

**FILED UNDER SEAL**

**EXHIBIT 280**

SHANI A. PINNEY 30(b)(6)  
Gov. U.S. Virgin Islands vs JP Morgan Chase

July 18, 2023

1

1 UNITED STATES DISTRICT COURT FOR THE  
2 SOUTHERN DISTRICT OF NEW YORK  
3 CASE NUMBER: 22-CV-10904-JSR  
4 ACTION FOR DAMAGES

5 GOVERNMENT OF THE UNITED STATES )  
6 VIRGIN ISLANDS, )  
7 Plaintiff, )  
8 VS. )  
9 JP MORGAN CHASE BANK, N.A., )  
10 Defendant. )  
11 -----

12

13

14

15 VIDEO RECORDED DEPOSITION OF

16 SHANI A. PINNEY

17 30(B)(6) WITNESS

18 TUESDAY, JULY 18, 2023

19

20

21 REPORTED BY:

22 DENISE D. HARPER-FORDE  
23 Certified Shorthand Reporter (CSR)  
Certified RealTime Reporter (CRR)  
Certified LiveNote Reporter (CLR)  
24 Registered Professional Reporter (RPR)  
Notary Public (FLORIDA)

SHANI A. PINNEY 30(b)(6)  
Gov. U.S. Virgin Islands vs JP Morgan Chase

July 18, 2023

12

1 Justice.

2 Q. Did any of the jobs you had  
3 before working for DoJ involve law  
4 enforcement?

5 A. No.

6 Q. Did they involve sex offender  
7 monitoring in any way?

8 A. No.

9 Q. When did your employment with  
10 DoJ begin?

11 A. In 2011, November 2011.

12 Q. What position did you have?

13 A. Sexual offender registry. I  
14 believe it's now it was coordinator.

15 Q. And what were your roles and  
16 responsibilities?

17 A. My role was for the St.  
18 Thomas, St. John Jurisdiction to  
19 register sexual offenders who were  
20 living or working on the two  
21 Islands.

22 Q. Anything else?

23 A. Paperwork. Updating the  
24 online registry for the sexual  
25 offenders to reflect their addresses,

SHANI A. PINNEY 30(b)(6)  
Gov. U.S. Virgin Islands vs JP Morgan Chase

July 18, 2023

26

1 Ackerman. It was just myself and  
2 Attorney Ackerman.

3 Q. So what was the reference you  
4 just made to Attorney Carbon or Monica  
5 Carbon?

6 A. So I understand that Attorney  
7 Carbon met with Attorney Ackerman, and  
8 her -- a brief review of -- of that  
9 meeting was provided to me as well  
10 too.

11 Q. Okay. So you never met with  
12 Ms. Carbon, but a summary of that  
13 meeting was provided to you?

14 A. That's correct.

15 Q. Okay. Do you have that  
16 document with you today?

17 A. No, I don't.

18 Q. Does your Counsel?

19 ATTORNEY ACKERMAN: Yes, I  
20 have it. I can provide it.

21 ATTORNEY O'LAUGHLIN: Okay.  
22 Could you enter it as the first  
23 exhibit please?

24 ATTORNEY ACKERMAN: Well -- so  
25 I'm going to enter it into the

SHANI A. PINNEY 30(b)(6)  
Gov. U.S. Virgin Islands vs JP Morgan Chase

July 18, 2023

28

1 ATTORNEY ACKERMAN: Okay.

2 (BY ATTORNEY O'LAUGHLIN):

3 Q. Is this the document that you  
4 reviewed in preparation for your  
5 testimony today?

6 A. Yes. I skimmed over this  
7 yesterday evening.

8 Q. So the first time you saw this  
9 document was yesterday evening?

10 A. Yes.

11 Q. And how did this document help  
12 you prepare for your testimony  
13 today?

14 ATTORNEY ACKERMAN: Object to  
15 form.

16 THE WITNESS: How it helped me  
17 to prepare for today? It  
18 explained the beginning of how the  
19 sexual offender registry statute  
20 came to be. How it was -- how and  
21 why it was improved here in the  
22 Virgin Islands. And then --

23 ATTORNEY ACKERMAN: You can  
24 scroll this document if you need  
25 to.

SHANI A. PINNEY 30(b)(6)  
Gov. U.S. Virgin Islands vs JP Morgan Chase

July 18, 2023

29

1                   THE WITNESS: Thank you. And  
2                   then it also went on to explain,  
3                   you know, the -- in regards to  
4                   Jeffrey Epstein and his  
5                   classification and his  
6                   registration here in the Virgin  
7                   Islands.

8                   (BY ATTORNEY O'LAUGHLIN):

9                   Q. What is the sex offender  
10                  registry for?

11                  A. The sex offender registry  
12                  board was a combination of  
13                  professionals here in the Virgin  
14                  Islands. And within the statute it  
15                  details that their duties are, you  
16                  know, to review -- if I recall, is to  
17                  review sex offender, their  
18                  classifications.

19                  You know, to also review sex  
20                  offenders who seek to be removed from  
21                  the registry. That's like some of --  
22                  that's like one or two of the duties  
23                  that the SOR board -- I'm not that  
24                  familiar with it, because while I was  
25                  there, it was defunct. You know, it

1                   questions.

2                   THE WITNESS: I'm sorry.

3                   ATTORNEY O'LAUGHLIN: Yes.

4                   THE WITNESS: Sorry, sorry,  
5                   sorry.

6                   (BY ATTORNEY O'LAUGHLIN):

7                   Q. There's a section at the end  
8                   that says "Monitoring visits to LSJ  
9                   when she wasn't there."

10                  This section is about what?

11                  A. The bullets under here. The  
12                  first bullet says, "She doesn't recall  
13                  much." She has to be Attorney Carbon.  
14                  "She just recalls that Pinney,"  
15                  myself, "mentioned a question as to  
16                  whether they had the authority to go  
17                  past the dock."

18                  Okay. So that first bullet.  
19                  The second one, "She recalls the U.S.  
20                  Marshals will go out and invite them,  
21                  because they had the boat. She  
22                  doesn't recall" a -- "discussions  
23                  regarding getting a warrant. If there  
24                  were concerns she'd have passed it on  
25                  to the AAG, but does not recall" --

SHANI A. PINNEY 30(b)(6)  
Gov. U.S. Virgin Islands vs JP Morgan Chase

July 18, 2023

44

7                   Okay. So this section here  
8                   refers to when we would do our  
9                   address verifications for all  
10                  registered offenders here in the  
11                  Virgin Islands.

17                   Okay. So the question was  
18                   whether or not the dock was  
19                   Jeffrey Epstein's front door to  
20                   his home. When we do the address  
21                   verifications, they are not search  
22                   warrants.

23                   We go, we knock on the                   door,  
24                   and we introduce ourselves. We  
25                   say, "Hello," you know, We're here

1 with the -- "This is DoJ. We're  
2 here with the U.S. Marshals here.  
3 We're VIPD. And we are here to  
4 conduct an address verification."

