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

IN THE MATTER OF THE ESTATE OF JEFFREY E. EPSTEIN,	)	**ST-19-PB-0000080**
Deceased.	)	

NOTICE TO THE COURT

COMES NOW, the Government of the Virgin Islands, by and through its undersigned counsel, Virgin Islands Department of Justice, Office of the Attorney General and advise the Court of its efforts to meet, confer and cooperate with counsel for the Estate of Jeffrey E. Epstein ("Estate"), in light of the Court's oral directive related to the filed "Criminal Activity Lien Notice" and the voluntary victims compensation fund ("Fund"). The purpose of this notice is to advise the court of the Government's endeavor to work cooperatively with the victims as well as the Estate on the above concerns. Since the hearing on February 4, 2020, the Government has reached out to and met with the counsel for the Estate and counsels for victims to begin the dialogue for a fair and just resolution of the following issues:

A. CRIMINAL ACTIVITY LIEN NOTICE ON ESTATE ACCOUNT

By way of recent background, the Court, on Tuesday, February 4, 2020, held a hearing on all outstanding motions in this matter. On Wednesday, February 5, 2020, Shauna Betz, Legal Assistant at Kellerhauls, Ferguson Kroblin (Attorneys for the Estate) sent email correspondence to the Attorney General from Estate attorney Christopher Kroblin, Esq, objecting to the Criminal Activity Lien hold ("Lien") that, , that the Government placed on accounts at the First Bank of Puerto Rico on January 31, 2020, in the name of the "The Estate of Jeffrey E. Epstein," "Nautilus, Inc." and "Great St. Jim, LLC",. (See Exhibit 1) On February 6, 2020, the Attorney General responded by email, and offered to schedule a meeting with the Estate the following day, which

Attorney Kroblin accepted. (See Exhibit 2). On Friday, February 7, 2020, the Attorney General met, in person, with Attorney Christopher Kroblin at the Office of the Attorney General. Attorney Kroblin expressed the concern that the Lien prevents the Estate from paying its expenses to maintain and preserve the Estate. The Attorney General expressed the importance of the Estate to meet its expenses for maintenance and preservation of the estate and offered, pursuant to her legal authority, to release sufficient funds to meet such expenses once the Estate identifies the expenses and the amount of funds needed. On Sunday February 9, 2020 the Attorney General followed up and memorialized that , meeting by sending an email again expressing her willingness to accommodate an immediate release of sufficient funds to pay the necessary expenses so that the executors could continue to manage, maintain and preserve estate assets, and stated that that the Attorney General's office was eagerly awaiting the listing of expenses to facilitate prompt release of funds for payment. In that same email, the Attorney General also indicated her intention to send follow-up correspondence on the victims' program fund that was briefly discussed in the Friday meeting. . (See Exhibit 3)

The CICO statute grants the Attorney General the authority to release, in whole or in part, any personal or real property from the notice. 14 V.I.C. § 610 (r). As the Government's underlying CICO action is still pending, only the Attorney General may release any property or interest from the Criminal Activity Liens. This is the express command of the statute, which provides in relevant part that:

> The Attorney General . . . filing the Criminal Activity Lien Notice may release, in whole or in part, any Criminal Activity Lien Notice or may release any personal or real property or beneficial interest in it from the Criminal Activity Lien Notice *upon such terms and conditions as he may determine.*

14 V.I.C. § 610(r) (emphasis added). The Act thus is clear and unambiguous that where, as here, a Criminal Activity Lien Notice has commenced and attached upon the Attorney General's filing

of an action and Notice, the Attorney General has sole authority to release the Liens upon such terms and conditions as she may determine to be appropriate.

On Monday, February 11, 2020, at 4:26 pm, Counsel for the Estate, Christopher Kroblin, Esquire, sent an email to the Attorney General stating that it was seeking an Order from the Court because FirstBank has informed them that the hold will remain absent a court order. In that email, Estate Counsel notably did not attach by email a courtesy copy of its filed motion. (See Exhibit 4). At 4:39 p.m., the Attorney General specifically requested a copy of the motion. More than one hour later, at 5:45 p.m., Estate Counsel did provide a copy of the motion, which had been emailed to all other counsel, except counsel for the Government. (See Exhibit 5) To date, the Estate has not responded to the Attorney General's request for the listing of expenses as discussed.

