

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

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SUPERIOR COURT
OF THE VIRGIN ISLANDS

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

CREDITORS' CLAIMS

COMES NOW, claimants Jasmine Doe, Becca Doe, Jadyne Doe, Maggie Doe, Daisy Doe, Lola Doe, Amelia Doe, Aneisha Doe, Faith Doe, Aurora Doe, Maribel Doe, Megan Doe, April Doe, Cassi Doe, Janna Doe, Francesca Doe, Victoria Doe, and Wanda Doe each proceeding anonymously under pseudonym (collectively the "Claimants"), through their undersigned counsel, Sean E. Foster, Esq. of Marjorie Rawls Roberts, P.C., 5093 Dronningens Gade, Ste. 1, St. Thomas, U.S. Virgin Islands 00802, and hereby present and file this Creditors' Claims for unliquidated damages from the Estate of Jeffrey E. Epstein, and state as follows:

1. Pursuant to U.S. Virgin Islands Probate and Fiduciary Rule 11 titled *Notice to Creditors and Persons Indebted to the Estate*, "[a]ll persons having claims against the estate are required to present all claims within six months from the date of this notice, verified by affidavit;" *see also 15 V.I.C. § 391* Publication of Notice of Administration.
2. The Claimants have claims for unliquidated damages against the Estate of Jeffrey E. Epstein. To date, some of the Claimants have filed suit against the Estate of Jeffrey E. Epstein in the Southern District of New York and in Circuit Court of the 15th Judicial Circuit in and for Palm Beach County, Florida, which include: VE v. Nine East 71st Street et al., No. 19-cv-07625 (S.D.N.Y.) (Nathan, J.) Katlyn Doe v. Darren K. Indyke et al., No. 19-cv-


07771 (S.D.N.Y.) (Castel, J.) Pricilla Doe v. Darren K. Indyke et al., No. 19-cv-07772 (S.D.N.Y.) (Carter, J.) Lisa Doe v. Darren K. Indyke et al., No. 19-cv-07773 (S.D.N.Y.) (Ramos, J.) Anastasia Doe v. Darren K. Indyke, et al., No. 19-cv-11869 (S.D.N.Y.) (Nathan, J.), *JJ Doe v. Darren K. Indyke and Richard D. Kahn as Co-Executors of the Estate of Jeffrey Epstein*, Case No. 50-2019-CA-016311-XXXX-MB – Div. AK, Judge James L. Martz (collectively the “Complaints”).

3. Claimants’ claims for unliquidated damages arise from Jeffrey E. Epstein’s repeated sexual assault, sexual abuse, and in some cases rape of the Claimants’, some of whom were minors at the time said assaults, abuse and rape occurred. Said abuse occurred with the assistance of Jeffrey E. Epstein’s associates and entities and caused the Claimants severe psychological distress and emotional trauma.
4. The Executors for the Estate of Jeffrey E. Epstein acknowledge the claims as presented in the Complaints and have listed such in Schedule G of the First Quarterly Accounting filed on January 31, 2020; furthermore, the Executors for the Estate of Jeffrey E. Epstein acknowledge the claims of those Claimants who have not yet filed suit by seeking to establish a voluntary claims resolution program (“the Fund”) to compensate such Claimants, and others, for the abuse that they endured.
5. As such, the Claimants have a right to money damages, whether in the form of judgment or liquidated, fixed or matured damages, and therefore, have an equitable lien on all unencumbered assets and property of the Estate of Jeffrey E. Epstein.

This Creditors’ Claims is verified by undersigned counsel, as it is sworn under penalties of perjury that the contents hereof are true and correct to the best of the undersigned counsel’s knowledge, information and belief.

Dated: March 5, 2020

Respectfully Submitted,

A handwritten signature in blue ink that reads "Sean E. Foster". The signature is written in a cursive style with a horizontal line underneath the name.

Sean E. Foster
Marjorie Rawls Roberts, P.C.
5093 Dronningens Gade, Ste. 1
St. Thomas, U.S. Virgin Islands 00802
(340) 774-0324
Fax: (340) 776-7951
Email: sean@marjorierobertspc.com

CERTIFICATE OF SERVICE

I HEARBY CERTIFY that on this 5th day of March, 2020, I caused a true and exact copy of the foregoing to be served upon:

Via Electronic Mail by Agreement of the Parties:

John H. Benham, Esq.
Law Office of John H. Benham, P.C.
P.O. Box 11720
St. Thomas, VI 00801
john@benhamlawvi.com

Douglas B. Chanco, Esq.
ChancoSchiffer, P.C.
3355 Lenox Road, Suite 750
Atlanta, GA 30326
doug@csfirm.com

Richard Bourne-Vanneck, Esq.
Law Offices of Richard Bourne-Vanneck
9800 Buccaneer Mall suite #9
St. Thomas, VI 00802
richard@rpvblawoffices.com

John K. Dema
Law Offices of John K. Dema
1236 Strand Street, Suite 103
St. Croix, VI 00820
jdema@demalaw.com

Via First-Class Mail:

Denise George, Esq.
V.I. Attorney General
Ariel Smith, Esq.
Chief, Civil Division
Virgin Islands Department of Justice
34-38 Kronprinsends Gade
GERS Building, 2nd Floor
St. Thomas, VI 00802

A Jeffrey Weiss, Esq.
A.J. Weiss & Associates
6934 Vessup Lane
St. Thomas, VI 00802
jeffweiss@weiss@weisslaw-vi.net

Kevin F. D'Amour, Esq.
Gaylin Vogel, Esq.
5143 Palm Passage, 18b & 19b
St. Thomas, VI 00802
Kevin.damour@comcast.net
Gaylin.vogel@comcast.net

Melody D. Westfall, Esq.
Westfall Law PLLC
5032 anchor Way, Suite 8
Christiansted, St. Croix 00820
mwestfall@westfalllaw.com

Kellerhalls Ferguson Kroblin PLLC
Christopher Kroblin, Esq.
Royal Palms Professional Building
Suite 101
9053 Estate Thomas, VI 00802
ckroblin@kellfer.com



Sean E. Foster, Esq.