

**FILED**

March 04, 2022 05:13 PM

ST-2020-CV-00014

**TAMARA CHARLES**  
CLERK OF THE COURT

# Exhibit 4

**From:** [Weinstein, Marc A.](#)  
**To:** [Carol Jacobs](#)  
**Cc:** [Scott, Carmen](#); [Daniel S. Ruzumna \(druzumna@pbwt.com\)](#)  
**Subject:** Epstein Estate lien release request for Q1 2022  
**Date:** Thursday, December 16, 2021 10:58:55 PM  
**Attachments:** [Estate Payables Q1 2022.pdf](#)  
[20211130\\_171626.pdf](#)  
[20211213142958\\_001.pdf](#)

---

Dear Chief Deputy Jacobs:

We are requesting a partial lien release on the Estate bank account in the amount of \$1,730,990.10 for expenses we expect to be incurred during the period January through March 2022, and for legal fees incurred from October through November 2021. Specifically, the Estate requests funds to cover \$1,289,974.43 in legal fees during October and November, and funds to cover \$76,332.25 in third-party indemnification of legal fees. Please note that as a result of the sale of certain Prytanee artwork in Paris (for a total of €144,819.53), the Estate has sufficient funds in the [REDACTED] account in Paris to cover operational expenses in Paris during this period, and thus is not seeking a lien release for Paris expenses in Q1 2022. Attached is a spreadsheet of Estate operating expenses and relevant invoices. As per our earlier agreement, the spreadsheet and invoices are being provided as Confidential material pursuant to the Protective Order agreed upon by the parties. We provide this information with the understanding that it will not be used for any discovery purposes, including third party subpoenas.

Below are details regarding the legal fee requests for the period October through November 2021:

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[Redacted text block]

[Redacted text block]

[Redacted text block]

[Redacted text block]

Thank you for your consideration,  
Marc

**From:** [Scott, Carmen](#)  
**To:** [Weinstein, Marc A.](#)  
**Cc:** [Carol Jacobs](#); [Singer, Linda](#); [Rice, Joe](#); [Ruzumna, Daniel \(x2034\)](#)  
**Subject:** Questions Regarding Estate's Requests  
**Date:** Thursday, December 23, 2021 4:21:45 PM

---

**CAUTION: This email was sent by someone outside of the Firm.**

Good afternoon:

We have reviewed the Estates requests for operating expenses through the first quarter of 2022 and have the following questions.

- \$212k of the requested amount is for projected operating expenses for the New Mexico property, much of it in management fees and payroll. We do not recall receiving an update from the Estate on the marketing of the property for sale. Please provide information as to when the marketing for sale of the property began. If it has not yet begun, please explain why.
- \$52k of the requested amount is for storage of fine art. Please provide an update as to the marketing efforts for the sale of the art being stored.
- The email accompanying the request indicates that artwork totaling more than 144,000 euros was sold, covering the Paris expenses. The Paris expenses have traditionally run only around \$100,000, or € 94,000. Assuming excess proceeds exist from the sale, please provide when those will be deposited. If the Paris expenses were for some reason much higher during this period, please provide an explanation.
- Additionally as to Paris, please provide an update as to the marketing and sale of the property.

Please also keep us apprised of the sale of any other Estate assets.

Thank you.

Carmen

**Carmen Sessions Scott** | Attorney at Law | Motley Rice LLC  
28 Bridgeside Blvd. | Mt. Pleasant, SC 29464  
o. 843.216.9160 | f. 843.216.9430 | [cscott@motleyrice.com](mailto:cscott@motleyrice.com)

[Confidential & Privileged](#)

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**From:** [Weinstein, Marc A.](#)  
**To:** [Scott, Carmen](#)  
**Cc:** [Carol Jacobs](#); [Singer, Linda](#); [Rice, Joe](#); [Ruzumna, Daniel \(x2034\)](#)  
**Subject:** RE: Questions Regarding Estate's Requests  
**Date:** Tuesday, January 4, 2022 3:14:00 PM

---

Carmen:

Below are responses to your questions:

