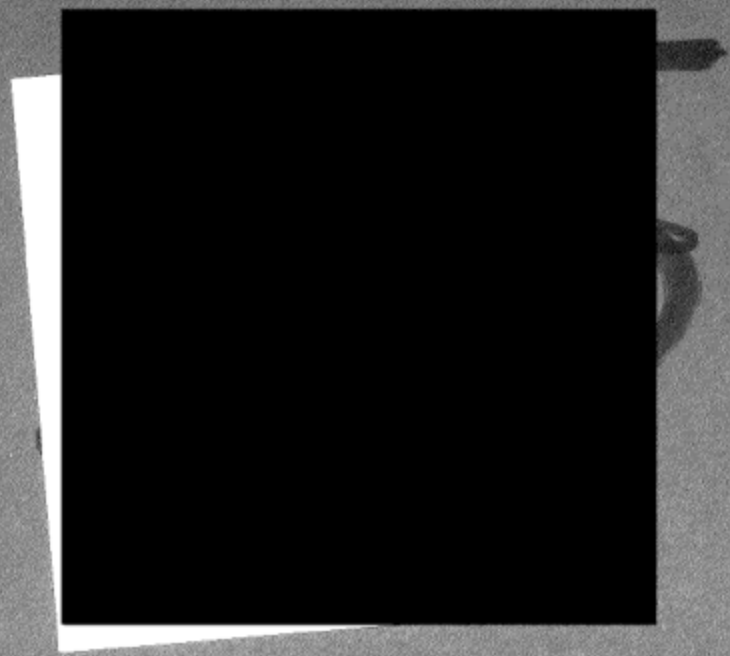
PALM BEACH POLICE / SAO RECORDS



EFTA00231917

PROBABLE CAUSE AFF.

EFTA00231918

Probable Cause Affidavit

Palm Beach Police Department

Agency ORI# FLO 500600

Police Case#: 05-368 (1)

Defendant: **Jeffrey Epstein**
Race/Sex: **White Male**
DOB: [redacted]
Charges: **Unlawful Sexual Activity with a Minor (4) counts**
Lewd and Lascivious Molestation

From March 15, 2005, through February 2006, the Palm Beach Police Department conducted a sexual battery investigation involving Jeffrey Epstein, [redacted] and [redacted] Sworn taped statements were taken from five victims and seventeen witnesses concerning massages and unlawful sexual activity that took place at the residence of Jeffrey Epstein, 358 El Brillo Way, Palm Beach. Several of the victims were recruited by and brought to the residence by [redacted] to perform massages for Epstein, for which [redacted] received monetary compensation. During the visit they would be introduced to [redacted] Epstein's assistant, who in turn would record their telephone numbers and name. The victims would be brought to Epstein's bedroom to provide the massage. Epstein would enter the room and order the victims to remove their clothing to provide the massage. As the victims complied and provided the massages, Epstein would rub his fingers on their vaginas. On occasion, Epstein would introduce a massager/vibrator and rub the victims vaginas as they provided the massage. On three separate occasions, Epstein had intercourse and inserted his penis/fingers in the victims vaginas. At the conclusion of the massages the victims were paid sums of money ranging from $200 - $1,000. The facts, as reported, are as follows:

On 03/15/2005, A fourteen year old white female, hereinafter referred to as [redacted] and her family reported unlawful sexual activity which occurred at a residence within the Town of Palm Beach. [redacted] reported that a subject known to her as "Jeff" had touched her vaginal area with a vibrator/massager while within his residence. "Jeff" was later identified as Jeffrey Epstein through a photo line up.

During a sworn taped interview, [redacted] stated that [redacted], a cousin of [redacted] boyfriend and classmate at [redacted] High School, worked for a wealthy man and did sexual favors for him. She also admitted that [redacted] had offered her an opportunity to make money. During the beginning of the month of February 2005, [redacted] explained that she was first approached by [redacted] to go with her to Epstein's house. [redacted] stated that [redacted] along with a Hispanic female, later identified at [redacted], pick her up at her father's house on a Sunday. [redacted] was not sure of the exact dates but knew it was a Sunday. [redacted] told her father that they were going shopping but in reality [redacted] drove them to Palm Beach. During the drive a

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State of Florida
County of Palm Beach

Signature/Arresting Officer

Signature of Police Officer (F.S.S. 117.10)

Date: 05/01/2006

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conversation occurred between [redacted] and [redacted] whereas [redacted] reportedly told [redacted] that if Jeff asked her age, she should say she was eighteen. It was later confirmed by the [redacted]'s father that [redacted] picked his daughter up on February 6, 2005. According to [redacted]'s father, [redacted] drove a pick up truck.

[redacted] described Epstein's house as a two-story pink house with a Cadillac Escalade parked in the driveway. She recalled that Jeff's house was on a dead end street. Upon arriving at the house [redacted] stated that they walked up a driveway, past what appeared to be a small guard/security room. A male approaching them asking what they wanted. [redacted] stated they were there to see Epstein. The male allowed them to continue walking up to the house. [redacted] stated the man told them that Epstein was not there but was expected back. He allowed them to enter the house, via the kitchen. He offered them something to drink while they waited inside. Shortly thereafter, Epstein and his assistant, described as white female with blond hair and later identified as [redacted] entered the kitchen. Epstein introduced himself to [redacted] [redacted] described Epstein as being approximately forty-five years old, having a long face and bushy eyebrows, with graying hair.

[redacted] and Epstein left the kitchen leaving [redacted] alone in the kitchen. They returned a short time later. They all spoke briefly in the kitchen. [redacted] was instructed to follow [redacted] upstairs. [redacted] recalled walking up a flight of stairs, lined with photographs, to a room that had a massage table in it. Upon entering the room there was a large bathroom to the right and a hot pink and green sofa in the room. There was a door on each side of the sofa. [redacted] recalled there being a mural of a naked woman in the room, as well as several photographs of naked women on a shelf. [redacted] told the victim that Epstein would be up in a second.

Epstein entered the room wearing only a towel and told [redacted] to take off her clothes. [redacted] stated Epstein was stern when he told her to take off her clothes. [redacted] said she did not know what to do as she was the only one there in the room so she took off her shirt leaving her bra on. Epstein had removed his towel and told the [redacted] to take off everything. [redacted] stated Epstein was nude when he took his towel off, placing it on the floor as he laid down on the table. [redacted] stated she then removed her pants leaving her thong panties on. Epstein then instructed her to give him a massage pointing to a specific lotion for her to use. As [redacted] began to give Epstein the massage, he told her to get on his back. [redacted] stated she straddled herself on Epstein's back whereby her exposed buttocks were touching Epstein's bare buttocks. [redacted] said Epstein was specific in his instruction to her on how to massage him, telling her to go clockwise or counter clockwise. Epstein then turned over and instructed [redacted] to massage his chest. [redacted] was now standing on the ground and resumed massaging Epstein's chest area. [redacted] stated Epstein held onto the small of her back as she massaged his chest and shoulder area. Epstein then turned to his side and started to rub his penis in an up and down motion. Epstein then pulled out a purple vibrator and began to

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massage [redacted]'s vaginal area. [redacted] stated there was no penetration as the vibrator was on top of her underwear. [redacted] recalled Epstein ejaculating because he had to use the towel to wipe himself as he got off the table. Epstein then left the room and [redacted] got dressed. She went back downstairs where she met with [redacted]. [redacted] said she was paid three hundred dollars in cash from Epstein. Before she left, Epstein asked [redacted] to leave her phone number. As [redacted] and [redacted] were leaving the house, [redacted] told [redacted] she received two hundred dollars that day for bringing her.

During the course of the investigation, parental consent was granted for [redacted] to assist with the investigation. At our direction [redacted] conducted controlled taped phone calls to [redacted]'s cellular telephone 561-[redacted]. [redacted] spoke with [redacted] in an attempt to arrange another meeting with Epstein. [redacted] asked [redacted] what did she need to do to make more money. [redacted] stated, "the more you do, the more you get paid." [redacted] had subsequently called back [redacted] and left a voice mail message for her indicating that she had set up an appointment for [redacted] to go to Epstein's house at 11:00 am on April 5, 2005. This message was recorded from [redacted] voice mail.

Based on the above, trash pulls were established at Epstein's residence with Supervisor Tony Higgins of the Sanitation Bureau of the Town of Palm Beach. The trash pull from April 5, 2005 revealed a telephone message for Epstein which stated [redacted] and [redacted] name at 11:00 am. This was the time frame [redacted] had informed [redacted] to be ready to go work at Epstein's house.

On October 3, 2005, Sgt Frick and I went to [redacted]'s residence and viewed her vehicle parked in the driveway, a red Dodge Neon. Sgt. Frick and I knocked on the door and met with [redacted] [redacted] was told that we were investigating a claim involving Jeffrey Epstein of El Brillo Way, in Palm Beach. [redacted] was asked if she would accompany us back to the police station for further questioning. She was also told that at the conclusion of the interview she would be returned home. [redacted] voluntarily came with us back to the Palm Beach Police Department.

Upon our arrival at the police station, [redacted] was brought to the interview room in the Detective Bureau where I obtained a taped, sworn statement. I began the interview by asking [redacted] how she became acquainted with Epstein. [redacted] stated that approximately two years ago, just after she turned 17 years of age, she was approached by a friend named [redacted] at the Canopy Beach Resort in Rivera Beach. [redacted] was asked if she wanted to make money. She was told she would have to provide a massage and should make $200.00. [redacted] thought about the offer and agreed to meet with Jeffrey.

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[redacted] (Unknown last name) and [redacted] (Unknown last name) picked [redacted] up and she was taken to Epstein's house. Upon her arrival to the house she was introduced to Epstein in the kitchen of the house. She was also introduced to a white female known to her as [redacted] She was led upstairs to the main bedroom known to her as Jeff Epstein's bedroom. [redacted] arranged the massage table and covered the table with a sheet. She brought out the massage oils and laid them next to the massage bed. [redacted] then left the room and informed [redacted] Jeff would be in, in a minute. Jeff entered the bedroom wearing only a towel. He removed the towel and laid nude on the massage table. He laid on the table onto his stomach and picked a massage oil for [redacted] to rub on him. During the massage, [redacted] stated "He tried to touch me and I stopped him." I asked how he tried to touch her. [redacted] stated that Epstein grabbed her buttocks and she felt uncomfortable. [redacted] told Epstein, I'll massage you but I don't want to be touched. [redacted] stated she performed the massage naked. At the conclusion of the massage, Epstein paid [redacted] $200.

After the massage Epstein stated to [redacted] that he understood she was not comfortable, but he would pay her if she brought over some girls. He told her the younger the better. [redacted] stated she once tried to bring a 23 year old female and Epstein stated that the female was too old. [redacted] stated that in total she only remembers six girls that she brought to see Epstein, each time she was paid $200. [redacted] stated she had brought the following girls: [redacted] said that at the time she brought these girls to Epstein's house they were all14 through 16 years of age. I asked [redacted] which one was the youngest. [redacted] advised [redacted] was the youngest as she was fourteen when the massage occurred. [redacted] stated every girl she brought knew what to expect when they arrived. They were told they would provide a [redacted] possibly naked, and allow some touching. I asked her if [redacted] was aware. She stated every girl she brought knew what to expect. She explained she knew that [redacted] wanted to make money. She approached [redacted] nd explained about going to work for Jeff, [redacted] agreed and arrangements were made to bring her to Epstein's house on a weekend. [redacted] stated that she and [redacted] (Later identified as [redacted] picked up [redacted] at her house. [redacted] stated that at that time she was driving a red pickup truck. They traveled to Epstein's house and entered through the kitchen door. They met with the house chef and Epstein's assistant [redacted] [redacted] was introduced to Epstein while they were in the kitchen area. [redacted] led [redacted] upstairs and Epstein went upstairs. When the massage was over [redacted] returned to the kitchen area. [redacted] stated she was paid $200.00 for bringing [redacted] to Epstein's house. [redacted] stated [redacted] told her she was paid $300.00 for the massage.

[redacted] stated that [redacted] was the last person she brought to Epstein's house. She had changed her cellular number to avoid being contacted by [redacted] She continued stating that she had no direct contact with Epstein

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EFTA00231922

when he was going to travel to Palm Beach. [redacted] said when Epstein announces to his assistant, [redacted], that he is traveling to Palm Beach, [redacted] would then contact [redacted] to arrange girls to "work" for Epstein. [redacted] stated that once her parents discovered that she was visiting Epstein, they disapproved of the encounters with him and she stopped. [redacted] further stated that [redacted] still tries to call [redacted] house and leaves messages.

Sgt Frick entered the room and explained to [redacted] that based on her own statements, she had implicated herself by bringing underage girls to Epstein's house. [redacted] provided cellular telephone numbers for the girls she had mentioned previously. Additionally, she also provided possible addresses and areas in which they lived.

As [redacted] was being taken home in the vehicle, a tape recorder was placed within the vehicle to record any conversations within the vehicle. During the drive back to her home, [redacted] made the comment " I'm like a Heidi Fleiss." (Hollywood Madam who sent girls to clients for sexual favors in California). [redacted] was dropped off at her house without incident.

On October 3, 2005, Sgt Frick and I went to speak with [redacted], a sixteen year-old female who was brought to Epstein's residence by [redacted] We met with [redacted] mother at their front door. We explained the ongoing investigation and asked to speak with [redacted] as we had information that she had "worked" for Jeff. Mrs. [redacted] introduced us to her husband and allowed us entry into the home. We sat in the dining room and met with [redacted] As she was under the age of eighteen, Mrs [redacted] was advised we would be speaking with her. She expressed if her daughter had information, she wanted to assist. We interviewed [redacted] who denied having any inappropriate encounters with Jeff (Epstein). She stated she had gone to Jeff's house with [redacted] approximately eight months ago and sat in the kitchen with the house chef, but nothing happened. As the parents were present during the interview, we felt that [redacted] was withholding information from us. She made several comments as to putting the entire incident behind her. I left my telephone number and advised should she wish to speak with me again to telephone me. Sgt Frick and I thanked Mrs. [redacted] for her time and left the area. She stated she would ask [redacted] again after we left as to what happened at Epstein's house. I informed her that [redacted] had my telephone number and hopefully she would call.