5 At that point, they can say  
6 whether or not we can enter into  
7 their home. They have that right  
8 to say "no." This question in  
9 regards to being able to pass his  
10 dock. Because the question came  
11 up whether his dock would be his  
12 front door.

13 So essentially, if we pull up  
14 there, you know, with U.S.  
15 Marshals services, with VIPD --  
16 and we used to go out on -- if I  
17 recall, one time we went on the  
18 U.S. Coast Guard boat. Another  
19 time we went out on a vessel from  
20 DPNR.

21 The question amongst all of  
22 the entities was essentially, is  
23 this dock his front door? Do we  
24 have the legal authority to  
25 actually force ourselves past the

SHANI A. PINNEY 30(b)(6)  
Gov. U.S. Virgin Islands vs JP Morgan Chase

July 18, 2023  
46

1                   dock since he actually owned the  
2                   island? So that is what that  
3                   first bullet is referencing.

4                   (BY ATTORNEY O'LAUGHLIN):

5                   Q. Was that question resolved?

6                   A. Was that question resolved?

7                   Basically, when -- even when we had a  
8                   telephone call with our liaisons from  
9                   USDoJ, they were not able to provide  
10                   any real guidance on that, because he  
11                   -- he owned the island.

12                   And so, like I said before,  
13                   when we knock on the door they can say  
14                   "yes" or "no" you can come in. So we  
15                   have conducted address verifications  
16                   in the yard of a sexual offender. It  
17                   doesn't have to be inside their home.

18                   So they were really unsure as  
19                   to what the laws are. They -- they  
20                   really were not able to provide any  
21                   real guidance regarding whether or not  
22                   Epstein's dock was essentially, you  
23                   know, representative of his front  
24                   door.

25                   Q. So there was a question, but

SHANI A. PINNEY 30(b)(6)  
Gov. U.S. Virgin Islands vs JP Morgan Chase

July 18, 2023  
47

1 DoJ never determined the answer?

2 A. DoJ wasn't able -- was unable  
3 to provide guidance. That's correct.  
4 No -- no answer was every really  
5 received from DoJ about that.

6 Q. Why not?

7 ATTORNEY ACKERMAN: Object to  
8 form.

9 THE WITNESS: I'm not sure why  
10 not. They weren't sure.

11 (BY ATTORNEY O'LAUGHLIN):

12 Q. And in the absence of guidance  
13 from DoJ, how did you approach the  
14 question of whether you could go past  
15 the dock or not?

16 ATTORNEY ACKERMAN: Object to  
17 form. You can answer.

18 THE WITNESS: So, if Epstein  
19 was on-island or if his staff  
20 allowed us to, that would be when  
21 we would go past the dock --

22 (BY ATTORNEY O'LAUGHLIN):

23 Q. Okay.

24 A. -- and actually be on the  
25 island, actually on the island

SHANI A. PINNEY 30(b)(6)  
Gov. U.S. Virgin Islands vs JP Morgan Chase

July 18, 2023

48

1 itself.

2 Q. So barring guidance to the  
3 contrary, you treated the dock as a  
4 front door?

5 ATTORNEY ACKERMAN: Object to  
6 form.

7 THE WITNESS: It was agreed  
8 amongst the different entities,  
9 the U.S. Marshals services, VIPD  
10 and also DoJ, that the dock had to  
11 be considered as his front door.

12 (BY ATTORNEY O'LAUGHLIN):

13 Q. So it was agreed that that's  
14 the way you would all proceed, but  
15 there was never a formal decision that  
16 that was in fact the right answer;  
17 correct?

18 ATTORNEY ACKERMAN: Object to  
19 form.

20 THE WITNESS: When you say  
21 formal decision, do you mean some  
22 -- what do you mean when you say  
23 formal decision?

24 (BY ATTORNEY O'LAUGHLIN):

25 Q. Well, you said you never got

SHANI A. PINNEY 30(b)(6)  
Gov. U.S. Virgin Islands vs JP Morgan Chase

July 18, 2023

49

1 the guidance you were looking for. So  
2 that's what I mean.

3 A. From USDoJ, no we did not.

4 Q. Okay. But you -- but USVIDoJ  
5 did have -- come to a conclusion, even  
6 though USDoJ didn't?

7 ATTORNEY ACKERMAN: Object to  
8 form.

9 THE WITNESS: Okay. So we  
10 concluded that his dock was his  
11 front door. That was the  
12 conclusion amongst -- jointly  
13 amongst all of the entities there  
14 that.

15 You know, U.S. Marshals  
16 services were not sure, neither  
17 was VIPD. So we said, "Okay.

18 Let's consider his dock as his  
19 front door."

20 (BY ATTORNEY O'LAUGHLIN):

21 Q. Okay. So USVI Department of  
22 Justice did have a view that the dock  
23 was the front door. And the thing  
24 they were wanting confirmation from  
25 was USDoJ. And that's the opinion

SHANI A. PINNEY 30(b)(6)  
Gov. U.S. Virgin Islands vs JP Morgan Chase

July 18, 2023

50

1       they never got?

2                   ATTORNEY ACKERMAN: Object to  
3                   form.

4                   THE WITNESS: I wouldn't say  
5                   that we had that view. If we were  
6                   able to, we would like to go into  
7                   the homes of all offenders, you  
8                   know, to -- because the offender  
9                   address checks are not warrants.

10                  The same way that we would not  
11                  force ourselves into any offenders  
12                  home through their front door, we  
13                  did not want to force our way onto  
14                  his island pass the dock.

15                  So we said we will conduct the  
16                  checks if they were allowed to  
17                  come on the island from Epstein or  
18                  from his employers, his staff, we  
19                  would go past the dock onto the  
20                  island.

21                  And that will be the same way  
22                  if any offender, if John Doe on  
23                  the registry said we can come in,  
24                  we would come into their home past  
25                  your front door as well too.

SHANI A. PINNEY 30(b)(6)  
Gov. U.S. Virgin Islands vs JP Morgan Chase

July 18, 2023

52

1                   Q. Got it. And USVIDoJ had  
2 thought about the question and had  
3 determined we're going to treat the  
4 dock as his front door for our  
5 purposes?

6                   ATTORNEY ACKERMAN: Object to  
7 form. Asked and answered.

8                   Misstates prior testimony. You  
9 can answer.

10                  THE WITNESS: Yes. So, you  
11 know, the -- the sex offender  
12 address checks, you know, it was  
13 done by U.S. Marshals services,  
14 VIPD and DoJ.

15                  And it's important to  
16 understand also that these address  
17 checks are really a function of  
18 the U.S. Marshal services. You  
19 know, that is something that they  
20 receive funding to do throughout  
21 the U.S.

22                  So they would bring down their  
23 team of Marshals from Florida and  
24 Georgia, I guess, you know, the  
25 Southeast region.