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Regards,  
Marc

---

**From:** Scott, Carmen <cscott@motleyrice.com>  
**Sent:** Thursday, December 23, 2021 4:22 PM  
**To:** Weinstein, Marc A. <marc.weinstein@hugheshubbard.com>  
**Cc:** Carol Jacobs <Carol.Jacobs@vi.gov>; Singer, Linda <lsinger@motleyrice.com>; Rice, Joe <jrice@motleyrice.com>; Ruzumna, Daniel (x2034) <druzumna@pbwt.com>  
**Subject:** Questions Regarding Estate's Requests

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**From:** [Weinstein, Marc A.](#)  
**To:** [Carol Jacobs](#)  
**Cc:** [Scott, Carmen](#); [Daniel S. Ruzumna \(druzumna@pbwt.com\)](#)  
**Subject:** RE: Epstein Estate lien release request for Q1 2022  
**Date:** Friday, January 14, 2022 2:30:00 PM

---

Dear Chief Deputy Jacobs and Carmen:

Can you let us know the status of this lien release request for the Estate?

Thanks,  
Marc

---

**From:** Weinstein, Marc A.  
**Sent:** Thursday, December 16, 2021 10:59 PM  
**To:** Carol Jacobs <Carol.Jacobs@vi.gov>  
**Cc:** Scott, Carmen <cscott@motleyrice.com>; Daniel S. Ruzumna (druzumna@pbwt.com) <druzumna@pbwt.com>  
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[REDACTED]

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[Redacted text block]

[Redacted text block]

[Redacted text block]

[Redacted text block]

[Redacted text block]

[Redacted text block]

[Redacted text block]

Thank you for your consideration,  
Marc



**From:** [Weinstein, Marc A.](#)  
**To:** [Carol Jacobs](#)  
**Cc:** [Scott, Carmen](#); [Daniel S. Ruzumna \(druzumna@pbwt.com\)](#)  
**Subject:** RE: Epstein Estate lien release request for Q1 2022  
**Date:** Friday, January 21, 2022 5:06:00 PM

---

Dear Chief Deputy Jacobs and Carmen:

Can you please let us know if you expect the Attorney General to issue a partial lien release for these expenses soon?

Thanks, and have a good weekend,  
Marc

---

**From:** Weinstein, Marc A.  
**Sent:** Friday, January 14, 2022 2:31 PM  
**To:** Carol Jacobs <[Carol.Jacobs@vi.gov](mailto:Carol.Jacobs@vi.gov)>  
**Cc:** Scott, Carmen <[cscott@motleyrice.com](mailto:cscott@motleyrice.com)>; Daniel S. Ruzumna ([druzumna@pbwt.com](mailto:druzumna@pbwt.com)) <[druzumna@pbwt.com](mailto:druzumna@pbwt.com)>  
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[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[Redacted]

Thank you for your consideration,  
Marc

**From:** [Weinstein, Marc A.](#)  
**To:** [Carol Jacobs](#)  
**Cc:** [Scott, Carmen](#); [Daniel S. Ruzumna \(druzumna@pbwt.com\)](#)  
**Subject:** RE: Epstein Estate lien release request for Q1 2022  
**Date:** Friday, January 28, 2022 5:35:00 PM

---

Dear Chief Deputy Jacobs:

It has now been more than six weeks since the Estate's lien release request was provided, and close to four weeks since we answered the four questions posed by Carmen concerning that request. In addition, we've requested an update each of the last two weeks with no response whatsoever. The delay and lack of response to our inquiries appear to be without justification and impair the Co-Executors' ability to administer the Estate. We request that the Government issue the release on Monday so that the Co-Executors can administer the Estate. If there is a reason that the lien cannot be released on Monday, please provide us with the explanation.

