

FILED

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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

GOVERNMENT OF THE UNITED STATES VIRGIN ISLANDS'
MOTION FOR LETTERS ROGATORY TO BARCLAYS BANK PLC

The Government of the United States Virgin Islands ("Government") hereby moves the Court for the issuance of letters rogatory, directed to the appropriate judicial authority of the United Kingdom, to request international judicial assistance to effect service of process to be used in a civil proceeding before this Court in the above-captioned matter pursuant to the Hague Convention of 18 March 1970 on the Taking of Evidence Abroad in Civil or Commercial matters. In support the Government states as follows:

1. Barclays Bank PLC is the sole custodian of the financial documents described in the proposed letters rogatory attached hereto as Exhibit A.
2. These financial documents are critical to the Government's law enforcement action.

3. The Government has unsuccessfully attempted to obtain these financial documents by serving subpoenas on related entities based in the United States.


4. The Government has also tried to obtain these financial documents by informally requesting them from Barclays Bank PLC, but Barclays Bank PLC refused to produce the documents.

5. The Government cannot obtain these critical financial documents without the Court issuing letters rogatory.

Respectfully submitted,

DENISE N. GEORGE, ESQUIRE
ATTORNEY GENERAL
VIRGIN ISLANDS DEPARTMENT OF JUSTICE

Dated: October 5, 2021

By: 
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Virgin Islands Department of Justice
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GOVERNMENT OF THE UNITED STATES VIRGIN ISLANDS' MOTION FOR LETTERS
ROGATORY TO BARCLAYS BANK PLC

Government of the U.S. Virgin Islands v. Indyke, et al.

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CERTIFICATE OF SERVICE

It is hereby certified that on this 5th day of October, 2021, a true and correct copy of the foregoing *Government of the United States Virgin Islands' Motion for Letters Rogatory to Barclays Bank PLC* was duly served upon the following by e-filing:

CHRISTOPHER ALLEN KROBLIN, ESQ.

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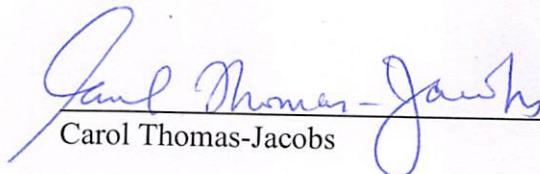
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