On October 4, 2005, Det Dawson and I drove to the [redacted] home and met with [redacted] and [redacted] During a sworn taped statement, [redacted] stated [redacted] a year ago when she was seventeen years old, she was taken to a house by [redacted] stated she knows [redacted] because they both attend [redacted] High School. She was told she could make money working

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for Jeff. She was told she would have to provide a massage to Jeff. [redacted] stated upon her arrival to the house she was brought to the kitchen area by [redacted] They met with the house chef who was already in the kitchen area. [redacted] stated [redacted] would wait for her in the kitchen. [redacted] was introduced t[redacted] Jeff's assistant, who brought her upstairs to the master bedroom. [redacted] prepared the room and massage table for a massage. Epstein entered the room wearing only a towel and she provided a massage. [redacted] stated she kept her clothes on during the massage. She advised sometime during the massage, Epstein grabbed her buttocks and pulled her close to him. [redacted] said she was uncomfortable by the incident involving Jeff. At the conclusion of the massage, she was paid $200.00 for the massage. I asked [redacted] if she has any formal training in massages to which she replied no. I asked her if [redacted] received any monies for taking her to perform the massage. [redacted] stated [redacted] had received money for taking her there but was unsure in the amount. [redacted] stated she returned to Epstein's house on another occasion with [redacted] and another girl, [redacted] stated she waited in the kitchen with [redacted] while [redacted] was taken upstairs by [redacted] stated she only did the massage once as she was uncomfortable with the whole experience.

At the conclusion of the interview, the tape was stopped. I was informed that [redacted] had attempted to reach [redacted] via cell phone. A voice mail message on October 4, 2005 at 10:59 am, revealed a female voice who identified herself as [redacted] who requested [redacted] to call her back reference the police questioning. [redacted] provided the incoming telephone number as [redacted] stated she inadvertently told [redacted] about the police investigation because [redacted] had called her to tell her about how she just received a rental car from Jeff Epstein. [redacted] had called her to tell her that she was given a rental car, a 2005 Silver Nissan Sentra, to utilize to visit family and visit Epstein. [redacted] asked her what was going on at the house that the police would be asking questions. [redacted] stated [redacted] then called Jeff and [redacted] and asked what was going on reference the ongoing police investigation. According to [redacted], [redacted] has since then been trying to contact her to ask about the police questions. I instructed [redacted] not to contact [redacted] and do not provide any more information to [redacted] as she would notify Jeff Epstein and [redacted] what was transpiring.

On October4, 2005, I made telephone contact with [redacted] who had left several messages for me to contact her. During the message, she advised she was not completely truthful when we met in person but would like to speak with me to advise what had happened. She further advised she did not want to speak of this incident in front of her mother. At approximately 3:48 pm I made telephone contact with [redacted] During a taped recorded statement [redacted] stated the following: approximately a year ago, when she was sixteen years of age, [redacted] took her to Epstein's house twice. She knows [redacted] because they both attend [redacted] High School. The first time she went, [redacted] drove to the house. They entered through the kitchen area where she was

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EFTA00231924

introduced to [redacted] and Epstein. She was taken upstairs to a bedroom by [redacted] who set the room up with a massage bed and brought out the oils to use. Epstein then entered the room wearing a towel. He laid on the table and picked out a lotion for [redacted] to rub on him. At one point during the massage he tried to remove her shirt, at which point she became very upset and discontinued the massage. Both [redacted] and Epstein had a verbal disagreement, at which time she left without being paid. She got with [redacted] who was sitting in the kitchen and told her "let's go." [redacted] advised she received no money for that day. [redacted] also said that [redacted] had told her if she was uncomfortable with what was going on, to let him know and he'll stop. She knew that the more you do the more you get paid. [redacted] advised that several weeks later she agreed to be taken a second time by [redacted] Once they arrived at the residence, [redacted] sat in the kitchen and [redacted] took her upstairs to the master bedroom again. [redacted] set the room up with a massage bed and brought out the oils to use. Epstein then entered the room wearing a towel. He laid on the table and picked out a lotion for [redacted] to rub on him. At one point during the massage he tried to touch her buttocks. As [redacted] was wearing tight jeans and had a tight belt on Epstein was unable to touch her buttocks. Epstein then rolled onto his back during the massage and then attempted to touch her breasts. [redacted] then became upset again and told Epstein she didn't want to be touched. [redacted] discontinued the massage and was paid $200.00. [redacted] then went downstairs where [redacted] was waiting for her. She told [redacted] she wanted to leave. [redacted] said she never returned to the house. [redacted] stated she is aware that her friend, [redacted] was also at the house and had a problem with Epstein.

I later researched [redacted] and met with her at her residence. During a sworn taped statement, [redacted] stated the following: on or about November 2004, she was approached at [redacted] High School by [redacted], a fellow student. [redacted] asked [redacted] if she wanted to make money. She agreed and was told she would provide a massage to wealthy man in Palm Beach. [redacted] picked her up and drove her to a house in Palm Beach. She was brought into the kitchen area of the house. She further stated that fellow [redacted] High School students [redacted] and [redacted] came with them. They were brought into the kitchen where she was introduced to Epstein and other females. [redacted] stated she was introduced to a female helper of Epstein, the female was described as white female (unknown name), with blond hair. She stated that the assistant was familiar with [redacted] The assistant brought her upstairs into a master bedroom area. The assistant set up the massage table and put out lotions to be used. She told [redacted] Epstein would be available in a minute. Epstein entered the room wearing only a towel. Epstein removed his towel, and laid naked on the massage table and picked a lotion to rub on his thighs and back. [redacted] further stated during the massage, Epstein asked her to remove her clothes. She complied and removed her pants and blouse. [redacted] didn't remember if she had removed her bra but feels that she did. [redacted] was certain that she stayed in her thong underwear. [redacted] continued the massage and at one point she climbed onto the massage

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table, straddling Epstein to massage his back. While doing this her buttocks were touching Epsteins. [redacted] was instructed to return to the ground at which time Epstein turned to have his chest rubbed. [redacted] advised she was sure he was masturbating based on his hand movements going up and down on his penis area. [redacted] did not want to look at his penis area because she was uncomfortable. Epstein removed a large white vibrator which was next to the massage table and turned it on. [redacted] stated Epstein began rubbing the vibrator over her thong underwear on her vaginal area. Shortly thereafter, Epstein ejaculated and removed himself from the table. He walked over to where the shower was and opened the glass door. She waited as he was taking a shower in her direct view. When I asked [redacted] how old she was when this occurred, she stated she had just turned seventeen. At the conclusion of the shower, [redacted] was paid either $350.00 or $400.00. She stated she wasn't sure, but knows it was close to $400.00. [redacted] stated she never returned to provide a massage for Epstein.

At approximately 2:10 pm, Det Dawson and I met with [redacted] at her residence. As [redacted] was only seventeen years of age, I had notified her mother, that she would be interviewed reference an ongoing investigation in Palm Beach. I assured her that her daughter was not a suspect. I explained the possibility of her being either a witness or victim. Mrs [redacted] advised she wanted [redacted] to cooperate and consented to the interview.

During a sworn taped statement, [redacted] stated the following: at the age of sixteen, during the month of September 2004, she was approached by [redacted] for a chance to make money. [redacted] was friends with associates of [redacted] and knew the same people. [redacted] had been previously told by her friends from [redacted] [redacted] High School, what [redacted] did for Epstein. [redacted] called a person known to [redacted] as [redacted] and scheduled the appointment. [redacted] picked [redacted] up and drove her to Palm Beach to a street called "Brillo Way". They drove to the end of the street and entered a large driveway. They entered the kitchen area of the house and met with Epstein. [redacted] was introduced to Jeff Epstein. [redacted] led [redacted] upstairs to the main bedroom area and set up the room with a massage table and set out the oils. [redacted] stated that while going up the stairs and into the bedroom she observed numerous photographs of naked young girls. [redacted] dimmed the lights and turned on soft music. [redacted] exited the room and Epstein entered the room wearing only a towel. Epstein picked oils and instructed her to rub his legs, under his buttocks, back and chest area. Epstein asked her to get comfortable. [redacted] advised she did not remove her clothes. She was wearing tight jeans and a cropped tank top exposing her belly area. During the massage, Epstein removed his towel and laid on the massage table naked. As [redacted] rubbed Epstein's chest area, he attempted to reach down her pants to touch her buttocks area however was unable to due so due to the tightness of the jeans and a tight belt. [redacted] advised Epstein began to masturbate as she rubbed his chest. Epstein moaned as she rubbed his chest. She observed he was continuing to masturbate and

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attempted to reach up her tank top and touch her breasts. [redacted] pulled back and Epstein stopped, however he kept masturbating until he climaxed. He cleaned himself with the towel he was previously wearing. [redacted] was paid $200.00 for the massage and left the area. She met with [redacted] who was waiting in the kitchen area and left the house.

[redacted] hen explained she never provided another massage for Epstein. She did however, go to the house with [redacted] and [redacted] as they took another friend of [redacted] advised she was present when [redacted] went to work for Epstein. She advised she rode over and sat in the kitchen area with [redacted] to wait for [redacted] advised while they waited for [redacted] the house chef prepared lunch for them as it was almost lunchtime when they went. When [redacted] was finished with the massage they left the area. I asked [redacted] if [redacted] ever told her what would be expected when she provided a massage. [redacted] stated yes, [redacted] told her that a massage would be expected, possibly naked and possibly some touching involved. [redacted] has no formal training in providing massages. [redacted] spoke about a third and last time she went to Epstein's house. [redacted] drove another girl, [redacted] (sixteen years of age) who is [redacted] friend, to Epstein's house. [redacted] stated [redacted] knew that [redacted] had made money massaging Epstein and wanted to make money herself. [redacted] took them in the kitchen area of the house and introduced [redacted] to [redacted] and [redacted] took [redacted] upstairs to the main bedroom. [redacted] advised she doesn't know what happened as [redacted] did not speak about what happened in the room. [redacted] received $100.00 from [redacted] for going with her to Epstein's house and recommending [redacted]

On October 6, 2005, at 11:45 am, I met with [redacted] at Lynn University and explained to her why we there to interview her. She advised she was aware of the ongoing investigation. [redacted] stated she had previously spoken with [redacted] who told her she was interviewed by detectives. During a sworn taped statement, [redacted] stated she knew that [redacted] worked for Jeff Epstein in Palm Beach. [redacted] advised she originally had been taken to the Epstein house by [redacted] whom she met when they both attended [redacted] High School. She began going to the house when she was sixteen years of age and stated she had been there a lot of times to provide massages over the past two years. I asked her if she had formal training in providing massages, which [redacted] stated she had not. [redacted] advised she was told what was expected of her by providing massages and she would have to remove clothing but if she felt uncomfortable just to say so and Epstein would stop pushing the issue. [redacted] began providing massages and advised she kept her clothes on. She considered Epstein a pervert and he kept pushing to go further and further. [redacted] explained she would keep telling him she had a boyfriend and would not be right to her boyfriend. It wasn't until recently that [redacted] began removing her clothes and staying in her thong underwear to provide a massage. [redacted] explained

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Epstein wanted to be rubbed on his back and recently he began turning over and have her rub his chest as he masturbated. He would try to touch her breasts as she rubbed his chest. [redacted] stated "Jeff would try to get away with more and more on each massage". [redacted] stated Epstein would try to touch her more and on one occasion he attempted to use a massager/vibrator on her. [redacted] drove [redacted] to the house for the original massage. [redacted] left [redacted] her cell phone number and every time Epstein would come into town [redacted] would call her for an appointment to "work". Each time she went, [redacted] would meet her at the kitchen door area. She would bring her upstairs and prepare the massage table. [redacted] advised Epstein would ask her questions about herself. Epstein knew she was a soccer player and would be attending Lynn University. I asked [redacted] if Epstein knew her real age. [redacted] stated Epstein did and didn't care. The most recent massage she provided was on October 1, 2005. During the massage, she asked Epstein if she could borrow one of his vehicles to visit her family and boyfriend in Orlando, Florida. Epstein had told her she could borrow one of his vehicles but later stated he would rent her a car. She continued with the massage as Epstein grabbed her buttocks and caressed the buttocks cheeks. I asked [redacted] if she was wearing undergarments to which she replied her thong underwear. Once he tried to touch her breasts, she would pull away from him and he would stop. [redacted] was asked if he ever used a vibrator on her. [redacted] was aware of the vibrator but advised she never would allow him to use the vibrator on her. She described the vibrator as the large white vibrator with a huge head on the tip of the vibrator. She stated he kept the vibrator in a closet near the massage table.

[redacted] stated that on October 3, 2005, she was contacted by Epstein's assistant [redacted] who informed her that Jeff Epstein had rented her a new Nissan Sentra and she should come by the house to pick it up. [redacted] informed [redacted] she would have the car for a month. [redacted] stated Epstein knew her car was not working properly and that she had missed appointments in the past because of her car being inoperable. [redacted] explained the car is currently parked next to the Lynn University Gym field. I asked her if she ever took any one to the house. [redacted] explained she took [redacted] a friend of hers who attended Royal Palm Beach High School, who has relocated to Orlando to attend college. I asked if she ever allowed another female in the room. [redacted] advised no one was brought into the room with her.

At the conclusion of the interview, Det Dawson and I went to the gym area of Lynn University and located the Silver Nissan Sentra bearing Florida tag [redacted]. The vehicle is registered to Dollar Rent a Car out of the Palm Beach International Airport. The vehicle was rented by Janusz Banasiack, later learned to be Epstein's houseman, and paid with Epstein's credit card.

On September 11, 2005, w/f [redacted] was arrested by the Palm Beach Police Department

The foregoing instrument was sworn to or affirmed before me this 1st day of May, 2006 by Det Joe Recarey, who is personally known to me.

State of Florida
County of Palm Beach

Signature/Arresting Officer

Signature of Police Officer (F.S.S. 117.10)

Date: 05/01/2006

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for misdemeanor possession of marijuana. During the arrest [redacted] told the arresting officer that she had information about sexual activity taking place at the residence of Jeffrey Epstein. Additionally, during the ongoing trash pulls from Epstein's residence, discarded papers were found which contained [redacted] name and cell phone number.

