

**FILED**

October 05, 2021 03:49 PM

ST-2020-CV-00014

TAMARA CHARLES  
CLERK OF THE COURT

**IN THE SUPERIOR COURT OF THE VIRGIN ISLANDS  
DIVISION OF ST. THOMAS AND ST. JOHN**

GOVERNMENT OF THE UNITED STATES  
VIRGIN ISLANDS,

Plaintiff,

v.

DARREN K. INDYKE, in his capacity as the  
EXECUTOR FOR THE ESTATE OF JEFFREY E.  
EPSTEIN and ADMINISTRATOR OF THE 1953  
TRUST; RICHARD D. KAHN, in his capacity as  
the EXECUTOR FOR THE ESTATE OF JEFFREY  
E. EPSTEIN, and ADMINISTRATOR OF THE  
1953 TRUST; ESTATE OF JEFFREY E. EPSTEIN;  
THE 1953 TRUST; PLAN D, LLC; GREAT ST.  
JIM, LLC; NAUTILUS, INC.; HYPERION AIR,  
LLC; POPLAR, Inc.; SOUTHERN TRUST  
COMPANY, INC.; JOHN AND JANE DOES,

Defendants.

CASE NO.: ST-2020-CV-00014

ACTION FOR DAMAGES

JURY TRIAL DEMANDED

**LETTER OF REQUEST (LETTERS ROGATORY)**

THE SUPERIOR COURT OF THE VIRGIN ISLANDS, DIVISION OF ST. THOMAS AND ST. JOHN, PRESENTS ITS COMPLIMENTS TO THE APPROPRIATE JUDICIAL AUTHORITY OF THE UNITED KINGDOM, AND REQUESTS INTERNATIONAL JUDICIAL ASSISTANCE TO EFFECT SERVICE OF PROCESS TO BE USED IN A CIVIL PROCEEDING BEFORE THIS COURT IN THE ABOVE CAPTIONED MATTER. A TRIAL IN THIS MATTER HAS NOT BEEN SCHEDULED. THIS REQUEST IS BEING MADE PURSUANT TO THE HAGUE CONVENTION OF 18 MARCH 1970 ON THE TAKING OF EVIDENCE ABROAD IN CIVIL OR COMMERCIAL MATTERS.

**SENDER:**

THE SUPERIOR COURT OF THE VIRGIN ISLANDS  
DIVISION OF ST. THOMAS AND ST. JOHN  
ALEXANDER A. FARRELLY JUSTICE CENTER  
5400 VETERAN'S DRIVE, SUITE 1  
ST. THOMAS, USVI 00802

**CENTRAL AUTHORITY OF THE REQUESTED STATE:**

THE SENIOR MASTER  
FOR THE ATTENTION OF THE FOREIGN PROCESS SECTION  
ROOM E16  
ROYAL COURTS OF JUSTICE  
STRAND  
LONDON WC2A 2LL

**PERSON TO WHOM THE EXECUTED REQUEST, AND RESPONSES ARE TO BE RETURNED:**

CAROL THOMAS-JACOBS, ESQ.  
CHIEF DEPUTY ATTORNEY GENERAL  
VIRGIN ISLANDS DEPARTMENT OF JUSTICE  
3438 KRONPRINDSENS GADE  
GERS COMPLEX 2<sup>ND</sup> FLOOR  
ST. THOMAS, VI 00802  
TELEPHONE: (340) 774-5666 EXT. 359  
CAROL.JACOBS@DOJ.VI.GOV  
ATTORNEY FOR PLAINTIFF, GOVERNMENT OF THE USVI

**SPECIFICATION OF THE DATE AND/OR TIMEFRAME IN WHICH THE REQUESTING AUTHORITY REQUESTS THE DOCUMENTS BE PRODUCED:**

DOCUMENTS TO BE PRODUCED WITHIN 30 DAYS FOLLOWING RECEIPT OF THE LETTERS ROGATORY.

**REASON FOR URGENCY:**

THE URGENCY FOR REQUESTING THE INFORMATION IS BASED ON THE FOLLOWING REASON: PLAINTIFF'S ATTORNEY WISHES TO REVIEW THE REQUESTED DOCUMENTS IN A SUFFICIENTLY EXPEDITED TIME FRAME TO MEET THE DISCOVERY DEADLINE.

