

From: "[REDACTED] (USANYS)" <[REDACTED]>
To: [REDACTED]
Cc: [REDACTED]
Subject: RE: Virgin Island case
Date: Fri, 29 May 2020 12:47:34 +0000

Thanks for the update [REDACTED]. Could we find some time either later today or early next week to discuss? I'm fairly flexible this afternoon from about 2:30-5:30. Monday I could do 10-12:30 or 3-5:30. Let me know if anything in any of those windows works for you two.

Best,

From: [REDACTED]
Sent: Thursday, May 28, 2020 4:09 PM
To: [REDACTED] (USANYS) <[REDACTED]>
Cc: [REDACTED]
Subject: Virgin Island case

Hi [REDACTED],

Talia and I just met with Geoff [REDACTED] to discuss the Virgin Islands case and our proposed course of action. We are going to prepare a statement of interest/motion that addresses 2 primary points:

- 1) we would attach the various iterations of the trust agreement that show the addition of employees/beneficiaries over time, particularly since Epstein's arrest, and explain our concerns about the disloyalty clause and how it should be interpreted, thus putting those employees on notice that cooperating with the government should not interfere with any bequest made to them on grounds of "disloyalty." As part of the background explaining our concerns about this unusual trust and the disloyalty provision, we would also point out that the trustees are making exorbitant and highly unusual sums, which further renders the document suspect and suggests that the disloyalty provision may be used for nefarious purposes.
- 2) we will also combine the above statement of interest points with a motion seeking to enjoin any bequest to Maxwell assuming that a criminal action has been filed already against Maxwell.

In order to prepare our statement of interest, we will need to figure out which series of trust agreements are needed to show the addition of employees and beneficiaries who may be subject to the disloyalty provision. Didn't [REDACTED] prepare an excel chart already that would have this information?

Would you in combination with [REDACTED] be able to prepare a 6(e) order to the Court allowing us to use key trust agreements in our public filing in the Virgin Islands? Because sometimes it's not clear when submitted documents are "filed," we should make sure the language in the 6(e) order is worded in such a way that after we "submit" the document to the surrogate's order for the purpose of filing it, we can simultaneously make it public such that any press release we file after submitting our document to the Surrogate's Court would not inadvertently disclose materials still covered by the 6(e) order.

Happy to discuss tomorrow morning if you would like.

Thanks,

