

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK**

GOVERNMENT OF THE UNITED  
STATES VIRGIN ISLANDS,

Plaintiff,

v.

JPMORGAN CHASE BANK, N.A.,

Defendant/Third-Party  
Plaintiff.

Case No. 22-cv-10904 (JSR)

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JPMORGAN CHASE BANK, N.A.,

Third-Party Plaintiff,

v.

JAMES EDWARD STALEY,

Third-Party Defendant.

**DECLARATION OF FELICIA H. ELLSWORTH IN SUPPORT OF JPMORGAN  
CHASE BANK, N.A.’s MOTION FOR PARTIAL SUMMARY JUDGMENT**

Pursuant to 28 U.S.C. § 1746, I, Felicia H. Ellsworth, declare under penalty of perjury as follows:

1. I am a member in good standing of the bar of the Commonwealth of Massachusetts. I am one of the attorneys representing Defendant JPMorgan Chase Bank, N.A. (“JPMC”) in the above-captioned action and have been admitted to this Court pro hac vice. I am a Partner with the law firm of Wilmer Cutler Pickering Hale and Dorr LLP, 60 State Street, Boston, Massachusetts 02109. I am familiar with the facts set forth herein, and if called as a witness, I could and would competently testify thereto.

2. Attached as Exhibit 1 is a true and correct copy of an article titled “Epstein’s Island, ‘Little St. Jeff’s’: A Hideaway Where Money Bought Influence,” dated August 28, 2019, available at <https://www.nytimes.com/2019/08/28/business/jeffrey-epstein-island.html>.
3. Attached as Exhibit 2 is a true and correct copy of a document produced by Jane Doe 1 in the related case captioned *Doe I v. JPMorgan Chase Bank, N.A.*, No. 1:22-cv-10019-JSR (S.D.N.Y.), Bates stamped JDoe\_JPMC\_004576, designated confidential pursuant to the Protective Order in this matter and filed under seal.
4. Attached as Exhibit 3 is a true and correct copy of the November 2020 Department of Justice, Office of Professional Responsibility Report.
5. Attached as Exhibit 4 is a true and correct copy of excerpts of the transcript from the July 7, 2023 Deposition of Jean-Pierre Oriol, designated confidential pursuant to the Protective Order in this matter and filed under seal.
6. Attached as Exhibit 5 is a true and correct copy of a document produced by Jane Doe 1 in the case captioned *Doe I v. Deutsche Bank Aktiengesellschaft*, No. 1:22-cv-10018-JSR (S.D.N.Y.), Bates stamped JDoe\_DBAG\_005374, designated confidential pursuant to the Protective Order in this matter and filed under seal.
7. Attached as Exhibit 6 is a true and correct copy of a document produced by Jane Doe 1 in the related case captioned *Doe I v. JPMorgan Chase Bank, N.A.*, No. 1:22-cv-10019-JSR (S.D.N.Y.), Bates stamped JDoe\_JPMC\_008593, designated confidential pursuant to the Protective Order in this matter and filed under seal.
8. Attached as Exhibit 7 is a true and correct copy of a document produced by Jane Doe 1 in the related case captioned *Doe I v. JPMorgan Chase Bank, N.A.*, No. 1:22-cv-10019-JSR

(S.D.N.Y.), Bates stamped JDoe\_JPMC\_003402, designated confidential pursuant to the Protective Order in this matter and filed under seal.

9. Attached as Exhibit 8 is a true and correct copy of a document produced by Jane Doe 1 in the related case captioned *Doe I v. JPMorgan Chase Bank, N.A.*, No. 1:22-cv-10019-JSR (S.D.N.Y.), Bates stamped JDoe\_JPMC\_003057, designated confidential pursuant to the Protective Order in this matter and filed under seal.
10. Attached as Exhibit 9 is a true and correct copy of a document produced by Jane Doe 1 in the related case captioned *Doe I v. JPMorgan Chase Bank, N.A.*, No. 1:22-cv-10019-JSR (S.D.N.Y.), Bates stamped JDoe\_JPMC\_003010, designated confidential pursuant to the Protective Order in this matter and filed under seal.
11. Attached as Exhibit 10 is a true and correct copy of excerpts of the transcript from the July 7, 2023 Deposition of Shaun O'Neill, designated confidential pursuant to the Protective Order in this matter and filed under seal.
12. Attached as Exhibit 11 is a true and correct copy of a document produced by Jane Doe 1 in the related case captioned *Doe I v. JPMorgan Chase Bank, N.A.*, No. 1:22-cv-10019-JSR (S.D.N.Y.), Bates stamped JDoe\_JPMC\_001314, designated confidential pursuant to the Protective Order in this matter and filed under seal.
13. Attached as Exhibit 12 is a true and correct copy of a document produced by Plaintiff the Government of the United States Virgin Islands, Bates stamped VI-JPM-000012200, designated confidential pursuant to the Protective Order in this matter and filed under seal.

