

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

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SUPERIOR COURT  
ST. THOMAS, VIRGIN ISLANDS

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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**CLAIM FOR UNLIQUIDATED AND UNSECURED DAMAGES**

COMES NOW Virginia Giuffre (“Giuffre”) and hereby files this claim for unliquidated and unsecured damages from the estate in the above entitled matter, and states as follows:

**CLAIM**

1. On February 19, 2020, Giuffre sent a verified Notice of Claim to the Estate of Jeffrey E. Epstein (the “Estate”). Notice of Claim attached as **Exhibit 1**.
2. Also on February 19, 2020, the Estate acknowledged receiving the claim.
3. Decedent Jeffery E. Epstein (“Decedent” or “Epstein”) while he was alive repeatedly trafficked, assaulted, battered and raped Giuffre while she was a minor.
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. Giuffre has a right to payment, whether or not her claim has been reduced to judgment, liquidated, fixed, or matured, and has an equitable lien on all unencumbered assets and property of the Estate. Giuffre’s claim requires this Court to secure sufficient assets from the estate to compensate her damages. She requires this Court to prevent the sale, transfer or waste of any assets in Decedent's estate.

**EPSTEIN'S ABUSE OF GIUFFRE**

6. Giuffre’s claim arises out of years of sexual abuse and exploitation of her by the notorious pedophile and convicted sex offender Jeffrey Epstein. She was abused by Epstein and his co-conspirators for years as a young girl, suffering unimaginable physical and psychological

trauma and distress. Despite that, she has persevered and survived, and has worked to hold her perpetrators accountable and to seek justice for the atrocities committed against her.

7. 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.

8. The years of abuse and exploitation perpetrated against her caused her immeasurable pain and suffering.

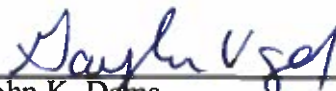
**WHEREFORE Claimants pray that the Court:**

9. Enter Judgment against the Estate in an amount sufficient to satisfy Giuffre's claim, along with interest, attorneys' fees and punitive damages related to Decedent's fraudulent scheme and activities.

10. Giuffre demands a jury trial to the extent permitted by law.

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

**Dated:** March 3, 2020

  
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**CERTIFICATE OF SERVICE**

**THIS IS TO CERTIFY** that on this 3<sup>rd</sup> day of March, 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.  
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By: \_\_\_\_\_



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February 19, 2020

**Via Email: [wblum@solblum.com](mailto:wblum@solblum.com); [ckroblin@kellfer.com](mailto:ckroblin@kellfer.com); [sdandrade@kellfer.com](mailto:sdandrade@kellfer.com); [mwhalen@kellfer.com](mailto:mwhalen@kellfer.com);**

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**RE: *Notice of Claim by Virginia Giuffre to the Estate of Jeffrey E. Epstein***

Dear Counsel,

On behalf of our client, Virginia Giuffre, pursuant to section 393 of Title 15 of the Virgin Islands code, we hereby give notice of a claim for unliquidated and unsecured damages from the Estate of Jeffrey E. Epstein in Probate No. ST-19-PB-80 in the Superior Court of the United States Virgin Islands. Attached please find the affidavit of Ms. Giuffre verifying her claim.

Sincerely,

  
Gaylin Vogel



