

® JOSEPH R. ATTERBURY

®† JACK A. GOLDBERGER

JASON S. WEISS

® Board Certified Criminal Trial Attorney

† Member of New Jersey & Florida Bars

July 21, 2008

██████████, AUSA
U.S. Department of Justice
United States Attorney
Southern District of Florida
500 South Australian Avenue, Suite 400
West Palm Beach, Florida 33401

SENT VIA FACSIMILE

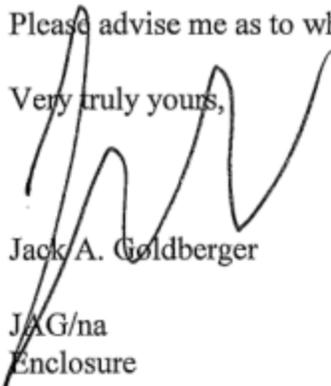
Re: Jeffrey Epstein

Dear Ms. ██████████,

Enclosed please find a Motion For Return of Property that I filed in Mr. Epstein's state case. Out of abundance of caution, I am providing you a copy of the motion.

Please advise me as to what your position is on this matter.

Very truly yours,


Jack A. Goldberger

JAG/na
Enclosure

IN THE CIRCUIT COURT OF THE FIFTEENTH JUDICIAL CIRCUIT,
IN AND FOR PALM BEACH COUNTY, FLORIDA

STATE OF FLORIDA

CASE NO.: 2006CF009454AXX
DIVISION: "W"

vs.

JEFFREY EPSTEIN,

Defendant.

DEFENDANT'S MOTION FOR RETURN OF PROPERTY

COMES NOW the Defendant, JEFFREY EPSTEIN, by and through his undersigned attorney, and moves this Honorable Court to enter an Order for return of property seized on October 20, 2005 during execution of a search warrant at the Defendant's residence. In support thereof the Defendant states as follows:

1. On October 20, 2005, the Palm Beach Police Department executed a search warrant at the Defendant's residence. During the execution of the warrant, numerous items of the Defendant's personal property were seized and impounded by the Palm Beach Police Department. A copy of the search warrant return is attached to this motion (Exhibit A).

2. On June 30, 2008, the criminal charges arising from the search warrant were resolved through a negotiated plea agreement.

3. No legal justification exists for the continued impoundment of the Defendant's personal property. The Defendant is entitled to the return of all personal property listed in Exhibit A.

WHEREFORE, the Defendant, JEFFREY EPSTEIN, respectfully requests this Honorable Court to enter an Order for the return of his personal property.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing Motion was sent via FAX and U.S. MAIL to Lanna Belohlavek, Esq., Assistant State Attorney, 401 North Dixie Highway, West Palm Beach, Florida 33401, this 21st day of July, 2008.

ATTERBURY, GOLDBERGER & WEISS, P.A.

250 Australian Avenue South, Suite 1400

West Palm Beach, Florida 33401

(1) [REDACTED]

JACK A. GOLBERGER, ESQUIRE

Florida Bar Number 262013

**M BEACH POLICE DEPARTMENT
PROPERTY RECEIPT
SEARCH WARRANT RETURN**

Pg 1 of 5
DETECTIVE BUREAU

PBR Form #52

<input type="checkbox"/> PROPERTY	<input type="checkbox"/> FOUND	<input type="checkbox"/> DECEASED (Probated)	<input type="checkbox"/> PERSONAL	<input type="checkbox"/> CONFISCATED	<input type="checkbox"/> DESTROY
<input checked="" type="checkbox"/> EVIDENCE	<input checked="" type="checkbox"/> TRIAL	<input type="checkbox"/> LABORATORY	<input type="checkbox"/> STOLEN/RECOVERED	<input type="checkbox"/> OTHER	
INCIDENT/CITATION NUMBER 05-368	DATE/TIME RECOVERED 10-20-2005	PROPERTY NUMBER (Leave Blank) 05-1024	BIN NUMBER (Leave Blank)		
ADDRESS WHERE PROPERTY IMPOUNDED 258 FL-Brillo					
DISCOVERED BY / D.O.B.	ADDRESS	Street	City	Zip	PHONE NUMBER
OWNER / VICTIM'S NAME / D.O.B.	ADDRESS	Street	City	Zip	PHONE NUMBER
SUSPECT'S NAME / D.O.B. 1-20-53 Eostein Jeff	ADDRESS	Street	City	Zip	PHONE
ADD'L SUSPECT / D.O.B.	ADDRESS	Street	City	Zip	PHONE
SPECIAL INSTRUCTIONS				FOUND PROPERTY 90 DAYS	CLAIM <input type="checkbox"/> NOT CLAIM <input type="checkbox"/>