14. Attached as Exhibit 13 is a true and correct copy of the May 1, 2009 Complaint and Demand For Jury Trial, in the case captioned *Jane Doe No. 102 v. Epstein*, 09-cv-80656 (S.D. Fla.).
15. Attached as Exhibit 14 is a true and correct copy of a document produced by Plaintiff the Government of the United States Virgin Islands, Bates stamped VI-JPM-000012205, designated confidential pursuant to the Protective Order in this matter and filed under seal.
16. Attached as Exhibit 15 is a true and correct copy of a document produced by JPMC, Bates stamped JPM-SDNYLIT-00127937.
17. Attached as Exhibit 16 is a true and correct copy of excerpts of the transcript from the July 13, 2023 Deposition of Carol T. Jacobs, designated confidential pursuant to the Protective Order in this matter and filed under seal.
18. Attached as Exhibit 17 is a true and correct copy of a document produced by Plaintiff the Government of the United States Virgin Islands, Bates stamped VI-JPM-000012225, designated confidential pursuant to the Protective Order in this matter and filed under seal.
19. Attached as Exhibit 18 is a true and correct copy of the Complaint and Jury Trial Demand in the case captioned *Jane Doe 43 v. Epstein et al.*, 17-cv-00616 (S.D.N.Y.).
20. Attached as Exhibit 19 is a true and correct copy of a document produced by Plaintiff the Government of the United States Virgin Islands, Bates stamped VI-JPM-000079661, designated confidential pursuant to the Protective Order in this matter and filed under seal.

21. Attached as Exhibit 20 is a true and correct copy of the transcript of the July 15, 2019 bail hearing conducted in the case captioned *United States v. Epstein*, 19-cr-490 (S.D.N.Y.).
22. Attached as Exhibit 21 is a true and correct copy of the federal indictment against Jeffrey Epstein in the case captioned *United States v. Epstein*, 19-cr-490 (S.D.N.Y.).
23. Attached as Exhibit 22 is a true and correct copy of an article titled “Bryan terminates Attorney General Denise George,” dated January 1, 2023, available at [http://www.virginislandsdailynews.com/news/bryan-terminates-attorney-general-denise-george/article\\_0cc24de2-7a57-5715-a100-787a75803304.html](http://www.virginislandsdailynews.com/news/bryan-terminates-attorney-general-denise-george/article_0cc24de2-7a57-5715-a100-787a75803304.html).
24. Attached as Exhibit 23 is a true and correct copy of excerpts of the transcript from the May 30, 2023 Deposition of Former Gov. John P. de Jongh, Jr.
25. Attached as Exhibit 24 is a true and correct copy of excerpts of the transcript from the May 24, 2023 Deposition of Former Gov. Kenneth E. Mapp.
26. Attached as Exhibit 25 is a true and correct copy of excerpts of the transcript from the June 6, 2023 Deposition of Gov. Albert Bryan, Jr.
27. Attached as Exhibit 26 is a true and correct copy of Plaintiff the Government of the United States Virgin Islands’ Supplemental Written Responses and Objections to Defendant’s Notice of Deposition of The Government of The United States Virgin Islands served on the July 3, 2023, contains potentially confidential information pursuant to the Protective Order in this matter and filed under seal.
28. Attached as Exhibit 27 is a true and correct copy of the January 15, 2020 Complaint filed in the case captioned *Government of the United States Virgin Islands v. Estate of Jeffrey E. Epstein*, 20-cv-014 (D.V.I.).

29. Attached as Exhibit 28 is a true and correct copy of a document produced by Plaintiff the Government of the United States Virgin Islands, Bates stamped VI-JPM-000041942, designated confidential pursuant to the Protective Order in this matter and filed under seal.
30. Attached as Exhibit 29 is a true and correct copy of an article titled “Exclusive: Billionaire Investor Buys Jeffrey Epstein’s Private Islands for \$60 Million,” dated May 2, 2023, available at <https://www.forbes.com/sites/richardjchang/2023/05/03/exclusive-billionaire-buys-jeffrey-epsteins-private-islands-60-million/?sh=3cd8cf5ca965>.
31. Attached as Exhibit 30 is a true and correct copy of a document produced by Plaintiff the Government of the United States Virgin Islands, Bates stamped VI-JPM-000041936, designated confidential pursuant to the Protective Order in this matter and filed under seal.
32. Attached as Exhibit 31 is a true and correct copy of a document produced by JPMC, Bates stamped JPM-SDNYLIT-00100251.
33. Attached as Exhibit 32 is a true and correct copy of a document produced by JPMC, Bates stamped JPM-SDNYLIT-00036596, designated confidential pursuant to the Protective Order in this matter and filed under seal.
34. Attached as Exhibit 33 is a true and correct copy of a document produced by the Estate of Jeffrey Epstein, Bates stamped Estate\_005175, designated confidential pursuant to the Protective Order in this matter and filed under seal.
35. Attached as Exhibit 34 is a true and correct copy of a document produced by JPMC, Bates stamped JPM-SDNYLIT-00274527.

