

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

IN THE MATTER OF THE ESTATE OF
JEFFREY E. EPSTEIN

Deceased.

PROBATE NO. ST-19-PB-____

ACTION FOR TESTATE
ADMINISTRATION

PETITION FOR PROBATE AND FOR LETTERS TESTAMENTARY

COME NOW Petitioners **DARREN K. INDYKE** and **RICHARD D. KAHN**, Executors of the Estate of Jeffrey E. Epstein, by and through KELLERHALS FERGUSON KROBLIN PLLC, and petition this Honorable Court to grant the instant petition pursuant to V.I. CODE ANN. tit. 15, § 161 and Rule 3 of the Virgin Islands Rules for Probate and Fiduciary Proceedings. In support thereof, Petitioners state the following:

- 1) That Petitioners Darren K. Indyke and Richard D. Kahn ("Petitioners") are citizens of the United States of America and residents of Florida and New York, respectively.
- 2) The original Last Will and Testament of Decedent, dated August 8, 2019, which is attached hereto, appoints Petitioners as Executors of the Estate.
- 3) The Decedent, Jeffrey E. Epstein, died testate on August 10, 2019 in New York, New York, and was domiciled in and a resident of St. Thomas, Virgin Islands at the time of his death, as supported by the copy of Certificate of Death attached hereto.¹
- 4) Decedent left certain assets in trust.
- 5) The Decedent died possessed of certain property within the Territory of the U.S. Virgin Islands and within the jurisdiction of the Court as herein described:

¹ The original death certificate, or a certified copy thereof, will be filed with the Court upon Counsel's receipt of the same.

PERSONAL PROPERTY²

VALUE

Cash	\$ 56,547,773.00
Fixed Income Investments	\$ 14,304,679.00
Equities	\$ 112,679,138.00
Aviation Assets, Automobiles and Boats	\$ 18,551,700.00
Fine Arts, Antiques, Collectibles, Valuables & Other Personal Property	TBD subject to appraisal/valuation
Hedge Funds & Private Equity Investments	\$ 194,986,301.00
10,000 shares of Maple, Inc., a U.S. Virgin Islands corporation which holds title to 9 East 71 st Street New York, NY 10021	\$ 55,931,000.00
10,000 shares of Cypress, Inc., a U.S. Virgin Islands Corporation, which holds title to 49 Zorro Ranch Road Stanley, New Mexico 87056	\$ 17,246,208.00
10,000 shares of Laurel, Inc., a U.S. Virgin Islands Corporation, which holds title to 358 El Brillo Way Palm Beach, Florida 33480	\$ 12,380,209.00
999 shares of SCI JEP, a French Company which holds title to units 47 with mezzanine, 48 and 81 on the 2nd floor, units 63 and 74 on the 5 th floor and units 5 and 22 (cellars) in the basement 22 Avenue Foch Paris, France 75116	\$ 8,672,823.00
10,000 shares of Poplar, Inc., a U.S. Virgin Islands Corporation, which holds title to Great St. James Island No. 6A Red Hook Quarter St. Thomas, Virgin Islands	\$ 22,498,600.00
10,000 shares of Nautilus, Inc., a U.S. Virgin Islands Corporation, which holds title to Little St. James Island No. 6B Red Hook Quarter Parcels A, B & C St. Thomas, Virgin Islands	\$ 63,874,223.00
TOTAL PERSONAL PROPERTY:	\$ 577,672,654.00
TOTAL ESTATE PROPERTY:	\$ 577,672,654.00

² Values are subject to appraisal and/or update to their date of death valuation, which will be confirmed in verified inventory to be filed with the Court.