ITEM #	QUANTITY	VALUE	DESCRIPTION
1	1		Phone message book (kitchen)
2	3		Phone message book (office off kitchen)
3	3		file folder (messages) w/ 2 more files (Pier)
4	1		shredded paper office off kitchen marked Amber + Chris
5	1		orange file folder marked message
* items 2-5 from office off kitchen			
6	✓		Big message table off from closet
7	✓		Brown message table → foyer
8	1		Black Framed Photo of nude girl
9	99		Pictures in frame items 6-8 from [unclear]
10	8		Photos from office off pool area
11	2		Photos from [unclear] left → [unclear] room off
12	2		Photos table on right → [unclear] pool area
TOTAL PACKAGE WEIGHT			

I hereby acknowledge that the above list represents all property taken from me and that I have received a copy of this receipt.

SIGNATURE _____ DATE _____

I hereby acknowledge that the above list represents all property impounded by me in the official performance of my duty as a police officer.

SIGNATURE ID# **7915** UNIT **D2**

RECEIVED BY _____ REASON _____ DATE/TIME RECEIVED _____

I, [redacted], the officer by whom this warrant was executed, do swear that the above inventory contains a true and detailed account of all the property taken by me, under the authority of this warrant.

Sworn to and subscribed before me [redacted]

this 21 day of October 2005.

**M BEACH POLICE DEPARTMENT
PROPERTY RECEIPT
SEARCH WARRANT RETURN**

PAGE 2 OF 6

DETECTIVE BUREAU

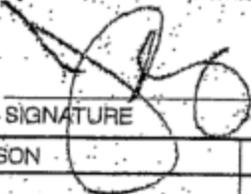
PBPD Form #52

<input type="checkbox"/> PROPERTY	<input type="checkbox"/> FOUND	<input type="checkbox"/> DECEASED (Probated)	<input type="checkbox"/> PERSONAL	<input type="checkbox"/> CONFISCATED	<input type="checkbox"/> DESTROY
<input checked="" type="checkbox"/> EVIDENCE	<input checked="" type="checkbox"/> TRIAL	<input type="checkbox"/> LABORATORY	<input type="checkbox"/> STOLEN/RECOVERED	<input type="checkbox"/> OTHER	
INCIDENT/CITATION NUMBER 05-368	DATE/TIME RECOVERED 10-20-05	PROPERTY NUMBER (Leave Blank) 05-1024	BIN NUMBER (Leave Blank) 6410		
ADDRESS WHERE PROPERTY IMPOUNDED 358 EL-Brillo					
DISCOVERED BY / D.O.B.	ADDRESS	Street	City	Zip	PHONE NUMBER
OWNER / VICTIM'S NAME / D.O.B.	ADDRESS	Street	City	Zip	PHONE NUMBER
SUSPECT'S NAME / D.O.B. Foster Jeff 01-20-53	ADDRESS	Street	City	Zip	PHONE NUMBER
ADD'L. SUSPECT / D.O.B.	ADDRESS	Street	City	Zip	PHONE NUMBER
SPECIAL INSTRUCTIONS			FOUND PROPERTY CLAIM <input type="checkbox"/> 90 DAYS NOT CLAIM <input type="checkbox"/>		

ITEM#	QUANTITY	VALUE	DESCRIPTION
✓ 13	2	✓	1 Hrs. tapes from (v data) By roof
✓ 14	2	*	CD's cracked Hipp. Birthday ↑ Creditors
✓ 15	3		Photos framed from Cabana
✓ 16	1	✓	message book 1st floor SW corner (top)
✓ 17	1	✓	message book (from inside)
✓ 18	3	✓	CD's from desk
✓ 19	1	*	D. from desk (Items # 18, 19, 20, 21)
✓ 20			unframed Photos from desk from 1st floor S.W.
✓ 21	2		framed Photos from desk
✓ 22	2		framed Photos from table in SW corner office
✓ 23	3		Soap on Rope (NE Bedroom) (wh. to room)
✓ 24	2		Twin Torpedo in Brown box
✓ 25	2		Soap on Rope (middle Bedroom) (wh. to room)
✓ 26	1		large framed Picture (from floor into Master Bed room)
TOTAL PACKAGE WEIGHT			

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I hereby acknowledge that the above list represents all property impounded by me in the official performance of my duty as a police officer.