36. Attached as Exhibit 35 is a true and correct copy of a document produced by JPMC, Bates stamped JPM-SDNYLIT-00731595.
37. Attached as Exhibit 36 is a true and correct copy of JPMC's First Supplemental Responses and Objections to Interrogatories in Lieu of Rule 30(b)(6) Deposition Testimony served on the April 14, 2023, designated confidential pursuant to the Protective Order in this matter and filed under seal.
38. Attached as Exhibit 37 is a true and correct copy of excerpts of the transcript from the April 19, 2023 deposition of Philip DeLuca, designated confidential pursuant to the Protective Order in this matter and filed under seal.
39. Attached as Exhibit 38 is a true and correct of copy of excerpts of the transcript from the May 30, 2023 deposition of Francis Pearn.
40. Attached as Exhibit 39 is a true and correct copy of excerpts of the June 23, 2023 Expert Report of Teresa A. Pesce, designated confidential pursuant to the Protective Order in this matter and filed under seal.
41. Attached as Exhibit 40 is a true and correct copy of a document produced by JPMC, Bates stamped JPM-SDNYLIT-W-00031038, designated confidential pursuant to the Protective Order in this matter and filed under seal.
42. Attached as Exhibit 41 is a true and correct copy of a document produced by the Financial Crimes Enforcement Network, Bates stamped FINCEN00000001, designated confidential pursuant to the Protective Order in this matter and filed under seal.
43. Attached as Exhibit 42 is a true and correct copy of a document produced by JPMC, Bates stamped JPM-SDNYLIT-W-00025790, designated confidential pursuant to the Protective Order in this matter and filed under seal.

44. Attached as Exhibit 43 is a true and correct copy of a document produced by JPMC, Bates stamped JPM-SDNYLIT-W-00025792, designated confidential pursuant to the Protective Order in this matter and filed under seal.
45. Attached as Exhibit 44 is a true and correct copy of a document produced by JPMC, Bates stamped SDNYLIT-W-00025791, designated confidential pursuant to the Protective Order in this matter and filed under seal.
46. Attached as Exhibit 45 is a true and correct copy of a document produced by JPMC, Bates stamped, JPM-SDNYLIT-W-00021932, designated confidential pursuant to the Protective Order in this matter and filed under seal.
47. Attached as Exhibit 46 is a true and correct copy of a document produced by JPMC, Bates stamped, JPM-SDNYLIT-W-00019086, designated confidential pursuant to the Protective Order in this matter and filed under seal.
48. Attached as Exhibit 47 is a true and correct copy of a document produced by JPMC, Bates stamped JPM-SDNYLIT-W-00018180, designated confidential pursuant to the Protective Order in this matter and filed under seal.
49. Attached as Exhibit 48 is a true and correct copy of a document produced by JPMC, Bates stamped JPM-SDNYLIT-W-00002185, designated confidential pursuant to the Protective Order in this matter and filed under seal.
50. Attached as Exhibit 49 is a true and correct copy of Plaintiff Government of The United States Virgin Islands' Third Supplemental Objections and Responses to JPMorgan Chase Bank, N.A.'s First Set of Interrogatories, served on July 19, 2023.



51. Attached as Exhibit 50 is a true and correct copy of excerpts of the June 16, 2023 Expert Report of Bridgette Carr, designated confidential pursuant to the Protective Order in this matter and filed under seal.
52. Attached as Exhibit 51 is a true and correct copy of the transcript from the June 26, 2023 Hearing in the related case captioned *Doe I v. JPMorgan Chase Bank, N.A.*, 1:22-cv-10019-JSR (S.D.N.Y.).
53. Attached as Exhibit 52 is a true and correct copy of excerpts of the June 16, 2023 Expert Report of Jonathan J. Rusch, designated confidential pursuant to the Protective Order in this matter and filed under seal.
54. Attached as Exhibit 53 is a true and correct copy of excerpts of the June 16, 2023 Expert Report of Robert Jackson, designated confidential pursuant to the Protective Order in this matter and filed under seal.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Dated: July 24, 2023

/s/ Felicia Ellsworth

Felicia H. Ellsworth