

IN THE SUPERIOR COURT OF THE VIRGIN ISLANDS
DIVISION OF ST. THOMAS & ST. JOHN

IN THE MATTER OF THE ESTATE OF)
JEFFREY E. EPSTEIN,)

Deceased.)

PROBATE NO. ST-19-PB-80

ACTION FOR TESTATE
ADMINISTRATION

CO-EXECUTORS' STATUS REPORT ON CONTINUING
EFFORTS TO ESTABLISH VOLUNTARY COMPENSATION PROGRAM AND
REQUEST FOR RULING

Come now the Co-Executors of the Estate of Jeffrey E. Epstein (the "Estate"), **DARREN K. INDYKE** and **RICHARD D. KAHN**, and provide the Court with this Status Report on their continuing efforts to establish an independent and voluntary claims resolution program (the "Program") for purposes of resolving sexual abuse claims against Jeffrey E. Epstein, deceased.

If the Program fails to launch, it will be an extraordinary lost opportunity for eligible claimants to receive compensation and voluntarily resolve their claims of sexual abuse against Mr. Epstein through a confidential, non-adversarial alternative to litigation. And there will be only one culprit: the Attorney General of the Virgin Islands. Despite weeks of negotiation with the Attorney General's representatives — who prefer to file misleading "status reports" with the Court rather than engage in actual, good-faith discussions — the Co-Executors are no closer than before to having the Attorney General lift her liens on the Estate's accounts so that the Program can receive funds essential for its operations.

The Co-Executors and the Attorney General agree on one point: both now seek a ruling from the Court that will enable the Program to go forward. The Co-Executors disagree, however, on the appropriate issue before the Court. According to the Attorney General, "[her] Office seeks a ruling from this Court as to whether the Program, as proposed, should be approved, or whether additional concessions, as outlined by the Attorney General, and in the better interests

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SUPERIOR COURT
THE VIRGIN ISLANDS

of the victims, *are required* for its approval and fair administration.”¹ That is not the correct question: rather, it is whether the Co-Executors have acted in accordance with their fiduciary obligations imposed by USVI law on executors of estates.

As the Court noted during the February 4, 2020 hearing (the “February 4 Hearing”), the Co-Executors function as an arm of the Court and are vested by law with the responsibility of administering the Estate. The actual issue before the Court is whether the Program that the Co-Executors seek to implement is consistent with their fiduciary duties. As Your Honor recognized, the Program as originally designed is not only consistent with the fiduciary duties of the Co-Executors, but, in fact “...we agreed that everybody believes this program is a great program...” (February 4 Hearing Tr. at 113:24-25.)

Accordingly, the Co-Executors ask that the Court grant their *Expedited* Motion for Establishment of a Voluntary Claims Resolution Program, filed November 14, 2019, and allow the Co-Executors to move forward with the Program as originally conceived.

Background

More than seven months ago, the Co-Executors sought to establish the Program by interviewing numerous highly-qualified candidates for the role of independent claims program designer and administrator. The individuals selected — Jordana Feldman, Kenneth Feinberg, and Camille Biros— are the gold standard, with unparalleled experience in that regard.² Designed and to be implemented by independent, nationally recognized claims administration experts, with input

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1. Government’s Status Report, dated March 18, 2020 (“Gov’t. March 18 Status Report”), at 7 (emphasis supplied).
 2. For a detailed description of their qualifications as well as the function and structure of the Program, see the Co-Executors’ *Expedited* Motion for Establishment of a Voluntary Claims Program, filed November 14, 2019; Request for Ruling on *Expedited* Motion for Establishment of a Voluntary Claims Resolution Program, filed December 4, 2019; Request for *Immediate* Hearing or Conference Regarding *Expedited* Motion for Establishment of a Voluntary Claims Resolution Program, filed December 13, 2019.

from interested parties including claimants and their representatives, the Program seeks to timely resolve claims through a process that is sensitive to the experiences and concerns of claimants and treats them with compassion, dignity, and respect.

