

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 2ND 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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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

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**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: October 12, 2021



Kathleen Mackay
Judge of the Superior Court
of the Virgin Islands

ATTEST:
TAMARA CHARLES
Clerk of the Court

BY: 
for **LATOYA CAMACHO**
Court Clerk Supervisor 10 / 12 / 2021

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 Virgin Islands Rules 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, Harry Beller, Ghislaine Maxwell, Bella Klein, Lesley Groff, and/or Sarah Kellen.

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 James E. Staley and Jeffrey Epstein and/or any Epstein Agent.

REQUEST NO. 14. All Documents reflecting or regarding James E. Staley's 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 James E. Staley and Jeffrey Epstein, or travel by James E. Staley 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 James E. Staley, including, but not limited to, the decision to hire James E. Staley.

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. JEJE, 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. Harry Beller;
57. Ghislaine Maxwell;
58. Bella Klein;
59. Lesley Groff; and
60. Sarah Kellen.