1           So we -- although we were  
2 registering the offenders here in  
3 the Virgin Islands, we were also  
4 taking their lead as to since it  
5 was essentially -- I don't want to  
6 say their operation.

7           But they received the funding  
8 and they would let us know, you  
9 know, when the possible dates for  
10 the -- we used to refer to them as  
11 registration sweeps, you know,  
12 when the sweeps could occur.

13           So I also want to highlight  
14 that even U.S. Marshals services  
15 -- you know, the Marshals, they  
16 were also not 100 percent sure as  
17 to whether or not we can actually,  
18 you know, just go on and pass the  
19 dock without the permission.

20           So the -- you know, that  
21 guidance, you know, the -- a  
22 little bit of unsure from USDoJ  
23 as well too. We said, "Okay.  
24 That must mean that we have to  
25 consider his dock as his front

1                   door." Did we want to do it that  
2                   way? No.

3                   You know, we would have loved  
4                   to. And it was actually, you know  
5                   -- like I said, we would love to  
6                   be able to go into the home of  
7                   every offender, including Epstein,  
8                   when -- when he was registering.

9                   But we came to the -- you  
10                  know, the decision that his dock  
11                  had to essentially be considered  
12                  as his -- as his front door.

13                  (BY ATTORNEY O'LAUGHLIN):

14                  Q. Why weren't you on the Friday  
15                  call with Ms. Carbon?

16                  A. Oh, I've been on family  
17                  vacation. I just came back yesterday  
18                  evening. I've been gone since July  
19                  5th. So I wasn't available for the  
20                  call on Friday. Actually Ms. -- the  
21                  E-mail invite for -- for that  
22                  meeting.

23                  Q. Okay. So you were invited to  
24                  the meeting by your counsel, but you  
25                  didn't see the invite, and so didn't

SHANI A. PINNEY 30(b)(6)  
Gov. U.S. Virgin Islands vs JP Morgan Chase

July 18, 2023

85

1 well.

2 Q. Do you recall which of these  
3 attorneys were specifically involved  
4 with Epstein?

5 ATTORNEY ACKERMAN: Object to  
6 form.

7 THE WITNESS: All of the  
8 offend -- all of the attorneys  
9 assisted with the offenders.

10 Okay. So if I backtrack, I said  
11 it would be attorneys specifically  
12 will assist with any warrants, any  
13 absconders.

14 Epstein didn't have any  
15 warrants. You know, he always  
16 appeared to register. So there --  
17 you know, there were no warrants  
18 for him or anything. But in  
19 regards to his initial  
20 classification, the attorney who  
21 dealt with that would have been  
22 Attorney Carbon.

23 (BY ATTORNEY O'LAUGHLIN):

24 Q. Okay. And then did the  
25 Attorney Generals -- the Attorneys

SHANI A. PINNEY 30(b)(6)  
Gov. U.S. Virgin Islands vs JP Morgan Chase

July 18, 2023

86

1 General themselves get involved in  
2 monitoring Epstein at any point?

3 ATTORNEY ACKERMAN: Object to  
4 form.

5 THE WITNESS: In monitoring  
6 Epstein, no. That -- those were  
7 the duties of the coordinators,  
8 myself as a manager and also the  
9 investigators. So the attorneys  
10 were not involved in the  
11 monitoring of the offenders.

12 (BY ATTORNEY O'LAUGHLIN):

13 Q. Were they involved in any way  
14 with Epstein?

15 ATTORNEY ACKERMAN: Object to  
16 form.

17 THE WITNESS: Only in regards  
18 to his classification. Epstein  
19 was not -- Epstein was never found  
20 to be in noncompliance.

21 So there was never a warrant  
22 for an attorney to be involved  
23 with him in that aspect. With  
24 regards to his classification  
25 regarding which tier he fell into,

SHANI A. PINNEY 30(b)(6)  
Gov. U.S. Virgin Islands vs JP Morgan Chase

July 18, 2023

87

1                   there was -- there was an attorney  
2                   who dealt with that.

3                   (BY ATTORNEY O'LAUGHLIN):

4                   Q. So I'm talking specifically  
5                   about the Attorneys General of the  
6                   USVI during your time period there.  
7                   And I'm asking were they involved in  
8                   any way with Epstein's sex offender  
9                   registration or monitoring?

10                  ATTORNEY ACKERMAN: Object to  
11                  form.

12                  THE WITNESS: In any way --  
13                  when he first came on, Attorney  
14                  Carbon, you know, she dealt with  
15                  him in regards to his  
16                  classification. Okay?

17                  ATTORNEY ACKERMAN: Ms.

18                  Pinney, he's asking you about  
19                  Attorney General --

20                  THE WITNESS: Attorneys  
21                  General.

22                  ATTORNEY ACKERMAN: --  
23                  Attorneys General.

24                  THE WITNESS: Okay.

25                  ATTORNEY ACKERMAN: Yes.

1           Q. Okay. So let me ask the  
2 question this way: If there was a new  
3 employee in the group and you had to  
4 give them an orientation, you would  
5 hand them the statute and say, read  
6 this.

7           And then you would describe  
8 the practices, but there wasn't a  
9 handbook or any other thing you would  
10 give them to be like, this is how we  
11 do our work.

12           ATTORNEY ACKERMAN: Objection  
13           to form, scope.

14           (BY ATTORNEY O'LAUGHLIN):

15           Q. Correct?

16           A. Outside of the statute, there  
17 was no other written handbook or  
18 policy for employees relative to the  
19 sex offender registry.

20           Q. Okay. And you -- so with  
21 regard to the practices, you said  
22 there was a practice regarding  
23 interaction with VIPD; correct?

24           A. Uh-huh.

25           Q. What was that practice?

SHANI A. PINNEY 30(b)(6)  
Gov. U.S. Virgin Islands vs JP Morgan Chase

July 18, 2023

106

1                   A. That VIPD will assist the US  
2 Marshals Services and VI DoJ with the  
3 sex offender registration sweeps.

4                   Q. What would you need to do --  
5 what would DoJ need to do in order to  
6 get that assistance?

7                   ATTORNEY ACKERMAN: Object to  
8 form, scope.

9                   THE WITNESS: The AAG will  
10 draft a letter to the head of VIPD  
11 requesting assistance.

12                   (BY ATTORNEY O'LAUGHLIN):

13                   Q. Were there ever times that DoJ  
14 would reach out for help with a  
15 specific sex offender?

16                   ATTORNEY ACKERMAN: Object to  
17 form, scope.

18                   THE WITNESS: No.

19                   (BY ATTORNEY O'LAUGHLIN):

20                   Q. So at no point in the time  
21 that you were at DoJ did USVI DoJ ever  
22 reach out to you US VIPD for  
23 assistance with any registered sex  
24 offender?

