

IN THE SUPERIOR COURT OF THE VIRGIN ISLANDS

DIVISION OF ST. THOMAS & ST. JOHN

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SUPERIOR COURT
THE VIRGIN ISLANDS

IN THE MATTER OF THE ESTATE OF)
JEFFREY E. EPSTEIN,)
)
 Deceased.)
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PROBATE NO. ST-19-PB-80

NOTICE OF GOOD FAITH NEGOTIATIONS ON VICTIM COMPENSATION FUND

COMES NOW the Attorney General of the Virgin Islands and notify the Court of the status of negotiations regarding the voluntary victim compensation fund proposed by the Estate of Jeffrey E. Epstein (“Estate”). See Expedited Motion for Establishment of a Voluntary Claims Resolution Program, Nov. 14, 2019, *In the Matter of the Estate of Jeffrey E. Epstein*, No. ST-19-PB-80, 2019 (V.I. 2019).

While all parties agree that a Fund is necessary and appropriate to avoid further trauma to victims and their families and to ensure appropriate financial compensation to victims, the Attorney General raised specific concerns to be addressed to ensure that the compensation process is fair, treats each victim with dignity and respect, and protects all potential claimants and the interests of the Virgin Islands, while operating in conformity with the laws of the Virgin Islands and the public interest.

Consistent with these guiding principles, the Attorney General intends to permit the release of Estate assets to allow for just compensation of victims of Mr. Epstein through the administration of the Fund assuming that certain enhancements to the claims program are implemented. After

NOTICE OF GOOD FAITH NEGOTIATIONS ON VICTIM COMPENSATION FUND

In the Matter of the Estate of Jeffrey E Epstein

Probate No. ST-19-PB-80

Page 2

careful consideration, including in-person meetings with several of Mr. Epstein's victims and counsel for many victims, the Attorney General and the victims have reached an agreement in principle, whereby if certain improvements are included in the Fund's protocol, the Attorney General agrees to a partial lifting of the criminal activity liens on the Estate's assets to allow for the immediate and effective implementation of the Fund. This agreement has been provided to the lawyers for the Estate for review and consideration, and they have also been working diligently through the proposed program changes.

To be clear, the Attorney General has not proposed and will not propose conditions that detract in any way from the rights and benefits afforded the victims through the original Fund protocol, and seeks only significant enhancements, developed in agreement with victims, to ensure fairness to all victims. To provide the Court insight into the types of modifications upon which the Attorney General has insisted and the Estate is now reviewing, these include generally: a claim administrator chosen by the victims in addition to one chosen by the Estate; reserved funds for victims who choose to proceed with litigation rather than participate in the Fund; transparency with regards to both Estate assets and payments made from the Fund; settlement releases that further protect the victims' rights; and Court approval of the budget for the administration of the Fund.

At this time, all parties are in the process of reaching an agreed resolution that allows for the release of funds from the Attorney General's criminal activity lien in order to compensate victims of Mr. Epstein through the Fund. The Office of the Attorney General, with the support of the victims, therefore requests that the Court refrain from ruling on the Fund until such time as the parties have had the opportunity to reach finality on this issue. In an effort to facilitate this request,

NOTICE OF GOOD FAITH NEGOTIATIONS ON VICTIM COMPENSATION FUND
In the Matter of the Estate of Jeffrey E Epstein
Probate No. ST-19-PB-80
Page 3


the Attorney General will file a status report on this issue on or before Monday, March 10, 2020.

The Attorney General does not wish to delay the Court in ruling on any matter in this case beyond that date regardless of the status of these negotiations.

Respectfully submitted,

DENISE N. GEORGE, ESQUIRE
ATTORNEY GENERAL

Dated: March 3, 2020

By: 
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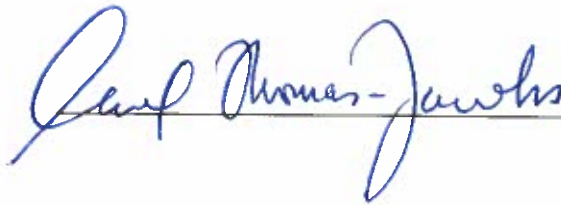
CERTIFICATE OF SERVICE

IT IS HEREBY CERTIFIED that the foregoing notice complies with the word and page requirements of V.I.R. Civ. P. 6-1(e) and, a true and correct copy of the motion was served via regular mail, postage prepaid, with a courtesy copy sent by email to counsel of record on March 3, 2020 to:

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