On February 4, 2020, the Court held an extensive hearing on the *bona fides* of the Program, taking detailed testimony from Program Administrator Jordana Feldman and Program Designer Kenneth Feinberg. (February 4 Hearing Tr. at 103:12-186:14.) The Court also heard repeated approval of the Program from the multiple claimants' counsel present at that hearing. (*Id.* 84:11-85:2; 85:6-19; 92:24-93:8.) As noted above, the Court recognized toward the end of the hearing that the Program is widely viewed as an important, positive step for both claimants and the Estate. (*Id.* at 113:24-25 ("THE COURT: . . . I think we agreed that everybody believes this program is a great program . . .").) Only one person, alone among all involved, opposes the Program: the Attorney General.³ To hold the Program hostage, the Attorney General issued Criminal Activity Liens freezing the Estate's accounts, including funds necessary to staff and operate the Program.⁴

At the conclusion of the February 4 hearing, the Court urged the Co-Executors and the Attorney General's representatives to see if they could come to an agreement on funding the Program. (*Id.* 112:4-12; 204:4-10.) Incredibly, the Attorney General tells the Court (twice) that it wrote to the Estate on February 10, 2020, but "received no response."⁵ That is false: on February 12, 2020, counsel for the Estate wrote a *six-page letter* to the Attorney General addressing each of

3. See Attorney General's Motion to Intervene, filed January 23, 2020 (attaching Government's Opposition to Estate's Motion for Establishment of a Voluntary Claims Resolution Program).

4. The Co-Executors have now moved in the Superior Court to vacate those Liens. (See *Expedited Motion to Vacate Liens*, dated March 17, 2020).

5. Gov't. March 18 Status Report, at 1, 2.

the points raised in her letter two days earlier. [Exhibit A] And now, more than five weeks later, the Attorney General continues to seek to accomplish her previously-stated goal of scuttling the Program before it has a chance to succeed.

Recent Developments

On February 28, 2020, the Attorney General — who has no experience whatsoever with claims resolution programs — presented the Co-Executors with an eleven-point laundry list of changes she demanded to the Program’s funding, structure, and operations.⁶ In their continued effort to make the Program a reality, the Co-Executors agreed to eight of those demands without substantial change; as to the other three, the Co-Executors agreed to the extent their fiduciary duties allow them.⁷ Each of these three latter items is discussed below.

1. The Attorney General Demands that Her Personally-Selected Candidate, a Biased Advocate with No Claims Administration Experience, Become a Co-Equal Program Administrator

The Attorney General demands that Professor Marci Hamilton, a legal academic in child sexual abuse at the University of Pennsylvania, assume a role in the Program co-equal with Ms. Feldman as Program Administrator.⁸ But Ms. Hamilton has no experience in mass tort claims resolution, and shoe-horning her into that inappropriate role will force the Estate to incur substantial additional time and expense with no commensurate benefit to the Program. That is not just the Co-Executor’s view: the Program Administrator and the Program Designers unanimously

6. See Gov’t. March 18 Status Report, at Exhibit B.

7. Bizarrely, the Attorney General reports that she offered the “concession[]” that the Estate’s cooperation with law enforcement not be tied to her approval of the Program. (Gov’t. March 18 Status Report, at 3.) The Co-Executors are extensions of the Court; they neither need nor require the Attorney General’s “concession” to uphold their fiduciary duties to the Estate or cooperate with legitimate law enforcement efforts.

8. See Gov’t. March 18 Status Report, at 2.

oppose this role for Ms. Hamilton. The Court had the opportunity to hear Ms. Feldman testify about her experience and to explain her efforts to address the views of all those interested in the design and the implementation of the Program. And, before the Attorney General raised Ms. Hamilton's candidacy, not a single claimants' counsel raised any concern about Ms. Feldman's qualifications, expertise or independence from the Estate.

