIED as moot now that plaintiffs have
been granted leave to file a second amended complaint.

Rule 15(a) of the Federal Rules of Civil Procedure provides that the court should "freely give leave [to amend a pleading] when justice so requires." The Supreme Court has also emphasized that amendments should be freely allowed absent "undue delay, bad faith or dilatory motive." Foman v. Davis, 371 U.S. 178, 182 (1962). The case is at a very early stage. Since one of the salient purposes of plaintiffs' motion is to correct acknowledged errors in the first amended complaint, and since there is no impediment to the filing of a second amended complaint, the motion is being allowed. Our granting of the motion to file the second amended complaint, of course, does not preclude the filing of a renewed motion to remand or any other appropriate motion.

Finally, we note that the attempt of Glencore Ltd. to speak for Glencore International A.G. in Glencore Ltd.'s response to plaintiffs' motion for leave to file second amended complaint is unavailing. At the time of the filing of the response and until the Order is entered, Glencore International A.G. was not a party to this action.

BY THE COURT:

/s/ Harvey Bartle III
HARVEY BARTLE III C.J.
SITTING BY DESIGNATION

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

LAURIE L.A. ABEDNEGO, et al. : CIVIL ACTION
 :
v. :
 :
ALCOA INC., et al. : NO. 10-9

ORDER

AND NOW, this 30th day of December, 2010, it is hereby
ORDERED that:

(1) the renewed motion of plaintiffs to remand for lack
of subject matter jurisdiction (Doc. No. 96) is DENIED as moot
without prejudice to plaintiffs' right to file a motion to remand
the Third Amended Complaint; and

(2) the motion of defendants Alcoa, Inc. and Glencore,
Ltd. to dismiss the plaintiffs' Second Amended Complaint (Doc.
No. 104) is DENIED as moot without prejudice to defendants' right
to file a motion to dismiss the Third Amended Complaint.

BY THE COURT:

/s/ Harvey Bartle III
HARVEY BARTLE III C.J.
SITTING BY DESIGNATION