On October, 11, 2005, Det Dawson and I met with [redacted] and obtained a sworn taped statement. [redacted] explained she had been going to Epstein's house since 2002, when she was sixteen years of age. Since then she has gone to the house hundreds of times. [redacted] stated she became his "number one girl." She explained that on her first visit she was brought to the house by fellow [redacted] School classmate, [redacted] said she was brought through the kitchen area where she met [redacted] for the first time. [redacted] was led to the master bedroom, Epstein s room. [redacted] explained that as she was walking up the stairs she observed several photographs of naked women along the walls and tables of the house. [redacted] further explained that she was brought into the bedroom, where [redacted] prepared the room by setting up the massage table and provided the oils for her to rub on Epstein. [redacted] explained she remembered the steam room area, which contained two large showers. Epstein entered the room from the steam room area and introduced himself. Epstein lay on the table and told her to get comfortable. [redacted] removed her skirt and kept her shirt on. Epstein then instructed her to remove her shirt. [redacted] removed her shirt and remembered she was not wearing a bra. [redacted] stated she provided the massage wearing only her panties. She continued rubbing his legs, thighs and feet. [redacted] advised he turned over onto his back. Epstein touched her breasts and began to masturbate. Epstein ejaculated which meant the massage was over. At the conclusion of the massage, [redacted] was paid $200.00. They walked together downstairs where [redacted] and [redacted] were waiting. [redacted] stated [redacted] received an unknown amount of money for taking her to Epstein. Epstein instructed to leave her cellular telephone number so that he could contact her when he is in town.

[redacted] stated that during her many visits a routine was established between her and Epstein. She would enter the house and get naked in the bedroom. She would then start with a back massage. Epstein would roll on to his back and allow her to massage his chest area. [redacted] stated Epstein would then began to masturbate himself and at the same time would insert his fingers in her vagina and masturbate her with his fingers. [redacted] explained Epstein would continue this process until he ejaculated. He would then utilize a vibrator/massager on her vagina until [redacted] climaxed. [redacted] advised that during her frequent visits, Epstein asked for her real age, [redacted] stated she was sixteen. Epstein advised her not to tell anyone her real age. [redacted] advised that things escalated within the home as Epstein would instruct and pay [redacted] to have intercourse with his female friend, [redacted]. [redacted] explained the intercourse included using strap on dildos, large rubber penis' and other devices that Epstein had at his disposal. Epstein would watch them have intercourse and masturbate himself . Occasionally, Epstein would then join in

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during the female on female intercourse and provide oral sex to both [redacted] and [redacted] This occurred during the time [redacted] was sixteen years of age.

[redacted] advised this continued to escalate during two years. The routine became familiar to [redacted] Epstein's assistant [redacted] would telephone her every time Epstein was in the Town of Palm Beach and would place appointments for her to visit and work for Epstein. Each time something new was introduced, additional monies were produced and offered for [redacted] to allow the acts to happen. [redacted] consented to perform all these acts but was adamant that there was an understanding with Epstein that no vaginal penetration would occur with his penis. [redacted] explained that Epstein's penis was deformed. [redacted] explained that his penis was oval shaped. [redacted] claimed when Epstein's penis was erect, it was thick toward the bottom but was thin and small toward the head portion. [redacted] called Epstein's penis "egg-shaped." [redacted] stated Epstein would photograph [redacted] and her naked and having sex and proudly display the photographs within the home. [redacted] stated during one visit to Epstein's house in which she provided a massage to Epstein, his female friend, [redacted] was also present. [redacted] provided the massage in which [redacted] and her would fondle each others breasts and kiss for Epstein to enjoy. Towards the end of this massage, Epstein grabbed [redacted] and turned her over onto her stomach on the massage table and forcibly inserted his penis into her vagina. [redacted] stated Epstein began to pump his penis in her vagina. [redacted] became upset over this. She said her head was being held against the table forcibly, as he continued to pump inside her. She screamed "No!" and Epstein stopped. She told him that she did not want to have his penis inside of her. Epstein did not ejaculate inside of her and apologized for his actions and subsequently paid her a thousand dollars for that visit. [redacted] stated she knows he still displays her photographs through out the house.

On October 12, 2005, Det Dawson and I met with [redacted] who stated during a sworn taped statement, that nothing happened between her and Epstein. [redacted] appeared nervous during the interview. I assured her that I have spoken with other people who advised differently. [redacted] stated on several occasions she provided a massage to Epstein. She stated she was brought to the Epstein house in March of 2005. [redacted] a classmate at [redacted] High School, approached her and asked her if she wanted to "work". [redacted] made the arrangements with [redacted] Epstein's assistant. [redacted] who has no formal training in providing massages, stated she provided a massage, fully clothed for $200.00 . As I sensed hesitancy in her answers, I asked [redacted] if she had been contacted by anyone from Epstein's organizations or his house. [redacted] stated she was interviewed already by a private investigator for Epstein. He identified himself as '[redacted] and inquired about the police investigation, and left his telephone number [redacted] for additional contact. [redacted] provided no additional information, as it appeared her responses were almost scripted.

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Date: 05/01/2006

EFTA00231930

Probable Cause Affidavit

Palm Beach Police Department

Agency ORI# FLO 500600

On November 6, 2005, at approximately 3:30 pm, I met with [redacted] at the Palm Beach Police Department. [redacted] was identified as a potential witness/victim through information obtained during the trash pulls. During the sworn taped statement, [redacted] advised she was at Jeffrey Epstein's house one time, approximately two months ago. She was approached by a girl, [redacted] who was dating [redacted] roommate, for an opportunity to make some quick money. [redacted] advised she needed to make some quick cash to make the rent that month. She agreed to go to the house. She had been told by [redacted] that the massage would have to be done in her underwear. She advised [redacted] drove with her and brought her into the house. They walked into the kitchen area, and took the stairs upstairs. [redacted] further stated she was brought into a master bedroom area. She advised she recalled seeing portraits of naked women throughout the room. A massage table was already out near the sauna/shower area in the master bedroom. Epstein entered the room wearing only a towel and introduced himself as "Jeff." At Epstein's direction, [redacted] and [redacted] removed their clothing down to their panties, Epstein laid on his stomach area and they provided a massage on his legs and feet area. I asked [redacted] if she had any formal massage training and she replied "no." [redacted] advised she was topless and the panties she wore were the boy shorts lace panties. She and [redacted] continued the massage until the last ten minutes of the massage, Epstein, told [redacted] to leave the room so that [redacted] could finish the massage. [redacted] got dressed, and left the room as Epstein turned over onto his back. Epstein then removed the towel and laid naked . Epstein requested that [redacted] rub his chest area. [redacted] stated as she did this, Epstein, began masturbating. [redacted] stated Epstein pulled down her boy short panties, and he produced a large white vibrator with a large head. She stated it was within his reach in a drawer in his master bathroom. He rubbed the vibrator on her vaginal area. [redacted] advised he never penetrated her vagina with the vibrator. He continued to rub her vagina with the vibrator as he continued to masturbate. [redacted] stated she was very uncomfortable during the incident but knew it was almost over. Epstein climaxed and started to remove himself from the table. He wiped himself with the towel he had on previously and went into the shower area. [redacted] got dressed and met with [redacted] in the kitchen area. Epstein came into the kitchen and provided [redacted] $200.00 for bringing [redacted] and paid $200.00 to [redacted] for providing the massage. [redacted] was told to leave her telephone number with [redacted] for future contact. [redacted] provided her cellular telephone number. [redacted] was asked if she was recently contacted about this investigation by anyone from the Epstein organization. She replied she was called but it was for work. She stated she was called by [redacted] for her to return to "work" for Epstein. [redacted] stated "work" is the term used by [redacted] to provide the massages and other things. [redacted] advised she declined as she was not comfortable in providing that type of "work."

On November 7, 2005, Det Sandman and I met with [redacted] During a sworn taped statement, [redacted] stated she met Jeffrey Epstein through [redacted] when they were still

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attending [redacted] High School. [redacted] would approach females who wished to work for Epstein. [redacted] stated she was offered to work for Epstein but declined. [redacted] explained that "work" means give massages. She was asked about any formal training in providing massages which she said "no." [redacted] said she accompanied [redacted] and other females who were taken to Epstein's house to provide massages. [redacted] further stated she had been to the house approximately 4 or 5 times in the past year. She accompanied [redacted] with [redacted] Each time the girls were taken over, they were previously told they would have to provide a massage, possibly naked. They were also told that should Epstein require them to do anything extra, and they were not comfortable just to tell him and he would stop. [redacted] stated [redacted] received $200.00 for each girl she brought over to massage Jeffrey Epstein. When I asked which girl appeared to be the youngest, she replied, [redacted] who was really young, fifteen years old at the most. [redacted] further stated each time she went to the house, she sat in the kitchen and waited with [redacted] until the massage was over. She further stated that the cook would make lunch or a snack for them as they waited. I asked her if there was anything that caught her attention within the home. [redacted] stated there were a lot of naked girls in photographs throughout the house.

On November 8, 2005, at approximately 2:00pm , I met with [redacted] at the Palm Beach Police Department. During a sworn taped statement, [redacted] stated she had met Epstein approximately two years ago when she was first approached by [redacted] a classmate at [redacted] High School. [redacted] approached her about working for Epstein and providing a massage to him for $200.00. [redacted] had made the arrangements however was unable to take her the day the arrangements were made. [redacted] had [redacted] take [redacted] also attended [redacted] High School and was familiar with Epstein. [redacted] recalled she was brought there and entered through the back kitchen door. She had met with an assistant [redacted] and another assistant [redacted] brought her upstairs as she observed several photographs of naked females throughout the house. [redacted] stated Epstein came in the room, wearing only a towel, and laid on the table. [redacted] stated he picked out the oils he wanted her to use and requested she remove her clothing to provide the massage. [redacted] stated that on the first massage she provided she did not remove her clothing. [redacted] stated she had returned several times after that. Each time she returned it was more than a massage. Epstein would walk into the master bedroom/bathroom area wearing only a towel. He would masturbate as she provided a massage. [redacted] stated she was unsure if he climaxed as he masturbated under the towel. Additionally, she never looked below his waist. She claimed that Epstein would convince her to remove her clothes. She eventually removed her clothes and stayed in her thong panties. On occasion, Epstein would use a massager/vibrator, which she described as white in color and a large head. Epstein would rub the vibrator/massager on her vaginal area as he would masturbate. [redacted] stated she had been to the house

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numerous times. [redacted] added she has no formal training in providing a massage. [redacted] stated she brought two females during her visits to provide massages. [redacted] stated she brought a girl named [redacted] from [redacted] High School. [redacted] stated she received $200.00 for each girl she brought.

On November 8, 2005, I met with [redacted] at the Palm Beach Police Department. During a sworn taped statement, [redacted] stated she had met Jeffrey Epstein approximately one year ago. She was approached by a subject known to her as [redacted] had asked her if she wanted to make money providing massages to Epstein. [redacted] had heard that several girls from [redacted] High School were doing this and making money. She agreed and was taken to the house by [redacted] had introduced her to [redacted] and Epstein and brought her upstairs to a master bedroom where a massage table was prepared and the proper oils were selected. [redacted] left the room and waited downstairs for her. [redacted] stated Epstein entered the room wearing a towel and laid on his stomach. She provided a massage wearing only her thong panties. [redacted] advised Epstein had masturbated every time she provided a massage. She stated Epstein continued to masturbate until he climaxed. Once that occurred the massage was over. She felt the whole situation was weird but she advised she was paid $200.00 for providing the massage. She also stated [redacted] was paid $200.00 by Epstein for bringing [redacted] stated she had gone a total of 15 times to Epstein's residence to provide a massage and things had escalated from just providing a massage. Epstein began touching her on her buttocks and grabbed her closer to him as he masturbated. Epstein also grabbed her breasts and fondled her breasts with his hands as she provided the massage. [redacted] stated on one occasion, while she was only seventeen years of age, he offered extra monies to have vaginal intercourse. She stated this all occurred on the massage table. [redacted] stated Epstein penetrated her vagina with his penis and began having intercourse with her until he reached the point of climax. Epstein removed his penis from her vagina and climaxed onto the massage table. [redacted] received $350.00 for her massage. I asked her if she had any formal training in providing massages, [redacted] stated she did not. [redacted] continued to state on one other occasion, Epstein introduced his girlfriend [redacted] into the massage. [redacted] was brought into room with [redacted] to provide a massage. Epstein had them kiss and fondle each other around the breasts and buttocks as they provided a massage to Epstein. Epstein, watched and masturbated as this occurred. On other occasions, Epstein, introduced the large white vibrator/massager in the massage. Epstein stroked the vibrator/massager on [redacted] vagina as she provided the massage.

On November 14, 2005, Det Sandman and I met with [redacted] During a sworn taped statement she advised she started going to the house approximately one year ago and has been there approximately five or six times. [redacted] also stated she was sixteen years old when she first went to Epstein's house. On her first visit she was brought by a fellow student from [redacted] High School known to her

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as [redacted] stated [redacted] brought her into the house and she was introduced to [redacted] then brought her upstairs into a master bathroom, located within the bedroom. [redacted] stated she met Epstein in the bathroom. He laid on the table and picked the massage oils. She provided the massage as he laid naked on the massage bed. She stated she rubbed his calves and back area. Upon the end of the massage, Epstein removed himself from the massage table and paid her $300.00 for the massage. [redacted] aid each subsequent time she went to the house, she was notified by [redacted] that Epstein was in town and would like her to "work". [redacted] stated she returned to the house and was again led upstairs by [redacted] She provided the massage, clothed. [redacted] was asked if she ever removed her clothing to provide a massage. [redacted] stated it was not until the third time that she went that she removed her clothing. [redacted] stated she was notified by [redacted] that Epstein wanted her to come to work. She arrived at the house and was led upstairs b[redacted] She started providing the massage when Epstein asked her to remove her clothing. [redacted] removed her pants, shirt and bra. She stayed in her thong panties and continued rubbing Epstein. Epstein turned over onto his back and she rubbed his chest area. [redacted] stated she knew he was masturbating himself as she providing the massage. [redacted] stated she believed he climaxed based on his breathing. She did not want to view either the climax or the fact that he was masturbating. [redacted] stated once the breathing relaxed he got up and told her to get dressed. She was paid $300.00 for her services. [redacted] stated on the last time she went to provide a massage, she was notified b[redacted] to come to the house and "work". [redacted] stated she was now dating her current boyfriend and did not feel comfortable going. She recalled it was approximately January 2005. She said she went, already thinking that this would be the last time. She went upstairs and went into the master bathroom. She met with Epstein, who was wearing only a towel, and laid onto the table. [redacted] stated Epstein caught her looking at the clock on several occasions. Epstein asked her if she was in a hurry. [redacted] stated her boyfriend was in the car waiting for her. [redacted] further stated that Epstein got upset as he wasn't enjoying the massage. She told him that she didn't want to continue and she would not be back. Epstein told her to leave as she was ruining his massage. [redacted] advised she had no formal training in providing any massages. [redacted] stated although she had a falling out with Epstein, she still received a Christmas bonus from Epstein. [redacted] stated she was wired money from Western Union for her Christmas bonus. Subpoena results from Western Union revealed money was sent from Jeffrey Epstein on December 23, 2004. [redacted] received $200.00 from Epstein for her Christmas bonus.

