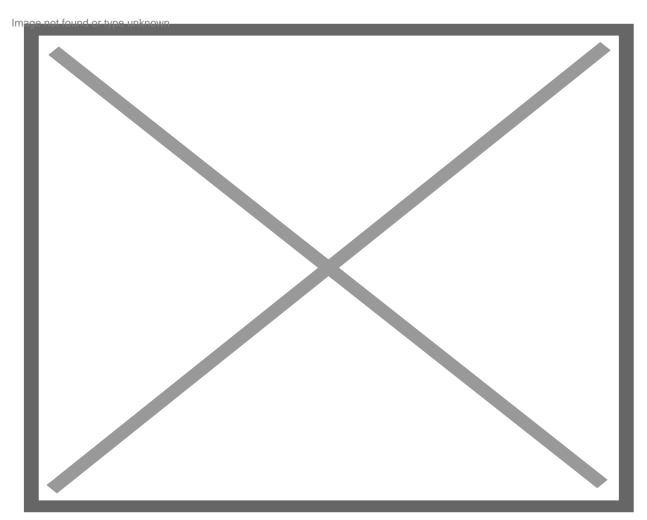
Epstein Scandal: JPMorgan Outlines Alleged Roles of Major Political Players in USVI

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Upper I2r: Governor Bryan and Delegate to Congress Stacey Plaskett. Lower I2r: Former Governor John P. de Jongh and former First Lady Cecile de Jongh.

In a heavily-redacted filing entered on Tuesday, lawyers for JP Morgan have placed on record their opposition to the U.S. Virgin Islands' attempt to have the court toss out some of the bank's defenses in the lawsuit against it.

The latest salvo in the civil battle between the Government of the Virgin Islands and the largest commercial bank in the United States holds that the evidence objected to by GVI lawyers are valid and should not be rejected by the court.

JP Morgan Chase alleges that GVI's motivation in seeking to have these defenses excluded from the case is nothing more than a cynical ploy to avoid the government's own culpability in facilitating the crimes of Jeffrey Epstein. The territory's suit claims that JP Morgan, for whom the convicted sex offender was a lucrative client for years, did nothing in the face of what should have been strong suspicion of his criminal activities.

However, the bank's argument since the suit was filed has been, in part, that the largest facilitator of Epstein's sex trafficking enterprise, headquartered on the island of Little St. James in the USVI, was the Government of the Virgin Islands itself.

Through 30 pages of a document, of which some pages are almost completely obscured by the heavy black rectangles of redaction, JP Morgan's lawyers argue that their counterparts on the opposite side, by claiming that these defenses would in part require an additional onerous burden when it comes to discovery, are merely trying to hide the Virgin Islands' complicit behavior in granting Epstein the ability to live a comfortable, low-profile life in the territory.

JP Morgan claims that Epstein established ties with the local political class that extended all the way to Government House. Cecile Galiber de Jongh, the wife of former Governor John de Jongh Jr. managed Epstein's local companies even while occupying her position as First Lady, the bank alleges.

It was she, JP Morgan attorneys claim, who was the "primary conduit for spreading money and influence" on Epstein's behalf, "throughout the USVI government." The filing claims that "unequivocally, a political culture was fostered within the local Democratic Party of the Virgin Islands that allowed Epstein to remain unchecked in exchange for his sponsorship and financial contributions." The bank's attorneys allege that Epstein donated to Congressional Delegate Stacey Plaskett, who reportedly responded to his contributions with a personal visit to his Manhattan townhouse for a meeting, less than a year before he was arrested on federal sex trafficking charges. Other territorial officials, the attorneys claim, also met with Epstein.

They accuse the VI Economic Development Authority (EDA) of being "well aware of Epstein's past" during the years between 2012 and 2014 in which two of Epstein's companies' received lucrative tax benefits from the authority. At a time when now-Governor Albert Bryan Jr, sat on the EDA board when he was Commissioner of Labor, tax benefits for two of Epstein's companies were extended, "despite the numerous red flags."

Governor Bryan, who fired former Attorney General Denise George shortly after she filed this lawsuit, said <u>back in January</u> that he was "sick and tired of our islands being associated with Jeffery Epstein" when quizzed by the Consortium about the former AG's abrupt departure from office.

In another heavily-redacted section of the filing, JP Morgan claims that Epstein's influence extended to the legislative process in the territory as well, and government regulatory and enforcement officials only exercised a cursory amount of oversight when it came to his compliance with prevailing sex crime statutes and regulations. Local officials, the attorneys claim, didn't just ignore or fail to recognize Epstein's criminal activities – some actively assisted him in his illegal endeavors, allowing him, a registered sex offender by then, to travel freely through airports in the territory accompanied by young women, without any noticeable scrutiny or surveillance.

"In exchange for Epstein's cash and gifts, USVI made life easy for him," JP Morgan lawyers argue. "The government mitigated any burdens from his sex offender status. And it made sure that

no one asked too many questions about his transport and keeping of young girls on his island."

If the court sides with the territory's lawyers and grants USVI's motion to strike JP Morgan's affirmative defenses, the bank claims that the true extent of the territory's complicit behavior in allowing Epstein to operate his sex trafficking hub may never be revealed.

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