**REQUESTING JUDICIAL AUTHORITY**

THE SUPERIOR COURT OF THE VIRGIN ISLANDS  
DIVISION OF ST. THOMAS AND ST. JOHN

**TO THE COMPETENT AUTHORITY OF**  
UNITED KINGDOM

**NAME OF THE CASE AND IDENTIFYING CASE NUMBER:**

GOVERNMENT OF THE UNITED STATES VIRGIN ISLANDS v. INDYKE, ET AL.  
CASE NUMBER: ST-2020-CV-00014

**NAMES AND ADDRESSES OF THE PARTIES AND THEIR REPRESENTATIVES:**  
**PLAINTIFF**

**GOVERNMENT OF THE UNITED STATES VIRGIN ISLANDS**

CAROL THOMAS-JACOBS, ESQ.  
CHIEF DEPUTY ATTORNEY GENERAL  
VIRGIN ISLANDS DEPARTMENT OF JUSTICE  
3438 KRONPRINDSENS GADE  
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ST. THOMAS, VI 00802  
TELEPHONE: (340) 774-5666 EXT. 359  
CAROL.JACOBS@DOJ.VI.GOV

**DEFENDANTS**

**DARREN K. INDYKE AS EXECUTOR OF ESTATE OF JEFFREY E. EPSTEIN AND  
ADMINISTRATOR OF THE 1953 TRUST (DEFENDANT)**

**RICHARD D. KAHN AS EXECUTOR OF ESTATE OF JEFFREY E. EPSTEIN AND  
ADMINISTRATOR OF THE 1953 TRUST (DEFENDANT)**

**ESTATE OF JEFFREY E. EPSTEIN (DEFENDANT)**

**THE 1953 TRUST (DEFENDANT)**

**PLAN D, LLC (DEFENDANT)**

**GREAT ST. JIM, LLC (DEFENDANT)**

**NAUTILUS, INC. (DEFENDANT)**

**HYPERION AIR, LLC (DEFENDANT)**

**POPLAR, INC. (DEFENDANT)**

**SOUTHERN TRUST COMPANY, INC. (DEFENDANT)**

CHRISTOPHER ALLEN KROBLIN, ESQ.

ANDREW W. HEYMANN, ESQ.,

WILLIAM BLUM, ESQ.

SHARI D'ANDRADE, ESQ.

KELLERHALS FERGUSON KROBLIN PLLC

ROYAL PALMS PROFESSIONAL BUILDING

9053 ESTATE THOMAS, SUITE 101

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AHEYMANN@SOLBLUM.COM

WBLUM@SOLBLUM.COM

SDANDRADE@KELLFER.COM

MWHALEN@KELLFER.COM

**RICHARD D. KAHN IN HIS CAPACITY AS THE EXECUTOR FOR THE ESTATE OF  
JEFFREY E. EPSTEIN AND ADMINISTRATOR OF THE 1953 TRUST (DEFENDANT)**

Gordon C. Rhea, Esq.

Gordon C. Rhea, P.C.

1533 Appling Dr.

Mt. Pleasant, SC 29464

Telephone: (340) 244-4058  
grhea@rpwb.com

**NATURE OF THE ORIGINAL PROCEEDINGS:**

A CIVIL ACTION RELATED TO THE VIRGIN ISLANDS' CRIMINALLY INFLUENCED AND CORRUPT ORGANIZATIONS ACT ("CICO"), BASED ON VIOLATIONS OF THE LAWS AGAINST HUMAN TRAFFICKING, CHILD ABUSE, AND SEXUAL ABUSE. THE PLAINTIFF SEEKS TO HAVE THE ISSUES BE DETERMINED BY THE COURT OF JURISDICTION.

