

FILED

September 03, 2020

TAMARA CHARLES
CLERK OF THE COURT

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

GOVERNMENT OF THE UNITED STATES
VIRGIN ISLANDS

Plaintiff,

v.

DARREN K. INDYKE, in his capacity as the EXECUTOR
FOR THE ESTATE OF JEFFREY E. EPSTEIN and
ADMINISTRATOR OF THE 1953 TRUST; RICHARD D.
KAHN, in his capacity as THE EXECUTOR FOR THE
ESTATE OF JEFFREY E. EPSTEIN, and
ADMINISTRATOR OF THE 1953 TRUST; ESTATE OF
JEFFREY E. EPSTEIN; THE 1953 TRUST; PLAN D. LLC;
GREAT ST. JIM, LLC; NAUTILUS, INC.; HYPERION
AIR, LLC; POPLAR, INC.; SOUTHERN TRUST
COMPANY, INC.; JOHN AND JANE DOES

Defendant.

CASE NO. ST-20-CV-014

ACTION FOR DAMAGES

JURY TRIAL DEMANDED

PLAINTIFF'S SUBPOENA TO THIRD-PARTY GLEN DUBIN

In accordance with Rule 45 of the Virgin Islands Rules of Civil Procedure, and pursuant to subpoena issued in the pending action *Government of the United States Virgin Islands v. Estate of Jeffrey E. Epstein, et al.*, ST-20-CV-014, before the Superior Court of the Virgin Islands, Division of St. Thomas and St. John, you, Glen Dubin, are hereby commanded to produce and deliver all documents responsive to the Requests set forth below to Carol Thomas-Jacobs, Esq. within 30 days following receipt of this subpoena. If you have any questions, please contact Carol Thomas-Jacobs, Esq.

INSTRUCTIONS

1. When providing Your responses, indicate the Request to which each Document or answer responds in the metadata field, Request No.
2. Documents produced pursuant to these Requests shall be produced as they are kept in the ordinary course of business.
3. For each Document that You produce, produce the current version together with all earlier editions or predecessor Documents during the relevant time period, even though the title of earlier Documents may differ from current versions. Format for Documents produced electronically:
 - a. Data shall be produced in single page TIFFs at a 300 DPI resolution which are named for the Bates Number of the page. There shall be no more than 1000 images per folder. Bates numbers, confidentiality designations, and redactions shall be burned into the TIFF image file so as not to unreasonably obstruct any information on the page.
 - b. Document Unitization. Each page of a Document shall be electronically converted into an image as described above. If a Document is more than one page, the unitization of the Document and any attachments and/or affixed notes shall be maintained as it existed in the original when creating the image file and appropriately designated in the load files. The corresponding parent/attachment relationships, to the extent possible, shall be provided in the load files furnished with each production.
 - c. Include Document level text files containing optical character recognition (“OCR”) or extracted text named with the Bates Number of the first page of the Document.

- d. Include data load files containing all of the metadata fields (both system and application – see list below) from the original Native Documents.
- e. Include the database field name in the first line of the metadata file, in such a manner that it is clear how the metadata is organized in the file.
- f. All hidden text (*e.g.*, track changes, hidden columns, comments, notes, etc.) shall be expanded, extracted, and rendered in the .TIFF file.
- g. Documents created in Excel (spreadsheets), .CSV files, Access (databases), and audio and video media files shall be produced in Native format. The extractable metadata and text shall be produced in the same manner as other Documents that originated in electronic form (as described herein) to the extent that metadata exists or is reasonably accessible.
- h. Email attachments and embedded files or links shall be mapped to their parent.
- i. Produce all attachments to responsive Documents attached to the responsive Documents.
- j. De-duplicate prior to production. To the extent that exact duplicate Documents (based on MD5 or SHA-1 hash values at the Document level) reside within a party's data set, each party is only required to produce a single copy of a responsive Document, so long as there is a data field that identifies each custodian who had a copy. In addition, Documents may be de-duplicated in such a way as to eliminate earlier or incomplete chains of emails, and produce only the most complete iteration of an email chain so long as there is a data field that identifies each custodian who had a copy.

REQUIRED METADATA FIELDS:

BEGDOC	ENDDOC
BEGATTACH	ENDATTACH
ATTCOUNT	ATTACH
CUSTODIAN	AUTHOR
FROM	TO
CC	BCC
FILESIZE	PGCOUNT
DATERECD	TIMERECD
DATESENT	TIMESENT
CRTDATE	CRTTIME
LASTMODDATE	LASTMODTIME
LASTACCDATE	LASTACCTIME
TITLE	SUBJECT
EMAILSUBJECT	FILENAME
FILEEXT	MD5HASH
ORGANIZATION	FULLPATH
RECORD_TYPE	VERSION
VOLUME	COMMENT
PRINTEDDATE	ENTRYID
ATTLST	ITEMTYPE
PSTINSIDEPATH	ITEMCREATIONTIME

