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September 9, 2020

By E-Filing

Honorable Carolyn P. Hermon-Percell
Superior Court of the U.S. Virgin Islands
Magistrate Division
Barbell Plaza South
St. Thomas, U.S. Virgin Islands

Re: Estate of Jeffrey E. Epstein
Probate No. ST-19-PB-80

Dear Magistrate Percell:

We write on behalf of Darren K. Indyke and Richard D. Kahn, as Co-Executors of the Estate of Jeffrey E. Epstein (the “Estate”), to follow up on our letter to Your Honor dated August 14, 2020. In that letter, the Co-Executors urgently requested a videoconference with Your Honor to address the Attorney General’s refusal to lift her liens on the accounts of the Estate and related entities to allow the Co-Executors to pay the ongoing administrative expenses of the Estate, including funds needed for maintenance of the residential properties within the Estate and payment of the Estate’s outstanding legal bills.

Regrettably, the concerns voiced by the Co-Executors in mid-August have come to pass: the Attorney General has not lifted her liens as requested, and the Estate now faces administrative expenses for which, absent a lien release, there are insufficient funds available in the liened accounts. There now remains only Two Hundred Thirty-Nine Thousand Six Hundred Ninety-Eight Dollars (\$239,698.00) in the Estate’s FirstBank account that is not subject to the Attorney General’s liens. As a result, the Estate is unable to meet its imminent financial obligations, including:

- Staff payroll and necessary utilities at the Estate’s U.S. and French properties (approximately One Hundred Eighty Thousand Dollars (\$180,000.00) per month);
- Appraisals for sale of the Estate’s U.S. properties (One Hundred Twenty-Eight Thousand Five Hundred Dollars (\$128,500.00)); and
- Maintenance and monthly parking of the Estate’s aircraft, including planes and helicopters (Eighty-Three Thousand Five Hundred Sixty Dollars (\$83,560.00)).

In addition, the Estate has been unable to pay its legal bills since May 2020. It currently owes its legal counsel over Four Million Dollars (\$4,000,000.00) for services rendered during the months of May – August 2020, including to defend against (i) the Attorney General’s pending lawsuit in the Virgin Islands and (ii) twenty-seven (27) lawsuits brought by forty-eight (48) individual plaintiffs in the state and federal courts of New York, Florida and Minnesota.

In the event that the Attorney General's intransigence continues, the Estate's Co-Executors will no longer be able to continue to administer the Estate. The residential properties will quickly deteriorate, the aircraft and other assets will fall into disrepair, its assets will remain unsold, and legal proceedings will be defaulted. Accordingly, we ask that the Court act in order to protect the Estate, its creditors and claimants, including scores of women currently seeking compensation through the Epstein Victims' Compensation Program.

Respectfully submitted,

A handwritten signature in blue ink, reading "Christopher Allen Kroblin". The signature is fluid and cursive, with the first name being the most prominent.

Christopher Allen Kroblin
Counsel for the Co-Executors

cc: Counsel of record