**EVIDENCE TO BE OBTAINED:**

PLAINTIFF SEEKS TO OBTAIN EVIDENCE WHICH IS RELATED TO THE CASE FROM **BARCLAYS BANK PLC** TO DETERMINE FACTS OF THE CASE. DOCUMENTS TO BE OBTAINED FROM **BARCLAYS BANK PLC** RELATED TO THIS CASE WILL HELP CLARIFY ISSUES THAT ARE RAISED IN THE CASE. PERSONAL APPEARANCE IS NOT REQUIRED.

**PURPOSE OF THE EVIDENCE SOUGHT:**

TO PROVIDE EVIDENCE REGARDING THE CASE.

**IDENTITY AND ADDRESS OF THE PERSON REQUESTED TO PROVIDE DOCUMENTS:**

BARCLAYS BANK PLC  
1 CHURCHILL PLACE, LONDON E14 5HP  
UNITED KINGDOM

**REQUEST:**

THE SUPERIOR COURT REQUESTS BARCLAYS BANK PLC PROVIDE THE DOCUMENTS CONTAINED IN EXHIBIT A.

**RECIPROCITY:**

THE SUPERIOR COURT OF THE VIRGIN ISLANDS, DIVISION OF ST. THOMAS AND ST. JOHN EXPRESSES A WILLINGNESS TO PROVIDE SIMILAR ASSISTANCE TO JUDICIAL AUTHORITIES OF THE UNITED KINGDOM.

**REIMBURSEMENT FOR COSTS:**

THE ATTORNEY FOR PLAINTIFF EXPRESS A WILLINGNESS TO REIMBURSE THE JUDICIAL AUTHORITIES OF THE UNITED KINGDOM FOR COSTS INCURRED IN EXECUTING THE REQUESTING COURT'S LETTER OF REQUEST. THEY ALSO EXPRESS A WILLINGNESS TO REIMBURSE **BARCLAYS BANK PLC** FOR THE REASONABLE EXPENSES INCURRED IN CONNECTION WITH THEIR PRODUCTION OF DOCUMENTS.

DATED: \_\_\_\_\_

JUDGE, THE SUPERIOR COURT OF THE VIRGIN ISLANDS, DIVISION OF ST. THOMAS AND ST. JOHN

[SEAL OF THE COURT]

## **EXHIBIT A**

### **DEFINITIONS**

1. As used herein, the term "Account Holder" shall mean any person or entity in whose name an account is held or where the person or entity has held any ownership or other interest or has had signatory authority.
2. "All/Each." The term "all" and "each" shall be construed as all and each.
3. "And/Or." The connectives "and" and "or" shall be construed either disjunctively or conjunctively as necessary to bring within the scope of the discovery request all responses that might otherwise be construed to be outside of its scope.
4. "Communication" means the transmittal of information (in the form of facts, ideas, inquiries or otherwise).
5. "Concerning" means relating to, referring to, describing, evidencing or constituting.
6. The terms "Document" or "Documents" are defined to be synonymous and equal in scope to the usage of these terms in Federal Rule of Civil Procedure 34(a), including, without limitation, any written, drawn, printed, typed, photographed or other graphic or electronically or computerized recorded data or compilations of any kind or nature prepared or received by, or in the possession, custody or control of the answering party, its agents, servants, employees or other representatives. Originals, drafts and all non-identical copies are separate Documents within the meaning of this term.
7. The term "identify" when used with reference to a person, means to give, to the extent known, the person's full name, present or last known address, and when referring to a natural person, additionally, the present or last known place of employment. Once a person has been

identified in accordance with this subparagraph, only the name of that person need to be listed in response to subsequent discovery requesting the identification of that person.

8. The term "identify" when used with reference to Documents, means to give, to the extent known, the (i) type of Document; (ii) general subject matter; (iii) date of the Document, and (iv) author(s), addressee(s) and recipient(s).

9. The term "identify" when used with reference to an oral communication, discussion, conversation or any other oral statement, shall mean to describe in detail the substance of each such communication, discussion, conversation or statement, state the date of such communication, discussion, conversation or statement, the place where such communication, discussion, conversation or statement was held and identify each person present for such communication, discussion, conversation or statement.

10. "Person" means any natural person or any business, legal or governmental entity or association.