B. **VICTIMS' COMPENSATON FUND – ALTERNATIVE**

On Monday, February 10, 2020, the Attorney General, , as promised in her previous email, sent a four (4) page letter via email to the Estate counsel, detailing the Government's concerns with the victim's compensation fund as proposed by the Estate and setting forth alternative victim compensation program protocols and guidelines for a more fair and just program fund for Epstein victims. . (See Exhibit 6). Jordana Feldman, proposed Fund administrator, was copied on this correspondence.

After the February 4, 2020 hearing, the Attorney General also had a very productive meeting with a counsel for victims. The Attorney General shared the government's program plan with said counsel, which was very well received. There are plans for further discussions and meetings with the victims and counsels in an effort to attain a more fair, impartial and just compensation program. (Exhibit 7)

Respectfully submitted,

DENISE N. GEORGE, ESQUIRE
ATTORNEY GENERAL
VIRGIN ISLANDS DEPARTMENT OF JUSTICE

Dated: February 11, 2020

By: [redacted]

Assistant Attorney General
Virgin Islands Department of Justice
Office of the Attorney General
[redacted]

CERTIFICATE OF SERVICE

IT IS HEREBY CERTIFIED that the foregoing Motion complies with the word and page requirements of V.I.R. Civ. P. 6-1(e) and, a true and correct copy of the Motion was served via regular mail, postage prepaid, with a courtesy copy sent by email to counsel of record on February 11, 2020 to:

CHRISTOPHER ALLEN KROBLIN, ESQ.
ANDREW W. HEYMANN, ESQ.,
WILLIAM BLUM, ESQ.
SHARI D'ANDRADE, ESQ.
MARJORIE WHALEN, ESQ.
KELLERHALS FERGUSON KROBLIN PLLC
[redacted]

Email: [redacted]

[redacted]

Exhibit 1

Denise George

From: Shauna Betz [redacted]
Sent: Wednesday, February 05, 2020 4:33 PM
To: Denise George; Denise George
Cc: [redacted] Chris Kroblin; Shari D'Andrade
Subject: [EXTERNAL MAIL]Notice of Criminal Activity Lien
Attachments: 2020-02.05 Ltr to Denise George re lien on bank account1.pdf

Good Day Attorney General George:

Please see the attached correspondence.

Regards,
Shauna Betz
Legal Assistant
Kellerhals Ferguson Kroblin PLLC
[redacted]

Kellerhals Ferguson Kroblin PLLC

[redacted]

February 5, 2019

Via Email and Hand Delivery

The Honorable Denise N. George, Esq.
Attorney General
V.I. Department of Justice
[redacted]

RE: Notice of Criminal Activity Lien

Dear Attorney General George:

While we are aware that you were not present at the Estate of Jeffrey E. Epstein (the "Estate") hearing before Judge Percell yesterday, Civil Chief Ariel Smith, Esq. appeared on behalf of the Government and the issue of the impact of the Notice of Criminal Activity Lien ("Lien") on the Estate arose. Attorney Smith clarified on the record that the V.I. Department of Justice, with the filing of the Criminal Activity Lien in the probate case, has no intention of prohibiting the co-Executors from paying expenses associated with the administration of the Estate and that the Estate could continue to function, pay employees, and pay attorneys, among other things. The Court echoed that sentiment and directed from the bench that the Lien does not interfere with the estate administration, as contemplated by the Decedent's Last Will and Testament, V.I. Code Ann. tit. 15, §§ 421, 568, and the Virgin Islands Rules for Probate and Fiduciary Proceedings.

Unfortunately, that is exactly what has occurred. Immediately following the hearing, and in stark contrast to the Government's explicit representation made on the record and the Court's instruction, the Estate received notification from Dudley Newman Feuerzeig, counsel to First Bank, that a hold has been placed on certain accounts, including, most importantly, the Estate of Jeffrey E. Epstein account. *See* attached correspondence. We demand that you immediately direct First Bank, through its counsel, that a lien of the Estate account is inappropriate and the account should be restored to active status. Your failure to do so will result in our filing an emergency motion with the Court seeking a declaration that the lien does not attach to the Estate account, as well as sanctions for acting in direct contravention to your office's representations to the Court and the Court's statement that administrative expenses must and should be paid by the Estate.