REQATTANDEES	REMINDERTIME
REPLYTIME	APPOINTMENTSTARTDATE
APPOINTMENTDURATIONTIME	APPOINTMENTCONTACT
CATEGORY	KEYWORDS
MANAGER	LASTAUTHOR
ENCRYPTED	FAMILYDATE
NATIVELINK	TEXTPATH
REQUESTNO	

4. Format for hard copies of Documents produced in response to this Request:
 - a. Re-type the question or request to which the Documents respond and firmly attach the Documents to the re-typed request;
 - b. Number all Documents consecutively, consistently with the numbers used for the Documents produced electronically.
5. Unless otherwise indicated, the relevant time period for this Request for Production of Documents is January 1, 1998 to the present.
6. If no Documents responsive to a particular request exist, so state.
7. As to any Document which no longer exists but which You are aware existed at one time, identify such Document with as much particularity as possible, and in addition, identify the last known location of the Document, the reason the Document is no longer in existence, and the person responsible for the Document's disposition.
8. For information that You withhold on the basis of privilege, provide a descriptive list of each Document stating the grounds for Your refusal and providing the following

information: the name or title of the Document; a description of the nature and subject matter of the Document sufficient to enable a meaningful challenge to the assertion of privilege; the date, author(s), sender(s), and recipient(s) of the Document, including whether the person is an attorney and/or was an employee of First Bank. at the time the Document was authored, sent or received; and the nature of the privilege.

9. These requests shall be deemed continuing in character so as to require prompt supplemental responses if additional Documents called for herein are obtained, discovered, or become known to You between the time of responding to the Requests and the final disposition of this action.
10. Social Security numbers may be redacted from documents to the extent required by applicable law.

DEFINITIONS

1. "All" shall be construed to include the collective as well as the singular and shall mean "each," "any," and "every."
2. "Document(s)" means any writing or any other tangible thing, whether printed, recorded (in audio, video, electronically or by any other means), reproduced by any process, or written or produced by hand, including, but not limited to, letters, memoranda, notes, opinions, books, reports, studies, agreements, statements, communications (including inter-company and intra-company communications), correspondence, telegrams, email, instant messages, chat logs, SMS, MMS or other "text" messages, posted information, messages, chat logs on "social networking" sites (including but not limited to, Facebook, Google+, MySpace and Twitter), logs, bookkeeping entries, summaries or records of personal conversations, diaries, calendars, telephone messages and logs, forecasts, photographs,

images, tape recordings, models, statistical statements, graphs, laboratory and engineering reports, notebooks, charts, plans, drawings, minutes, bylaws, resolutions, records of conferences, expressions or statements of policy, lists of persons attending meetings or conferences, lists of clients or customers or suppliers, reports or summaries of interviews, opinions or reports of negotiations, brochures, pamphlets, advertisements, circulars, trade letters, press releases, drafts of any document and revisions of drafts of any document, and any other similar paper or record. The terms also include a copy of a document where the copy is not exactly the same as the original. The terms also include emails and other documents made or stored in electronic form, whether kept on computers, computer tapes, disks or drives, including Cloud storage, of any type, or other media upon which information may be recorded.

3. "Communication" means the transmittal of information (in the form of facts, ideas, inquiries or otherwise).

4. "Including" is used merely to emphasize that a request for certain types of documents or information should not be construed as limiting the request in any way.

5. "Referring to", "relating to", "reflecting", "regarding" or "with respect to" mean, without limitation the concepts: pertain to, deal with, concern, reflect, record, report, constitute, contain, mention, describe, discuss, analyze, evaluate, estimate, study, survey, project, assess, support, modify, contradict, criticize, summarize, comment, or otherwise involve, in whole or in part.

6. "Epstein Entities" shall include, but not be limited to, Jeffrey E. Epstein, Estate of Jeffrey E. Epstein; The 1953 Trust; JEGE, LLC; Cypress, Inc.; Financial Ballistics, LLC; FSF, LLC; FT Real Estate, Inc.; Great St. Jim, LLC; Hyperion Air, LLC; IGO Company, LLC; Jeepers, Inc.;

Laurel, Inc.; Little St. Jim, LLC; LSJE, LLC; LSJ Emergency, LLC; Maple, Inc.; Michelle's Transportation Company, L.L.C.; Nautilus, Inc.; Plan D, LLC; Poplar, Inc.; Prytanee, LLC; Southern Country International, Ltd.; Southern Trust Company, Inc.; Southern Financial, LLC; Thomas World Air, LLC; VT&T, LLC; Zorro Management, LLC; Mort, Inc.; CDE, Inc.; Freedom Air Petroleum, LLC; C.O U.Q. Foundation; Epstein Foundation, Inc.; Epstein Interests; Gratitude America LTD; J. Epstein Foundation, Inc.; Southern Trust Co.; Financial Trust Co.; IGY-AYH St. Thomas Holdings, LLC; Butterfly Trust; LSJ Employees, LLC; CDE, Inc.; and Financial Informatics.

