

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

IN THE MATTER OF THE ESTATE)
OF JEFFREY E. EPSTEIN,)
Deceased.)
)
)
_____)

PROBATE NO. ST-19-PB-80

ACTION FOR TESTATE
ADMINISTRATION

Jury Trial Demanded

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SUPERIOR COURT
THE VIRGIN ISLANDS

**CLAIM FOR UNLIQUIDATED AND UNSECURED DAMAGES
AND MOTION TO PROCEED BY PSEUDONYM**

COMES NOW Maria Farmer, Annie Farmer, Teresa Helm, Juliette Bryant and Jane Doe 1000 (collectively "Claimants") through their attorney John K. Dema, Esq., and hereby file this claim for unliquidated and unsecured damages from the estate in the above entitled matter, and states as follows:

CLAIM

1. In the United States District Court, Southern District of New York on November 12, 2019, Maria Farmer (case number 1:19-cv-10474), Annie Farmer (case number 1:19-cv-10475) and Teresa Helm (case number 1:19-cv-10476), and on November 14, 2019, Juliette Bryant (case number 1:19-cv-10479) and Jane Doe 1000 (case number 1:19-cv-10577), properly filed a civil actions seeking damages against Decedent Jeffrey Edward Epstein's Estate (the "Estate") and others. True and correct copies of their Complaints are attached as composite **Exhibit 1** to Claimants' Motion to Intervene filed on even date.

2. The Estate has accepted these claims, evidenced by the listing the claims on Schedule G of the First Quarterly Accounting filed on January 31, 2020.

3. Decedent repeatedly assaulted, battered and raped Claimants.

4. Decedent's petition for probate and for letters testamentary lists personal property valued at \$577,672,654.00. Decedent's petition for probate and for letters testamentary lists total estate property valued at \$577,672,654.00.

5. Claimants have a right to payment, whether or not their individual claims have presently been reduced to judgment, liquidated, fixed, or matured, and have an equitable lien on all unencumbered assets and property of the Estate. Claimants' claims require this Court to secure sufficient assets from the estate compensate their damages. They require this Court to prevent the sale, transfer or waste of any assets in decedent's estate.

6. These Creditors' Claims are verified by counsel, pursuant to 5 V.I.C. §699, as it is sworn under penalties of perjury that the contents hereof are true and correct to the best of undersigned counsel's knowledge, information and belief.

EPSTEIN'S ABUSE OF CLAIMANTS

7. These claims arise out of years of sexual abuse and exploitation of Claimants by notorious pedophile and convicted sex offender Jeffrey Epstein ("Epstein"). Claimants were abused by Epstein and his co-conspirators for years as young girls, suffering unimaginable physical and psychological trauma and distress. Despite that, they have persevered and survived to tell their stories, to hold their perpetrators accountable, and to seek justice for the atrocities committed against them.

8. Throughout his life, Epstein systematically perpetrated acts of molestation, exploitation, assault and rape on hundreds of young girls. Epstein's system of abuse was facilitated in large part by his co-conspirators, who helped supply him with a steady stream of young and vulnerable girls—many of whom were from disadvantaged backgrounds.

9. Despite escaping from Epstein, the years of abuse and exploitation perpetrated against Claimants caused them immeasurable pain and suffering.

MOTION TO PROCEED ANONYMOUSLY

10. Claimant Jane Doe 1000 further moves this Court to permit her to proceed by pseudonym at this point. The Honorable Lorna G. Schofield has already permitted claimant Jane Doe 1000 to proceed by pseudonym in her civil action against the Estate pending in the Southern District of New York. *See Jane Doe 1000 v. Indyke,, et al.*, No. 19-cv-10577 (S.D.N.Y. Jan. 24, 2020), ECF No. 23. Further, the Estate stipulated to allowing Jane Doe 1000 to proceed by

pseudonym in that litigation.

WHEREFORE Claimants pray that the Court:

11. Enter Judgment against decedent's estate in an amount sufficient to satisfy Claimants' individual Final Judgments in all pending matters, along with interest, attorneys' fees and punitive damages related to the decedent's fraudulent scheme and activities; or in the alternative, stay all further proceedings in this matter pending the disposition of Claimants' New York lawsuit against the Estate.

12. Claimants demand a jury trial to the extent permitted by law.

13. All other relief as this Court may deem just and proper.

Dated: February 3, 2020



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CERTIFICATE OF SERVICE

THIS IS TO CERTIFY that on this 3 day of February, 2020, I caused a true and correct copy of the foregoing be sent to the following via U.S. Mail, postage paid.

Christopher A. Kroblin, Esq.
Andrew W. Heymann, Esq.
William Blum, Esq.
Shari D'Andrade, Esq.
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By: _____