On November 15, 2005, Det. Sandman and I met with [redacted] During a sworn taped statement, [redacted] tated she met Jeffrey Epstein over a year ago. She was sixteen years of age and was approached by [redacted] a fellow [redacted] High School student, who informed her that she could make $200.00 providing a massage to Epstein. [redacted] had informed her that she would have to provide this

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massage topless. [redacted] made the arrangements with Epstein and his assistants and took [redacted] to the house. [redacted] stated [redacted] and she entered through a glass door that led into a kitchen. She was taken upstairs by [redacted] to a master bedroom. She recalled the master bathroom had a large pink couch, sauna and matching shower. Epstein entered into the room wearing only a towel. [redacted] and [redacted] removed their clothing remaining only in thong underwear. She further stated that Epstein laid on his chest on the table. The oils were selected on which ones to use. Both [redacted] and [redacted] provided the massage on his legs, back and feet. Forty minutes into the massage, Epstein turned over onto his back and requested [redacted] wait downstairs in the kitchen area for [redacted] Epstein instructed [redacted] to finish the massage. As [redacted] got dressed, [redacted] starting rubbing Epstein's chest. [redacted] left the room, and Epstein began masturbating as [redacted] rubbed Epstein's chest. [redacted] stated Epstein continued masturbating until he climaxed on the towel he was wearing. When asked if he had removed the towel she stated he turned the towel around so that the opening would allow him to expose himself. After he cleaned himself off with the towel he instructed [redacted] the massage was done and to get dressed and meet with him downstairs. [redacted] got dressed and met with Epstein in the kitchen area. She was paid $200.00 dollars for providing the massage. [redacted] stated she was aware that [redacted] also received monies for the same thing. The second time she went to the house she was again approached by [redacted] [redacted] advised if she wanted to return to the house to provide another massage. [redacted] agreed and the arrangements were made by [redacted] for her to return to the house. [redacted] stated [redacted] drove her to the house and knocked on the same glass door which leads to the kitchen area. They were allowed entry into the house by one of the staff members. [redacted] led her upstairs to the master bedroom and master bathroom area. [redacted] left [redacted] this time to do the massage alone. Epstein entered the room again wearing only a towel. [redacted] began removing her clothing as she did the last time she was at the house. Epstein instructed her to get naked. He laid on the table onto his stomach as [redacted] began massaging his legs and back. As [redacted] finished with Epstein's back and legs, Epstein then turned over onto his back. [redacted] started to rub his chest and he began masturbating. As [redacted] rubbed his chest, Epstein leaned over and produced a massager/vibrator. He turned it on and began rubbing [redacted] vagina and masturbating himself at the same time. [redacted] stated she continued to rub his chest as this was occurring. She described the vibrator/massager as large grey with a large head. Epstein rubbed her vagina for approximately two to three minutes with the massager/vibrator. He then removed the vibrator from her vaginal area and concentrated on masturbating himself. [redacted] stated Epstein climaxed onto the towel again and informed her that the massage was done. [redacted] got dressed and met with [redacted] who was waiting in the kitchen area. She received $200.00 for the massage. [redacted] said she never returned to the house and had no desire to return to the house. [redacted] was asked if she received any formal massage training. She advised she had no formal training. [redacted] was asked if Epstein knew her real age. [redacted] stated he knew, as he asked her questions about herself and high school. He was aware she attended, and is still attending [redacted] High School.

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Date: 05/01/2006

EFTA00231935

During the course of the investigation a search warrant was executed at Jeffrey Epstein's home located at 358 El Brillo Way in Palm Beach. While in the home I observed the pink and green couch within the master bedroom area just as the girls previously mentioned. The stairway, which is located from the kitchen area to the master bedroom area, is lined with photos of naked young girls. Additionally, numerous photographs of naked young females, some of which appeared to be the girls I previously interviewed, were on display throughout the house. Also located in the house were various phone message books. The telephone message books have a duplicate copy (Carbon Copy) which, once a phone message is written into the book, the top copy is then torn on the perforated edge and the carbon copy is left in the book. First names of girls, dates and telephone numbers were on the copy of the messages. I recognized various numbers and names of girls that had already been interviewed. The body of the messages were time of the day that they called for confirmation of "work." Other names and telephone numbers were located in which the body of the messages were, "I have girls for him" or "I have 2 girls for him." These messages were taken by [redacted], who signed the bottom of the messages. During the execution of the warrant, I located a [redacted] High School transcript for [redacted]n Epstein's bedroom desk. This desk had stationary marked Jeffrey E Epstein. I located a wood colored armoire beside Epstein's bed that contained a bottle of "Joy Jelly," which is used to provide a warm massage. Several massage tables were located throughout the second floor of the residence, including a massage table found in Epstein's bedroom. On the first floor of the residence I found two covert cameras hidden within clocks. One was located in the garage and the other located in the library area on a shelf behind Epstein's desk. A computer was located which was believed to contain the images from the covert cameras. The computer's hard drive was reviewed which showed several images of [redacted] and other witnesses that have been interviewed. All of these images appeared to come from the camera positioned behind Epstein's desk.

On December 13, 2005, Det. Dawson and I met with [redacted] During a sworn taped statement, [redacted] stated that when she was sixteen years old she was taken to Epstein's house to provide a massage for money. [redacted]stated it was before Christmas last year (2004) when an associate, [redacted] approached her and asked if she needed to make money for Christmas. [redacted] made arrangements to take [redacted] to the house and drove [redacted] to the house to "work." They were encountered by a white female with long blond hair. [redacted] was unable to remember the name of the white female with blond hair but knew she was Epstein's assistant. She was led upstairs by the white female who explained that there would be lotions out already and Epstein would choose the lotion he wanted her to use. She was led through a spiral staircase which led to a master bedroom and bathroom. The massage table was already set up in the bathroom. [redacted] described the bathroom as a large spacious bathroom with a steam room and shower beside it. [redacted] was introduced to Epstein who was on the phone when she entered the room. Epstein was wearing a white towel and laid on his stomach so that [redacted] may

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Date: 05/01/2006

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massage his feet and calves. [redacted] started the massage with the oils Epstein chose and rubbed his feet and calves. Epstein got off the phone and requested she massage his back as well. [redacted] began rubbing his back and got to the small of his back. During the rubbing of his back, Epstein asked her to get comfortable. He requested she remove her pants and shirt. [redacted] removed her shirt and pulled her pants off. [redacted] stayed in her bra and thong panties. As she finished massaging the small of Epstein's back, he then turned onto his back. Epstein instructed [redacted] to rub his chest and pinch his nipples. As she began to rub his chest, Epstein asked her questions about herself. [redacted] remembered telling him she attended [redacted] High School. Epstein asked her if she was sexually active. Before [redacted] could answer, he also asked what sexual position does she enjoy. [redacted] stated she was shy and didn't like talking about those things. She continued rubbing his chest. Epstein reached up and unsnapped her bra from the front. [redacted] explained the bra she used had a front snapping device. Epstein rubbed her breasts and asked her if she like having her breasts rubbed. [redacted] said "no, I don't like that." Epstein then removed his towel and laid on the bed naked exposing his penis to [redacted] He began touching his penis and masturbated as he touched her breasts. [redacted] explained Epstein then touched her vaginal area by rubbing her vagina with his fingers on the outside of her thong panties. [redacted] ensed up and stated Epstein was aware that she was uncomfortable. [redacted] stated that Epstein said to her, "Relax, I'm not going inside." She further explained Epstein commented to her how beautiful and sexy she was. Epstein then moved her thong panties to one side and began stroking her clitoris. [redacted] said, "He commented how hard my clit was." He then inserted two fingers in her vagina and was stroking her within her vagina. She tried pulling back to pull out his fingers from within her vagina. Epstein removed his fingers from within her vagina and apologized for putting his fingers inside her. During this time, he kept his hand on her vaginal area and continued to rub her vagina. [redacted] stated he rubbed her really hard as he was masturbating. [redacted] said he climaxed onto the towel he had been previously wearing and got up from the table. Epstein told her there was $200.00 dollars for her on the dresser within the master bathroom. Epstein also told her that there was an additional $100.00 that was to be given to [redacted] for bringing her there to massage him. Epstein told her to leave her telephone number with his assistant as he wanted to see her again. Epstein stated his assistant would contact her to work again soon. I asked her if she ever received any formal massage training to which [redacted] stated she did not. [redacted] stated it was the only time she ever went to work for Jeff and knew what happened to her was wrong. She further stated that she had never been contacted for any additional work.

On January 9, 2006, I located and interviewed another victim, [redacted] was identified as a potential victim/witness from information obtained during trash pulls from Epstein's residence. [redacted] stated she met Epstein when she was fifteen years of age. She was approached by a friend from [redacted] High School, [redacted] to be taken to Jeffrey Epstein's house to work. She was originally told she would be able

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to model lingerie for a wealthy Palm Beacher. [redacted] was taken to Epstein's house located on El BrilloWay. [redacted] introduced [redacted] to Jeffrey Epstein. Epstein had his personal chef prepare dinner for [redacted] and [redacted] At the conclusion of dinner, [redacted] and Epstein brought [redacted] upstairs into a master bedroom area. [redacted] observed a large massage table with a sheet on it. Epstein entered through a door and exited wearing only a towel. [redacted] informed [redacted] that they were going to provide a massage on Epstein. [redacted] asked why were they doing this instead of modeling lingerie. [redacted] explained to [redacted] that this was his routine and to rub his calves and feet. Epstein had told [redacted] to get comfortable. [redacted] removed her pants and blouse. [redacted] stated she stayed only in panties as she did not wear a bra that evening. [redacted] stated while rubbing his calves and feet, Epstein turned over onto his back. Epstein told [redacted] to rub his chest and rub his nipples. [redacted] stated that as she started rubbing his chest, Epstein began masturbating himself . Epstein touched her breasts and stroked her vagina with his fingers. Epstein continued to masturbate himself as he stroked her vagina. Epstein ejaculated on his towel and paid [redacted] $200.00 for the massage. Epstein told [redacted] that if she told anyone what happened at his house that bad things could happen. [redacted] and [redacted] were brought home by Epstein's houseman and [redacted] was afraid that Epstein knew where she lived. [redacted] stated that several days later she received a telephone call from [redacted] who coordinated for [redacted] to return to "work." [redacted] returned to the house and was brought to Epstein's bedroom area by [redacted] who prepared the room for the massage. Epstein entered the room wearing only a towel. Epstein had [redacted] remove her clothing and provide the massage naked. [redacted] began rubbing his feet and calves and Epstein turned over onto his back. Epstein rubbed her vagina with his fingers. Epstein began to masturbate himself with an upwards and downward motion on his penis. Epstein continued to touch her vagina with one hand and masturbate with the other hand. Once Epstein ejaculated onto the towel he was wearing, the massage was over. [redacted] was paid $200.00 for the massage. Epstein again told [redacted] not to speak of what happened at his house or bad things would happen. [redacted] wanted to notify authorities however she was afraid of what would happen to either her or her family.

During the course of the investigation, several subjects were identified as a potential witness/victim through information obtained during the trash pulls, physical surveillance and telephone message books retrieved from the search warrant. While conducting research on the subjects, I discovered that the females were age eighteen or older. Interviews were conducted on the consenting adults whose statements provided the same massage routine when they went to "work" for Epstein. The females would be notified by [redacted] and made appointments for the females to "work" for Epstein. The females would come to Epstein's house and were led upstairs, through a stairwell from the kitchen area, by [redacted] to Epstein's bedroom. Epstein would then enter the room wearing only a towel, and ask them to get comfortable. The females would then provide the massage naked as Epstein would either touch their vaginas with his fingers and/or utilize the massager/vibrator on

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their vaginal area. He would masturbate during the massage and upon his climaxing, the massage would end. The girls were then paid two or three hundred dollars for the massage.

On November 21, 2005 I interviewed Jose Alessi, a former houseman for Jeffrey Epstein. Alessi stated he was employed for eleven years with Mr. Epstein, from approximately 1993 through 2004. Alessi stated he was the house manager, driver and house maintenance person. It was his responsibility to prepare the house for Epstein s arrival. When asked about cooks or assistants, Alessi stated they traveled with Epstein on his private plane. I asked Mr. Alessi about the massages that have occurred at Epstein's home. Alessi stated Epstein receives three massages a day. Each masseuse that visited the house was different. Alessi stated that towards the end of his employment, the masseuses were younger and younger. When asked how young, Mr. Alessi stated they appeared to be sixteen or seventeen years of age at the most. The massages would occur in Epstein's bedroom or bathroom. He knew this because he often set up the massage tables. I asked if there were things going on other than a massage. Alessi stated that there were times towards the end of his employment that he would have to wash off a massager/vibrator and a long rubber penis, which were in the sink after the massage. Additionally, he stated the bed would almost always have to be made after the massage.