Nor would hiring Ms. Hamilton in the role demanded by the Attorney General be consistent with the Co-Executors' fiduciary duties. Ms. Hamilton's outspoken views on the purported criminality of Mr. Epstein and those around him reveal her deep-seated bias against the Estate. It is rich irony that the Attorney General compares Ms. Hamilton's proposed role to that of a neutral arbitrator.⁹ In this matter, Ms. Hamilton is as far from a neutral party as one could possibly be: her public statements — on television, in opinion pieces and in multiple news articles — are replete with her strong, loudly-voiced bias against Decedent and anyone who knew him when he was alive, such that she believes the Estate should be drained of all assets without regard to any nexus to individual claims. Here are but a few examples:

- “It took us 16 years, but New York will be the epicenter for taking down the powerful who sexually abused children in New York. It will start to happen this year — in the civil courts. That is because there is another path that justice will take to force the facts into the public square: On Aug. 14, the one-year look-back window in the New York Child Victims Act will kick into effect. When it does, every girl who was sexually abused through Epstein's scheme will be able to sue for civil damages the ones who caused the abuse. Epstein is wealthy and so are many of his friends who enjoyed spending time partying with him when these girls — lured into doing ‘massages’ for much-needed cash — were turned into victims of a wealthy sex-trafficking ring. The CVA will level the playing field by handing these women potent legal weapons. It's a new world, and it's finally getting close to fair.” Marci Hamilton, *New York Daily News*, July 8, 2019 (“What Jeffrey Epstein's arrest

9. See Gov't. March 18 Status Report, at 2.

means: it's a sign of how profoundly things have changed for sex abuse victims and perpetrators," available at <http://www.nydailynews.com/opinion/ny-oped-what-epsteins-arrest-means-20190708-bdhg5ktn7bds3g6uti71pssui-story.html>).

- "Marci Hamilton, a child sex-abuse expert and founder of the nonprofit think tank CHILD USA, alleges that there's 'no question' that the men who palled around with Epstein must have noticed the presence of underage girls. 'There's also no question that they had to have known that these girls were supposedly providing massages — and that should have been warning bells all over the place,' Hamilton added." (Meera Jagannathan, *MarketWatch*, July 14, 2019 ("Amid new Jeffrey Epstein allegations, here's how to help a victim of child sex trafficking," available at <https://www.marketwatch.com/story/how-to-help-a-victim-of-child-sex-trafficking-2019-07-11>).
- "Have you noticed that the latest in the Jeffrey Epstein child sex-trafficking scandal has focused on the powerful men involved, from Epstein to President Trump, Alex Acosta, Bill Clinton, Ken Starr, Alan Dershowitz and New York Attorney Geoffrey Berman? To be sure, these men—except for Berman—operated together to empower Epstein to abuse far more girls than he might have otherwise, and that is newsworthy." (Marci Hamilton, *Miami Herald*, July 14, 2019 ("Epstein's victims deserve to find justice in civil court, too"; available at <https://www.miamiherald.com/opinion/op-ed/article 232663662.html>).
- "Basically, this failure to protect children is a political problem across the culture . . . This is outrageous that the [Epstein] victims themselves were not even part of the negotiation process. The arrogance of [] Epstein . . . in this situation is overwhelming . . . These women were sexually abused as children, one after the other. Dozens of them . . . This is exactly what is wrong with our society." (Marci Hamilton, *The Rachel Maddow Show*, December 3, 2018; available at <http://www.msnbc.com/rachel-maddow/watch/trump-cabinet-members-s-leniency-towed-sex-offender-stirs-outrage-1387897923761>).

That is not a criticism of Ms. Hamilton — as a zealous advocate for children, she is of course entitled to voice her deeply-held beliefs. But it *does* disqualify her as any sort of a "neutral" voice in hearing and determining claims through the Program.