25                   ATTORNEY ACKERMAN: Objection,

SHANI A. PINNEY 30(b)(6)  
Gov. U.S. Virgin Islands vs JP Morgan Chase

July 18, 2023  
108

1 registered sex offenders and our  
2 statutes. Any questions that we may  
3 have had, such as what we spoke about;  
4 you know, the dock of Epstein.

5 Q. Who at US DoJ would you reach  
6 out to with those questions?

7 A. I can't remember the title,  
8 but at one point it was Lori  
9 McPherson.

10 Q. How many times did you reach  
11 out to Lori McPherson regarding  
12 Epstein?

13 A. Oh, I -- I cannot recall the  
14 amount of times. I -- I can't recall.

15 Q. Were there times?

16 A. The only time I can recall in  
17 what would have been in regards to the  
18 dock, and that was held when I  
19 attended a training for, you know, for  
20 -- for -- they had a training for all  
21 SORNA, all sex offender registries to  
22 attend.

23 And in person when I saw Ms.  
24 McPherson, we spoke about, you know,  
25 the question regarding Epstein and his

1 dock.

2 Q. Okay. What did you say to  
3 her?

4 A. I explained to her that we  
5 were doing the address verifications.  
6 And I mean, I can't remember word for  
7 word. But all in all, the scope was  
8 whether or not we can forcibly come  
9 onto the island or you know, is --  
10 when I say forcibly, I mean, you know,  
11 if we can actually go past the dock  
12 and you know, walk on the island until  
13 we see, you know, perhaps where he  
14 rests. You know, where -- where he  
15 lays his head. Or is -- or is there  
16 any guidance with regards to offenders  
17 who own islands, you know?

18 And the response I got back  
19 was that Epstein was unique in that  
20 most offenders don't own islands.  
21 However, they're -- they drew the  
22 comparison to, let's say, an offender  
23 lives in the Midwest, you know, where  
24 there are, you know, mass amounts of  
25 land. You know, and the offender has

SHANI A. PINNEY 30(b)(6)  
Gov. U.S. Virgin Islands vs JP Morgan Chase

July 18, 2023

110

1 a gate, you know, and he owns  
2 probably, you know, 20-something ares  
3 of land.

4                   If his home is within the  
5 middle of that, he can argue that his  
6 fence is his front door. So, you  
7 know, that was the comparison that was  
8 -- that was drawn to Epstein.

9                   Q. And did they give you that  
10 comparison as a means of saying, and  
11 we think the dock is the same?

12                   ATTORNEY ACKERMAN: Object to  
13 form.

14                   THE WITNESS: Pretty much, you  
15 know, they said that they were not  
16 sure. But, you know, they drew  
17 that comparison to show that --  
18 that essentially, you know, that  
19 was how another juris- -- another  
20 state had to deal with -- -- with  
21 their offender. So yeah, you  
22 know, it's -- it's their  
23 property.

24                   (BY ATTORNEY O'LAUGHLIN):

25                   Q. Do you know what Lori

SHANI A. PINNEY 30(b)(6)  
Gov. U.S. Virgin Islands vs JP Morgan Chase

July 18, 2023

125

1 what was said in Brisson's E-mail.

2 Q. What year was that E-mail that  
3 you escalated?

4 A. Oh, I don't recall, but I do  
5 remember reviewing that document with  
6 Attorney Ackerman.

7 Q. Okay. Aside from that one  
8 escalation, there were no other  
9 escalations by DoJ regarding Epstein;  
10 correct?

11 A. Correct. No other, no.

12 Q. Okay. You said that in 2017,  
13 your role expanded to include looking  
14 at the budget for DoJ; correct?

15 A. Uh-huh.

16 Q. And for the sex offender  
17 monitoring group specifically,  
18 correct?

19 A. And for the sex -- oh,  
20 overseeing the other employees, yes.

21 Q. How is the sex offender  
22 monitoring program funded?

23 A. It's a Federally funded  
24 program from VI -- from US DoJ and Sex  
25 Offender Registry Notification Act.

SHANI A. PINNEY 30(b)(6)  
Gov. U.S. Virgin Islands vs JP Morgan Chase

July 18, 2023  
126

1 You know, so by -- by enhancing our  
2 laws in 2012, that made us eligible to  
3 -- us being the Virgin Islands --  
4 eligible to receive funding for  
5 employees to -- to monitor offenders  
6 in the Virgin Islands.

7 Q. Was that funding adequate to  
8 do the job that you guys had to do?

9 ATTORNEY ACKERMAN: Object to  
10 form, scope.

11 THE WITNESS: If it was the  
12 pos- -- that funding was used for  
13 salaries. Other -- and funding  
14 was also received from US Marshals  
15 Services as well too, you know, to  
16 purchase like iPads, you know, for  
17 us to use to be able to monitor  
18 offenders outside of the office.

19 You know, to be able to update the  
20 registry, the online registry  
21 outside the office as well too.

22 So from -- from V- -- from US  
23 DOJ, that funding was used for  
24 salaries, the salaries being, you  
25 know, for the three positions.

SHANI A. PINNEY 30(b)(6)  
Gov. U.S. Virgin Islands vs JP Morgan Chase

July 18, 2023

158

1 to form, scope to the extent it's  
2 outside the sex offender registry  
3 topic.

4 THE WITNESS: To my knowledge,  
5 no.

6 (BY ATTORNEY O'LAUGHLIN):

7 Q. Do you know if First Lady  
8 Cecile de Jongh ever interacted with  
9 DoJ regarding Epstein?

10 A. I cannot say that I was aware  
11 of that during my -- during my time.  
12 So no.

13 Q. Do you know if Governor de  
14 Jongh ever interacted with VI DoJ on  
15 behalf of Epstein?

16 A. I --

17 ATTORNEY ACKERMAN: I'm just  
18 going to object on scope to this  
19 line of questioning. And you can  
20 go ahead.

21 THE WITNESS: To my knowledge,  
22 no.

23 (BY ATTORNEY O'LAUGHLIN):

24 Q. What about Governor Bryan?

25 A. To my knowledge, no.

SHANI A. PINNEY 30(b)(6)  
Gov. U.S. Virgin Islands vs JP Morgan Chase

July 18, 2023

179

1                   THE WITNESS: About the  
2                   tuition being paid?

3                   (BY ATTORNEY O'LAUGHLIN):

4                   Q. About the relationship between  
5 Governor John de Jongh, the First Lady  
6 and Epstein.

7                   ATTORNEY ACKERMAN: Objection  
8                   to form, scope.

9                   THE WITNESS: I cannot recall  
10                  when I was first -- when I became  
11                  aware of these -- the relationship  
12                  between Epstein and the former  
13                  Governor.

14                  (BY ATTORNEY O'LAUGHLIN):

15                  Q. Did the relationship between  
16 Epstein and the de Jongh family ever  
17 play any role in DoJ's monitoring of  
18 Epstein as a sex offender?