On January 4, 2006 I interviewed another former houseman, Mr Alfredo Rodriguez. During a sworn taped statement, Mr. Rodriguez stated he was employed by Jeffrey Epstein for approximately six months, from November 2004 through May of 2005. His responsibilities as house manager included being the butler, chauffeur, chef, houseman, run errands for Epstein and provide for Epstein's guests. I asked Rodriguez about masseuses coming to the house. Rodriguez stated Epstein would have two massages a day. Epstein would have one massage in the morning and one massage in the afternoon everyday he was in residence. Rodriguez stated he would be informed to expect someone and make them comfortable until either [redacted] or Epstein would meet with them. Rodriguez stated once the masseuses would arrive, he would allow them entry into the kitchen area and offer them something to drink or eat. They would then be encountered by either [redacted] or Epstein. They would be taken upstairs to provide the massage. I asked Rodriguez if any of the masseuses appeared young in age. Rodriguez stated the girls that would come appeared to be too young to be masseuses. He stated one time under Epstein's direction, he delivered a dozen roses to [redacted] High School for one of the girls that came to provide a massage. He knew the girls were still in high school and were of high school age. I asked Rodriguez about the massages. He felt there was a lot more going on than just massages. He would often clean Mr. Epstein's bedroom after the alleged massages and would discover massagers/vibrators and sex toys scattered on the floor. He also said he would wipe down the vibrators and sex toys and put them away in an armoire. He described the armoire as a small wood armoire which was on the wall close to Epstein's

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bed. On one occasion Epstein ordered Rodriguez to go to the Dollar rent a car and rent a car for the same girl he brought the roses to, so that she could drive her self to Epstein's house without incident. Rodriguez said the girl always needed rides to and from the house.

Rodriguez produced a green folder which contained documents, and a note with Mr. Epstein's stationary with direction to deliver a bucket of roses to [redacted] High School after [redacted] high school drama performance. Also in that same note was direction to rent a car for [redacted] and direction to extend the rental contract.

During the course of the investigation, subpoenas were obtained for cell phone and home phone records from several victims and witnesses along with the cell phone records of [redacted]. An analysis of these records was conducted which found numerous telephone calls were made between [redacted] and the victims. These records indicate the dates the calls were made are consistent with the dates and times they victims/witnesses stated they were contacted. Specifically, The phone records showed [redacted] called [redacted] during the exact times and dates when victim [redacted] advised the incident occurred. [redacted] also coordinated the encounters with [redacted] during the time frame the girls stated they occurred.

Pursuant to a lawful subpoena I obtained Epstein's private plane records for 2005 from Jet Aviation. The plane records show arrival and departure of Epstein's plane at Palm Beach International airport. These records were compared to the cell phone records of [redacted] This comparison found that all the phone calls [redacted] made to [redacted] and the victims were made in the days just prior to their arrival or during the time Epstein was in Palm Beach.

Therefore, as Jeffrey Epstein, who at the time of these incidents was fifty one years of age, did have vaginal intercourse either with his penis or digitally with [redacted] who were minors at the time this occurred, there is sufficient probable cause to charge Jeffrey Epstein with four counts of Unlawful Sexual Activity with a Minor, in violation of Florida State Statute 794.05(1), a second degree felony. As Epstein, who at the time of the incident was fifty two years of age, did use a vibrator on the external vaginal area of [redacted] a fourteen year old minor, there is sufficient probable cause to charge him with Lewd and Lascivious Molestation, in violation of Florida State Statute 800.04 (5), a second degree felony.

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Probable Cause Affidavit

Palm Beach Police Department

Agency ORI# FLO 500600

Police Case#: 05-368 (2)

Defendant: [redacted]
Race/Sex: White Female
DOB: [redacted]
Charges: **Principal in the 1st Unlawful Sexual Activity with a Minor (4) counts**
Principal in the 1st Lewd and Lascivious Molestation (1) count

From March 15, 2005, through February 2006, the Palm Beach Police Department conducted [redacted] sexual battery investigation involving Jeffrey Epstein, [redacted] and [redacted] Sworn taped statements were taken from five victims and seventeen witnesses concerning massages and unlawful sexual activity that took place at the residence of Jeffrey Epstein, 358 El Brillo Way, Palm Beach. Several of the victims were recruited by and brought to the residence by [redacted] to perform massages for Epstein, for which [redacted] received monetary compensation. During the visit they would be introduced to [redacted] Epstein's assistant, who in turn would record their telephone numbers and name. The victims would be brought to Epstein's bedroom to provide the massage. Epstein would enter the room and order the victims to remove their clothing to provide the massage. As the victims complied and provided the massages, Epstein would rub his fingers on their vaginas. On occasion, Epstein would introduce a massager/vibrator and rub the victims vaginas as they provided the massage. On three separate occasions, Epstein had intercourse and inserted his penis/fingers in the victims vaginas. At the conclusion of the massages the victims were paid sums of money ranging from $200 - $1,000. The facts, as reported, are as follows:

On 03/15/2005, A fourteen year old white female, hereinafter referred to as [redacted] and her family reported unlawful sexual activity which occurred at a residence within the Town of Palm Beach. [redacted] reported that a subject known to her as "Jeff" had touched her vaginal area with a vibrator/massager while within his residence. "Jeff" was later identified as Jeffrey Epstein through a photo line up.

During a sworn taped interview, [redacted] stated that [redacted] a cousin of [redacted] boyfriend and classmate at Royal Palm Beach High School, worked for a wealthy man and did sexual favors for him. She also admitted that [redacted] had offered her an opportunity to make money. During the beginning of the month of February 2005, [redacted] explained that she was first approached by [redacted] to go with her to Epstein's house. [redacted] stated that [redacted] along with a Hispanic female, later identified at [redacted] pick her up at her father's house on a Sunday. [redacted] was not sure of the exact dates but knew it was a Sunday. [redacted] told her father that they were going shopping but in reality [redacted] drove them to Palm Beach. During the drive a conversation occurred between [redacted] and [redacted] whereas [redacted]

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reportedly told [redacted] that if Jeff asked her age, she should say she was eighteen. It was later confirmed by the [redacted] father that [redacted] picked his daughter up on February 6, 2005. According to [redacted] father, [redacted] drove a pick up truck.

[redacted] described Epstein's house as a two-story pink house with a Cadillac Escalade parked in the driveway. She recalled that Jeff's house was on a dead end street. Upon arriving at the house [redacted] stated that they walked up a driveway, past what appeared to be a small guard/security room. A male approaching them asking what they wanted. [redacted] stated they were there to see Epstein. The male allowed them to continue walking up to the house. [redacted] stated the man told them that Epstein was not there but was expected back. He allowed them to enter the house, via the kitchen. He offered them something to drink while they waited inside. Shortly thereafter, Epstein and his assistant, described as white female with blond hair and later identified as [redacted] entered the kitchen. Epstein introduced himself to [redacted] [redacted] described Epstein as being approximately forty-five years old, having a long face and bushy eyebrows, with graying hair.

[redacted] and Epstein left the kitchen leaving [redacted] alone in the kitchen. They returned a short time later. They all spoke briefly in the kitchen. [redacted] was instructed to follow [redacted] upstairs. [redacted] recalled walking up a flight of stairs, lined with photographs, to a room that had a massage table in it. Upon entering the room there was a large bathroom to the right and a hot pink and green sofa in the room. There was a door on each side of the sofa. [redacted] recalled there being a mural of a naked woman in the room, as well as several photographs of naked women on a shelf. [redacted] told the victim that Epstein would be up in a second.

Epstein entered the room wearing only a towel and told [redacted] to take off her clothes. [redacted] stated Epstein was stern when he told her to take off her clothes. [redacted] said she did not know what to do as she was the only one there in the room so she took off her shirt leaving her bra on. Epstein had removed his towel and told the [redacted] to take off everything. [redacted] stated Epstein was nude when he took his towel off, placing it on the floor as he laid down on the table. [redacted] stated she then removed her pants leaving her thong panties on. Epstein then instructed her to give him a massage pointing to a specific lotion for her to use. As [redacted] began to give Epstein the massage, he told her to get on his back. [redacted] stated she straddled herself on Epstein's back whereby her exposed buttocks were touching Epstein's bare buttocks. [redacted] said Epstein was specific in his instruction to her on how to massage him, telling her to go clockwise or counter clockwise. Epstein then turned over and instructed [redacted] to massage his chest. [redacted] was now standing on the ground and resumed massaging Epstein's chest area. [redacted] stated Epstein held onto the small of her back as she massaged his chest and shoulder area. Epstein then turned to his side and started to rub his penis in an up and down motion. Epstein then pulled out a purple vibrator and began to

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massage [redacted] vaginal area. [redacted] stated there was no penetration as the vibrator was on top of her underwear. [redacted] recalled Epstein ejaculating because he had to use the towel to wipe himself as he got off the table. Epstein then left the room and [redacted] got dressed. She went back downstairs where she met with [redacted] said she was paid three hundred dollars in cash from Epstein. Before she left, Epstein asked [redacted] to leave her phone number. As [redacted] were leaving the house, [redacted] told [redacted] she received two hundred dollars that day for bringing her.

During the course of the investigation, parental consent was granted for [redacted] to assist with the investigation. At our direction [redacted] conducted controlled taped phone calls to [redacted] cellular telephone 561-[redacted] [redacted] spoke with [redacted] in an attempt to arrange another meeting with Epstein. [redacted] asked [redacted] what did she need to do to make more money. [redacted] stated, "the more you do, the more you get paid." [redacted] had subsequently called back [redacted] and left a voice mail message for her indicating that she had set up an appointment for [redacted] to go to Epstein's house at 11:00 am on April 5, 2005. This message was recorded from [redacted] voice mail.

Based on the above, trash pulls were established at Epstein's residence with Supervisor [redacted] of the Sanitation Bureau of the Town of Palm Beach. The trash pull from April 5, 2005 revealed a telephone message for Epstein which stated [redacted] and [redacted] name at 11:00 am. This was the time frame [redacted] had informed [redacted] to be ready to go work at Epstein's house.

On October 3, 2005, Sgt Frick and I went to [redacted] residence and viewed her vehicle parked in the driveway, a red Dodge Neon. Sgt. Frick and I knocked on the door and met with [redacted] was told that we were investigating a claim involving Jeffrey Epstein of El Brillo Way, in Palm Beach. [redacted] was asked if she would accompany us back to the police station for further questioning. She was also told that at the conclusion of the interview she would be returned home. [redacted] voluntarily came with us back to the Palm Beach Police Department.

Upon our arrival at the police station, [redacted] was brought to the interview room in the Detective Bureau where I obtained a taped, sworn statement. I began the interview by asking [redacted] how she became acquainted with Epstein. [redacted] stated that approximately two years ago, just after she turned 17 years of age, she was approached by a friend named [redacted] at the Canopy Beach Resort in Rivera Beach. [redacted] was asked if she wanted to make money. She was told she would have to provide a massage and should make $200.00. [redacted] thought about the offer and agreed to meet with Jeffrey.

[redacted] Unknown last name) and [redacted] (Unknown last name) picked [redacted] up and she was taken to Epstein's house. Upon her arrival to the house she was introduced to Epstein in the kitchen of the

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house. She was also introduced to a white female known to her as [redacted] She was led upstairs to the main bedroom known to her as Jeff Epstein's bedroom. [redacted] arranged the massage table and covered the table with a sheet. She brought out the massage oils and laid them next to the massage bed. [redacted], then left the room and informed [redacted] Jeff would be in, in a minute. Jeff entered the bedroom wearing only a towel. He removed the towel and laid nude on the massage table. He laid on the table onto his stomach and picked a massage oil for [redacted] to rub on him. During the massage, [redacted] stated "He tried to touch me and I stopped him." I asked how he tried to touch her. [redacted] stated that Epstein grabbed her buttocks and she felt uncomfortable. [redacted] told Epstein, I'll massage you but I don't want to be touched. [redacted] stated she performed the massage naked. At the conclusion of the massage, Epstein paid [redacted] $200.

After the massage Epstein stated to [redacted] that he understood she was not comfortable, but he would pay her if she brought over some girls. He told her the younger the better. [redacted] stated she once tried to bring a 23 year old female and Epstein stated that the female was too old. [redacted] stated that in total she only remembers six girls that she brought to see Epstein, each time she was paid $200. [redacted] stated she had brought the following girls: [redacted] (a16 year old female), [redacted] (a 16 year old female) and [redacted] said that at the time she brought these girls to Epstein's house they were all14 through 16 years of age. I asked [redacted] which one was the youngest. [redacted] advised [redacted] was the youngest as she was fourteen when the massage occurred. [redacted] stated every girl she brought knew what to expect when they arrived. They were told they would provide a massage, possibly naked, and allow some touching. I asked her if [redacted] was aware. She stated every girl she brought knew what to expect. She explained she knew that [redacted] wanted to make money. She approached [redacted] and explained about going to work for Jeff, [redacted] agreed and arrangements were made to bring her to Epstein's house on a weekend. [redacted] stated that she and [redacted] (Later identified as [redacted]) picked up [redacted] at her house. [redacted] stated that at that time she was driving a red pickup truck. They traveled to Epstein's house and entered through the kitchen door. They met with the house chef and Epstein's assistant [redacted] was introduced to Epstein while they were in the kitchen area. [redacted] led [redacted] upstairs and Epstein went upstairs. When the massage was over [redacted] returned to the kitchen area. [redacted] stated she was paid $200.00 for bringing [redacted] to Epstein's house. [redacted] stated [redacted] told her she was paid $300.00 for the massage.

[redacted] stated that [redacted] was the last person she brought to Epstein's house. She had changed her cellular number to avoid being contacted by [redacted] She continued stating that she had no direct contact with Epstein when he was going to travel to Palm Beach. [redacted] said when Epstein announces to his assistant, [redacted] that he is traveling to Palm Beach, [redacted] would then contact [redacted] to arrange girls to "work" for Epstein. [redacted] stated that once her parents discovered that she was visiting Epstein, they

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disapproved of the encounters with him and she stopped. [redacted] further stated tha[redacted] still tries to call [redacted] house and leaves messages.

Sgt Frick entered the room and explained to [redacted] that based on her own statements, she had implicated herself by bringing underage girls to Epstein's house. [redacted] provided cellular telephone numbers for the girls she had mentioned previously. Additionally, she also provided possible addresses and areas in which they lived.

As [redacted] was being taken home in the vehicle, a tape recorder was placed within the vehicle to record any conversations within the vehicle. During the drive back to her home, [redacted] made the comment " I'm like a Heidi Fleiss." (Hollywood Madam who sent girls to clients for sexual favors in California). [redacted] was dropped off at her house without incident.

