

# EXHIBIT 299

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

July 13, 2023

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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    JP MORGAN CHASE BANK, N.A., )  
15    )  
16    Defendant. )  
17    )  
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)

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1 ATTORNEY NEIMAN: All right.

2 ATTORNEY ACKERMAN: Okay.

3 (BY ATTORNEY NEIMAN):

4 Q. Ms. Thomas-Jacobs, I'm showing  
5 you a document that's marked as  
6 Exhibit 2. And this is the E-mail  
7 exchange between Jeffrey Epstein and  
8 somebody named Cecile de Jongh on  
9 March 17th of 2019, which is three  
10 days after the letter that we've been  
11 looking at.

12 Do you know Cecile de Jongh?

13 A. I know of Cecile de Jongh. I  
14 don't personally know Cecile de Jongh.

15 Q. All right.

16 A. I know she was -- she's the --  
17 she's Governor De Jongh's wife.

18 Q. Okay. And were you aware that  
19 Ms. De Jongh worked for Mr. Epstein?

20 A. I think everyone in the Virgin  
21 Islands knew that.

22 Q. Okay. And did you ever  
23 interact with Ms. De Jongh related to  
24 Mr. Epstein?

25 A. No.