Sincerely,

Christopher A. Kroblin

cc: [redacted]

DUDLEY NEWMAN FEUERZEIG LLP

KURT E. PETRI
Partner
[redacted]

Physical Address
[illegible]

Mailing Address
[illegible]

February 4, 2020

VIA EMAIL AND U.S. POST

Darren K. Indyke
Richard D. Kahn
The Estate of Jeffrey E. Epstein
Great St. Jim LLC
Nautilus, Inc.
[redacted]

Re: Criminal Activity Lien Notices
DNF File No. 4100-36

Dear Mr. Indyke and Mr. Kahn:

This letter is being sent to notify you that, as a result of the attached Criminal Activity Lien Notices (ST-2020-CV-14) (the "Notices") served upon FirstBank on January 31, 2020, a hold has been placed on the following accounts:

Account Name	Account Number	Address
Great St. Jim LLC	[redacted]	6100 Red Hook Quarter B3 St. Thomas, VI 00802
Nautilus, Inc.	[redacted]	6100 Red Hook Quarter B3 St. Thomas, VI 00802
Estate of Jeffrey E. Epstein	[redacted]	9053 Estate Thomas #101 St. Thomas, VI 00802

This hold will remain in place until FirstBank receives an Order from a court of appropriate jurisdiction releasing the lien claims upon these accounts set forth in the Notices.

Sincerely,

Kurt E. Petri

cc: Christopher A. Kroblin, Esq.

R:\DOCS\6602\5\LTR\30F478102.DOCX

EXHIBIT 2

Denise George

From: Chris Kroblin [redacted]
Sent: Thursday, February 06, 2020 9:06 PM
To: Denise George
Cc: [redacted]
Subject: Re: [EXTERNAL MAIL]Notice of Criminal Activity Lien

Attorney George,

Thanks for the response. Happy to do so.

Best regards,

Chris

Sent from my iPhone

On Feb 6, 2020, at 7:51 PM, Denise George <[redacted]> wrote:

Good evening Attorney Kroblin:

I just noticed this email correspondence from your legal assistant whose name I did not recognize. Please have Ms. Betz contact my Executive Assistant Jennifer Springette to set a time to meet tomorrow afternoon to discuss this matter.

Have a good evening.

DENISE N. GEORGE, ESQ.
Attorney General
Virgin Islands Department of Justice
Office of the Attorney General
[redacted]

From: Shauna Betz [redacted]
Sent: Wednesday, February 05, 2020 4:33 PM
To: Denise George <[redacted]>; Denise George [redacted]
Cc: [redacted] Chris Kroblin [redacted]; Shari D'Andrade <[redacted]>
Subject: [EXTERNAL MAIL]Notice of Criminal Activity Lien

Exhibit 3

Denise George

From: Denise George
Sent: Sunday, February 09, 2020 8:15 AM
To: Chris Kroblin
Cc: [redacted]
Subject: GVI v. Epstein Estate et al

Good day Attorney Kroblin,

It was great meeting with you Friday afternoon as we discussed the importance to all concerned for the estate to meet its day to day maintenance expenses and our willingness to accommodate for an immediate release of funds sufficient to pay these expenses so that the executors may continue to manage and preserve estate assets. We eagerly await your response regarding those expenses are costs so we can expeditiously move forward.

You can also expect written correspondence from me on the victims' program fund as a follow up to our brief discussion.

DENISE N. GEORGE, ESQ.
Attorney General
Virgin Islands Department of Justice
Office of the Attorney General
[redacted]

EXHIBIT 4

Denise George

From: Chris Kroblin [redacted]
Sent: Monday, February 10, 2020 4:26 PM
To: Denise George
Cc: [redacted]
Subject: [EXTERNAL MAIL]RE: GVI v. Epstein Estate et al

Attorney General George,

We appreciate your recognition of the critical importance of paying the ongoing maintenance expenses of the Epstein Estate. Because the Estate cannot survive the indefinite "hold" placed on the Estate's account at FirstBank as the result of the Criminal Activity Lien Notices recently issued by your office, and because FirstBank has informed us that it will maintain that hold absent "an Order from a court of appropriate jurisdiction releasing the [Government's] lien claims," the Co-Executors have today sought an order from the Superior Court releasing all funds necessary for the routine administration of the Estate and the preservation of its assets.

