

SMALL CLAIMS COMPLAINT

SUPERIOR COURT  
OF THE VIRGIN ISLANDS

2009 SEP 31 PM 12: 14

IN THE SUPERIOR COURT OF THE VIRGIN ISLANDS

DIVISION OF ST. THOMAS/ST. JOHN

	Plaintiff	)	
Andreas Tietje		)	
6501 Red Hook Plaza		)	CASE NO. <u>ST-09-sm-547</u>
Suite 201		)	
St. Thomas, VI 00802		)	
Phone: 340 777-6460		)	
	Vs.	)	ACTION FOR: <u>Debt</u>
		)	
Roger W. Morgan and Kangja Morgan		)	
Pricipals and Owners of		)	
Rainbow Broadcasting LLC		)	
5072 Anchor Way		)	
Christianstead, VI 00820		)	
Phone: 340 773-5935		)	
	Defendant	)	

Plaintiff hereby asserts that Defendants, Roger W. Morgan and Kangja Morgan aka Rainbow Broadcasting, LLC, jointly and individually have entered into a loan arrangement with the Plaintiff in form of a Promissory Note in the amount of \$ 25,000 (Twenty-Five Thousand Dollars) on November 3, 2008. See EXHIBIT A.

The terms of the loan are as follows:

1. The loan amount was furnished to the Defendants as a downpayment for the purchase of WODI radio station in Brookneal, Virginia;
2. The due date for final payment in full of the loan amount was agreed by all parties not to exceed January 15, 2009;
3. Defendants further agreed to pay as interest an additional \$ 5,000 (Five Thousand Dollars according to the following schedule:
  - a. February 15, 2009 - \$ 2,000 (Two Thousand Dollars);
  - b. March 15, 2009 - \$ 1,500 (One Thousand Five Hundred Dollars);
  - c. April 15, 2009 - \$ 1,500 (One Thousand Five Hundred Dollars).

Plaintiff concedes the original loan amount of \$ 25,000 (Twenty-Five Thousand Dollars) has been paid as has the interest payments (albeit in breach of the established due dates) with the exception of a balance of an outstanding balance of \$ 2,000 (Two

Thousand) owing on the interest which continues to be unpaid and has been delinquent since the April 15, 2009 due date.

Email exchanges substantiating the Plaintiff's good faith effort to collect the outstanding debt are documented and available to the Court.

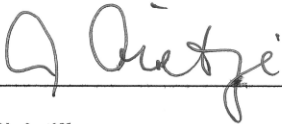
Wherefore Plaintiff demands that judgement be entered as follows:

1. \$ 2,000 (Two Thousand Dollars) to be awarded to the Plaintiff to make whole the original Agreement;
2. An additional \$ 500 (Five Hundred Dollars) to be awarded to the Plaintiff for time and expense to collect the aforementioned debt, as well as reimbursement for Court filing and process service fees.

Process Service:

Between the hours of 9:00 AM and Noon, Monday thru Thursday, at the Rain Broadcasting office located in Gallows Bay (above the US Post Office) on St. Croix.

Dated: October 2, 2009



A handwritten signature in cursive script, appearing to read "A. Pietze", is written above a horizontal line.

Plaintiff