11. "Referring to", "relating to", "reflecting", "regarding" or "with respect to" mean, without limitation the concepts pertain to, deal with, concern, reflect, record, report, constitute, contain, mention, describe, discuss, analyze, evaluate, estimate, study, survey, project, assess, support, modify, contradict, criticize, summarize, comment, or otherwise involve, in whole or in part.

12. "You," "Your," "Your company," and "the Bank" means Barclays Bank PLC, and includes all predecessors, successors, subsidiaries, parents, branches, departments, divisions, or affiliates, including, without limitation, any organization or entity in which they have management or controlling interests, together with all present and former directors, officers, employees, agents, representatives, or any other persons acting, or purporting to act, on behalf of the identified entities.



13. "Service" means the Bank's transfer of funds by means of wire transfer, cashier's check, official check or travelers check on behalf of an Account Holder or other Person.
14. "SWIFT" means the Society for Worldwide Interbank Financial Telecommunication.
15. "Epstein Agent" refers to any individual or entity authorized, or apparently authorized, to act on behalf of Jeffrey Epstein, including, but not limited to: Darren Indyke, Richard Kahn, [REDACTED], and/or [REDACTED]

#### SCOPE

Unless otherwise specified, the Documents specified below are required to be produced for the time period commencing January 1, 1998 and continuing through the present.

#### REQUESTS

For each account, Account Holder, or Person or entity identified in Attachment 1 to this Subpoena, please produce the following Documents:

**REQUEST NO. 1.** All Documents pertaining to each account of any kind, Account Holder, Person, or Service provided, including, but not limited to, account numbers, account opening Documents, monthly account statements, annual account statements, deposits, withdrawals, deposit slips, check stubs, cleared or canceled checks, disbursements checks, receipts, account notices, and any other forms of deposits into or withdrawals from each account including any authorization agreements or executed powers of attorney.

**REQUEST NO. 2.** All Documents showing the source(s) and/or destination(s) of any funds deposited into or withdrawn from each account or transferred via any Services provided from January 1, 1998 through present, including, but not limited to, wire transfer reports, memos, receipts, SWIFT transaction records, debit slips, credit slips, confirmations, correspondence, and reports related to currency transactions and/or suspicious activities.

**REQUEST NO. 3.** All Documents providing the identity of the Persons requesting the transactions described in Request 1 and/or the identity of the Persons receiving the benefit of the transactions described in Request 1.

**REQUEST NO. 4.** All Documents indicating those Persons who: (i) have had direct or beneficial ownership or other interest in each account; and/or (ii) have had signatory authority for each account.

**REQUEST NO. 5.** All Documents relating to any safe deposit box(es) held by the Account Holder or any Person or entity identified in Attachment 1.

**REQUEST NO. 6.** All Documents, including, but not limited to, correspondence, letters, memoranda, notes, and e-mails, that refer to, relate to, or reflect any and all Communications (oral and/or written) occurring between January 1, 1998 through present, between or among You and/or each Account Holder identified in Attachment 1 and/or any Persons or entities that: (i) have had direct or beneficial ownership or other interest in each account and/or (ii) have had signatory authority for each account.

**REQUEST NO. 7.** All internal bank Documents regarding or containing information about each account, Account Holder, Service, or Person, including but not limited to internal memoranda, correspondence, phone records, audits, investigatory materials, Know-Your-Customer information, notes held by account officers (regardless of form), condition files (including files often kept separate from account files which may include matters or issues that need to be addressed as conditions of the Account Holder obtaining or maintaining their status at the Bank, and including files that address, for example, account problems, suspicions, letters of authorization, money laundering or fraud issues and/or concerns), or any other files concerning or containing information about such account, Account Holder, Person, or Service, or whether to terminate the account.

**REQUEST NO. 8.** All Documents that refer or relate to any loans, lines of credit, letters of credit or any other credit given to any officers, signatories or authorized representatives of each account, Account Holder, or Person or entity.

**REQUEST NO. 9.** All Documents that identify any investments or securities held by each account, Account Holder, or Person or entity identified on Attachment 1 and managed by the Bank.

**REQUEST NO. 10.** All Documents that refer to or relate to accounts closed by each Account Holder or Person or entity within the last 6 years.