We received your communication yesterday afternoon regarding the voluntary compensation program proposed by the Co-Executors and endorsed by the Court and claimants' counsel at the hearing on February 4. We will consult with our clients and expect to respond shortly.

Best regards,

Christopher Allen Kroblin
Member
KELLERHALS FERGUSON KROBLIN PLLC
[redacted]
Of Counsel to:
Solomon Blum Heymann LLP
[redacted]

From: Denise George <Denise.George@doj.vi.gov>
Sent: Sunday, February 9, 2020 8:15 AM

EXHIBIT 5

Denise George

From: Denise George
Sent: Monday, February 10, 2020 4:39 PM
To: Chris Kroblin
Cc: [redacted]
Subject: RE: [EXTERNAL MAIL]RE: GVI v. Epstein Estate et al

Good day Attorney Kroblin,

Please provide us with a copy of that motion. Thank you.

DENISE N. GEORGE, ESQ.
Attorney General
Virgin Islands Department of Justice
Office of the Attorney General
[redacted]

From: Chris Kroblin [redacted]
Sent: Monday, February 10, 2020 4:26 PM
To: Denise George [redacted]
Cc: [redacted]
Subject: [EXTERNAL MAIL]RE: GVI v. Epstein Estate et al

Attorney General George,

We appreciate your recognition of the critical importance of paying the ongoing maintenance expenses of the Epstein Estate. Because the Estate cannot survive the indefinite "hold" placed on the Estate's account at FirstBank as the result of the Criminal Activity Lien Notices recently issued by your office, and because FirstBank has informed us that it will maintain that hold absent "an Order from a court of appropriate jurisdiction releasing the [Government's] lien claims," the Co-Executors have today sought an order from the Superior Court releasing all funds necessary for the routine administration of the Estate and the preservation of its assets.

We received your communication yesterday afternoon regarding the voluntary compensation program proposed by the Co-Executors and endorsed by the Court and claimants' counsel at the hearing on February 4. We will consult with our clients and expect to respond shortly.

Denise George

From: Chris Kroblin [redacted]
Sent: Monday, February 10, 2020 5:45 PM
To: Denise George
Cc: [redacted]
Subject: [EXTERNAL MAIL]RE: [EXTERNAL MAIL]RE: GVI v. Epstein Estate et al
Attachments: DS Emergency M for Order Releasing Funds for Administration.pdf

Please see the attached.

Best regards,

Christopher Allen Kroblin
Member
KELLERHALS FERGUSON KROBLIN PLLC
[redacted]

Of Counsel to:
Solomon Blum Heymann LLP
[redacted]

From: Denise George [redacted]
Sent: Monday, February 10, 2020 4:39 PM
To: Chris Kroblin [redacted]
Cc: [redacted]
Subject: RE: [EXTERNAL MAIL]RE: GVI v. Epstein Estate et al

Good day Attorney Kroblin,

Please provide us with a copy of that motion. Thank you.

DENISE N. GEORGE, ESQ.

Exhibit 6

[redacted]

From: [redacted]
Sent: Monday, February 10, 2020 10:19 AM
To: Chris Kroblin
Cc: [redacted]; Denise George
Subject: 02-10-2020 Letter to Christopher Kroblin (Estate of Jeffrey E. Epstein)
Attachments: 02-10-2020 Letter to Christopher Kroblin (Estate of Jeffrey E. Epstein).pdf

Tracking:	**Recipient**	**Delivery**	**Read**
	Chris Kroblin		
	[redacted]		
	Denise George	Delivered: 2/10/2020 10:19 AM	Read: 2/10/2020 10:21 AM

Good Morning Attorney Kroblin:

Attached please find letter dated February 10, 2020 from Attorney General Denise George. Thank you.