19                  A. No.

20                  Q. Did either Cecile de Jongh or  
21 John de Jongh ever reach out to anyone  
22 involved in sex offender monitoring at  
23 DoJ regarding Epstein?

24                  A. To my knowledge, no.

25                  ATTORNEY O'LAUGHLIN: Let's

SHANI A. PINNEY 30(b)(6)  
Gov. U.S. Virgin Islands vs JP Morgan Chase

July 18, 2023  
206

1 A. Uh-huh.

2 ATTORNEY ACKERMAN: Same  
3 objection, speculation.

4 THE WITNESS: No.

5 (BY ATTORNEY O'LAUGHLIN):

6 Q. Do you agree with the  
7 statement that there was no  
8 information available to the USVI to  
9 trigger an investigation?

10 ATTORNEY ACKERMAN: Objection,  
11 scope.

12 THE WITNESS: You're talking  
13 about the Attorney General  
14 George's statements?

15 (BY ATTORNEY O'LAUGHLIN):

16 Q. Yes.

17 A. Yes, I agree with that.

18 Q. Isn't all of the information  
19 that we just looked at information  
20 about complaints of criminal activity  
21 by Epstein on Little St. James?

22 ATTORNEY ACKERMAN: Objection  
23 to form, scope.

24 THE WITNESS: So like what  
25 Denise George says here, an

SHANI A. PINNEY 30(b)(6)  
Gov. U.S. Virgin Islands vs JP Morgan Chase

July 18, 2023

207

1                   investigation can only be launched  
2                   if someone launches -- if someone  
3                   files a criminal Complaint. I'm  
4                   understanding that to be a  
5                   Complaint being filed locally, you  
6                   know, with VI DoJ or you know,  
7                   with VIPD.

8                   (BY ATTORNEY O'LAUGHLIN):

9                   Q. Why does it need to be a  
10                   locally filed Complaint?

11                   A. I'm saying that's what I  
12                   understand and --

13                   ATTORNEY ACKERMAN: Hold on.  
14                   Objection, scope. You can go  
15                   ahead.

16                   THE WITNESS: Yes. I'm saying  
17                   that's what I understand, you  
18                   know, the AG's meaning to be here  
19                   in this sentence. Nothing was  
20                   ever filed directly with VI DoJ or  
21                   VIPD to launch an investigation.

22                   (BY ATTORNEY O'LAUGHLIN):

23                   Q. And DoJ's position is that  
24                   unless something was filed directly  
25                   with them, there was no need to do any

SHANI A. PINNEY 30(b)(6)  
Gov. U.S. Virgin Islands vs JP Morgan Chase

July 18, 2023  
208

1 kind of investigation into Epstein?

2 ATTORNEY ACKERMAN: Objection  
3 to form, scope.

4 THE WITNESS: Yeah. You know,  
5 it cannot be a -- no hearsay. It  
6 cannot be rumors, whispers. It  
7 has to actually be someone  
8 actually filing a Complaint.

9 That would have been the  
10 means, you know, for any sexual  
11 offender to start spark an  
12 investigation or you know, if  
13 information was shared directly,  
14 you know, with the victim you know  
15 to VI DoJ. It would have to have  
16 been dir- -- it would have had to  
17 have been direct communication.

18 (BY ATTORNEY O'LAUGHLIN):

19 Q. Did anyone within DoJ ever  
20 push for more to be done with respect  
21 to investigating Epstein?

22 ATTORNEY ACKERMAN: Objection  
23 to form, scope.

24 THE WITNESS: No.

25 (BY ATTORNEY O'LAUGHLIN):

SHANI A. PINNEY 30(b)(6)  
Gov. U.S. Virgin Islands vs JP Morgan Chase

July 18, 2023  
306

1 (BY ATTORNEY O'LAUGHLIN):

2 Q. No you don't know or you don't  
3 think they were?

4                   A. If other offenders were  
5 granted this, I would have been aware,  
6 since I was registering the  
7 offenders.

8 Q. Okay. And you're not aware of  
9 any other offenders that got these  
10 sorts of waivers?

11 A. No.

12 Q. Okay.

13                   A. I do want to say though -- you  
14 said if they -- if anyone ever made  
15 requests. We got complaints all the  
16 time, you know.

22 Q. What was the reason for the  
23 original regime of having the 21-day  
24 notice requirement?

25 ATTORNEY ACKERMAN: Object to

SHANI A. PINNEY 30(b)(6)  
Gov. U.S. Virgin Islands vs JP Morgan Chase

July 18, 2023  
307

1 form, scope.

2 THE WITNESS: I am not sure.

3 I don't know. I wasn't involved in  
4 the -- in the creation of it.

5 Guidance was received from US DoJ. So  
6 that may have been perhaps what US DoJ  
7 recommended.

8 However, in the end, even with  
9 the changes, US DoJ still approved  
10 this SORNA for us to receive the  
11 funding for -- we had to receive the  
12 funding.

13 (BY ATTORNEY O'LAUGHLIN):

14 Q. Were -- was the 21-day  
15 requirement part of what you described  
16 as making the laws more strict  
17 surrounding the sex offender  
18 monitoring?

19 A. I --

20 ATTORNEY ACKERMAN: Object to  
21 form. You can answer.

22 THE WITNESS: I assume so.  
23 Yes.

24 (BY ATTORNEY O'LAUGHLIN):

25 Q. Okay. And was the requirement

SHANI A. PINNEY 30(b)(6)  
Gov. U.S. Virgin Islands vs JP Morgan Chase

July 18, 2023

363

1 notify via E-mail.

2 (BY ATTORNEY O'LAUGHLIN):

3 Q. Okay. So between the period  
4 when Attorney General Vincent Frazer  
5 left office and then was replaced by  
6 Attorney General -- by acting Attorney  
7 General Thomas-Jacobs, you don't  
8 recall any particular incidents  
9 outside of the ones that you just  
10 discussed?

11 A. No, I do not.

12 ATTORNEY O'LAUGHLIN: Okay.

13 So let's enter Tab 12 as Exhibit 20.

14 (Whereupon, Defendant's  
15 Exhibit No. 20, 2019 MetaData  
16 Documents, was marked for  
17 identification)

18 THE WITNESS: And I do also  
19 want to add in there, you know, that  
20 -- that when I remember more, I think  
21 the statute speaks about traveling  
22 outside of the United States.

23 So, you know, it was more so  
24 like a policy that we have for  
25 offenders to notify us of any travel

SHANI A. PINNEY 30(b)(6)  
Gov. U.S. Virgin Islands vs JP Morgan Chase

July 18, 2023

364

1 outside of the Virgin Islands. But  
2 the statute really clearly spoke about  
3 outside of the United States.

4 And since we are a US  
5 territory, you know, travel to Florida  
6 or to Minnesota or to New York or New  
7 Jersey would have still be considered  
8 inside the United States.

9 So we got a policy in place  
10 where we wanted the offenders to  
11 notify us of, you know, any travel to  
12 include outside the territory.