On October 3, 2005, Sgt Frick and I went to speak with [redacted] a sixteen year-old female who was brought to Epstein's residence by [redacted] We met with [redacted] mother at their front door. We explained the ongoing investigation and asked to speak with [redacted] as we had information that she had "worked" for Jeff. Mrs. [redacted] introduced us to her husband and allowed us entry into the home. We sat in the dining room and met with [redacted] As she was under the age of eighteen, Mrs [redacted] was advised we would be speaking with her. She expressed if her daughter had information, she wanted to assist. We interviewed [redacted] who denied having any inappropriate encounters with Jeff (Epstein). She stated she had gone to Jeff's house with [redacted] approximately eight months ago and sat in the kitchen with the house chef, but nothing happened. As the parents were present during the interview, we felt that [redacted] was withholding information from us. She made several comments as to putting the entire incident behind her. I left my telephone number and advised should she wish to speak with me again to telephone me. Sgt Frick and I thanked Mrs [redacted] her time and left the area. She stated she would ask [redacted] again after we left as to what happened at Epstein's house. I informed her that [redacted] had my telephone number and hopefully she would call.

On October 4, 2005, Det Dawson and I drove to the [redacted] home and met with [redacted] and [redacted] During a sworn taped statement, [redacted] stated approximately a year ago when she was seventeen years old, she was taken to a house by [redacted] stated she knows [redacted] because they both attend [redacted] High School. She was told she could make money working for Jeff. She was told she would have to provide a massage to Jeff. [redacted] stated upon her arrival to the house she was brought to the kitchen area by [redacted] They met with the house chef who was already in the kitchen area. [redacted] stated [redacted] would wait for her in the kitchen. [redacted] was introduced to [redacted] eff's assistant, who brought her upstairs to the master bedroom. [redacted] prepared

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the room and massage table for a massage. Epstein entered the room wearing only a towel and she provided a massage. [redacted] stated she kept her clothes on during the massage. She advised sometime during the massage, Epstein grabbed her buttocks and pulled her close to him. [redacted] said she was uncomfortable by the incident involving Jeff. At the conclusion of the massage, she was paid $200.00 for the massage. I asked [redacted] if she has any formal training in massages to which she replied no. I asked her if [redacted] received any monies for taking her to perform the massage. [redacted] stated [redacted] had received money for taking her there but was unsure in the amount. [redacted] stated she returned to Epstein's house on another occasion with [redacted] and another girl, [redacted] stated she waited in the kitchen with [redacted] while [redacted] was taken upstairs by [redacted] stated she only did the massage once as she was uncomfortable with the whole experience.

At the conclusion of the interview, the tape was stopped. I was informed tha[redacted] had attempted to reach [redacted] via cell phone. A voice mail message on October 4, 2005 at 10:59 am, revealed a female voice who identified herself as [redacted] who requested [redacted] to call her back re[redacted]ence the police questioning. [redacted] provided the incoming telephone number as [redacted] stated she inadvertently told [redacted] about the police investigation because [redacted] had [redacted]alled her to tell her about how she just received a rental car from Jeff Epstein. [redacted] had [redacted]alled her to tell her that she was given a rental car, a 2005 Silver Nissan Sentra, to utilize to visit family and visit Epstein. [redacted] asked her what was going on at the house that the police would be asking questions. [redacted] stated [redacted] [redacted] then called Jeff and [redacted] and asked what was going on reference the ongoing police investigation. According to [redacted] Sarah has since then been trying to contact her to ask about the police questions. I instructed [redacted] not to contact [redacted] and do not provide any more information to [redacted] s she would notify Jeff Epstein and [redacted] hat was transpiring.

On October4, 2005, I made telephone contact with [redacted] who had left several messages for me to contact her. During the message, she advised she was not completely truthful when we met in person but would like to speak with me to advise what had happened. She further advised she did not want to speak of this incident in front of her mother. At approximately 3:48 pm I made telephone contact with [redacted] During a taped recorded statement [redacted] stated the following: approximately a year ago, when she was sixteen years of age, [redacted] took her to Epstein's house twice. She knows [redacted] because they both attend Royal Pal Beach High School. The first time she went, [redacted] drove to the house. They entered through the kitchen area where she was introduced to [redacted] and Epstein. She was taken upstairs to a bedroom t[redacted] who set the room up with a massage bed and brought out the oils to use. Epstein then entered the room wearing a towel. He laid on the table and picked out a lotion for [redacted] to rub on him. At one point during the massage he tried to remove her shirt, at which point she became very upset and discontinued the massage. Both [redacted] nd Epstein had a verbal disagreement, at which time she left without

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being paid. She got with [redacted] who was sitting in the kitchen and told her "let's go." [redacted] advised she received no money for that day. [redacted] also said that [redacted] had told her if she was uncomfortable with what was going on, to let him know and he'll stop. She knew that the more you do the more you get paid. [redacted] advised that several weeks later she agreed to be taken a second time by [redacted] Once they arrived at the residence, [redacted] sat in the kitchen and [redacted] took her upstairs to the master bedroom again. [redacted] set the room up with a massage bed and brought out the oils to use. Epstein then entered the room wearing a towel. He laid on the table and picked out a lotion for [redacted] to rub on him. At one point during the massage he tried to touch her buttocks. As [redacted] was wearing tight jeans and had a tight belt on Epstein was unable to touch her buttocks. Epstein then rolled onto his back during the massage and then attempted to touch her breasts. [redacted] then became upset again and told Epstein she didn't want to be touched. [redacted] discontinued the massage and was paid $200.00. [redacted] then went downstairs where [redacted] was waiting for her. She told [redacted] she wanted to leave. [redacted] said she never returned to the house. [redacted] stated she is aware that her friend, [redacted] was also at the house and had a problem with Epstein.

I later researched [redacted] dob 02/08/1987, and met with her at her residence. During a sworn taped statement, [redacted] stated the following: on or about November 2004, she was approached at [redacted] High School by [redacted] a fellow student. [redacted] asked [redacted] if she wanted to make money. She agreed and was told she would provide a massage to wealthy man in Palm Beach. [redacted] picked her up and drove her to a house in Palm Beach. She was brought into the kitchen area of the house. She further stated that fellow [redacted] High School students [redacted] and [redacted] ([redacted] came with them. They were brought into the kitchen where she was introduced to Epstein and other females. [redacted] stated she was introduced to a female helper of Epstein, the female was described as white female (unknown name), with blond hair. She stated that the assistant was familiar with [redacted] The assistant brought her upstairs into a master bedroom area. The assistant set up the massage table and put out lotions to be used. She told [redacted] Epstein would be available in a minute. Epstein entered the room wearing only a towel. Epstein removed his towel, and laid naked on the massage table and picked a lotion to rub on his thighs and back. [redacted] further stated during the massage, Epstein asked her to remove her clothes. She complied and removed her pants and blouse. [redacted] didn't remember if she had removed her bra but feels that she did. [redacted] was certain that she stayed in her thong underwear. [redacted] continued the massage and at one point she climbed onto the massage table, straddling Epstein to massage his back. While doing this her buttocks were touching Epsteins. [redacted] was instructed to return to the ground at which time Epstein turned to have his chest rubbed. [redacted] advised she was sure he was masturbating based on his hand movements going up and down on his penis area. [redacted] did not want to look at his penis area because she was uncomfortable. Epstein removed a large white vibrator which was next to the massage table and turned it on. [redacted] stated Epstein began rubbing the vibrator over her

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thong underwear on her vaginal area. Shortly thereafter, Epstein ejaculated and removed himself from the table. He walked over to where the shower was and opened the glass door. She waited as he was taking a shower in her direct view. When I asked [redacted] how old she was when this occurred, she stated she had just turned seventeen. At the conclusion of the shower, [redacted] was paid either $350.00 or $400.00. She stated she wasn't sure, but knows it was close to $400.00. [redacted] stated she never returned to provide a massage for Epstein.

At approximately 2:10 pm, Det Dawson and I met with [redacted] dob 03/05/1988, at her residence. As [redacted] was only seventeen years of age, I had notified her mother, that she would be interviewed reference an ongoing investigation in Palm Beach. I assured her that her daughter was not a suspect. I explained the possibility of her being either a witness or victim. Mrs[redacted] advised she wanted [redacted] to cooperate and consented to the interview.

During a sworn taped statement, [redacted] stated the following: at the age of sixteen, during the month of September 2004, she was approached by [redacted] for a chance to make money. [redacted] was friends with associates of [redacted] and knew the same people. [redacted] had been previously told by her friends from [redacted] High School, what [redacted] did for Epstein. [redacted] called a person known to [redacted] as [redacted] and scheduled the appointment. [redacted] picked [redacted] up and drove her to Palm Beach to a street called "Brillo Way". They drove to the end of the street and entered a large driveway. They entered the kitchen area of the house and met with Epstein. [redacted] was introduced to Jeff Epstein. [redacted] led [redacted] upstairs to the main bedroom area and set up the room with a massage table and set out the oils. [redacted] stated that while going up the stairs and into the bedroom she observed numerous photographs of naked young girls. [redacted] dimmed the lights and turned on soft music. [redacted] exited the room and Epstein entered the room wearing only a towel. Epstein picked oils and instructed her to rub his legs, under his buttocks, back and chest area. Epstein asked her to get comfortable. [redacted] advised she did not remove her clothes. She was wearing tight jeans and a cropped tank top exposing her belly area. During the massage, Epstein removed his towel and laid on the massage table naked. As [redacted] rubbed Epstein's chest area, he attempted to reach down her pants to touch her buttocks area however was unable to due so due to the tightness of the jeans and a tight belt. [redacted] advised Epstein began to masturbate as she rubbed his chest. Epstein moaned as she rubbed his chest. She observed he was continuing to masturbate and attempted to reach up her tank top and touch her breasts. [redacted] pulled back and Epstein stopped, however he kept masturbating until he climaxed. He cleaned himself with the towel he was previously wearing. [redacted] was paid $200.00 for the massage and left the area. She met with [redacted] who was waiting in the kitchen area and left the house.

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[redacted] then explained she never provided another massage for Epstein. She did however, go to the house with [redacted] and [redacted] ([redacted] as they took another friend of [redacted] [redacted] advised she was present when [redacted] went to work for Epstein. She advised she rode over and sat in the kitchen area with [redacted] to wait for [redacted] [redacted] advised while they waited for [redacted] the house chef prepared lunch for them as it was almost lunchtime when they went. When [redacted] was finished with the massage they left the area. I asked [redacted] if [redacted] ever told her what would be expected when she provided a massage. [redacted] stated yes, [redacted] told her that a massage would be expected, possibly naked and possibly some touching involved. [redacted] has no formal training in providing massages. [redacted] spoke about a third and last time she went to Epstein's house. [redacted] drove another girl, [redacted] (sixteen years of age) who is [redacted] friend, to Epstein's house. [redacted] stated [redacted] knew that [redacted] had made money massaging Epstein and wanted to make money herself. [redacted] took them in the kitchen area of the house and introduced [redacted] to [redacted] and [redacted] took [redacted] upstairs to the main bedroom. [redacted] advised she doesn't know what happened as [redacted] did not speak about what happened in the room. [redacted] received $100.00 from [redacted] for going with her to Epstein's house and recommending [redacted]

On October 6, 2005, at 11:45 am, I met with [redacted] dob [redacted], at Lynn University and explained to her why we there to interview her. She advised she was aware of the ongoing investigation. [redacted] stated she had previously spoken with [redacted] who told her she was interviewed by detectives. During a sworn taped statement, [redacted] stated she knew that [redacted] worked for Jeff Epstein in Palm Beach. [redacted] advised she originally had been taken to the Epstein house by [redacted] whom she met when they both attended [redacted] High School. She began going to the house when she was sixteen years of age and stated she had been there a lot of times to provide massages over the past two years. I asked her if she had formal training in providing massages, which [redacted] stated she had not. [redacted] advised she was told what was expected of her by providing massages and she would have to remove clothing but if she felt uncomfortable just to say so and Epstein would stop pushing the issue. [redacted] began providing massages and advised she kept her clothes on. She considered Epstein a pervert and he kept pushing to go further and further. [redacted] explained she would keep telling him she had a boyfriend and would not be right to her boyfriend. It wasn't until recently that [redacted] began removing her clothes and staying in her thong underwear to provide a massage. [redacted] explained Epstein wanted to be rubbed on his back and recently he began turning over and have her rub his chest as he masturbated. He would try to touch her breasts as she rubbed his chest. [redacted] stated "Jeff would try to get away with more and more on each massage". [redacted] stated Epstein would try to touch her more and on one occasion he attempted to use a massager/vibrator on her. [redacted] drove [redacted] to the house for the original massage. [redacted] left [redacted] her cell phone number and every time Epstein would come into town, [redacted] would call her for an appointment to "work". Each time she went [redacted] would meet her at the kitchen door area. She would bring her upstairs and prepare the massage table. [redacted] advised Epstein would ask her questions

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about herself. Epstein knew she was a soccer player and would be attending Lynn University. I asked [redacted] if Epstein knew her real age. [redacted] stated Epstein did and didn't care. The most recent massage she provided was on October 1, 2005. During the massage, she asked Epstein if she could borrow one of his vehicles to visit her family and boyfriend in Orlando, Florida. Epstein had told her she could borrow one of his vehicles but later stated he would rent her a car. She continued with the massage as Epstein grabbed her buttocks and caressed the buttocks cheeks. I asked [redacted] if she was wearing undergarments to which she replied her thong underwear. Once he tried to touch her breasts, she would pull away from him and he would stop. [redacted] was asked if he ever used a vibrator on her. [redacted] was aware of the vibrator but advised she never would allow him to use the vibrator on her. She described the vibrator as the large white vibrator with a huge head on the tip of the vibrator. She stated he kept the vibrator in a closet near the massage table.

[redacted] stated that on October 3, 2005, she was contacted by Epstein's assistant [redacted] who informed her that Jeff Epstein had rented her a new Nissan Sentra and she should come by the house to pick it up. [redacted] informed [redacted] she would have the car for a month. [redacted] stated Epstein knew her car was not working properly and that she had missed appointments in the past because of her car being inoperable. [redacted] explained the car is currently parked next to the Lynn University Gym field. I asked her if she ever took any one to the house. [redacted] explained she took [redacted], a friend of hers who attended [redacted] High School, who has relocated to Orlando to attend college. I asked if she ever allowed another female in the room. [redacted] advised no one was brought into the room with her.

