

EXHIBIT 8

CAROL T. JACOBS
U.S. VIRGIN ISLANDS vs JP MORGAN CHASE

July 13, 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)
8 Plaintiff,)
9)
10)
11 VS.)
12)
13)
14)
15 JP MORGAN CHASE BANK, N.A.,)
16)
17 Defendant.)
18)
19 -----
20)
21)
22)
23)
24)
25)

15 VIDEO RECORDED DEPOSITION OF
16 CAROL THOMAS JACOBS
17 THURSDAY, JULY 13, 2023

20 REPORTED BY:

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

CAROL T. JACOBS
U.S. VIRGIN ISLANDS vs JP MORGAN CHASE

July 13, 2023
146

1 Q. We have met before. I am
2 David Ackerman with the law firm of
3 Motley Rice. We represent the
4 Government of the Virgin Islands in
5 this action.

6 I'm just going to have a few
7 questions for you. And I want to
8 start with that document that was
9 marked as Exhibit 10. Can you pull
10 that in front of you?

11 A. Yes.

12 Q. And this is a document that's
13 entitled "Complaint."

14 Do you see that?

15 A. Yes.

16 Q. Okay. Does the document
17 indicate where the Complaint was
18 filed?

19 A. It says United States District
20 Court Southern District of New York.

21 Q. Was this Complaint filed in
22 the Virgin Islands?

23 A. No, it was not.

24 Q. Okay. In your opinion, do you
25 believe law enforcement has an

CAROL T. JACOBS
U.S. VIRGIN ISLANDS vs JP MORGAN CHASE

July 13, 2023

147

1 obligation to monitor public dockets
2 of every court in the country for
3 allegations that may reference the
4 Virgin Islands?

5 A. I don't. I think it's
6 unreasonable. It would be an
7 unreasonable obligation on the Virgin
8 Islands.

9 Q. Okay. Thank you. We can put
10 that document aside.

11 Let's go to Exhibit 1, which
12 is that big document. And I want to
13 start with the page that is -- I
14 apologize, I need to find it -- 12500
15 near the end of the document. Are you
16 there?

17 A. Yes.

18 Q. And this is the E-mail chain
19 that counsel showed you involving
20 Clive Rivers and Denise George. And
21 you were copied on several of these
22 E-mails; is that correct?

23 A. Yes.

24 Q. Okay. If you would look
25 please at the second page at the very