13 (BY ATTORNEY O'LAUGHLIN):

14 Q. So let me see if I understand.  
15 Was -- there a change -- was there a  
16 change between whether international  
17 travel required reporting versus  
18 travel within the United States?

19 A. Well, you know, now that we're  
20 speaking, and I spoke specifically  
21 about the travel to DR, to the  
22 Dominican Republic. I'm remembering  
23 now that within the statute, it spoke  
24 about notifying VI DoJ if any offender  
25 has notified any -- of any travel

SHANI A. PINNEY 30(b)(6)  
Gov. U.S. Virgin Islands vs JP Morgan Chase

July 18, 2023  
365

1 outside the United States.

2 Q. Okay.

3 A. However, we adopted, you know,  
4 a policy, you know, within VI DoJ. We  
5 wanted offenders to notify us of any  
6 travel outside of the territory as  
7 well. So not just outside the United  
8 States.

9 So if they were going to  
10 Puerto Rico, we wanted to know they  
11 were going to Tortola, we wanted to  
12 know that as well too.

13 Q. Okay. Was that different from  
14 the regime that had been in place  
15 before? Like if they had gone to  
16 Florida before, would they have needed  
17 to notify?

18 ATTORNEY ACKERMAN: Object to  
19 form.

20 THE WITNESS: When you say  
21 different from before, what time  
22 frame? You mean prior to 2012.

23 (BY ATTORNEY O'LAUGHLIN):

24 Q. The -- well, when do you think  
25 the change -- if there was a change,

SHANI A. PINNEY 30(b)(6)  
Gov. U.S. Virgin Islands vs JP Morgan Chase

July 18, 2023  
398

1 her response was to that I cannot  
2 recall.

3 (BY ATTORNEY O'LAUGHLIN):

4 Q. Okay. So you don't remember  
5 what her view was about the previous  
6 grants?

7 ATTORNEY ACKERMAN: Object to  
8 form.

9 THE WITNESS: No.

10 (BY ATTORNEY O'LAUGHLIN):

11 Q. Okay. You don't know whether  
12 she opposed the grants that Frazer had  
13 put in place?

14 ATTORNEY ACKERMAN: Object to  
15 form.

16 THE WITNESS: No.

17 (BY ATTORNEY O'LAUGHLIN):

18 Q. Okay. You talked about  
19 sweeps. What is a sweep?

20 A. So the sweep was the name that  
21 the US Marshals gave the -- the  
22 operation. It was called Operation  
23 Island Sweep. And that was when US  
24 Marshals Services, they would come in.

25 They would let us know the

SHANI A. PINNEY 30(b)(6)  
Gov. U.S. Virgin Islands vs JP Morgan Chase

July 18, 2023

399

1 dates where we can have this operation  
2 to verify the addresses of sex  
3 offenders in the Virgin Islands.

4 Q. So the sweeps were run by  
5 who?

6 A. Nothing within the statute  
7 speaks about sweeps having to occur.  
8 So the only thing that is within the  
9 statute, if I remember, speaks about  
10 an offender moves to the territory  
11 within a set amount of dates, VI DoJ  
12 officials go out to verify that  
13 address.

14 In regards to the sex offender  
15 address compliance checks, that was an  
16 effort from the US Marshals Services.  
17 And if I remember correctly, a part of  
18 US DoJ is that the US Marshals  
19 Services, that they assist states, you  
20 know in the offices who oversee the  
21 sexual -- the sex offenders; that they  
22 assist them with the operation to  
23 include the address verifications.

24 Q. How frequently do sweeps  
25 occur?

SHANI A. PINNEY 30(b)(6)  
Gov. U.S. Virgin Islands vs JP Morgan Chase

July 18, 2023

400

1                   A. How frequent the sweeps occur?

2                   There was no set-in-stone time for the  
3                   frequency of the sweeps to occur. It  
4                   would be something where we were in  
5                   constant communication with the US  
6                   Marshals Services. And they will let  
7                   us know, Hey, you know, this will be  
8                   the time for an upcoming sweep.

9                   Q. Do you have an estimate of how  
10                  frequently they occurred?

11                  A. I would say perhaps once a  
12                  year depending on funding.

13                  Q. Okay. Funding from where?

14                  A. Funding that the US Marshals  
15                  Services received. So the US Marshals  
16                  is Federal funding to conduct the  
17                  operational sweeps.

18                  Q. Okay. And during a sweep,  
19                  what was the objective?

20                  A. The objective was to verify  
21                  the address of the -- that the sex  
22                  offender had on record as their  
23                  permanent residence.

24                  Q. What does verify mean?

25                  A. Verify, verification process

SHANI A. PINNEY 30(b)(6)  
Gov. U.S. Virgin Islands vs JP Morgan Chase

July 18, 2023  
409

1 confirm with Epstein to complete his  
2 compliance check within that time  
3 period, they would have tried. But  
4 once they went back, that was it. You  
5 know, the operation ended at that  
6 point.

7 Q. And there wouldn't have been  
8 any further follow-up, correct?

9 A. Further follow-up in regards  
10 to verifying his address?

11 Q. Yeah.

12 A. Well, if we go there and  
13 Epstein -- remember I said before  
14 another person in the home can, you  
15 know, confirm that the offender was  
16 living there. Ideally we do want to  
17 see the offender in person.

18 However, an offender not being  
19 at the address does not -- does not  
20 immediately mean that they are in  
21 noncompliance or, you know, it -- it  
22 wouldn't immediately mean they were in  
23 noncompliance if -- within the team if  
24 it was agreed that, okay, you know,  
25 he's off island right now or, you

SHANI A. PINNEY 30(b)(6)  
Gov. U.S. Virgin Islands vs JP Morgan Chase

July 18, 2023  
410

1 know, we can meet him at his office,  
2 then that would have been enough to,  
3 you know, to -- at the time for, you  
4 know, during the week of the checks.

5 Q. You testified earlier that  
6 USVI DoJ SOR unit purchased a car?

7 A. Uh-huh.

8 Q. Why?

9 A. I testified earlier that the  
10 vehicle was used to conduct the  
11 verification checks --

12 Q. So --

13 A. -- the compliance checks.

14 Q. So the car was only used  
15 approximately once a year?

16 A. No. Remember I also said  
17 that -- that during the year, we would  
18 also verify the addresses of  
19 offenders, you know, if they  
20 relocated, if they had a new address.

21 Within that time, I think it's seven  
22 days, that we would also go out to  
23 verify their addresses.

24 Q. Were there any other reasons a  
25 car would be used?

SHANI A. PINNEY 30(b)(6)  
Gov. U.S. Virgin Islands vs JP Morgan Chase

July 18, 2023

415

1           Q. The news articles that we went  
2 over earlier today and the 2009  
3 article that we looked at -- or sorry,  
4 I think it was 2010, July 2010 Daily  
5 Beast article with the allegations  
6 against Epstein, did any of that  
7 reporting cause USVI DoJ to initiate a  
8 check on Epstein?