Despite Ms. Hamilton's obvious bias against the Estate and those around Mr. Epstein, the Co-Executors still sought to find a way in which her expertise on relevant issues might be used to benefit claimants, while at the same time avoiding opportunities for her prejudice to mar the Program Administrator's independent, neutral determinations. In their efforts at continuing compromise, the Co-Executors proposed to the Attorney General that Ms. Hamilton play an extensive consulting role with the Program, a significant concession given Ms. Hamilton's bias:

"Professor Marci A. Hamilton, a nationally recognized sexual abuse expert, leading legal academic and advocate of victim's rights, will work closely with the Program Administrator to complement the Program's resources. Ms. Hamilton's role will be to further inform the Administrator and her staff about the dynamics of sexual abuse, common responses to sexual abuse, and the impact of sexual abuse on victims; to serve as a resource for the Administrator in developing or updating policies and procedures; to advise the Administrator regarding sensitivities involved in interactions with victims; and to serve as a referral source for the Administrator in providing post-determination information to claimants who seek guidance, counseling or other services."

(See email from Daniel H. Weiner to Linda Singer dated March 16, 2020, annexed as Exhibit D to the Government's March 18, 2020 Status Report.)¹⁰

Regrettably, the Attorney General rejected that generous proposal out-of-hand in her latest public filing.¹¹

10. While the Attorney General purports to quote the Co-Executors' proposal, she leaves out entirely this extensive description of the role offered to Ms. Hamilton. (Gov't. March 18 Status Report. at 4.) That is disingenuous in the extreme.

11. See Gov't. March 18 Status Report, at 4-5.

2. The Attorney General Demands that the Co-Executors Restrict Funds Available to Claimants Under the Program

The Attorney General also demands that the Co-Executors “set aside” — *i.e.*, make unavailable to claimants seeking compensation through the Program — \$40 million for the next three years.¹² Restricting the Estate’s funds available to pay compensation determinations under the Program is anathema to the Co-Executors — after all, one of the primary attractions of the Program is that all of the Estate’s funds are available to it. Removing \$40 million from the Estate’s assets available to the Program — on top of the Attorney General’s demand that, to ensure she gets paid if she prevails in her CICO action against the Estate, the Estate also “set aside” Little St. James Island, Great Saint James Island, and \$73.1 million in cash for past tax incentives — risks leaving the Program with insufficient funds to make good on its promise of speedy, just compensation.

As a compromise, the Co-Executors offered to set aside \$25 million in assets for eighteen months, a time period that will extend well beyond the expected term of the Program. The Attorney General did not respond to the Co-Executors’ good-faith compromise proposal.

3. The Attorney General Demands that the Co-Executors Report to Her Information Not Required by Virgin Islands Law

Finally, the Attorney General demands that, in addition to performing their fiduciary duties to the Court by accounting for all items concerning the Estate in accordance with Virgin Islands law, the Co-Executors also report to the Attorney General on matters and entities outside the probate proceeding. Once again, that is inappropriate: the Attorney General, an active

¹² The Attorney General initially insisted that any unused funds from this set-aside be donated to charity. That would constitute a direct breach of the Co-Executors’ obligations under Virgin Islands law.

litigant against the Estate, has no right to usurp the Court's authority to oversee the Co-Executors' administration of the Estate.¹³

* * * *

As the Attorney General continues to prolong her refusal to fund the Program — finding one pretext after another to claim she simply wants to improve the Program, while taking actions that would remove over \$200 million from the Program and make it more costly and less effective — the Estate is forced to actively litigate scores of cases that could otherwise have been resolved through the Program. As a result, both claimants and the Estate are expending precious resources that would have been far better used in resolving claims through the Program.¹⁴

It is now-or-never for the Program. Accordingly, the Co-Executors ask the Court to allow the Co-Executors to continue to perform their fiduciary duties, and — for the benefit of all stakeholders in the Estate, including those who seek to participate in the Program — grant their motion to establish the Program as originally conceived and presented to the Court on November 14, 2019.

13. The Attorney General also takes a cheap shot at Program Designer Kenneth Feinberg, citing nine-year-old criticism of Mr. Feinberg in the BP Deepwater Horizon litigation. (Gov't. March 18 Status Report at 6 and Exhibit E.) Yet the court in that case expressly found that Mr. Feinberg was "independent" in the sense that BP did not control his evaluation of individual claims. (*Id.* Exh. D at p. 11.) And Mr. Feinberg is not the Program Administrator here — Ms. Feldman is.