Regards,  
Marc

---

**From:** Weinstein, Marc A.  
**Sent:** Friday, January 21, 2022 5:06 PM  
**To:** 'Carol Jacobs' <Carol.Jacobs@vi.gov>  
**Cc:** 'Scott, Carmen' <cscott@motleyrice.com>; Daniel S. Ruzumna (druzumna@pbwt.com) <druzumna@pbwt.com>  
**Subject:** RE: Epstein Estate lien release request for Q1 2022

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Thanks, and have a good weekend,  
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**Sent:** Friday, January 14, 2022 2:31 PM  
**To:** Carol Jacobs <[Carol.Jacobs@vi.gov](#)>  
**Cc:** Scott, Carmen <[cscott@motleyrice.com](#)>; Daniel S. Ruzumna ([druzumna@pbwt.com](#)) <[druzumna@pbwt.com](#)>  
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Marc

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**Cc:** Scott, Carmen <[cscott@motleyrice.com](mailto:cscott@motleyrice.com)>; Daniel S. Ruzumna ([druzumna@pbwt.com](mailto:druzumna@pbwt.com)) <[druzumna@pbwt.com](mailto:druzumna@pbwt.com)>  
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[REDACTED]

[REDACTED]

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[Redacted]

[Redacted]

[Redacted]

[Redacted]

Thank you for your consideration,  
Marc

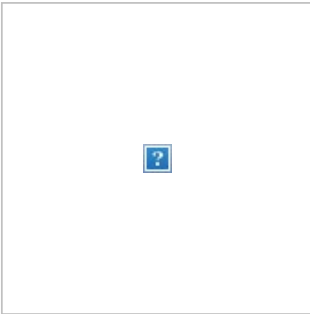
**From:** [Carol Jacobs](#)  
**To:** [Weinstein, Marc A.](#)  
**Cc:** [Scott, Carmen](#); [Daniel S. Ruzumna \(druzumna@pbwt.com\)](#)  
**Subject:** RE: [EXTERNAL MAIL]RE: Epstein Estate lien release request for Q1 2022  
**Date:** Friday, January 28, 2022 5:41:40 PM  
**Attachments:** [image001.png](#)

---

**CAUTION: This email was sent by someone outside of the Firm.**

Attorney Weinstein:

We received your request and are reviewing it internally.



**Carol Thomas-Jacobs, Esq.**  
**Chief Deputy Attorney General**

**p:** (340) 774-5666 ext. 10101  
**w:** [www.doj.vi.gov](http://www.doj.vi.gov)  
**e:** [carol.jacobs@doj.vi.gov](mailto:carol.jacobs@doj.vi.gov)

-  
Virgin Islands Department of Justice  
Office of the Attorney General  
3438 Kronprindsens Gade  
GERS Complex, 2nd Floor  
St. Thomas, VI 00802-5749

---

**From:** Weinstein, Marc A. <marc.weinstein@hugheshubbard.com>  
**Sent:** Friday, January 28, 2022 6:36 PM  
**To:** Carol Jacobs <Carol.Jacobs@vi.gov>  
**Cc:** Scott, Carmen <cscott@motleyrice.com>; Daniel S. Ruzumna (druzumna@pbwt.com) <druzumna@pbwt.com>  
**Subject:** [EXTERNAL MAIL]RE: Epstein Estate lien release request for Q1 2022

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Regards,  
Marc

**Marc A. Weinstein** | Partner  
Chair, White Collar Defense

**Hughes Hubbard & Reed LLP**  
One Battery Park Plaza, 17th floor | New York | NY 10004-1482  
Office +1 (212) 837-6460 | Cell +1 (646) 537-5750 | Fax +1 (212) 299-6460  
[marc.weinstein@hugheshubbard.com](mailto:marc.weinstein@hugheshubbard.com)

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---

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[REDACTED]



[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

Thank you for your consideration,  
Marc

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**From:** [Weinstein, Marc A.](#)  
**To:** [Carol Jacobs](#)  
**Cc:** [Scott, Carmen](#); [Daniel S. Ruzumna \(druzumna@pbwt.com\)](#)  
**Subject:** RE: [EXTERNAL MAIL]RE: Epstein Estate lien release request for Q1 2022  
**Date:** Thursday, February 10, 2022 4:08:36 PM  
**Attachments:** [image001.png](#)

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Dear Chief Deputy Jacobs:

It has now been more than 8 weeks since we provided our detailed lien release request, and six weeks since we answered the few questions posed in connection with that request. We have repeatedly asked for updates and have gotten no response. There appears to be no reason for the delay other than to impede the Co-Executors' ability to administer the Estate, and regardless of any reason, the delay is having that effect.

