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

| IN THE MATTER OF THE ESTAT | ΓE) | PROBATE NO. ST-19-PB-80 |
|----------------------------|------|-------------------------|
| OF JEFFREY E. EPSTEIN, |) | |
| |) | ACTION FOR TESTATE |
| Deceased. |) | ADMINISTRATION |
| |) | |
| |) | Jury Trial Demanded |

CLAIM FOR UNLIQUIDATED AND UNSECURED DAMAGES

COMES NOW Sarah Ransome ("Ransome") 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 20, 2020, Ransome sent a verified Notice of Claim to the Estate of Jeffrey E. Epstein (the "Estate"). Notice of Claim attached as **Exhibit 1**.
- 2. Decedent Jeffery E. Epstein ("Decedent" or "Epstein") while he was alive repeatedly trafficked, assaulted, battered and raped Ransome.
- 3. 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.
- 4. Ransome 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. Ransome'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 RANSOME

5. Ransome'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 woman, 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.

6. 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.

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

WHEREFORE Claimants pray that the Court:

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

9. Ransome demands a jury trial to the extent permitted by law.

10. 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 3rd 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.

mwhalen@kellfan.com

By

Kevin F. D'Amour, P.C.

Attorneys at Law

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February 20, 2020

<u>Via Email: wblum@solblum.com; ckroblin@kellfer.com; sdandrade@kellfer.com; mwhalen@kellfer.com;</u>

William L. Blum, Esq. Chris Kroblin, Esq. Shari N. D'Andrade, Esq. Marjorie Whalen, Esq. Kellerhals Ferguson Kroblin PLLC Royal Palms Professional Building 9053 Estate Thomas, Suite 101 St. Thomas, VI 00802

RE: Notice of Claim by Sarah Ransome to the Estate of Jeffrey E. Epstein

Dear Counsel,

On behalf of our client, Sarah Ransome, 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. Ransome verifying her claim.

Sincerely.

Mayln Vogel
Gaylin Vogel



AFFIDAVIT OF SARAH RANSOME

I, Sarah Ransome, first being duly sworn do hereby depose and say under penalty and

| perjury that: | | |
|---|--|--|
| 1 I am an adult resident of United Kingdom 3 South Ofrica. | | |
| 2. I hereby verify that I am a victim of Jeffery E. Epstein's sex trafficking and sex abuse from 2006 through 2007 and have 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. | | |
| Sarah Ransome | | |
| | | |
| County: Broward) State: Florida) | | |
| | | |
| The foregoing was acknowledged before me via video conference this 20 day of February 2020, by Sarah Ransome personally known or made known to me | | |
| Dubonh C. Knoch | | |
| (Notary Signature) | | |
| Notary Public State of Florida Deborah C Knowlton My Commission GG 133867 Expires 11/29/2021 | | |