14. The Attorney General's interference has forced the Estate to litigate against numerous plaintiffs who would have participated in the Program if they had the opportunity to do so. As we emphasized to the Court at our February 21, 2020 conference, the Co-Executors affirmatively decided to reduce litigation (and the adversity inherent in it) by making the Program available to litigants as well as to those who were harmed but either were not prepared to litigate in a public forum, or barred from recovery through the courts due to statute of limitations or other reasons. The Attorney General's actions have had the unfortunate effect of pitting many plaintiffs against the Estate. That is precisely the opposite of what the Co-Executors sought and the Court endorsed at the February 4 Hearing.

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Respectfully,

Dated: March 23, 2020

/s/ Christopher Allen Kroblin

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Estate of Jeffrey E. Epstein
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 23rd day of March 2020, I caused a true and exact copy of the foregoing **Co-Executors' Status Report on Continuing Efforts to Establish Voluntary Compensation Program and Request for Ruling** to be served via electronic mail upon:

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February 12, 2020

BY E-MAIL

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Re: *In the Matter of the Estate of Jeffrey E. Epstein*
Probate No. ST-19-PB-80

Attorney General George:

As promised in my e-mail to you dated February 10, 2020, we write in response to your letter sent earlier that day regarding the formation of the voluntary compensation program – officially known as the Epstein Victims' Compensation Program (the "Program") – proposed by the Co-Executors in November 2019 and endorsed by Superior Court Judge Hermon-Percell and multiple claimants' counsel at the Court's hearing held on February 4, 2020 (the "February 4 Hearing"). We believe your letter misapprehends both the Court's direction to the Co-Executors and the Attorney General's limited role in this matter, and that your suggestions concerning the purpose, structure and administration of the Program are far outside the scope of the single issue as to which the Court requested that we confer.

EXHIBIT A

1. The Program is Designed and Will be Administered by the Nation's Leading Experts in the Field.

As your representatives have no doubt reported to you, both Program Administrator Jordana H. Feldman and Program Designer Kenneth R. Feinberg testified at length at the February 4 Hearing. Nationally renowned and respected experts in the highly specialized field of mass tort claims resolution, Ms. Feldman, Mr. Feinberg, and their colleague Camille Biros have extraordinary experience in administering programs addressing the Catholic Church's sexual abuse scandal, the Pennsylvania State University sexual abuse scandal, the Boeing 737 Max airplane crashes, the General Motors transmission recall, the Volkswagen diesel emissions scandal, the BP Deepwater Horizon oil spill, the Boston Marathon bombing, the September 11th terrorist attacks, and victims of exposure to Agent Orange, DES and asbestos, as well as several other mass torts.

Both Ms. Feldman and Mr. Feinberg testified regarding their absolute independence from the Co-Executors in resolving through the Program claims of sexual abuse against Mr. Epstein, explaining that such independence is the *sine qua non* of their agreement to design and implement the Program. Far from questioning the capabilities, integrity, or independence of Ms. Feldman and Mr. Feinberg, the multiple stateside and Virgin Islands counsel for nearly three dozen individual claimants present at the February 4 Hearing supported the Program and the manner in which it was expeditiously developed *without exception*.

Other than your counsel, no one in the courtroom (or elsewhere) voiced any objections to the Program, which — as designed by Ms. Feldman, Mr. Feinberg and Ms. Biros — will provide claimants with an entirely voluntary, easily accessible, non-adversarial alternative to protracted civil litigation. As Judge Hermon-Percell appropriately concluded at the February 4 Hearing, the Program has the potential to save enormous amounts of time, risk, and money for both individual claimants and the Estate.

2. The Court Urged the Co-Executors to Consult with the Attorney General on a Single Issue: Providing Adequate Funding for the Program.

Your Office previously raised several objections to the Program¹; each was addressed in detail at the February 4 Hearing. As the testimony of Ms. Feldman and Mr. Feinberg elucidated, those critiques were either misguided or mistaken, or both.² While there are various possible permutations in developing the precise details of a compensation mechanism, the Program designed by Ms. Feldman, Mr. Feinberg and Ms. Biros — with substantial input from claimants' counsel — is cost-effective, fair and just.