Kindest Regards,

[redacted]
Executive Assistant to the Attorney General
Virgin Islands Department of Justice
Office of the Attorney General
[redacted]

Live Your Life With Purpose: ***Count your blessings, not your problems, and you will realize how beautiful your life truly is.***

THE UNITED STATES VIRGIN ISLANDS
DEPARTMENT OF JUSTICE
OFFICE OF THE ATTORNEY GENERAL

February 10, 2020

Christopher Allen Kroblin, Esq.
Kellerhals Ferguson Kroblin PLLC
[redacted]

RE: Estate of Jeffrey E. Epstein

Dear Attorney Kroblin:

It was good to meet with you on Friday as we discussed matters involving the Estate of Jeffrey Epstein ("Estate"). As we discussed briefly, Judge Carolyn Hermon-Percell requested that the Attorney General's Office and the Estate confer on the issues related to a victims' compensation fund ("Fund"). I write to begin that dialogue by laying out in detail my concerns about and recommendations for the Fund.

I expect and certainly understand why some victims will want an expedited process that provides compensation – however incomplete – for the harm done to them. However, to be credible and to comport with the law and policies of the Virgin Islands, that process must also be fair, just, and independent. The Fund, as proposed by the Estate, does not meet those standards.

Among the issues raised in the Government's opposition to the Fund were four critical issues.

Frist, the Fund must set aside sufficient funds to pay claims of victims who may come forward in the future or may proceed through civil litigation. Particularly given the nature of the trauma suffered by these victims, many of whom were children when they were trafficked, there needs to be sufficient time and alternate venues available to victims. While some victims have stepped forward now, others may require more time and support. To make the Fund truly voluntary, the Estate must preserve assets for those who choose not to participate in it. Otherwise, many victims will be coerced into the process, believing that the Fund provides the only chance to ensure that their claims are paid. To the extent that additional victims do not seek or obtain funding, those funds can support organizations that advocate for or support victims of human trafficking – a far more meaningful and appropriate use of an Estate so tied to its funder's criminal activities.

Second, public policy does not permit the Estate to require broad third-party releases from victims in exchange for compensation. These releases serve no permissible purpose and will only silence victims and prevent them from seeking accountability and recovery from other individuals and

[redacted]

entities that participated in, facilitated, or covered up Jeffrey Epstein's crimes. I understand that, after I raised this issue, the Epstein Fund has now offered to remove those broad releases from its protocol. That is a positive step, but the commitment must be made binding.

Third, the Epstein Estate, whose executors are directly associated with entities that are defendants in the Government's lawsuit and which allegedly facilitated or participated in Epstein's criminal activity, should play no role in choosing a claims administrator or in designing a compensation program. While the Estate has indicated that the program administrator will have full authority to evaluate and set claim amounts, the fact that the administrators were chosen by, advised by and would be paid handsomely by the Estate creates an unavoidable appearance of impropriety. To ensure the integrity and credibility of the process, the Estate must disavow any role in the process, and allow the victims and the Attorney General, with the Court's approval, to collectively select an appropriate administrator. Further, payments to the administrator, now disclosed to be up to $200,000 per month, with $1.7 million for just two months of work to the attorney who designed the Fund, as well as administrative staffing and other business expenses that could amount to millions, are excessive and disproportionate to the nature of the case and anticipated number of victims. The costs to run the Fund should be capped at a reasonable amount that ensures that the Estate's assets will not be unnecessarily and unreasonably dissipated.

Fourth, the Epstein Estate must commit not only to a providing compensation, but cooperating with law enforcement. Otherwise, the Fund's primary purpose can be seen as limiting the Estate's exposure, protecting Epstein's associates, paying for victims' silence and avoiding further public exposure. That is a debt owed not only to Epstein's victims, but to all those who may avoid becoming victims of other sexual predators in the future.

Specifically, an acceptable, fair and appropriate victims' program fund would have to be consistent with these principles and include the following commitments from the Estate:

1. The Estate must provide a complete inventory and accounting of the assets that are held by the Estate, 1953 Trust and by Jeffrey Epstein or any other entities that he owned or controlled, whether or not a part of the probate. The Estate in good faith should be open and honest with the victims, the Court and the Government regarding the assets of the estate and the value of each asset as Virgin Islands probate law requires. The victims should not be asked to evaluate appropriate compensation, nor can the Government blindly release funds from its criminal activity liens without knowing the true nature and total value of Epstein's assets.