**REQUEST NO. 11.** All Documents concerning internal or external audits, investigations, inquiries or compliance issues which refer or relate to any account, Account Holder, or Person or entity identified in Attachment 1;

- a. the date that any and all accounts were opened;
- b. the date that any and all accounts were closed;
- c. the stated purpose for the account(s), if any; and
- d. all other names related to the account(s) whether as cosigner, authorized user, or for any other purpose.

**REQUEST NO. 12.** For each account, Account Holder, or Person or entity identified in Attachment 1, please produce all Documents related to any offshore account, location, or operation, including those Documents contained in any file held by any account manager, private banker, finder, sales associate, or other Person associated with or directing any Person or entity identified in Attachment 1 to any offshore account, location, or operation.

**REQUEST NO. 13.** All Communications between [REDACTED] and Jeffrey Epstein and/or any Epstein Agent.

**REQUEST NO. 14.** All Documents reflecting or regarding [REDACTED] relationship with Jeffrey Epstein and/or Your investigation of their relationship, including, but not limited to, all Documents You produced to any regulatory, administrative, or law enforcement agency.

**REQUEST NO. 15.** All Documents, including, but not limited to, calendars, invoices, travel receipts, itineraries, photographs, or videos reflecting or related to any meetings between [REDACTED] and Jeffrey Epstein, or travel by [REDACTED] to Little St. James or the Virgin Islands.

**REQUEST NO. 16.** All Documents reflecting or related to any Communications by Jeffrey Epstein to any employee, agent, or officer of the Bank regarding [REDACTED], including, but not limited to, the decision to hire [REDACTED]

## **Attachment 1**

### **Accounts and Account Holders For Which Information Is Requested To Be Provided**

Accounts held in the name of any of the following persons or entities, or where any of the following persons or entities have held any ownership or other interest or has had signatory authority:

1. Jeffrey E. Epstein;
2. The Estate of Jeffrey E. Epstein;
3. The 1953 Trust; Plan D LLC;
4. Great St. Jim, LLC;
5. Nautilus, Inc.;
6. Nautilus Foundation, Inc.;
7. Hyperion Air, LLC;
8. Poplar Inc.;
9. The C.O.U.Q. Foundation, Inc.;
10. The Epstein Foundation, Inc.;
11. Epstein Interests;
12. Gratitude America, LTD.;
13. The J. Epstein Foundation, Inc.;
14. Southern Trust Company, Inc.;
15. Financial Infomatics, LLC;
16. Financial Trust Company, Inc.;
17. IGY-AYH St. Thomas Holdings, LLC;
18. Cypress, Inc.;
19. Laurel, Inc.;
20. JEGE, LLC;
21. 2013 Butterfly Trust;
22. LSJE, LLC;
23. LSJ Employees, LLC;
24. CDE, Inc.;
25. Financial Ballistics, LLC;
26. FSF, LLC;
27. FT Real Estate, Inc.;
28. Maple, Inc.;
29. Mort, Inc.;
30. Prytanee, LLC;
31. Thomas World Air, LLC;
32. VT&T, LLC (f/k/a VTT, LLC);
33. Zorro Management, LLC;
34. IGO Company, L.L.C.;
35. Jeepers, Inc.;
36. Southern Financial LLC;
37. The Haze Trust;
38. Little St. Jim, LLC;
39. Little St. James, LLC;

40. L.S.J., LLC;
41. LSJ Emergency LLC;
42. Michelle's Transportation Company, L.L.C.;
43. Southern Country International, Ltd.;
44. Financial Strategy Group, Ltd.;
45. Southern Trust LLC;
46. Freedom Air Petroleum, LLC;
47. NES, LLC;
48. Ergo EB 2014 Ltd.;
49. J. Epstein Virgin Islands Foundation, Inc. (Enhanced Education);
50. Aviloop, LLC;
51. HBRK Associates;
52. JSC Interiors, LLC;
53. SLK Designs, LLC;
54. Darren Indyke;
55. Richard Kahn;
56. [REDACTED];
57. [REDACTED];
58. [REDACTED];
59. [REDACTED] and
60. [REDACTED];