Perhaps most important, the Program is already well underway. As you know, and as Ms. Feldman and Mr. Feinberg testified, they have been working on the Program

1. See Opposition to Estate's Motion for Establishment of a Voluntary Claims Resolution Program, dated January 23, 2020.

2. Your February 10 letter indicates your Office's lingering confusion on certain aspects of the Program. For example, the Co-Executors have not jettisoned the concept of individual claimants signing releases if, and only if, those individuals elect to accept the compensation offered by the Program Administrator. It would be nonsensical for the Co-Executors to do so, since the Estate would otherwise risk being dragged back into litigation through third-party demands for contribution or indemnification. Given the Estate's need for legal finality and claimants' unfettered ability to pursue their claims in other fora, including through the courts, it is no surprise that — as both Ms. Feldman and Mr. Feinberg testified — such releases are commonplace in mass tort compensation programs.

since well before the Co-Executors announced the “Establishment of the Epstein Victims’ Compensation Program” on November 14, 2019 – almost three months ago. As Ms. Feldman, Mr. Feinberg and counsel for the claimants made clear at the February 4 Hearing, they have been working diligently and cooperatively to develop a Protocol for Judge Hermon-Percell’s review and approval.

Mr. Epstein died on August 10, 2019 – six months ago. You only first expressed disagreement with the Program when you filed your Complaint in the Superior Court on January 15, 2020. You did not seek to intervene in the Probate Court until January 23, 2020 or issue your liens until January 31, 2020. The concerns you now express raise an obvious question as to why you didn’t propose a different compensation program before filing these pleadings – which taken together amount to an effort to block or at least substantially delay the Program. You certainly had every opportunity to contact the Co-Executors or Ms. Feldman, Mr. Feinberg, or Ms. Biros and present your concerns and make your suggestions to improve the existing Program, but chose not to do so. And while this is neither the time nor the place to address each of your purported concerns about the Program, it is worth emphasizing that your letter is long on criticisms – misplaced in our view -- and woefully short on solutions.

The bottom line is that the claimants have invested in the Program and both the Estate and the claimants are already incurring significant resources unnecessarily litigating while you are delaying the Program. That is something no one who is truly concerned about conserving Estate resources and offering claimants an alternative to litigation should desire.

As the Co-Executors pointed out in their recent filings in the Superior Court,³ it is for the Court, not your Office, to oversee administration of the Estate and determine the propriety of the Co-Executors' actions under Virgin Islands law. There is only one point remaining to be discussed: how best to provide adequate funds for the Program. On this issue, the Co-Executors have made their position clear since the outset — they have placed no limits, either individually or in the aggregate, on the compensation that individual claimants may receive under the Program. That is the very best that the Co-Executors can do for existing and potential claimants, as they exercise their fiduciary duties under Virgin Islands law in administering the Estate. Your efforts seem singularly designed to thwart the proper exercise of these fiduciary duties to the substantial detriment of all such claimants.

As you know, the Co-Executors believe that the liens placed by your Office on the Estate's assets are improper and invalid under Virgin Islands law. It is for that reason that they seek judicial relief from those liens, which if left in place will cause irreparable harm to the Estate's property — including assets that would otherwise be available to fund the Program. Already, the Co-Executors' ability to preserve the Estate's assets have been severely undercut. The enclosed check written to an exterminator needed to preserve one of the properties is the first of what will be many checks to bounce as a result of the lien imposed by your Office on the Estate's operating bank account. This is the first

3. See Supplemental Brief Regarding Co-Executors' Obligations to Satisfy Expenses of Administration Notwithstanding Liens Issued to "The Estate," dated January 31, 2020; *Emergency Motion for Order Releasing Funds for Administration of Estate*, dated February 10, 2020.

of what will become an avalanche of harms to the Estate. Your lien has also stripped the Co-Executors of their ability to meet payroll, and prevents them from paying electric, water, and other basic bills. As a result of your actions, all the Estate's assets – including the islands in St. Thomas – will rapidly lose value. Likewise, the impact on the properties in Paris, New York City, and Florida if the Estate is unable to pay for their operating and maintenance expenses will likely be swift and severe. And it will be hard if not impossible to rehire staff once they are forced to seek alternative employment. The harm will be irreparable and substantial. Most disappointing and in disregard of the Court's request, your Office is holding the Program hostage, thereby threatening to derail a vitally important process for claimants to obtain justice.

