

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 LESLEY GROFF

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, Lesley Groff, 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; JEJE, 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 Lesley Groff.

REQUESTS FOR PRODUCTION

From January 1, 1998 to present.

REQUEST NO. 1. All documents or materials reflecting or referencing any Communications with Jeffrey Epstein, Ghislaine Maxwell, Erika Kellerhals, Richard D. Kahn, Darren K. Indyke, Yulia Slinskaya, Adriana Ross, Sarah Kellen and/or Nadia Marcinkova.

REQUEST NO. 2. All documents reflecting any and all payments to You, whether monetary or in-kind, for any services or work performed by You for or on behalf of Jeffrey Epstein, Ghislaine Maxwell, Erika Kellerhals, Richard D. Kahn, Darren K. Indyke, Yulia Slinskaya, Adriana Ross, Sarah Kellen and/or Nadia Marcinkova.

REQUEST NO. 3. All documents and materials reflecting any employment agreements and/or severance agreements between You and Jeffrey Epstein, Ghislaine Maxwell, Richard D. Kahn, Darren K. Indyke, or any Epstein Entity, including all defendants in this matter.

REQUEST NO. 4. All documents and materials reflecting or discussing any non-disclosure agreements related to your employment with any individual or entity identified in response to Request number 3, above.

REQUEST NO. 5. All documents and materials reflecting any and all duties and/or job responsibilities performed as an employee or agent of any individual or entity identified in response to Request number 3, above.

REQUEST NO. 6. All documents, materials, recordings, or books reflecting, referencing or documenting any appointments or schedule you created, handled, or maintained for or on behalf of Jeffrey Epstein or any Epstein Entity.

REQUEST NO. 7. All documents and materials related to any and all living arrangements made for any female at the request of or on behalf of Jeffrey Epstein or any Epstein Entity, including but not limited to any housing leases or payments, transportation arrangements, and/or financial allowances for any individual.

REQUEST NO. 8. Provide all documents and materials related to any and all cellular phone numbers used by You for the relevant time frame, including each phone number assigned to or used by You and the cellular carrier through which the service was handled.

REQUEST NO. 9. All documents reflecting any financial transactions You conducted for, on behalf of and/or related to Jeffrey Epstein, Ghislaine Maxwell, Richard D. Kahn, Darren K. Indyke, or any entity associated with Jeffrey Epstein or any Epstein Entity, including all defendants in this matter.

REQUEST NO. 10. All documents and materials relating to any immigration matters, including but not limited to visas and applications therefor, for any girl or woman who visited or traveled with Jeffrey Epstein, and all Communications, in electronic or paper form, with any immigration attorney related to any such girl or woman.

REQUEST NO. 11. All documents or materials, including correspondence, relating to any travel arrangements of any female and/or Jeffrey Epstein, including documents or materials related to any plane, helicopter, car, or boat used for travel to or from the Virgin Islands, including but not limited to the identity and age of all passengers.

REQUEST NO. 12. Any and all documents related to any gifts or items of value given to you by Jeffrey Epstein or any Epstein Entity, including but not limited to automobiles, clothing allowances, and or payments for household assistants or childcare providers for You.

REQUEST NO. 13. Any and all documents related to any locations of any offices, residences, or other places at or in which you conducted business for Jeffrey Epstein and/or any Epstein entity, including but not limited to payments for any leases, mortgages, telephone and utility bills, office equipment, and/or furniture for such locations.

REQUEST NO. 14. Any and all documents or materials containing the names, addresses, or telephone numbers of individuals who were identified as masseuses.

REQUEST NO. 15. Any and all documents or materials reflecting payments made to any female who provided a massage to Jeffrey Epstein.

REQUEST NO. 16. All documents or materials reflecting the names of any person to visit Little St. James and the dates of such visits.

REQUEST NO. 17. All documents containing names, addresses, and phone numbers of all persons who ever stayed overnight at any of the apartments owned, managed, or controlled by Jeffrey Epstein located at 301 East 66th Street, New York, New York.

DENISE N. GEORGE, ESQ.
ATTORNEY GENERAL

DATE: September 3, 2020

/s/ Carol Thomas-Jacobs

CAROL THOMAS-JACOBS, ESQ.
Chief Deputy Attorney General
Virgin Islands Department of Justice
Office of the Attorney General
3438 Kronprindsens Gade
GERS Complex, 2nd Floor
St. Thomas, USVI 00802
(340) 774-5666 Ext. 10101
Carol.Jacobs@doj.vi.gov

LINDA SINGER
MOTLEY RICE LLC
401 9th Street NW, Suite 1001
Washington, DC 20004
Tel: 202-232-5504
Fax: 202-386-9622

*Attorneys for Plaintiff Government of the
USVI*