7. "You" or "Your" refers to Glen Dubin and Dubin & Co.

REQUESTS FOR PRODUCTION

From January 1, 1998 to present.

REQUEST NO. 1. All Documents and Communications relating to all financial transactions between You, Jeffrey Epstein, and any Epstein Entity, agent, or associate. This includes, but is not limited to, three wire transfers between 2014 and 2016.

REQUEST NO. 2. All Documents and Communications relating or referring to the Virgin Islands or Little St. James, including, but not limited to, travel to or from the Virgin Islands or Little St. James.

REQUEST NO. 3. All Documents and Communications relating or referring to Jeffrey Epstein's criminal plea, conviction, probation, or any other criminal, civil, or administrative investigation or litigation related to Epstein or the sexual abuse or trafficking of females by Epstein or any individual associated with Epstein.

REQUEST NO. 4. All Documents and Communications between You and Darren Indyke, Richard Kahn, Bella Klein, and/or Harry Beller, and/or regarding Jeffrey Epstein's Estate, trusts, or will.

REQUEST NO. 5. All Documents and Communications regarding any assistant employed by Jeffrey Epstein or with Jeffrey Epstein or any Epstein agent or associate regarding any au pair or child care provider employed by you.

REQUEST NO. 6. All Documents and Communications regarding a Swedish female traveling with or employed by Jeffrey Epstein or regarding transportation You provided or arranged for her.

REQUEST NO. 7. All Documents and Communications regarding the departure of Rinaldo and/or Debra Rizzo from Your employment, any severance or non-disclosure agreement or payment, or regarding statements or testimony by Rinaldo or Debra Rizzo in any investigation or litigation related to Jeffrey Epstein and/or Ghislaine Maxwell.

REQUEST NO. 8. All Documents and Communications regarding travel by You on any airplane used by Jeffrey Epstein, any travel with Jeffrey Epstein, Ghislaine Maxwell, or any individual or agent associated with or accompanying Jeffrey Epstein or Ghislaine Maxwell, or any travel by Jeffrey Epstein Ghislaine Maxwell, or any individual or agent associated with or accompanying Jeffrey Epstein or Ghislaine Maxwell on an airplane used by You.

REQUEST NO. 9. All Documents and Communications regarding Virginia Roberts Giuffre or any other allegations that You sexually abused any female associated with Jeffrey Epstein.

REQUEST NO. 10. All Documents and Communications regarding any employee or female that was transported by car, plane, boat or otherwise to or from any of Jeffrey Epstein's properties.

REQUEST NO. 11. All Documents and Communications related to any of your three children, Maye, Celina or Jordan, which also relate in any way to Jeffrey Epstein or any Epstein Entity.

REQUEST NO. 12. All schedules reflecting visits you made to any of Jeffrey Epstein's or Ghislaine Maxwell's properties or any visits made by Jeffrey Epstein or Ghislaine Maxwell to any property owned by You.

REQUEST NO. 13. All Documents and Communications about Jeffrey Epstein sent or received by You.

REQUEST NO. 14. All trust Documents related to Jeffrey Epstein.

REQUEST NO. 15. All Documents and Communications evidencing donations made by you to Jeffrey Epstein or an Epstein Entity or donations by Jeffrey Epstein to You or any entity related to You.

REQUEST NO. 16. All Documents and Communications between You and any female associated with Jeffrey Epstein.

REQUEST NO. 17. All Documents and Communications related to or reflecting any message you received at any of Jeffrey Epstein's properties or performed by someone sent to Your property at the direction of Jeffrey Epstein.

REQUEST NO. 18. All Documents and Communications related to or reflecting any assistance that you provided in securing employment for any female at the request of Jeffrey Epstein or for any female associated with Jeffrey Epstein.

REQUEST NO. 19. All Documents and Communications between You, Jeffrey Epstein and/or James E. Staley regarding massages, travel to or meetings in the Virgin Islands or elsewhere, the sale or purchase of Highbridge Capital, or any other financial transaction, commission, fee, or investment, or any Epstein Entity.

REQUEST NO. 20. All Documents and Communications between You, Jeffrey Epstein and/or Daniel Zwirn regarding investments by Jeffrey Epstein in or litigation related to investments by Jeffrey Epstein.

REQUEST NO. 21. All Documents and Communications reflecting Your relationship, including as an investment advisor, to Jeffrey Epstein or any Epstein Entity.

REQUEST NO. 22. Any photographs, videos, or other recordings related to or reflecting any visits You made to Little St. James.

Respectfully submitted,

DENISE N. GEORGE, ESQ.
ATTORNEY GENERAL

DATE: September 3, 2020

/S/ Carol Thomas-Jacobs
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