

11/6/19 - SE estate aty meeting

### Executives:

- into compensation program - "fair + independent from them"
- those will face more claims this way b/c nonpublic
- must deal w/ USVI Ct. why would spend more \$ this way
- Insp. people to design + im. program
  - interviewed 7 candidates
  - included P's counsel views
- Administrators will have complete autonomy + executors will have no authority to reject or modify administrator's recommendation
- have to convince USVI court to allow (motion being put off)
  - facing ahead as though don't need beneficiary buy-in + unclear if beneficiaries will get notice
- beneficiaries have not been notified of contents of trust
  - USVI counsel advises that trustees of trust don't have to give notice as matter of law

- USAO agreed to maintain confidentiality of today's conversation re identity of administrators pre filing of motion w/ identities
  - have to file next week, at latest 11/20/19

### Motion:

- request approval of Ct to be able to enter into program
  - engage administrators
  - allow administrators to design + implement a plan
  - process of coding program will then be w/ input from Prof. Gov.
- no priority of course, but kind of asking for blank check

- Administrators already bear some "free" risk
  - expectation is they can start taking claims w/i 90 days
  - would have website where can file claims + get info

- Eligibility = as inclusive as can be

- SE part of exclusion

- risk factors for litigation will be taken into account by administrators

Unclear whether USVI Ct will be open to participation by USVI prior settlements

Discussed USAO's ability to provide compensation other to those who previously settled through brokerage + adult witnesses provide to

VS can preserve claims & litigate if unhappy w/ claims admin, but  
have to accept Admin proposal  
- ~~have~~ to stay litig. during program

Findings:

- open ended, no cap is idea from executors
- resistant to floor, but AUL proposes possible backgrounding forfeiture to extent estate pays to VS at least a certain amount

\* Administrators (confidential)

- 1) Judy (Jordan) Feldman (9/11 victims fund) - interview victims + run
- 2) Ken Fendberg - designing program in 2 months

- Judy will hire others to run program

- proposal to Gov't to meet w/ admin re program