SIGNATURE _____ DATE _____ SIGNATURE  ID# **7915** UNIT **D2**

RECEIVED BY	REASON	DATE/TIME RECEIVED

PROPERTY RECEIPT
SEARCH WARRANT RETURN

DETECTIVE BUREAU

BPBD Form #52

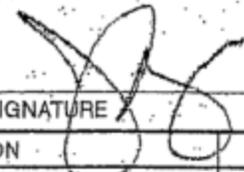
<input type="checkbox"/> PROPERTY	<input type="checkbox"/> FOUND	<input type="checkbox"/> DECEASED (Probated)	<input type="checkbox"/> PERSONAL	<input type="checkbox"/> CONFISCATED	<input type="checkbox"/> DESTROY
<input checked="" type="checkbox"/> EVIDENCE	<input checked="" type="checkbox"/> TRIAL	<input type="checkbox"/> LABORATORY	<input type="checkbox"/> STOLEN/RECOVERED	<input type="checkbox"/> OTHER	lab
INCIDENT/CITATION NUMBER 05-368	DATE/TIME RECOVERED 10-20-05	PROPERTY NUMBER (Leave Blank) 05-1024	BIN NUMBER (Leave Blank)		
ADDRESS WHERE PROPERTY IMPOUNDED 358 EL Brillo					
DISCOVERED BY / D.O.B.	ADDRESS	Street	City	Zip	PHONE NUMBER
OWNER / VICTIM'S NAME / D.O.B.	ADDRESS	Street	City	Zip	PHONE NUMBER
SUSPECT'S NAME / D.O.B. 01-20-53	ADDRESS	Street	City	Zip	PHONE NUMBER
ADD'L SUSPECT / D.O.B.	ADDRESS	Street	City	Zip	PHONE NUMBER
SPECIAL INSTRUCTIONS				FOUND PROPERTY 90 DAYS	CLAIM <input type="checkbox"/> NOT CLAIM <input type="checkbox"/>

ITEM#	QUANTITY	VALUE	DESCRIPTION
27	1	✓	SCHOOL TRANSCRIPT, ALEXANDER HALL, MASTER BEDROOM DESK
28	1	✓	BOTTLE OF JOY JELL MASTER BEDROOM CROWNZA MASTER BEDROOM (2)
29	3	✓	VIDEOTAPES 1/2", SEX IN CITY, EAT IN JANINE, HOWE LE SBIANS FOUR, MASTER R. Bedroom
30	6	✓	FRAMED PHOTOS FROM MEN'S BATHROOM - MASTER BEDROOM
31	1	✓	GREEN MASSAGE TABLE, MEN'S BATHROOM - MASTER BEDROOM → DNA test 3 Greg
32	1	✓	THRIFTY RENTAL AGREEMENT FROM CHEVROLET SUBURBAN (COPIED)
33	1	✓	NOTE FROM JOHANNIA FROM CHEVROLET SUBURBAN
34	11	✓	CD'S from office of kitchen
35	6	✓	ZIP CD'S from Book case RETURN
36	2	✓	8mm Video tapes from Book case RETURN
37	4	✓	Compact flash cards from Book case RETURN
38	1	✓	Flash card from camera on book case - RETURN TO OWNER
39	3	✓	ZIP CD'S from Book case RETURN
40	30	✓	CD'S from Book case (items 35-40 from guest house) RETURN
TOTAL PACKAGE WEIGHT			1