2. The Estate must agree to set aside a sufficient fixed fund prior to the close of the probate proceedings to compensate victims who do not accept payment from the Fund or do not come forward within the probate claims period of the Estate. In the event that such victims do not come forward or obtain judgments, the balance of the fund would be donated, through *cy pres*, to organizations providing support to victims of human trafficking, sexual exploitation and sexual assault. The timing for payments must be centered on victims' relief, not deadlines dictated by the probate process.

3. The Estate may not transfer ownership of Great St. James and Little St. James and other instrumentalities of Epstein's crimes in the Virgin Islands and must set aside a fixed sum sufficient to satisfy any potential judgment in favor of the Government of the Virgin Islands. The Government preserves its authority to enforce its laws to curtail human trafficking, sexual assaults and criminal enterprises, to hold Epstein and other violators accountable, to protect the safety and wellbeing of the Virgin Islands, to guide how victims are cared for and to protect our children—those who live here, as well as those who are brought here—from the scourge of human trafficking and sexual exploitation, now and in the future.

4. The Fund administrator and the protocol and criteria for the Fund must be chosen by Epstein's victims and the Attorney General, informed by experts in human trafficking, and/or survivors of human trafficking, and approved by the Court. The Fund administrator herself must be knowledgeable and experienced in the administration and settlement of funds for victims of crimes of human trafficking and sexual exploitation/assault of women and children.

5. Because of the existing conflicts of interest of the Estate and executors, as laid out in the Government's opposition to the Fund, there must be an absolute firewall between the Fund and the Estate. Furthermore, because of these conflicts, the Executors of the Estate should have no role at all in the Fund, including in selecting or approving the administrator, the protocol or criteria for the fund, or oversight or approval of the Fund's administration.

6. The Fund must provide full reporting on its criteria, process, awards, and expenses to the Court and the public while protecting the privacy of any claimants who choose to remain anonymous.

7. The program administrator must, in consultation with victims and non-profit or government organizations focused on human trafficking, identify a plan to adequately publicize the existence of the Fund.

8. Once a claim reaches settlement, victims will not be asked or required to release any person or entity from liability other than the Estate.

9. The Estate will set aside funds to provide counseling to any victim who wishes to discuss coming forward to the Fund or to law enforcement. The individual or entity providing such counseling will be approved by the Attorney General, victims' counsel, and the Court. The identity of all such victims will not be disclosed to the Estate.

10. Claimants will be provided with the Virgin Islands Crime Victims' Bill of Rights and be provided with contact information for the Virgin Islands Office of the Attorney General should they care to cooperate with Virgin Islands law enforcement.

11. The Estate will agree that no records obtained in the claims or counseling process will be used against any victim or in defending any claim against the Estate or related entities or individuals.

12. Expenses of setting up and administering the Epstein Fund will be capped at a reasonable amount. This is absolutely necessary to avoid the excessive costs proposed to run the Fund, which would deplete the funds in the Estate and place significant resources from the Fund in the pockets of the Estate's associates and hand-picked administrators and attorneys. The costs of the program should be commensurate with the nature of the claims and the number of victims addressed.

13. The Estate will agree to preserve, identify, and make available to the Virgin Islands all documents (including electronically stored information and video/audio recordings) related to Epstein's criminal conduct in the Virgin Islands, and will not seek to prevent disclosure of such information, though no information that might reveal the identity of his victims will be publicly disclosed, as required by Virgin Islands law.

14. The Estate will agree to cooperate to provide information against any individuals or other entities that participated in the conduct described in the Government's complaint.

15. The Estate will waive any non-disclosure agreements signed by former employees of Epstein or related entities and will notify such employees that they are not bound by confidentiality and are encouraged to cooperate fully and truthfully with the Attorney General and her representatives.

I sincerely hope that the Estate will find these commitments to be uncontroversial and consistent with its commitment to ensure swift, fair and lawful resolution for Epstein's victims, and we look forward to talking with you about these issues and any other suggestions you may have to address the Government's concerns and interests.