Among the detailed expenses on the request were funds to pay for propane from January through March which is essential to heating the New Mexico property. The propane company has threatened to stop upcoming deliveries without payment. Similarly, the Estate must pay its annual fee to Honeywell, which has refused to do necessary HVAC work at the New Mexico property without payment. There are additional critical repairs and maintenance to be done at the New Mexico property, such as work on sewer lines and a cracked water line, for which the Co-Executors have not approved estimates because the lien release has not been issued. The Estate's legal team has been required and continues to negotiate, mediate, and litigate numerous filed or pre-suit claims by individuals alleging to have been abused by Jeffrey Epstein, as well as address issues concerning the CICO action, and provide advice to effectuate asset sales, among other Estate-related legal issues, and yet their fees and costs remain outstanding for months as well.

There is no reason the Co-Executors should be facing these urgent and ongoing situations without the timely release of funds to address them properly.

Regards,  
Marc

---

**From:** Carol Jacobs <Carol.Jacobs@vi.gov>  
**Sent:** Friday, January 28, 2022 5:41 PM  
**To:** Weinstein, Marc A. <marc.weinstein@hugheshubbard.com>  
**Cc:** Scott, Carmen <cscott@motleyrice.com>; Daniel S. Ruzumna (druzumna@pbwt.com) <druzumna@pbwt.com>  
**Subject:** RE: [EXTERNAL MAIL]RE: Epstein Estate lien release request for Q1 2022

**CAUTION: This email was sent by someone outside of the Firm.**

Attorney Weinsten:

We received your request and are reviewing it internally.

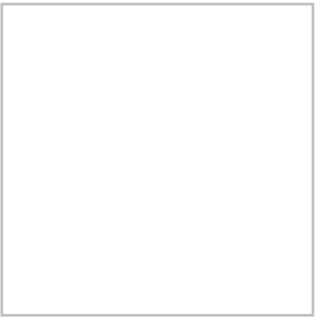
**Carol Thomas-Jacobs, Esq.**  
**Chief Deputy Attorney General**

**p:** (340) 774-5666 ext. 10101

**w:** [www.doj.vi.gov](http://www.doj.vi.gov)

**e:** [carol.jacobs@doj.vi.gov](mailto:carol.jacobs@doj.vi.gov)

-  
Virgin Islands Department of Justice  
Office of the Attorney General  
3438 Kronprindsens Gade



GERS Complex, 2nd Floor  
St. Thomas, VI 00802-5749

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Marc

**Marc A. Weinstein** | Partner  
Chair, White Collar Defense

**Hughes Hubbard & Reed LLP**  
One Battery Park Plaza, 17th floor | New York | NY 10004-1482  
Office +1 (212) 837-6460 | Cell +1 (646) 537-5750 | Fax +1 (212) 299-6460  
[marc.weinstein@hugheshubbard.com](mailto:marc.weinstein@hugheshubbard.com)

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---

**From:** Weinstein, Marc A.  
**Sent:** Friday, January 21, 2022 5:06 PM  
**To:** 'Carol Jacobs' <[Carol.Jacobs@vi.gov](mailto:Carol.Jacobs@vi.gov)>  
**Cc:** 'Scott, Carmen' <[cscott@motleyrice.com](mailto:cscott@motleyrice.com)>; Daniel S. Ruzumna ([druzumna@pbwt.com](mailto:druzumna@pbwt.com)) <[druzumna@pbwt.com](mailto:druzumna@pbwt.com)>  
**Subject:** RE: Epstein Estate lien release request for Q1 2022

Dear Chief Deputy Jacobs and Carmen:

Can you please let us know if you expect the Attorney General to issue a partial lien release for these expenses soon?

Thanks, and have a good weekend,

Marc

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**From:** Weinstein, Marc A.  
**Sent:** Friday, January 14, 2022 2:31 PM  
**To:** Carol Jacobs <[Carol.Jacobs@vi.gov](mailto:Carol.Jacobs@vi.gov)>  
**Cc:** Scott, Carmen <[cscott@motleyrice.com](mailto:cscott@motleyrice.com)>; Daniel S. Ruzumna ([druzumna@pbwt.com](mailto:druzumna@pbwt.com)) <[druzumna@pbwt.com](mailto:druzumna@pbwt.com)>  
**Subject:** RE: Epstein Estate lien release request for Q1 2022

Dear Chief Deputy Jacobs and Carmen:

Can you let us know the status of this lien release request for the Estate?