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SIGNATURE  ID# 715 UNIT D2

RECEIVED BY	REASON	DATE/TIME RECEIVED

LM BEACH POLICE DEPARTMENT
PROPERTY RECEIPT

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DETECTIVE BUREAU

FBPD Form #52

SEARCH WARRANT RETURN

<input type="checkbox"/> PROPERTY	<input type="checkbox"/> FOUND	<input type="checkbox"/> DECEASED (Probated)	<input type="checkbox"/> PERSONAL	<input type="checkbox"/> CONFISCATED	<input type="checkbox"/> DESTROY
<input checked="" type="checkbox"/> EVIDENCE	<input checked="" type="checkbox"/> TRIAL	<input type="checkbox"/> LABORATORY	<input type="checkbox"/> STOLEN/RECOVERED	<input type="checkbox"/> OTHER	Lab
INCIDENT/CITATION NUMBER 05-368	DATE/TIME RECOVERED 10-20-05	PROPERTY NUMBER (Leave Blank) 05-1024	BIN NUMBER (Leave Blank)		
ADDRESS WHERE PROPERTY IMPOUNDED 258 El Brillo					
DISCOVERED BY / D.O.B.	ADDRESS	Street	City	Zip	PHONE NUMBER
OWNER'S NAME / D.O.B.	ADDRESS	Street	City	Zip	PHONE NUMBER
SUSPECT'S NAME / D.O.B. Epstein, Jeff 01-20-53	ADDRESS	Street	City	Zip	PHONE NUMBER
ADD'L. SUSPECT / D.O.B.	ADDRESS	Street	City	Zip	PHONE NUMBER
SPECIAL INSTRUCTIONS				FOUND PROPERTY	CLAIM <input type="checkbox"/>
				90 DAYS	NOT CLAIM <input type="checkbox"/>

ITEM #	QUANTITY	VALUE	DESCRIPTION
41	11	✓	Floppy disks from desk middle shelf RETURN
42	1	*	ZIP Drive disk from guest room RETURN
43	1		Power Cord for CPU from guest room
44	1		CPU from Guest Bedroom
45	10	✓	8mm video Tapes in Guest Bedroom RETURN
46	1	✓	maxell CD-R in guest bedroom RETURN
47	10	*	Disks in clear Box RETURN (COPIES)
48	7		ZIP Disks from guest room RETURN
49	1		items # 35-48 from guest bedroom RETURN
50	1		message book from guest house office RETURN
51	2		message book RETURN
52	6		Compact flash cards from RETURN
53	1		CD's return #49-51 from office RETURN
			CPA from guest house office RETURN

TOTAL PACKAGE WEIGHT

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SIGNATURE

DATE

SIGNATURE

ID#

UNIT

RECEIVED BY

REASON

DATE/TIME RECEIVED

[Handwritten Signature]

7915 D2

**PALM BEACH POLICE DEPARTMENT
PROPERTY RECEIPT**

PAGE 5 of 6
DETECTIVE BUREAU

PBPD Form #52

SEARCH WARRANT RETURN

<input type="checkbox"/> PROPERTY	<input type="checkbox"/> FOUND	<input type="checkbox"/> DECEASED (Probated)	<input type="checkbox"/> PERSONAL	<input type="checkbox"/> CONFISCATED	<input type="checkbox"/> DESTROY
<input checked="" type="checkbox"/> EVIDENCE	<input checked="" type="checkbox"/> TRIAL	<input type="checkbox"/> LABORATORY	<input type="checkbox"/> STOLEN/RECOVERED	<input type="checkbox"/> OTHER	Lab
INCIDENT/CITATION NUMBER 05-368	DATE/TIME RECOVERED 10-20-05	PROPERTY NUMBER (Leave Blank) 05-1024	BIN NUMBER (Leave Blank)		

ADDRESS WHERE PROPERTY IMPOUNDED
358 EL Brillo Palm Beach

DISCOVERED BY / D.O.B.	ADDRESS <i>Street City Zip</i>	PHONE NUMBER
OWNER'S NAME / D.O.B.	ADDRESS <i>Street City Zip</i>	PHONE NUMBER
SUSPECT'S NAME / D.O.B. 01-20-5 Epstein, Jeff	ADDRESS 358 EL Brillo	PHONE NUMBER
ADD'L. SUSPECT / D.O.B.	ADDRESS <i>Street City Zip</i>	PHONE NUMBER

SPECIAL INSTRUCTIONS: FOUND PROPERTY 90 DAYS CLAIM NOT CLAIM

ITEM #	QUANTITY	VALUE	DESCRIPTION	RETURN
54	1		Power cord to CPU (#53)	Return
55	1	*	CPU from office off kitchen (Haly + (Julie Brabon)	Returned
56	1		Power cord to item #55	
57	3		CD'S Whum #55-57 from office off kitchen	Return
58	1	*	Peach message table upstairs	RETURN
				RETURN
TOTAL PACKAGE WEIGHT				

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SIGNATURE	DATE	SIGNATURE	ID#	UNIT
RECEIVED BY	REASON	DATE/TIME RECEIVED		