At the conclusion of the interview, Det Dawson and I went to the gym area of Lynn University and located the Silver Nissan Sentra bearing Florida tag [redacted]. The vehicle is registered to Dollar Rent a Car out of the Palm Beach International Airport. The vehicle was rented by Janusz Banasiack, later learned to be Epstein's houseman, and paid with Epstein's credit card.

On September 11, 2005, w/f [redacted] dob [redacted], was arrested by the Palm Beach Police Department for misdemeanor possession of marijuana. During the arrest [redacted] told the arresting officer that she had information about sexual activity taking place at the residence of Jeffrey Epstein. Additionally, during the ongoing trash pulls from Epstein's residence, discarded papers were found which contained [redacted]s name and cell phone number.

On October, 11, 2005, Det Dawson and I met with [redacted] and obtained a sworn taped statement. [redacted] explained she had been going to Epstein's house since 2002, when she was sixteen years of age. Since then she has gone to the house hundreds of times. [redacted] stated she became his "number one girl." She explained that on her first visit she was brought to the house by fellow [redacted] High School

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classmate, [redacted]. [redacted] said she was brought through the kitchen area where she met [redacted] for the first time. [redacted] was led to the master bedroom, Epstein s room. [redacted] explained that as she was walking up the stairs she observed several photographs of naked women along the walls and tables of the house. [redacted] further explained that she was brought into the bedroom, where [redacted] prepared the room by setting up the massage table and provided the oils for her to rub on Epstein. [redacted] explained she remembered the steam room area, which contained two large showers. Epstein entered the room from the steam room area and introduced himself. Epstein lay on the table and told her to get comfortable. [redacted] removed her skirt and kept her shirt on. Epstein then instructed her to remove her shirt. [redacted] removed her shirt and remembered she was not wearing a bra. [redacted] stated she provided the massage wearing only her panties. She continued rubbing his legs, thighs and feet. [redacted] advised he turned over onto his back. Epstein touched her breasts and began to masturbate. Epstein ejaculated which meant the massage was over. At the conclusion of the massage, [redacted] was paid $200.00. They walked together downstairs where [redacted] and [redacted] were waiting. [redacted] stated [redacted] received an unknown amount of money for taking her to Epstein. Epstein instructed to leave her cellular telephone number so that he could contact her when he is in town.

[redacted] stated that during her many visits a routine was established between her and Epstein. She would enter the house and get naked in the bedroom. She would then start with a back massage. Epstein would roll on to his back and allow her to massage his chest area. [redacted] stated Epstein would then began to masturbate himself and at the same time would insert his fingers in her vagina and masturbate her with his fingers. [redacted] explained Epstein would continue this process until he ejaculated. He would then utilize a vibrator/massager on her vagina until [redacted] climaxed. [redacted] advised that during her frequent visits, Epstein asked for her real age, [redacted] stated she was sixteen. Epstein advised her not to tell anyone her real age. [redacted] advised that things escalated within the home as Epstein would instruct and pay [redacted] to have intercourse with his female friend [redacted] explained the intercourse included using strap on dildos, large rubber penis' and other devices that Epstein had at his disposal. Epstein would watch them have intercourse and masturbate himself . Occasionally, Epstein would then join in during the female on female intercourse and provide oral sex to both [redacted] and [redacted] This occurred during the time [redacted] was sixteen years of age.

[redacted] advised this continued to escalate during two years. The routine became familiar to [redacted] Epstein's assistant [redacted] would telephone her every time Epstein was in the Town of Palm Beach and would place appointments for her to visit and work for Epstein. Each time something new was introduced, additional monies were produced and offered for [redacted] to allow the acts to happen. [redacted] consented to perform all these acts but was adamant that there was an understanding with Epstein that no vaginal penetration would occur with his penis. [redacted] explained that Epstein's penis was deformed. [redacted]

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explained that his penis was oval shaped. [redacted] claimed when Epstein's penis was erect, it was thick toward the bottom but was thin and small toward the head portion. [redacted] called Epstein's penis "egg-shaped." [redacted] stated Epstein would photograph [redacted] and her naked and having sex and proudly display the photographs within the home. [redacted] stated during one visit to Epstein's house in which she provided a massage to Epstein, his female friend, [redacted] was also present. [redacted] provided the massage in which [redacted] and her would fondle each others breasts and kiss for Epstein to enjoy. Towards the end of this massage, Epstein grabbed [redacted] and turned her over onto her stomach on the massage table and forcibly inserted his penis into her vagina. [redacted] stated Epstein began to pump his penis in her vagina. [redacted] became upset over this. She said her head was being held against the table forcibly, as he continued to pump inside her. She screamed "No!" and Epstein stopped. She told him that she did not want to have his penis inside of her. Epstein did not ejaculate inside of her and apologized for his actions and subsequently paid her a thousand dollars for that visit. [redacted] stated she knows he still displays her photographs through out the house.

On October 12, 2005, Det Dawson and I met with [redacted] dob [redacted] who stated during a sworn taped statement, that nothing happened between her and Epstein. [redacted] appeared nervous during the interview. I assured her that I have spoken with other people who advised differently. [redacted] stated on several occasions she provided a massage to Epstein. She stated she was brought to the Epstein house in March of 2005. [redacted] a classmate at [redacted] High School, approached her and asked her if she wanted to "work". [redacted] made the arrangements with [redacted] Epstein's assistant. [redacted] who has no formal training in providing massages, stated she provided a massage, fully clothed for $200.00 . As I sensed hesitancy in her answers, I asked [redacted] if she had been contacted by anyone from Epstein's organizations or his house. [redacted] stated she was interviewed already by a private investigator for Epstein. He identified himself as "[redacted] and inquired about the police investigation, and left his telephone number [redacted] for additional contact. [redacted] provided no additional information, as it appeared her responses were almost scripted.

On November 6, 2005, at approximately 3:30 pm, I met with [redacted] dob [redacted], at the Palm Beach Police Department. [redacted] was identified as a potential witness/victim through information obtained during the trash pulls. During the sworn taped statement, [redacted] advised she was at Jeffrey Epstein's house one time, approximately two months ago. She was approached by a girl, [redacted] who was dating [redacted] roommate, for an opportunity to make some quick money. [redacted] advised she needed to make some quick cash to make the rent that month. She agreed to go to the house. She had been told by [redacted] that the massage would have to be done in her underwear. She advised [redacted] drove with her and brought her into the house. They walked into the kitchen area, and took the stairs upstairs. [redacted] further stated she was brought into a master bedroom area. She advised she

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recalled seeing portraits of naked women throughout the room. A massage table was already out near the sauna/shower area in the master bedroom. Epstein entered the room wearing only a towel and introduced himself as "Jeff." At Epstein's direction, [redacted] and [redacted] removed their clothing down to their panties, Epstein laid on his stomach area and they provided a massage on his legs and feet area. I asked [redacted] if she had any formal massage training and she replied "no." [redacted] advised she was topless and the panties she wore were the boy shorts lace panties. She and [redacted] continued the massage until the last ten minutes of the massage, Epstein, told [redacted] to leave the room so that [redacted] could finish the massage. [redacted] got dressed, and left the room as Epstein turned over onto his back. Epstein then removed the towel and laid naked . Epstein requested that [redacted] rub his chest area. [redacted] stated as she did this, Epstein, began masturbating. [redacted] stated Epstein pulled down her boy short panties, and he produced a large white vibrator with a large head. She stated it was within his reach in a drawer in his master bathroom. He rubbed the vibrator on her vaginal area. [redacted] advised he never penetrated her vagina with the vibrator. He continued to rub her vagina with the vibrator as he continued to masturbate. [redacted] stated she was very uncomfortable during the incident but knew it was almost over. Epstein climaxed and started to remove himself from the table. He wiped himself with the towel he had on previously and went into the shower area. [redacted] got dressed and met with [redacted] in the kitchen area. Epstein came into the kitchen and provided [redacted] $200.00 for bringing [redacted] and paid $200.00 to [redacted] for providing the massage. [redacted] was told to leave her telephone number with [redacted] for future contact. [redacted] provided her cellular telephone number. [redacted] was asked if she was recently contacted about this investigation by anyone from the Epstein organization. She replied she was called but it was for work. She stated she was called by [redacted] for her to return to "work" for Epstein. [redacted] stated "work" is the term used by [redacted] o provide the massages and other things. [redacted] advised she declined as she was not comfortable in providing that type of "work."

On November 7, 2005, Det Sandman and I met with [redacted] dob [redacted]. During a sworn taped statement, [redacted] stated she met Jeffrey Epstein through [redacted] when they were still attending [redacted] High School. [redacted] would approach females who wished to work for Epstein. [redacted] stated she was offered to work for Epstein but declined. [redacted] explained that "work" means give massages. She was asked about any formal training in providing massages which she said "no." [redacted] said she accompanied [redacted] and other females who were taken to Epstein's house to provide massages. [redacted] further stated she had been to the house approximately 4 or 5 times in the past year. She accompanied [redacted] with [redacted] and [redacted] Each time the girls were taken over, they were previously told they would have to provide a massage, possibly naked. They were also told that should Epstein require them to do anything extra, and they were not comfortable just to tell him and he would stop. [redacted] stated [redacted] received $200.00 for each girl she brought over to massage Jeffrey Epstein. When I asked which girl appeared to be the

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youngest, she replied, [redacted] who was really young, fifteen years old at the most. [redacted] further stated each time she went to the house, she sat in the kitchen and waited with [redacted] until the massage was over. She further stated that the cook would make lunch or a snack for them as they waited. I asked her if there was anything that caught her attention within the home. [redacted] stated there were a lot of naked girls in photographs throughout the house.

On November 8, 2005, at approximately 2:00pm , I met with [redacted] dob[redacted], at the Palm Beach Police Department. During a sworn taped statement, [redacted] stated she had met Epstein approximately two years ago when she was first approached by [redacted] a classmate at [redacted] High School. [redacted] approached her about working for Epstein and providing a massage to him for $200.00. [redacted] had made the arrangements however was unable to take her the day the arrangements were made. [redacted] had [redacted] take [redacted] also attended [redacted] High School and was familiar with Epstein. [redacted] recalled she was brought there and entered through the back kitchen door. She had met with an assistan[redacted] and another assistant [redacted] brought her upstairs as she observed several photographs of naked females throughout the house. [redacted] stated Epstein came in the room, wearing only a towel, and laid on the table. [redacted] stated he picked out the oils he wanted her to use and requested she remove her clothing to provide the massage. [redacted] stated that on the first massage she provided she did not remove her clothing. [redacted] stated she had returned several times after that. Each time she returned it was more than a massage. Epstein would walk into the master bedroom/bathroom area wearing only a towel. He would masturbate as she provided a massage. [redacted] stated she was unsure if he climaxed as he masturbated under the towel. Additionally, she never looked below his waist. She claimed that Epstein would convince her to remove her clothes. She eventually removed her clothes and stayed in her thong panties. On occasion, Epstein would use a massager/vibrator, which she described as white in color and a large head. Epstein would rub the vibrator/massager on her vaginal area as he would masturbate. [redacted] stated she had been to the house numerous times. [redacted] added she has no formal training in providing a massage. [redacted] stated she brought two females during her visits to provide massages. [redacted] stated she brought a girl named "[redacted] and [redacted] from [redacted] High School. [redacted] stated she received $200.00 for each girl she brought.

On November 8, 2005, I met with [redacted] W/F, [redacted] at the Palm Beach Police Department. During a sworn taped statement, [redacted] stated she had met Jeffrey Epstein approximately one year ago. She was approached by a subject known to her as [redacted] had asked her if she wanted to make money providing massages to Epstein. [redacted] had heard that several girls from [redacted] High School were doing this and making money. She agreed and was taken to the house by [redacted] had introduced her to [redacted] and Epstein and brought her upstairs to a master bedroom where a massage table

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was prepared and the proper oils were selected. [redacted] left the room and waited downstairs for her. [redacted] stated Epstein entered the room wearing a towel and laid on his stomach. She provided a massage wearing only her thong panties. [redacted] advised Epstein had masturbated every time she provided a massage. She stated Epstein continued to masturbate until he climaxed. Once that occurred the massage was over. She felt the whole situation was weird but she advised she was paid $200.00 for providing the massage. She also stated [redacted] was paid $200.00 by Epstein for bringing [redacted] stated she had gone a total of 15 times to Epstein's residence to provide a massage and things had escalated from just providing a massage. Epstein began touching her on her buttocks and grabbed her closer to him as he masturbated. Epstein also grabbed her breasts and fondled her breasts with his hands as she provided the massage. [redacted] stated on one occasion, while she was only seventeen years of age, he offered extra monies to have vaginal intercourse. She stated this all occurred on the massage table. [redacted] stated Epstein penetrated her vagina with his penis and began having intercourse with her until he reached the point of climax. Epstein removed his penis from her vagina and climaxed onto the massage table. [redacted] received $350.00 for her massage. I asked her if she had any formal training in providing massages, [redacted] stated she did not. [redacted] continued to state on one other occasion, Epstein introduced his girlfriend, [redacted] into the massage. [redacted] was brought into room with [redacted] to provide a massage. Epstein had them kiss and fondle each other around the breasts and buttocks as they provided a massage to Epstein. Epstein, watched and masturbated as this occurred. On other occasions, Epstein, introduced the large white vibrator/massager in the massage. Epstein stroked the vibrator/massager on [redacted] vagina as she provided the massage.