9           ATTORNEY ACKERMAN: Object to  
10 form.

11           THE WITNESS: No. Like I  
12 stated before, there were no written  
13 concrete allegations that were  
14 submitted to VI DoJ to constitute, you  
15 know, or to elevate for -- for an  
16 investigation.

17           And the article was there. I  
18 saw the article from The Daily Beast,  
19 and yeah, I mean, I remember seeing  
20 that here with you, and yeah.

21           (BY ATTORNEY O'LAUGHLIN):

22           Q. That's fine. You don't need  
23 to find it.

24           A. I'm not sure how --

25           Q. There was no follow-up here,

SHANI A. PINNEY 30(b)(6)  
Gov. U.S. Virgin Islands vs JP Morgan Chase

July 18, 2023  
438

1 already know where Mr. Epstein was  
2 living?

3 A. Yes, we did.

4 Q. Okay. Was there any doubt in  
5 your mind or in the SORNA unit's mind  
6 as to whether Mr. Epstein had moved to  
7 a different address?

8 A. No, there was not.

9 Q. Why not?

10 A. Well, for one, he did not  
11 provide any notice of change. We  
12 received no tips saying that he was no  
13 longer living on Little St. James and  
14 living at another residence, and yeah.

15 Q. Okay. Was there an instance  
16 where Mr. Epstein's verification was  
17 conducted at his office?

18 A. Yes, there was.

19 Q. Okay. Did you participate in  
20 that verification?

21 A. From my recollection, I did.

22 Q. Okay. And tell me what you  
23 recall about that verification when  
24 you met Mr. Epstein at his office.

25 A. So we ended up -- when we went

SHANI A. PINNEY 30(b)(6)  
Gov. U.S. Virgin Islands vs JP Morgan Chase

July 18, 2023  
439

1 to his island, he wasn't there. So at  
2 that point we decided that we can meet  
3 him at his -- at his office.

4                   When we went to the island,  
5 his staff was there, his employees  
6 were there. They confirmed, you know,  
7 that this was Little St. James and  
8 that this was Jeffrey Epstein's, if  
9 you want to say his island, you know.

10                  And just like how the decision  
11 was made in other address checks for  
12 other offenders, since he wasn't at  
13 home, that was not determined to be  
14 that he was in noncompliance. We  
15 simply just said, Okay. We'll go to  
16 his employer address.

17                  Q. Did you verify other sex  
18 offenders in the Virgin Islands at  
19 their employer's address?

20                  A. Yes, we did.

21                  Q. Okay. Are the address  
22 verifications or the sweeps required  
23 by any Virgin Islands statute to your  
24 knowledge?

25                  A. No.

SHANI A. PINNEY 30(b)(6)  
Gov. U.S. Virgin Islands vs JP Morgan Chase

July 18, 2023  
440

1                   Q. When you performed the address  
2 verifications or the sweeps, do you  
3 have a warrant?

4                   A. No, we do not.

5                   Q. Do you have an understanding  
6 as to whether there is any limit on  
7 your ability to search or enter a  
8 person's, a sex offender's property  
9 during an address verification or  
10 sweep?

11                  A. An address verification does  
12 not constitute that VI DoJ has the  
13 right to search an offender's home.  
14 If we go to the address and we say,  
15 Hi, we're here to conduct an address  
16 verification, can we come inside, they  
17 have the right to say no.

18                  Them saying no does not put  
19 them in noncompliance because it is  
20 not a search warrant. We don't have a  
21 search warrant to search the home.

22                  So in many instances, we have  
23 conducted address -- checks in an  
24 offender's yard, on their front porch,  
25 and they were found to still be in

SHANI A. PINNEY 30(b)(6)  
Gov. U.S. Virgin Islands vs JP Morgan Chase

July 18, 2023  
441

1 compliance because a search of their  
2 home was not required to complete that  
3 address verification.

4 Q. Okay. Thank you.

5 You testified earlier one of  
6 the things you did in preparation for  
7 this deposition was to review the  
8 testimony of Inais Borque, right?

9 A. Yes.

10 Q. Okay. There was testimony in  
11 Ms. Borque's deposition about  
12 performing weekly checks of offenders.  
13 Do you recall that testimony?

14 A. I do recall reading that in  
15 her -- in her deposition, yes.

16 Q. Okay. Was it the practice of  
17 the Virgin Islands DoJ SORNA office to  
18 conduct weekly checks of sex offenders  
19 during the time period that you worked  
20 in that office?

21 A. No, it was not.

22 Q. Thank you.

23 I want to go through a few  
24 exhibits, and I'll try to just go  
25 quickly. But let's start with Exhibit

SHANI A. PINNEY 30(b)(6)  
Gov. U.S. Virgin Islands vs JP Morgan Chase

July 18, 2023  
442

1 25, if you would. Do you have Exhibit  
2 25 in front of you?

3 A. Yes, I do.

4 Q. Okay. And this is the Virgin  
5 Islands daily news article from April  
6 3rd, 2018. Do you see that?

7 A. Yes.

8 Q. Okay. And counsel read you a  
9 quote that said, "We're not a lenient  
10 jurisdiction because we know  
11 registration reduces the frequencies  
12 of sex offenses against new victims."

13 Did I read that correctly?

14 A. Yes.

15 Q. Did Mr. Epstein ever fail to  
16 register in the Virgin Islands?

17 A. No.

18 Q. Okay. We can put that aside.

19 Let's look quickly at Exhibit  
20 22. Do you have Exhibit 22 in front  
21 of you?

22 A. Yes.

23 Q. Okay. And Exhibit 22 is the  
24 E-mail chain with a sex offender. His  
25 name is redacted on this document.

SHANI A. PINNEY 30(b)(6)  
Gov. U.S. Virgin Islands vs JP Morgan Chase

July 18, 2023  
446

1 had to be creditable, it had to have  
2 been a clear indication that the  
3 offender was in noncompliance.

4 (BY ATTORNEY ACKERMAN):

5 Q. In your exper- -- given your  
6 experience, do you believe news  
7 reports would have been sufficient to  
8 obtain a warrant to search  
9 Mr. Epstein's property?

10 ATTORNEY O'LAUGHLIN:

11 Objection.

12 THE WITNESS: No.

13 (BY ATTORNEY ACKERMAN):

14 Q. Why not?

15 A. The media has a way of  
16 sensationalizing a lot of things.  
17 That's for one. And it would have to  
18 be something that is concrete, that  
19 has evidence.

20 It would have to be a victim  
21 actually coming forward or a witness  
22 actually coming forward and saying,  
23 putting it, you know, on record and,  
24 you know, a full statement to VI DoJ  
25 would have been needed from -- that's

SHANI A. PINNEY 30(b)(6)  
Gov. U.S. Virgin Islands vs JP Morgan Chase

July 18, 2023  
447

1 what I think would have been needed to  
2 move forward with an investigation  
3 against Epstein from VI DoJ.

