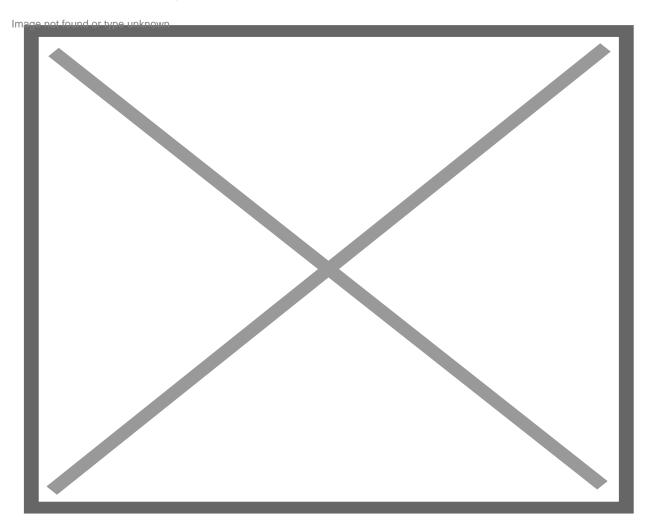
JPMorgan Wants GVI to Produce Properly Prepared Witnesses For Deposition in Epstein Saga; Jes Staley Wants Documents JPMorgan is Withholding

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JPMorgan has raised concerns over the Government of the Virgin Islands' presentation of inadequately prepared witnesses during the latter stages of the discovery process related to the Jeffrey Epstein saga. The bank has taken action by urging the court to intervene and compel the USVI to: a) provide supplementary witnesses who are appropriately prepared, and b) compensate for the expenses incurred, encompassing attorney's fees, due to the insufficiency of the initial depositions and the subsequent ones now deemed necessary.

The complaint comes in the form of a heavily redacted motion filed on June 22, in which JPMorgan's lawyers describe depositions concerning two unnamed witnesses which occurred four days before the close of fact discovery. During questioning, JPMorgan says its attorneys

discovered that the "USVI had failed to take even the most basic steps to prepare its designees. They could not provide answers to simple questions and acknowledge that they were unprepared."

The USVI initially offered a replacement witness, but JPMorgan attorneys say that that witness would only be able to speak to some of the topics which need to be covered. Additionally, JPMorgan says the USVI needs to foot the bill for not just the videographer and court reporter, but all other associated fees, since the failed deposition was due to the territory's lack of effort.

Some of the topics JPMorgan says it needs to question witnesses about include how the territory plans to use the money from the settlement negotiated with Jeffrey Epstein's estate, and any "investigations, audits, or reviews of the government's failure...to identify or stop Epstein," his associates or business entities, from participating in Epstein's "sex-trafficking venture."

JPMorgan also wants information about Epstein's sex-offender registration in the territory, and "any monitoring occurring as a result of that registration," according to the filed motion, as well as "investigations, or investigative or monitoring steps concerning Epstein or his companies undertaken by the [V.I.] Economic Development Authority that occurred prior to December 1, 2020."

Critically, JPMorgan wants to know how much the Government of the Virgin Islands knew about Cecile de Jongh working for Jeffrey Epstein's company, including while her husband John de Jongh was the sitting governor of the territory. Her correspondence with Epstein and senior local political figures, revealed in previous filings in the case, paint a picture of the convicted sex offender seeking to develop an influence network among the territory's political directorate, with Mrs. de Jongh at the center of the coordination efforts.

In light of the "glaring deficiencies" in the preparation of those two unnamed witnesses, JPMorgan is asking the court to order that GVI fill in the gaps.

Meanwhile, Jes Staley, the former JPMorgan executive who is a third-party defendant in the matter, filed a motion of his own, also on June 22. Staley wants JPMorgan to produce documents which he says the bank is currently improperly withholding. The documents, lawyers for Staley argue, are no longer subject to privilege or certain protections because the bank has made factual assertions based on evidence contained in those supposedly-privileged documents.

JPMorgan is accusing Staley of being the "direct and proximate cause of JPMC's decision to continue to do business with Epstein until 2013," and also claims that Staley fraudulently concealed relevant facts about the man he called his "family," while "affirmatively misrepresenting the true facts" of the personal relationship between Staley and Epstein.

"The only way to test the bank's assertion...is to probe what the general counsel in fact knew and relied upon when assessing the bank's relationship with Epstein," Staley's filing contends.

Staley's lawyers argue that evidence presented so far "appears to reflect that JPMorgan had plenty of information independent of Staley."

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