The Co-Executors continue to hope that you will reverse your Office's position. In the interests of all concerned, the Co-Executors remain willing to work with you on how best to adequately fund the Program. Time is of the essence if the Program, and the hopes of those women who are eager to use it, are to survive.

Respectfully,



Christopher Allen Kroblin

cc: Jordana H. Feldman
Program Administrator

Attack Exterminating Company LLC
7105 3rd Avenue #438
Brooklyn, NY 11209
info@attackexterminating.com
www.attackexterminating.com



BILL TO
NES, LLC
9 East 71st Street
New York, NY 10021

INVOICE # 2395
DATE 01/01/2020
DUE DATE 01/31/2020
TERMS Net 30

Monthly Service	9 East 71st Street	1	100.00	100.00T
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SUBTOTAL	100.00
TAX	8.88
TOTAL	108.88
BALANCE DUE	\$108.88

AK
1/22/2020

THIS PAGE OF THIS DOCUMENT HAS A COLORED BACKGROUND ON WHITE PAPER AND ORIGINAL DOCUMENT SECURITY SCREEN ON BACK WITH FALLOUT SECURITY CODE

ESTATE OF JEFFREY EPSTEIN
9053 ESTATE THOMAS STE 101
ST THOMAS VI 00802

FIRST BANK
11A-B Curacao Gade
ST THOMAS VI 00802
101-7285/2216

001085

DATE 1/22/2020

PAY TO THE ORDER OF Attack Exterminating Company LLC

\$ **108.88

One Hundred Eight and 88/100 ***** DOLLARS

Attack Exterminating Company LLC
7105 3rd Avenue # 438
Brooklyn, NY 11209



MEMO

Invoice # 2395

AUTHORIZED SIGNATURE

MP

ESTATE OF JEFFREY EPSTEIN
Attack Exterminating Company LLC

1/22/2020

001085

108.88

First Bank Estate JE Invoice # 2395

108.88

ESTATE OF JEFFREY EPSTEIN
Attack Exterminating Company LLC

1/22/2020

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108.88

First Bank Estate JE Invoice # 2395

108.88

**IN THE SUPERIOR COURT OF THE VIRGIN ISLANDS
DIVISION OF ST. THOMAS & ST. JOHN**

IN THE MATTER OF THE ESTATE OF	)	
JEFFREY E. EPSTEIN,	)	PROBATE NO. ST-19-PB-80
	)	
Deceased.	)	ACTION FOR TESTATE
_____	)	ADMINISTRATION

ORDER

THIS MATTER is before the Court on the Co-Executors' Status Report on Continuing Efforts to Establish Voluntary Compensation Program and Request for Ruling. Having reviewed the Co-Executors' Status Report on Continuing Efforts to Establish Voluntary Compensation Program and Request for Ruling, the Court will grant the same.

Accordingly, it is hereby:

ORDERED that the Co-Executors' Status Report on Continuing Efforts to Establish Voluntary Compensation Program and Request for Ruling is **GRANTED**; and it is further

ORDERED that the Co-Executors' *Expedited* Motion for Establishment of a Voluntary Claims Resolution Program is **GRANTED**; and it is further

ORDERED that a copy of this Order shall be directed to counsel of record.

Dated: _____

ATTEST: TAMARA CHARLES
Clerk of the Court

CAROLYN P. HERMON-PERCELL
Magistrate Judge of the Superior Court
of the Virgin Islands

BY: _____

Court Clerk Supervisor ____ / ____ / ____