

FILED

November 04, 2020

ST-2020-CV-00014

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

Defendants.

CASE NO. ST-2020-CV-00014

ACTION FOR DAMAGES

JURY TRIAL DEMANDED

PLAINTIFF'S SUBPOENA TO THIRD-PARTY JEAN LUC BRUNEL

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, Jean Luc Brunel, 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

Unless otherwise specified, the documents specified below are required to be produced for the time period commencing January 1, 1998 and continuing through the present. Where production of account data is provided in electronic format or media the preferred software format to incorporate the data into is Microsoft Excel.

As used herein, the following terms are defined as indicated:

1. "All/Each." The term "all" and "each" shall be construed as all and each.
2. "And/Or." The connectives "and" and "or" shall be construed either disjunctively or conjunctively as necessary to bring within the scope of the discovery request all responses that might otherwise be construed to be outside of its scope.
3. "Communication" means the transmittal of information (in the form of facts, ideas, inquiries or otherwise).

4. The terms "Document" or "Documents" are defined to be synonymous and equal in scope to the usage of these terms in Federal Rule of Civil Procedure 34(a), including, without limitation, any written, drawn, printed, typed, photographed or other graphic or electronically or computerized recorded data or compilations of any kind or nature prepared or received by, or in the possession, custody or control of the answering party, its agents, servants, employees or other representatives. Originals, drafts and all non-identical copies are separate documents within the meaning of this term.
5. The term "identify" when used with reference to a person, means to give, to the extent known, the person's full name, present or last known address, and when referring to a natural person, additionally, the present or last known place of employment. Once a person has been identified in accordance with this subparagraph, only the name of that person need to be listed in response to subsequent discovery requesting the identification of that person.
6. The term "identify" when used with reference to documents, means to give, to the extent known, the (i) type of document; (ii) general subject matter; (iii) date of the document; and (iv) author(s), addressee(s) and recipient(s).
7. The term "identify" when used with reference to an oral communication, discussion, conversation or any other oral statement, shall mean to describe in detail the substance of each such communication, discussion, conversation or statement, state the date of such communication, discussion, conversation or statement, the place where such communication, discussion, conversation or statement was held and identify each person present for such communication, discussion, conversation or statement.
8. "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.

9. "You" and "Your" shall mean Jean Luc Brunel. These terms also shall be deemed to include all agents and other persons acting or authorized to act on his behalf.
10. "Employee" includes, but is not limited to, all current or former salaried employees, hourly employees, independent contractors, and individuals performing work as temporary employees, for the entity referred to in the request.
11. "Agent" refers to any individual or entity authorized, or apparently authorized, to act on behalf of Jeffrey Epstein, including, but not limited to: Darren Indyke; Richard Kahn; [REDACTED]; [REDACTED]; [REDACTED]; [REDACTED]; and/or [REDACTED]
12. "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 Trust, 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.; NES, LLC; Financial Informatics; and Ergo EB 2014 Ltd.

REQUESTS FOR PRODUCTION

For the time period January 1, 1998 to present:

REQUEST NO. 1. Any and all Documents, in electronic or paper form, reflecting or relating to any relationship between YOU, [REDACTED] and [REDACTED] [REDACTED], and [REDACTED], including but not limited to any and all financial arrangements and ownership interests among each.

REQUEST NO. 2. Any and all Documents or materials, in electronic or paper form, reflecting or referring to any financial transaction made to, by or between YOU and Jeffrey Epstein and/or any Epstein Agent or Epstein Entity.

REQUEST NO. 3. Any and all Documents, Communications or Materials related to any and all travel to the Virgin Islands of or for any female that YOU, or any modeling or talent agency with which YOU were affiliated, arranged or assisted in arranging.

REQUEST NO. 4. Any and all Documents or materials reflecting or referring to YOUR travel to the Virgin Islands at any time from 2000 to present.

REQUEST NO. 5. Any and all Communications with Jeffrey Epstein and/or any Epstein Agent or Epstein Entity, whether it be written, electronic, telephone or otherwise.

REQUEST NO. 6: Any and all agreements between or among YOU, Jeffrey Epstein, and/or any Epstein Entity or Epstein Agent.

REQUEST NO. 7: Documents sufficient to Identify any and all properties or offices utilized by YOU for the operation of any business, including the address of each property or office and the owner or lessor of such properties or offices.

REQUEST NO. 8: Any and all photos and/or videos of any property owned by Jeffrey Epstein and/or any Epstein Entity in YOUR possession, including undeveloped film and digital images.

REQUEST NO. 9: Any and all photos, including digital and still images, and/or videos of any females YOU either arranged to traveled to the Virgin Islands or with whom YOU traveled to the Virgin Islands.

REQUEST NO. 10: All Documents, Materials or Communications regarding Jeffrey Epstein, including, but not limited to, Documents, Materials and Communications regarding females sought by or provided to Jeffrey Epstein.

REQUEST NO. 11: All Documents, Materials or Communications reflecting any catalog, brochure, or other document reflecting photographs and/or demographic information related to models employed by any and all modeling agencies with which YOU have been affiliated.

REQUEST NO. 12: All Documents, Materials or Communications reflecting or regarding any and all arrangements, contracts, agreements, appointment, schedules or other documents or communications related to photo shoots in the Virgin Islands for or with any model associated with YOU or any modeling or talent agency with which YOU were involved.

REQUEST NO. 13: All Documents, Materials or Communications related to YOUR recruitment, or the recruitment by any modeling or talent agency with which YOU have been involved, of any models or talent for any individual or entity, including but not limited to Jeffrey Epstein, any Epstein Entity, or [REDACTED]

REQUEST NO. 14: Any and all Documents, materials, or communications, in electronic or paper form, reflecting or referring to any financial transaction made to any model or talent agency provided by you, or any modeling or talent agency with which YOU have been involved, by YOU, Jeffrey Epstein and/or any Epstein Agent or Epstein Entity, including but not limited to any contracts, whether executed or not, promissory notes, or other financial assurances. **REQUEST NO. 15:** A copy of any legal Complaint, newspaper or other media article, electronic or otherwise, or police report, referring or relating to any complaint of abuse

against YOU filed by any individual, including any female employed by YOU in any modeling or talent agency with which YOU have been involved.

REQUEST NO. 16: Any and all Documents or Materials related to any legal matters pursued against Jeffrey Epstein and/or any Epstein Entity.

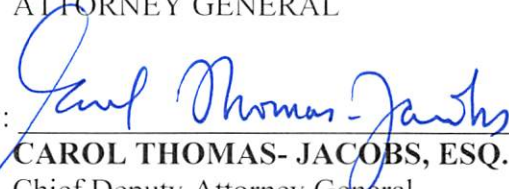
REQUEST NO. 17: Any and all Documents, Materials or Communications related to any Visas or immigration documents for any female contracted, hired or employed by YOU, or any modeling or talent agency with which YOU were involved, including but not limited to any documents related to legal services to obtain Visas or other immigration documents and any and all correspondence and communications with [REDACTED]

Respectfully submitted,

DENISE N. GEORGE, ESQ.
ATTORNEY GENERAL

Dated: November 4, 2020

By:


CAROL THOMAS- JACOBS, ESQ.

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