Sincerely,

Denise N. George, Esq.
Attorney General of the U.S. Virgin Islands

cc. [redacted]

Exhibit 7

Denise George

From: Brittany Henderson <[redacted]
Sent: Monday, February 10, 2020 11:37 AM
To: Denise George
Cc: [redacted]
Subject: Re: Epstein Estate

Attorney General George,

After our meeting, I am confident we all agree that there is nothing more powerful than the voices of the victims. As a testament, one of our clients reached out late last week and asked if she could speak with you directly or write you a letter sharing her feelings on the events that have recently transpired. The next day, another client called with similar requests. Hearing that these women welcome the opportunity to speak with you not only instills in me a great sense of pride, but it is also a reminder that we are all stronger together. Please let me know if you are interested in meeting so that we can figure out the best way to make that happen.

Thank you for your time,

EDWARDS POTTINGER LLC

Brittany N. Henderson
Trial Attorney
[redacted]

Denise George

From: Denise George
Sent: Monday, February 10, 2020 12:46 PM
To: Brittany Henderson
Cc: [redacted] Brad Edwards; [redacted]
Subject: RE: Epstein Estate
Attachments: 02-10-2020 AG Letter to Christopher Kroblin (Estate of Jeffrey E. Epstein).pdf

Good day Ms. Henderson and Attorney Edwards:

We are indeed very interested in meeting with the victims and I thank you for the productive and encouraging conversation in our February 4th meeting. I agree that this is so important to ensure that we maintain an open dialogue with a goal of reaching a resolution that best serves all of the victims of Jeffrey Epstein's conduct and provides a model for how cases and conduct like this may be resolved in the future.

To that end, I have attached a letter that I want to share with you which I sent to Epstein's Estate to establish the kind of specific commitments that would be required of the Estate to address the Government's concerns regarding their program as proposed. I welcome your thoughts and feedback. I also welcome you to contact my Executive Assistant Jennifer Springette to coordinate a meeting with the victims as soon as possible.

I look forward to meeting with you again on this very important matter.

Sincerely,

DENISE N. GEORGE, ESQ.
Attorney General
Virgin Islands Department of Justice
Office of the Attorney General
[redacted]

From: Brittany Henderson [redacted]
Sent: Monday, February 10, 2020 11:37 AM
To: Denise George [redacted]
Cc: [redacted]
Subject: Re: Epstein Estate

Denise George

From: Brittany Henderson [redacted]
Sent: Monday, February 10, 2020 2:13 PM
To: Denise George
Cc: [redacted]
Subject: Re: Epstein Estate

Attorney General George,

Thank you very much for the quick reply. It is evident in reading your correspondence to the Estate that you and your team have put a significant amount of time into reviewing the proposed claims fund in its current form. Your suggestions and requested commitments, as outlined, demonstrate that the best interests of the victims are at the forefront of your mission. That alone is comforting to us as we wade through conversations with our clients regarding the current status of affairs.

That being said, I reached out to both of our clients immediately, who appreciate tremendously your willingness to meet with them. We look forward to facilitating an even more expansive free flow of ideas in an effort to reach a resolution that is most advantageous to the survivors. At your direction, we will contact Ms. Springette today to coordinate a time that works best for you and your office.

In the meantime, please let us know if you are available this afternoon for a short call to discuss which portions of your letter, if any, you would feel comfortable with us sharing with the court tomorrow during the status conference for all currently pending cases being litigated in the Southern District of New York. Alternatively, we can speak in the morning prior to the conference which is set to begin at 10am EST.

We look forward to speaking and continuing to work with you.

Brittany Henderson, Esq.
Edwards Pottinger LLC
[redacted]

On Feb 10, 2020, at 11:45 AM, Denise George <[redacted] wrote:

Good day Ms. Henderson and Attorney Edwards:

We are indeed very interested in meeting with the victims and I thank you for the productive and encouraging conversation in our February 4th meeting. I agree that this is so important to ensure that we maintain an open dialogue with a goal of reaching a resolution that best serves all of the victims of Jeffrey Epstein's conduct and provides a model for how cases and conduct like this may be resolved in the future.

To that end, I have attached a letter that I want to share with you which I sent to Epstein's Estate to establish the kind of specific commitments that would be required of the Estate to address the Government's concerns regarding their program as proposed. I welcome your thoughts and feedback. I