

influence local politicians, and says deJongh even asked Epstein to suggest changes to the territory's sex offender law.

"Epstein's primary conduit for spreading money and influence throughout the USVI government was First Lady deJongh," who worked as Epstein's local fixer for two decades, including throughout her husband John deJongh Jr.'s tenure as VI. governor from 2007 to 2015, according to the filing.

DeJongh told Epstein which government officials to pay off, and devised ways to justify his victims' presence in the territory by enrolling them at the University of the Virgin Islands so they could obtain student visas, according to the filing.

In a statement to The Daily News on Thursday, UVI President David Hall denied all allegations in the bank's filing.

Attorneys for the bank say documents obtained during the discovery process, which is still ongoing, show that deJongh asked Epstein — a registered sex offender — to suggest changes to the territory's sex offender law in 2011, and apologized profusely, via email, when not all of his revisions were included in the final version.

As a sex offender, Epstein occasionally encountered difficulties traveling through the airport with young women. But Epstein needed only "to email the USVI's First Lady, who gamely intervened on his behalf" by reaching out to her husband, according to the filing, which cites a Nov. 15, 2012, email from Epstein to deJongh, "regarding sending 'all 78 [USVI customs agents] a turkey' for Thanksgiving."

In return, Epstein paid deJongh well, and she received "a salary, bonuses, and other benefits, including \$200,000 in 2007 alone," according to the filing.

Epstein also paid tuition for the children of the then-governor and first lady — which allowed the deJonghs to funnel more of their personal money into the campaign — and said he would fund the former governor's defense in a criminal corruption case that was later dropped, offering to "play any role in this you guys like,"



Former first lady Cecile deJongh and her husband, former Gov. John deJongh Jr.

according to the filing.

"Lest there be doubt that Epstein's goal was to gain influence, First Lady deJongh explicitly advised Epstein on how to buy control of the USVI political class," according to the filing, telling him "how to vote and whom to support."

The filing cited an email exchange between Epstein and deJongh, in which he asked her for a list of candidates he should vote for. DeJongh also suggested ways to influence senators, writing to Epstein that he should, "consider putting Celestino [White] on some sort of monthly retainer. That is what will get you his loyalty and access," according to the filing.

De Jongh also "crafted a plan to facilitate Epstein's easy travel to and from USVI," and told him that, "we will need to work through [then-USVI Senator Carlton] Dowe" and White, according to the filing.

Epstein had particularly close ties to the Executive Director of the VI. Port Authority, and "could count on his 'great relationship'" with airport officials "to avoid scrutiny or detection" when traveling with young women as a registered sex offender, according to the filing.

Ellsworth also cited a communication from Cecile de Jongh to Epstein, on behalf of her husband, asking "if

he would 'support [then-USVI senator] Carlton Dowe's bid to go back to VIPA' who would be a 'good person for us' there."

Prior to his election, Gov. Albert Bryan Jr., in 2018, also "facilitated donations by Epstein to USVI's schools and little leagues," and Epstein also gave money to local politicians like VI. Delegate to Congress Stacey Plaskett, and "asked that his contributions be kept secret," according to the filing.

Bryan has publicly denied receiving campaign contributions from Epstein, but according to the filing, there are records of Epstein "discussing a \$25,000 private gift to current Governor Bryan's inaugural committee."

Bryan is scheduled to be deposed on June 6, and Plaskett admitted to accepting \$30,000 in campaign contributions from Epstein and his employees during her May 9 deposition.

"For two decades, and for long after JPMC exited Epstein as a client, the entity that most directly failed to protect public safety and most actively facilitated and benefited from Epstein's continued criminal activity was the plaintiff in this case — the USVI government itself," according to the filing.

The allegations are contained in a 30-page document by Felicia Ellsworth, an attorney representing JPMorgan Chase in its defense of a

lawsuit filed by the VI. Justice Department in the U.S. District Court for the Southern District of New York.

The government has accused the bank of facilitating and profiting from Epstein's crimes. But attorneys for the bank say the government provided a safe haven for Epstein and allowed him to continue bringing victims to the territory without scrutiny, even rewarding him with lucrative tax benefits.

Ellsworth initially submitted the 30-page filing on Tuesday with redactions through more than half of the document, and some pages were almost completely blacked out.

On Thursday, Ellsworth refiled the document with the majority of redactions removed, although several pages are still not fully public.

The new filing came after District Court Judge Jed Rakoff entered an order Tuesday, granting the bank's motion to compel Epstein's estate to produce all email correspondence containing the search terms "Cecile de Jongh," "CDJ," or "De Jongh."

After briefing by both parties, Rakoff ruled that "the requested documents are relevant and that the burden of producing them is not excessive."

That will allow lawyers for the bank to further delve into de Jongh's work for Epstein, after years of speculation about her level of involvement in his

the VI. government has asked the court to deny certain affirmative defenses. But Ellsworth responded in the bank's latest filing that it's the VI. government that bears responsibility for enabling Epstein's crimes.

"To grant USVI immunity from these defenses would be to allow it to profit from Epstein twice: first directly, then again in a civil suit which it could just as easily see reflected in a mirror," according to the filing.

A judge has not yet ruled on the dispute over affirmative defenses.

Meanwhile, the bank's lawyers are naming Cecile de Jongh and other Virgin Islanders as key parties responsible for helping Epstein thrive in the territory, despite his status as a sex offender convicted of procuring children for prostitution in Florida in 2008.

The VI. Justice Department is responsible for monitoring sex offenders in the territory, including Epstein, who claimed Little St. James island off St. Thomas as his primary residence for two decades before his August 2019 suicide.

Several sections of Ellsworth's filing that remain partially redacted refer to the territory's lack of enforcement of its sex offender laws, and the unredacted sections indicate that Epstein was given "leniency" and leeway other sex offenders were not.

"Even as to the regulations USVI did enforce, it did so incompetently," according to the filing, which goes on with several additional paragraphs that remain redacted as of Thursday night.

Another unredacted line says that, "Further, while the USVI did conduct site visits of Epstein's residence, those inspections were cursory at best." VI. Justice Department spokeswoman Sandra Goomansingh did not respond to a request for comment Thursday.

Dates, dollar amounts unclear

Some of the allegations in JPMorgan's filing conflict with previous public statements.

For example, the filing says Cecile deJongh arranged for several of Epstein's victims to enroll at UVI so they could

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