Thanks,  
Marc

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**From:** Weinstein, Marc A.  
**Sent:** Thursday, December 16, 2021 10:59 PM  
**To:** Carol Jacobs <[Carol.Jacobs@vi.gov](mailto:Carol.Jacobs@vi.gov)>  
**Cc:** Scott, Carmen <[cscott@motleyrice.com](mailto:cscott@motleyrice.com)>; Daniel S. Ruzumna ([druzumna@pbwt.com](mailto:druzumna@pbwt.com)) <[druzumna@pbwt.com](mailto:druzumna@pbwt.com)>  
**Subject:** Epstein Estate lien release request for Q1 2022

Dear Chief Deputy Jacobs:

We are requesting a partial lien release on the Estate bank account in the amount of \$1,730,990.10 for expenses we expect to be incurred during the period January through March 2022, and for legal fees incurred from October through November 2021. Specifically, the Estate requests funds to cover \$1,289,974.43 in legal fees during October and November, and funds to cover \$76,332.25 in third-party indemnification of legal fees. Please note that as a result of the sale of certain Prytanee artwork in Paris (for a total of €144,819.53), the Estate has sufficient funds in the [REDACTED] account in Paris to cover operational expenses in Paris during this period, and thus is not seeking a lien release for Paris expenses in Q1 2022. Attached is a spreadsheet of Estate operating expenses and relevant invoices. As per our earlier agreement, the spreadsheet and invoices are being provided as Confidential material pursuant to the Protective Order agreed upon by the parties. We provide this information with the understanding that it will not be used for any discovery purposes, including third party subpoenas.

Below are details regarding the legal fee requests for the period October through November 2021:

[REDACTED]

[REDACTED]

[REDACTED]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

Thank you for your consideration,  
Marc

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**From:** [Weinstein, Marc A.](#)  
**To:** [Carol Jacobs](#)  
**Cc:** [Scott, Carmen](#); [Daniel S. Ruzumna \(druzumna@pbwt.com\)](mailto:druzumna@pbwt.com)  
**Subject:** Estate lien release request for EVCP  
**Date:** Tuesday, February 15, 2022 8:20:18 AM  
**Attachments:** [Epstein VCP - MASTER INVOICE \(Jan 2022\) Final Redacted.pdf](#)  
[Epstein VCP - MASTER INVOICE \(Dec 2021\) Final.pdf](#)

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Dear Chief Deputy Jacobs:

We are requesting a partial lien release of the Estate's account for payment of the EVCP administrator's December and January fees and costs in the total amount of \$50,549.71.

Thank you for your attention to this request.

Regards,  
Marc

**From:** [Weinstein, Marc A.](#)  
**To:** [Carol Jacobs](#)  
**Cc:** [Scott, Carmen](#); [Daniel S. Ruzumna \(druzumna@pbwt.com\)](#)  
**Subject:** RE: Estate lien release request for EVCP  
**Date:** Friday, February 18, 2022 9:16:00 AM

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Dear Chief Deputy Jacobs:

Are you available for a call today concerning the pending lien release requests? The Co-Executors continue to receive calls from vendors regarding payment and threats to cease work. Please let us know your availability.

Regards,  
Marc

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**From:** Weinstein, Marc A.  
**Sent:** Tuesday, February 15, 2022 8:20 AM  
**To:** Carol Jacobs <Carol.Jacobs@vi.gov>  
**Cc:** Scott, Carmen <cscott@motleyrice.com>; Daniel S. Ruzumna (druzumna@pbwt.com) <druzumna@pbwt.com>  
**Subject:** Estate lien release request for EVCP

Dear Chief Deputy Jacobs:

We are requesting a partial lien release of the Estate's account for payment of the EVCP administrator's December and January fees and costs in the total amount of \$50,549.71.

Thank you for your attention to this request.

Regards,  
Marc