

From: [REDACTED] (USANYS) <[REDACTED]>
To: [REDACTED] (USANYS) <[REDACTED]>
Cc: [REDACTED] (USANYS) <[REDACTED]>
Subject: RE: Epstein probate update
Date: Thu, 28 May 2020 16:31:58 +0000

I would be happy to chat about this tomorrow (with [REDACTED] and [REDACTED]). I have a court conference tomorrow from 9:30-11:00 and a NYCHA conference call at noon; otherwise I am available.

We were just talking about whether we should replace [REDACTED] on this matter. We were not sure how much work would be needed going forward. Maybe we could figure that out after the call.

From: [REDACTED] (USANYS) <[REDACTED]>
Sent: Thursday, May 28, 2020 12:24 PM
To: [REDACTED] (USANYS) <[REDACTED]>
Cc: [REDACTED] (USANYS) <[REDACTED]>
Subject: FW: Epstein probate update

[REDACTED]
Geoff would like to have a Webex tomorrow with [REDACTED] and (theoretically) [REDACTED] which he would like you to attend, so I start with you knowing how busy you are.

We are getting to the point where we need to more concretely plan our litigation with the estate.

Did I hear you say that [REDACTED] about to give birth? If so, wonderful!, but should we get someone else assigned to this matter?

[REDACTED]

From: [REDACTED] (USANYS) <[REDACTED]>
Sent: Thursday, February 20, 2020 12:47 PM
To: [REDACTED] (USANYS) <[REDACTED]>; [REDACTED] (USANYS) <[REDACTED]>; [REDACTED] (USANYS) <[REDACTED]>
Subject: Epstein probate update

All,

Recent filings in the Epstein probate case reflect the following developments, which might be of interest.

First, the probate court denied the Virgin Islands Attorney General's motion to intervene in the probate proceedings.

Second, it appears that the court directed the AG to ensure that its criminal activity liens on the estate's property did not prevent the executors from paying administrative expenses or preserving the estate's assets. However, the estate's bank accounts are currently frozen due to the AG's liens, and the AG is taking the position that it will only allow funds to be released if the AG first approves all of the executors' proposed expenditures. The executors have moved the probate court for emergency relief, asking that they be given full access to the estate's funds to pay administrative expenses and preserve assets without the AG's prior approval.

Third, the AG sent a letter to the executors laying out the AG's demands for a fair victim compensation program. Those include the following, which may be of particular interest (the full letter can be found at Ex. 6 of the attached document):

- The estate must cooperate with the AG's investigations into Epstein and his affiliates.

- The estate must waive any non-disclosure agreements signed by former employees of Epstein or his affiliates, and notify such employees that they are encouraged to fully cooperate with the AG's investigation.
- Participants in the compensation program will not be required to sign any third-party releases (apparently, the current proposal would involve such releases).
- The estate must provide a complete inventory of assets held by the estate, the 1953 Trust, Epstein, and any entities he controlled, even if those assets are exempt from the probate process.
- The executors cannot play any role in establishing the victim compensation program or selecting its administrators.

I have not seen evidence of the executors' response to the AG's letter.

From: [REDACTED] (USANYS) <[REDACTED]>
Sent: Thursday, February 13, 2020 9:54 AM
To: [REDACTED] [REDACTED] (USANYS) <[REDACTED]>
Subject: FW: SDNY News Clips, Wednesday, February 12, 2020

Would you please send around the AG's filing accusing the executors of complicity?

Last month, George brought charges against Epstein's estate and alleged that his lawyers, Darren Indyke and Richard Kahn, may have been part of Epstein's alleged fraud. George also put claims on Epstein's two islands.

Thanks,
[REDACTED]

Epstein's lawyers in dispute with Virgin Islands over settlements with victims

The Guardian
By Edward Helmore
2/12/2020

Efforts to settle sex abuse claims against Jeffrey Epstein's estate are being thwarted by the attorney general of the US Virgin Islands, lawyers for the disgraced late financier have claimed in court.

The dispute arises from efforts by the territory's attorney general, Denise George, to claim that Epstein, who owned two islands in the Virgin Islands and where monetary claims on his estate are focused, fraudulently obtained benefits related to a banking licence as part of his alleged criminal enterprise.

In court documents, **George said she planned to name the disgraced financier's lawyers as co-defendants and fight his estate's involvement in creating a victims' compensation fund.**

In July last year, Epstein was arrested on fresh federal sex trafficking and conspiracy charges. He had previously pleaded guilty in 2008 to a Florida state prostitution charge and completed a 13-month jail sentence. Epstein pleaded not guilty to the new allegations but died by suicide in a New York jail cell in August.

His death has triggered a wide-ranging investigation into his associates and members of his powerful social circle and also many victim claims for compensation.

Bennet Moskowitz, who is representing Epstein's estate, claimed that liens against the estate have left him unable to release money from Epstein's \$570m fortune to a victim's compensation fund.

"The attorney general for the Virgin Islands has decided for whatever reason to impede the program," Moskowitz said at the hearing in Manhattan federal court.

But George countered that claim, saying she was in fact looking out for victims who may yet come forward.

"The attorney general's office has opposed the approval of the fund as currently proposed because it lacks fairness, accountability, impartiality and sensitivity to victims at a level they deserve," George said in the statement.

"Further, victims who have not yet come forward or who may not wish to use the fund must be supported and protected, with funds for counseling and for their claims, too," she said, adding: "There must be full accountability, not only of the estate, but those who participated in, facilitated, and covered up Epstein's crimes."

Last month, George brought charges against Epstein's estate and alleged that his lawyers, Darren Indyke and Richard Kahn, may have been part of Epstein's alleged fraud. George also put claims on Epstein's two islands.

Epstein named Indyke and Kahn as his executors to a will he modified so that it would be executed in the Caribbean territory two days before he was found dead in a Manhattan jail cell on 10 August.

In November, it was reported that Epstein's estate had asked the courts to allow a voluntary resolution program for the late sex offender's accusers overseen by Ken Feinberg, the settlement's expert who oversaw claims from victims of the 9/11 terrorist attacks, the Catholic church's sex abuse scandals, and the BP-Blue Water Horizon oil spill.

But lawyers for several victims have argued that a victims fund would maintain the shroud of secrecy over Epstein's alleged crimes and prevent the release of any new information while minimizing the threat of large jury awards from individual legal actions.