- 6) Petitioners are investigating potential debts and claims of the Estate and at this time they are unknown.
- 7) That the names and addresses, insofar as known to Petitioners, of the heirs and next of kin of the deceased, who would be entitled to share the estate if he had left no will; the relation of each such person to him; the proportion due each such person, and whether each of them is an adult or an infant are as follows:

<u>NAMES</u>	<u>RELATIONSHIP</u>	<u>CAPACITY</u>	<u>SHARE</u>
Mark Epstein	Brother	Adult	100%

- 8) That Petitioners Darren K. Indyke and Richard D. Kahn be appointed Executors. They are adults of sound mind, are not convicted of any crime involving moral turpitude, and are not judicial officers of this Honorable Court.
- 9) Although Petitioners are not residents of the Virgin Islands, they are qualified to serve as Executors pursuant to 15 V.I.C. § 235(c) because they otherwise qualify under 15 V.I.C. § 235(a) and they have appointed the law firm of Kellerhals Ferguson Kroblin PLLC, which has offices on St. Thomas, Virgin Islands, to accept service of all papers for purposes of the probate of Decedent's estate.
- 10) The Decedent's Last Will and Testament provides that "No bond or other security shall be required of any Executor in any jurisdiction." *See* original Last Will and Testament attached hereto at Article THIRD, subsection B on page 2. Accordingly, Petitioners pray that the bond be waived pursuant to V.I. R. Prob. 3.

WHEREFORE, Petitioners pray:

- A. That the Estate of Jeffrey E. Epstein be entered into Probate;
- B. That a citation be issued to any heir or next of kin who has not signed a Waiver;
- C. That this Honorable Court order the issuance of a notice to creditors and claims procedure order in substantial form of that which will be separately proposed to the court forthwith;
- D. That the Last Will and Testament of Jeffrey E. Epstein, attached hereto, be admitted to Probate;
- E. That Darren K. Indyke and Richard D. Kahn be appointed Executors and Letters Testamentary be issued to them;
- F. That the bond be waived; and
- G. That the Petition be granted.

Respectfully,

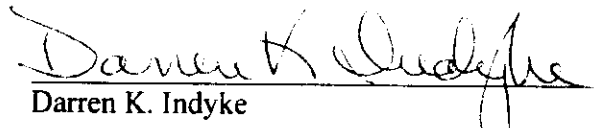
DATED: August 15, 2019


WILLIAM BLUM, ESQ., Of Counsel
V.I. Bar No. 136
KELLERHALS FERGUSON KROBLIN PLLC
Royal Palms Professional Building
9053 Estate Thomas, Suite 101
St. Thomas, V.I. 00802-3602
Telephone: (340) 779-2564
Facsimile: (888) 316-9269
Email: wblum@solblum.com

VERIFICATION OF PETITION

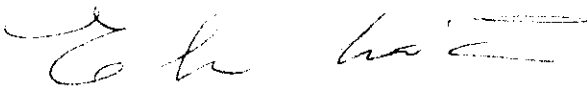
I, Darren K. Indyke, Executor of the Last Will and Testament of Jeffrey E. Epstein, hereby verify I have read and do hereby certify that the statements contained in the Petition for Probate and for Letters Testamentary are accurate in so far as my knowledge and insofar as my own records show.

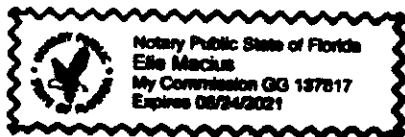
DATED: August 15, 2019


Darren K. Indyke

SUBSCRIBED AND SWORN to before me

this 15 day of AUGUST, 2019.

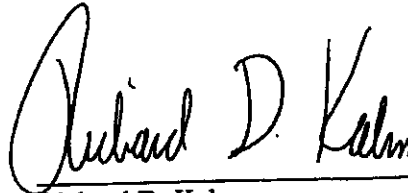




VERIFICATION OF PETITION

I, Richard D. Kahn, Executor of the Last Will and Testament of Jeffrey E. Epstein, hereby verify I have read and do hereby certify that the statements contained in the Petition for Probate and for Letters Testamentary are accurate in so far as my knowledge and insofar as my own records show.

DATED: August 15th, 2019



Richard D. Kahn

by

SUBSCRIBED AND SWORN to before me

this 15th day of August, 2019.



MARIANNE BARNETT
NOTARY PUBLIC, STATE OF NEW YORK
NO. 01BA6276845
Qualified in Suffolk County
Term expires February 25, 2021

by

ate

de

by

ate

de