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MEMORANDUM

TO: Darren K. Indyke

FROM: Denise Francois 

RE: Request for information with respect to all Civil Lawsuits of which JE, FTC or LSJ or Lafayette were named as defendants in the past 10 years: date lawsuit filed, name and address of the court, docket/case number, names of any other parties to the suit, nature of suit, disposition and date of disposition of suit.

DATE: October 25, 2011

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**1. Financial Trust Company, Inc. vs. Citibank, N.A.**

Plaintiff: Financial Trust Company, Inc.  
Defendant: Citibank, N.A.  
& counterclaim Plaintiff  
Date lawsuit filed: June 11, 2002  
Name of the court: District Court of the Virgin Islands, St. Thomas/St. John Division  
Address: 550 Veteran's Drive, Rm. 310, St. Thomas, VI 00802  
Docket/case number: 3:02-cv-00108  
Nature of suit: Action for fraudulent misrepresentation, damages, rescission;  
Counterclaim against Financial Trust Company, Inc. was to enforce two notes and hypothecation agreement  
Disposition: Settled and stipulation for dismissal filed

**2. Alain Gifford d/b/a Blessed Trucking vs. LSJ, LLC, Lafayette Contractors, LLC, William Rowles and Lance Galloway**

Plaintiff: Alain Gifford d/b/a Blessed Trucking  
Defendants: LSJ, LLC, Lafayette Contractors, LLC, Williams Rowles and Lance Galloway  
Date lawsuit filed: February 20, 2009  
Name of the court: Superior Court of the Virgin Islands, St. Thomas/St. John Division  
Address of court: P. O. Box 70, St. Thomas, VI 00804  
Docket/case number: ST-09-CV-91  
Nature of suit: Breach of contract  
Disposition: Dismissed by order of the court  
Date of disposition: September 20, 2010

**2. Jeffrey E. Epstein v. D. Eric Williams a/k/a Eric Williams, Hairoun Aviation Services, Inc., R Pearlitha Williams and Josephine Simmons**

Plaintiff: Jeffrey E. Epstein  
Defendants & Counterclaim Plaintiffs: D. Eric Williams a/k/a Eric Williams, Hairoun Aviation Services, Inc., R. Pearlitha Williams and Josephine Simmons  
Date lawsuit filed: July 1, 2009  
Nature of suit: Breach of contract, specific performance, material misrepresentation, fraud and declaratory relief. Defendant's counterclaim was for breach of contract and damages  
Docket/case number: ST-09-CV-307  
Disposition: Settled and stipulation for dismissal filed  
Date of disposition: March 15, 2010

**3. J.P. Molyneux Studio, Ltd. and Juan Pablo Molyneux vs. Jeffrey Epstein and L.S.J., LLC**

Plaintiffs: J.P. Molyneux Studio, Ltd. and Juan Pablo Molyneux  
Defendants: Jeffrey Epstein and L.S.J., LLC  
Date lawsuit filed: April 1, 2010  
Name of the Court: District Court of the Virgin Islands, St. Thomas/St. John Division  
Address: 550 Veteran's Drive, Rm 310, St. Thomas, VI 00802  
Docket/case number: 3:10-cv-00034  
Nature of suit: Breach of contract  
Disposition: Settled  
Date of disposition: January 4, 2011 self executing stipulation for dismissal with prejudice filed

**4. Jeffrey Epstein and L.S.J., LLC vs. Fancelli Paneling, Inc.**

Plaintiffs: Jeffrey Epstein and L.S.J., LLC  
Defendant: Fancelli Paneling, Inc.  
Date lawsuit filed: July 30, 2010  
Name of the Court: Superior Court of the Virgin Islands, St. Thomas/St. John Division  
Address of Court: P. O. Box 70, St. Thomas, VI 00804  
Docket/case number: ST-10-CV-443  
Nature of Suit: Breach of contract, negligence  
Disposition: pending