4 I don't think that a media  
5 source of allegations would have been  
6 enough for us to go forward to a judge  
7 to request an investigation or a  
8 warrant to search -- to search the  
9 island.

10 Q. During your tenure at the  
11 SORNA unit, are you aware of any of  
12 Epstein's victims or any witness to  
13 Epstein's crimes coming forward to DoJ  
14 prior to his arrest?

15 A. No.

16 Q. I want to give you the  
17 opportunity to, I think, explain  
18 something. You earlier in this  
19 deposition used the term real  
20 complaints and real victims. Do you  
21 recall that phrase?

22 A. I think I was explaining about  
23 what -- if allegations were reported  
24 to VI DoJ about offenders. Yes, I  
25 do.

SHANI A. PINNEY 30(b)(6)  
Gov. U.S. Virgin Islands vs JP Morgan Chase

July 18, 2023  
448

1                   Q. Yes. Were you meaning to  
2 suggest that the victims of  
3 Mr. Epstein weren't real?

4                   A. Oh, of course not, no. That's  
5 not what I meant at all. I was trying  
6 to just draw the comparison to show  
7 how, you know, a news report of  
8 allegations from victims, that was not  
9 going -- that was not going to be  
10 considered as something concrete.

11                  In comparison to other  
12 offenders we've had where there have  
13 been written allegations, you know,  
14 victims coming forward saying that,  
15 you know, for example, John Doe on the  
16 registry is still committing sexual  
17 offenses against children, for  
18 example.

19                  And with that, that would have  
20 been enough proof for us to do an  
21 investigation, to contact human  
22 services, to contact VIPD as well in  
23 those instances. But it was not to  
24 say in any way that -- that the  
25 allegations from any of those victims,

SHANI A. PINNEY 30(b)(6)  
Gov. U.S. Virgin Islands vs JP Morgan Chase

July 18, 2023  
449

1 you know, that they were not real.

2 Q. Thank you.

3 You described earlier a  
4 discussion with Denise George  
5 concerning Mr. Epstein. Do you recall  
6 that testimony?

7 A. Yes.

8 Q. Was that discussion specific  
9 to Mr. Epstein or did Mr. Epstein come  
10 up in the context of a discussion of  
11 sex offenders generally?

12 A. If I recall, he came up in a  
13 conversation of sexual -- of sex  
14 offenders generally. He came up  
15 within the discussion.

16 Q. Thank you.

17 Are you aware whether the  
18 Attorney General is involved in  
19 monitoring sex -- or strike that. Let  
20 me ask the question differently.

21 During your tenure -- tenure  
22 at the SORNA unit, was the Attorney  
23 General involved directly in  
24 monitoring sex offenders?

25 ATTORNEY O'LAUGHLIN:

SHANI A. PINNEY 30(b)(6)  
Gov. U.S. Virgin Islands vs JP Morgan Chase

July 18, 2023  
452

1 ATTORNEY O'LAUGHLIN:

2 Objection.

3 THE WITNESS: I'm not sure,  
4 but I can say that every jurisdiction  
5 has their own set of statutes that  
6 they use to determine how frequently  
7 or the -- or the duration of time that  
8 offenders must appear or how long they  
9 have to register.

10 (BY ATTORNEY ACKERMAN):

11 Q. Okay. There was some  
12 discussion about the 2012 changes in  
13 legislation, the changes in the SORNA  
14 legislation, correct?

15 A. Yes.

16 Q. And do you recall testimony  
17 about whether drafts of that  
18 legislation were shared with  
19 Mr. Epstein or his lawyers?

20 A. Yes.

21 Q. Are you aware whether any  
22 proposed legislation required approval  
23 from the US DoJ?

24 A. It would have had to have been  
25 approved by US DoJ. So it was

SHANI A. PINNEY 30(b)(6)  
Gov. U.S. Virgin Islands vs JP Morgan Chase

July 18, 2023

453

1 approved prior to the amendment.  
2 After the amendment, it was still  
3 approved by VI -- by US DoJ to be in  
4 compliance with SORNA.

5 Q. Okay. The proposed  
6 legislation, what role did the  
7 legislature play in --

8 A. The legis- --

9 Q. -- that process?

10 ATTORNEY O'LAUGHLIN:

11 Objection.

12 THE WITNESS: The role that  
13 the legislature played in the -- in  
14 the proposed -- the legislature, they  
15 had to pass it; you know, they enacted  
16 it.

17 (BY ATTORNEY ACKERMAN):

18 Q. Could DoJ have put that  
19 legislation in effect by itself?

20 A. No.

21 Q. I want to, if you would, pull  
22 out Exhibit 14. Let me know when you  
23 have that --

24 A. Okay. I have it.

25 Q. -- in front of you.

SHANI A. PINNEY 30(b)(6)  
Gov. U.S. Virgin Islands vs JP Morgan Chase

July 18, 2023

455

1 A. No.

2 Q. Did the Virgin Department of  
3 Justice have access to how often he  
4 withdrew cash from his accounts?

5 A. No.

6 Q. Did the Virgin Islands have --  
7 Department of Justice have access to  
8 the amounts of cash withdrawals that  
9 Mr. Epstein made from his accounts?

10 A. No.

11 Q. The Department of Justice  
12 couldn't get that information without  
13 a -- unless it had a warrant, right?

14 A. I assume that would have --  
15 that would be what would have been  
16 needed. So yes.

17 ATTORNEY O'LAUGHLIN:

18 Objection.

19 (BY ATTORNEY ACKERMAN):

20 Q. None of that materi- -- none  
21 of what I just mentioned is listed on  
22 this checklist, is it?

23 A. No.

24 Q. Okay. Ms. Pinney, you were at  
25 the SORNA unit for close to ten years;

SHANI A. PINNEY 30(b)(6)  
Gov. U.S. Virgin Islands vs JP Morgan Chase

July 18, 2023

456

1 is that right?

2 A. Yes.

3 Q. Did you do everything in your  
4 power to appropriately monitor  
5 Mr. Epstein?

6 A. Absolutely, yes.

7 Q. Do you believe that the SORNA  
8 unit is responsible for Mr. Epstein's  
9 crimes?

10 A. No.

11 Q. If you had any information  
12 that Mr. Epstein was committing crimes  
13 on his island, what would you have  
14 done?

15 A. I would have reported that  
16 information to our investigator,  
17 VIPD, criminal, the AG.

18 Q. Did you ever participate in a  
19 cover-up of Mr. Epstein's crimes?

20 A. Absolutely not. No.

21 MR. ACKERMAN: I have nothing  
22 further.

23 REDIRECT EXAMINATION

24 (BY ATTORNEY O'LAUGHLIN):

25 Q. Ms. Pinney, counsel for USVI