

On behalf of an entity yet to be formed, Jeffrey Epstein respectfully requests consideration for approval of a license to operate a Protected Cell Company within RTPark-PC as further described below. Provided below is a brief summary regarding Mr. Epstein, his contributions to the Virgin Islands and his plans for the prospective Protected Cell Company. A more comprehensive due diligence submission will be made in the near future. In the meantime, please do not hesitate to direct any and all questions or comments you may have regarding Mr. Epstein and the prospective Protected Cell Company to Mr. Epstein's counsel, Erika Kellerhals at Kellerhals Ferguson, LLP, 9100 Havensight, Port of Sale, Suite 15/16, St. Thomas, Virgin Islands 00802, Telephone (340) 779-2564.

Mr. Epstein's business career began in 1976 at Bear Stearns & Company. He subsequently started his own financial consulting firm in 1981, which he eventually brought to the Virgin Islands in 1999, when he opened Financial Trust Company, Inc. Mr. Epstein is the Chairman, President and sole shareholder of Financial Trust Company, Inc., a financial consulting firm which has been an EDC beneficiary for the past 12 years. In addition to his and his company's significant contributions to the Virgin Islands economy, over the past 12 years, Mr. Epstein, his company and the philanthropic foundation he funded and organized have given over \$2.3 million to U.S. Virgin Islands' charitable interests, including \$1.1 Million to educational pursuits, and scholarship and enrichment programs and approximately \$650,000 to local U.S. Virgin Islands' charities and U.S. Virgin Islands' youth sporting organizations. His foundation has continued to provide opportunities for scientific and technological exploration and development in the Virgin Islands by sponsoring several scientific symposiums in the Virgin Islands enabling local interaction among Nobel Laureates and faculty, postdoctoral researchers, graduate and undergraduate students, educators and the public.

For a relatively brief period in what has otherwise been a productive and accomplished life, Mr. Epstein did face some legal difficulties relating to matters alleged to have taken place over five years ago exclusively within Palm Beach County, Florida. Following a local investigation commenced in 2005 by the Palm Beach Police and the Palm Beach County State Attorney, Mr. Epstein was arrested and charged with one count of solicitation of prostitution in 2006. An investigation was conducted by the US Attorney's Office for the Southern District of Florida and the FBI in 2007 relating to the same local matters investigated by the Palm Beach authorities. The federal investigation was discontinued in 2008 without the issuance of any federal charges. On June 30, 2008, before the Florida Circuit Court for the 15th Judicial Circuit located in Palm Beach, Florida, Mr. Epstein pleaded guilty to and was convicted of, the above-mentioned solicitation charge and one count of procuring prostitution of a person under the age of 18. All of the alleged conduct investigated and all of the events as to which Mr. Epstein pleaded guilty and was convicted were limited to local events alleged to have taken place exclusively in Palm Beach County, Florida over 5

years ago. There have been no similar allegations or charges of any misconduct by Mr. Epstein since that time. Nothing investigated or to which Mr. Epstein pleaded guilty and was convicted had any relation whatsoever to the business or industry of Mr. Epstein or to the ownership, management or operation of any business by Mr. Epstein.

Beginning in 2008 a number of civil tort actions arising out of the same matters alleged in the Palm Beach investigations were commenced against Mr. Epstein in Federal District Court for the Southern District of Florida, as well as in the Florida Circuit Court of the 15<sup>th</sup> Judicial Circuit in and for Palm Beach County. Once again, all of these cases related to matters alleged to have occurred over 5 years ago exclusively within Palm Beach County and had no relation whatsoever to the business or industry of Mr. Epstein or the to ownership, management or operation of any of Mr. Epstein's businesses. All of these cases commenced against Mr. Epstein have been settled successfully and have been dismissed with prejudice. In 2007, after Mr. Epstein's legal issues began attracting public attention, a tort action was commenced against Mr. Epstein in New York Supreme Court based on matters of a similar nature alleged to have occurred in New York over 11 years ago. The trial court dismissed that case against Mr. Epstein with prejudice, and the matter was settled favorably to Mr. Epstein on appeal. A full description of all the relevant information regarding these cases will be provided with Mr. Epstein's comprehensive due diligence submission.

With the exception of the above matters, which have been fully resolved, and a small number of legal actions or proceedings commenced by Mr. Epstein, as plaintiff, and successfully resolved, litigation commenced over the past 10 years against Mr. Epstein as a defendant has been unremarkable, and all of it has been resolved favorably to Mr. Epstein:

- In 2004, Mr. Epstein successfully settled a Pennsylvania state court case with an artist involving a dispute over the performance of a personal service contract.
- In 2005, Mr. Epstein and his company received a settlement in connection with a dispute with Citibank brought in separate fora in New York and in the Virgin Islands over investments made by Mr. Epstein's company in Citibank sponsored investment vehicles.
- In 2006, Mr. Epstein successfully settled a Florida Circuit Court case with an artwork consignor involving a dispute among the consignor, the dealer and Mr. Epstein over ownership of artwork which Mr. Epstein purchased for good value from the dealer.
- An action was commenced in New York Supreme Court by the liquidating trustee of a limited partnership to recover distributions made several years earlier to a limited partner on the basis of audited financial statements, which were later challenged as inaccurate. Mr. Epstein was the trustee of the limited partner. The case against Mr.

Epstein as trustee of the limited partner was dismissed with prejudice in 2007.

- In 2009, Mr. Epstein successfully settled a dispute in the United States District Court for the Southern District of Florida with a marine contractor who overcharged Mr. Epstein for its services at his Palm Beach property.
- In 2010, a case against Mr. Epstein in the Virgin Islands Superior Court involving a contract dispute with a contractor engaged to provide services at Mr. Epstein's home in the Virgin Islands was dismissed by order of the Court and referred to Arbitration. The contractor did not pursue the matter in Arbitration.
- In 2010, Mr. Epstein successfully settled a sales contract dispute in the Virgin Islands Superior Court with a seller who refused to honor the sales agreement and counterclaimed against Mr. Epstein.
- In 2011, Mr. Epstein and his company received a settlement in a declaratory judgment and contract action commenced against Mr. Epstein by an architectural and design firm.

With the exception of the case brought against Mr. Epstein as a trustee and the Citibank cases, which ended in either an outright dismissal of Mr. Epstein or a settlement in Mr. Epstein's favor, none of the litigation described briefly above involved any of Mr. Epstein's business activities; they related to Mr. Epstein's personal matters and all of them were successfully resolved and are no longer pending.

Over the past 10 years, neither Mr. Epstein, individually, nor any of his controlled affiliates, have ever been subject to an audit or a post audit penalty assessment by a tax authority (including, but not limited to, the Internal Revenue Service and/or the Virgin Islands Bureau of Internal Revenue). Moreover, neither Mr. Epstein nor any of his controlled affiliates have ever been adjudged, either civilly or criminally, to be in violation of any laws relating to the conduct of his or any such controlled affiliate's business, or have ever been subject to a judgment, decree or final order enjoining violations of any such laws, or prohibiting or mandating any business activities subject to such laws.

Mr. Epstein seeks approval from the University of the Virgin Islands Research and Technology Park Corporation for a license to conduct business as a Protected Cell Company as described below. [JE to provide description of Protected Cell Company]