On November 14, 2005, Det Sandman and I met with [redacted] dob [redacted] During a sworn taped statement she advised she started going to the house approximately one year ago and has been there approximately five or six times. [redacted] also stated she was sixteen years old when she first went to Epstein's house. On her first visit she was brought by a fellow student from [redacted] High School known to her as [redacted] stated [redacted] brought her into the house and she was introduced t[redacted] then brought her upstairs into a master bathroom, located within the bedroom. [redacted] stated she met Epstein in the bathroom. He laid on the table and picked the massage oils. She provided the massage as he laid naked on the massage bed. She stated she rubbed his calves and back area. Upon the end of the massage, Epstein removed himself from the massage table and paid her $300.00 for the massage. [redacted] said each subsequent time she went to the house, she was notified by [redacted] that Epstein was in town and would like her to "work". [redacted] stated she returned to the house and was again led upstairs by [redacted] She provided the massage, clothed. [redacted] was asked if she ever removed her clothing to provide a massage. [redacted] stated it was not until the third time that she went that she removed her clothing. [redacted] stated she was notified by [redacted] that Epstein wanted her to come to work. She arrived at the house and was led upstairs by [redacted] She started providing the massage

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EFTA00231955

when Epstein asked her to remove her clothing. [redacted] removed her pants, shirt and bra. She stayed in her thong panties and continued rubbing Epstein. Epstein turned over onto his back and she rubbed his chest area. [redacted] stated she knew he was masturbating himself as she providing the massage. [redacted] stated she believed he climaxed based on his breathing. She did not want to view either the climax or the fact that he was masturbating. [redacted] stated once the breathing relaxed he got up and told her to get dressed. She was paid $300.00 for her services. [redacted] stated on the last time she went to provide a massage, she was notified by [redacted] to come to the house and "work". [redacted] stated she was now dating her current boyfriend and did not feel comfortable going. She recalled it was approximately January 2005. She said she went, already thinking that this would be the last time. She went upstairs and went into the master bathroom. She met with Epstein, who was wearing only a towel, and laid onto the table. [redacted] stated Epstein caught her looking at the clock on several occasions. Epstein asked her if she was in a hurry. [redacted] stated her boyfriend was in the car waiting for her. [redacted] further stated that Epstein got upset as he wasn't enjoying the massage. She told him that she didn't want to continue and she would not be back. Epstein told her to leave as she was ruining his massage. [redacted] advised she had no formal training in providing any massages. [redacted] stated although she had a falling out with Epstein, she still received a Christmas bonus from Epstein. [redacted] stated she was wired money from Western Union for her Christmas bonus. Subpoena results from Western Union revealed money was sent from Jeffrey Epstein on December 23, 2004. [redacted] received $200.00 from Epstein for her Christmas bonus.

On November 15, 2005, Det. Sandman and I met with [redacted] dob [redacted]. During a sworn taped statement, [redacted] stated she met Jeffrey Epstein over a year ago. She was sixteen years of age and was approached by [redacted] a fellow [redacted] High School student, who informed her that she could make $200.00 providing a massage to Epstein. [redacted] had informed her that she would have to provide this massage topless. [redacted] made the arrangements with Epstein and his assistants and took [redacted] to the house. [redacted] stated [redacted] and she entered through a glass door that led into a kitchen. She was taken upstairs by [redacted] to a master bedroom. She recalled the master bathroom had a large pink couch, sauna and matching shower. Epstein entered into the room wearing only a towel. [redacted] and [redacted] removed their clothing remaining only in thong underwear. She further stated that Epstein laid on his chest on the table. The oils were selected on which ones to use. Both [redacted] and [redacted] provided the massage on his legs, back and feet. Forty minutes into the massage, Epstein turned over onto his back and requested [redacted] wait downstairs in the kitchen area for [redacted] Epstein instructed [redacted] to finish the massage. As [redacted] got dressed, [redacted] starting rubbing Epstein's chest. [redacted] left the room, and Epstein began masturbating as [redacted] rubbed Epstein's chest. [redacted] stated Epstein continued masturbating until he climaxed on the towel he was wearing. When asked if he had removed the towel she stated he turned the towel around so that the opening would allow him to expose himself. After he cleaned himself off with the

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State of Florida
County of Palm Beach

Signature/Arresting Officer

Signature of Police Officer (F.S.S. 117.10)

Date: 05/01/2006

EFTA00231956

towel he instructed [redacted] the massage was done and to get dressed and meet with him downstairs. [redacted] got dressed and met with Epstein in the kitchen area. She was paid $200.00 dollars for providing the massage. [redacted] stated she was aware that [redacted] also received monies for the same thing. The second time she went to the house she was again approached by [redacted] advised if she wanted to return to the house to provide another massage. [redacted] agreed and the arrangements were made by [redacted] for her to return to the house. [redacted] stated [redacted] drove her to the house and knocked on the same glass door which leads to the kitchen area. They were allowed entry into the house by one of the staff members. [redacted] led her upstairs to the master bedroom and master bathroom area. [redacted] left [redacted] this time to do the massage alone. Epstein entered the room again wearing only a towel. [redacted] began removing her clothing as she did the last time she was at the house. Epstein instructed her to get naked. He laid on the table onto his stomach as [redacted] began massaging his legs and back. As [redacted] finished with Epstein's back and legs, Epstein then turned over onto his back. [redacted] started to rub his chest and he began masturbating. As [redacted] rubbed his chest, Epstein leaned over and produced a massager/vibrator. He turned it on and began rubbing [redacted] vagina and masturbating himself at the same time. [redacted] stated she continued to rub his chest as this was occurring. She described the vibrator/massager as large grey with a large head. Epstein rubbed her vagina for approximately two to three minutes with the massager/vibrator. He then removed the vibrator from her vaginal area and concentrated on masturbating himself. [redacted] stated Epstein climaxed onto the towel again and informed her that the massage was done. [redacted] got dressed and met with [redacted] who was waiting in the kitchen area. She received $200.00 for the massage. [redacted] said she never returned to the house and had no desire to return to the house. [redacted] was asked if she received any formal massage training. She advised she had no formal training. [redacted] was asked if Epstein knew her real age. [redacted] stated he knew, as he asked her questions about herself and high school. He was aware she attended, and is still attending [redacted] High School.

During the course of the investigation a search warrant was executed at Jeffrey Epstein's home located at 358 El Brillo Way in Palm Beach. While in the home I observed the pink and green couch within the master bedroom area just as the girls previously mentioned. The stairway, which is located from the kitchen area to the master bedroom area, is lined with photos of naked young girls. Additionally, numerous photographs of naked young females, some of which appeared to be the girls I previously interviewed, were on display throughout the house. Also located in the house were various phone message books. The telephone message books have a duplicate copy (Carbon Copy) which, once a phone message is written into the book, the top copy is then torn on the perforated edge and the carbon copy is left in the book. First names of girls, dates and telephone numbers were on the copy of the messages. I recognized various numbers and names of girls that had already been interviewed. The body of the messages were time of the day that they called for confirmation of "work." Other names and telephone numbers were located in which the body of the messages were, "I have girls for him" or "I have 2 girls for him." These

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messages were taken by [redacted] who signed the bottom of the messages. During the execution of the warrant, I located a [redacted] High School transcript for [redacted] in Epstein's bedroom desk. This desk had stationary marked Jeffrey E Epstein. I located a wood colored armoire beside Epstein's bed that contained a bottle of "Joy Jelly," which is used to provide a warm massage. Several massage tables were located throughout the second floor of the residence, including a massage table found in Epstein's bedroom. On the first floor of the residence I found two covert cameras hidden within clocks. One was located in the garage and the other located in the library area on a shelf behind Epstein's desk. A computer was located which was believed to contain the images from the covert cameras. The computer's hard drive was reviewed which showed several images of [redacted] and other witnesses that have been interviewed. All of these images appeared to come from the camera positioned behind Epstein's desk.

On December 13, 2005, Det. Dawson and I met with [redacted] dob [redacted] During a sworn taped statement, [redacted] stated that when she was sixteen years old she was taken to Epstein's house to provide a massage for money. [redacted] stated it was before Christmas last year (2004) when an associate, [redacted] approached her and asked if she needed to make money for Christmas. [redacted] made arrangements to take [redacted] to the house and drove [redacted] to the house to "work." They were encountered by a white female with long blond hair. [redacted] was unable to remember the name of the white female with blond hair but knew she was Epstein's assistant. She was led upstairs by the white female who explained that there would be lotions out already and Epstein would choose the lotion he wanted her to use. She was led through a spiral staircase which led to a master bedroom and bathroom. The massage table was already set up in the bathroom. [redacted] described the bathroom as a large spacious bathroom with a steam room and shower beside it. [redacted] was introduced to Epstein who was on the phone when she entered the room. Epstein was wearing a white towel and laid on his stomach so that [redacted] may massage his feet and calves. [redacted] started the massage with the oils Epstein chose and rubbed his feet and calves. Epstein got off the phone and requested she massage his back as well. [redacted] began rubbing his back and got to the small of his back. During the rubbing of his back, Epstein asked her to get comfortable. He requested she remove her pants and shirt. [redacted] removed her shirt and pulled her pants off. [redacted] stayed in her bra and thong panties. As she finished massaging the small of Epstein's back, he then turned onto his back. Epstein instructed [redacted] to rub his chest and pinch his nipples. As she began to rub his chest, Epstein asked her questions about herself. [redacted] remembered telling him she attended [redacted] High School. Epstein asked her if she was sexually active. Before [redacted] could answer, he also asked what sexual position does she enjoy. [redacted] stated she was shy and didn't like talking about those things. She continued rubbing his chest. Epstein reached up and unsnapped her bra from the front. [redacted] explained the bra she used had a front snapping device. Epstein rubbed her breasts and asked her if she like having her breasts rubbed. [redacted] said "no, I don't like that." Epstein then removed his towel and laid on the bed naked exposing his penis to [redacted] He began touching his penis and masturbated as he touched her breasts. [redacted] explained Epstein then

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touched her vaginal area by rubbing her vagina with his fingers on the outside of her thong panties. [redacted] tensed up and stated Epstein was aware that she was uncomfortable. [redacted] stated that Epstein said to her, "Relax, I'm not going inside." She further explained Epstein commented to her how beautiful and sexy she was. Epstein then moved her thong panties to one side and began stroking her clitoris. [redacted] said, "He commented how hard my clit was." He then inserted two fingers in her vagina and was stroking her within her vagina. She tried pulling back to pull out his fingers from within her vagina. Epstein removed his fingers from within her vagina and apologized for putting his fingers inside her. During this time, he kept his hand on her vaginal area and continued to rub her vagina. [redacted] stated he rubbed her really hard as he was masturbating. [redacted] said he climaxed onto the towel he had been previously wearing and got up from the table. Epstein told her there was $200.00 dollars for her on the dresser within the master bathroom. Epstein also told her that there was an additional $100.00 that was to be given to [redacted] for bringing her there to massage him. Epstein told her to leave her telephone number with his assistant as he wanted to see her again. Epstein stated his assistant would contact her to work again soon. I asked her if she ever received any formal massage training to which [redacted] stated she did not. [redacted] stated it was the only time she ever went to work for Jeff and knew what happened to her was wrong. She further stated that she had never been contacted for any additional work.

On January 9, 2006, I located and interviewed another victim, [redacted] dob [redacted] [redacted] was identified as a potential victim/witness from information obtained during trash pulls from Epstein's residence. [redacted] stated she met Epstein when she was fifteen years of age. She was approached by a friend from [redacted] High School, [redacted] [redacted] to be taken to Jeffrey Epstein's house to work. She was originally told she would be able to model lingerie for a wealthy Palm Beacher. [redacted] was taken to Epstein's house located on El BrilloWay. [redacted] introduced [redacted] to Jeffrey Epstein. Epstein had his personal chef prepare dinner for [redacted] and [redacted] At the conclusion of dinner, [redacted] and Epstein brought [redacted] upstairs into a master bedroom area. [redacted] observed a large massage table with a sheet on it. Epstein entered through a door and exited wearing only a towel. [redacted] informed [redacted] that they were going to provide a massage on Epstein. [redacted] asked why were they doing this instead of modeling lingerie. [redacted] explained to [redacted] that this was his routine and to rub his calves and feet. Epstein had told [redacted] to get comfortable. [redacted] removed her pants and blouse. [redacted] stated she stayed only in panties as she did not wear a bra that evening. [redacted] stated while rubbing his calves and feet, Epstein turned over onto his back. Epstein told [redacted] to rub his chest and rub his nipples. [redacted] stated that as she started rubbing his chest, Epstein began masturbating himself . Epstein touched her breasts and stroked her vagina with his fingers. Epstein continued to masturbate himself as he stroked her vagina. Epstein ejaculated on his towel and paid [redacted] $200.00 for the massage. Epstein told [redacted] that if she told anyone what happened at his house that bad things could happen. [redacted] and [redacted] were brought home by Epstein's houseman and [redacted] was afraid that Epstein knew where she lived. [redacted] stated that several days later she received a telephone call from [redacted]

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EFTA00231959

[redacted] who coordinated for [redacted] to return to "work." [redacted] returned to the house and was brought to Epstein's bedroom area by [redacted] who prepared the room for the massage. Epstein entered the room wearing only a towel. Epstein had [redacted] remove her clothing and provide the massage naked. [redacted] began rubbing his feet and calves and Epstein turned over onto his back. Epstein rubbed her vagina with his fingers. Epstein began to masturbate himself with an upwards and downward motion on his penis. Epstein continued to touch her vagina with one hand and masturbate with the other hand. Once Epstein ejaculated onto the towel he was wearing, the massage was over. [redacted] was paid $200.00 for the massage. Epstein again told [redacted] not to speak of what happened at his house or bad things would happen. [redacted] wanted to notify authorities however she was afraid of what would happen to either her or her family.

During the course of the investigation, several subjects were identified as a potential witness/victim through information obtained during the trash pulls, physical surveillance and telephone message books retrieved from the search warrant. While conducting research on the subjects, I discovered that the females were age eighteen or older. Interviews were conducted on the consenting adults whose statements provided the same massage routine when they went to "work" for Epstein. The females would be notified by [redacted], and made appointments for the females to "work" for Epstein. The females would come to Epstein's house and were led upstairs, through a stairwell from the kitchen area, by [redacted] to Epstein's bedroom. Epstein would then enter the room wearing only a towel, and ask them to get comfortable. The females would then provide the massage naked as Epstein would either touch their vaginas with his fingers and/or utilize the massager/vibrator on their vaginal area. He would masturbate during the massage and upon his climaxing, the massage would end. The girls were then paid two or three hundred dollars for the massage.

On November 21, 2005 I interviewed Jose Alessi, a former houseman for Jeffrey Epstein. Alessi stated he was employed for eleven years with Mr. Epstein, from approximately 1993 through 2004. Alessi stated he was the house manager, driver and house maintenance person. It was his responsibility to prepare the house for Epstein s arrival. When asked about cooks or assistants, Alessi stated they traveled with Epstein on his private plane. I asked Mr. Alessi about the massages that have occurred at Epstein's home. Alessi stated Epstein receives three massages a day. Each masseuse that visited the house was different. Alessi stated that towards the end of his employment, the masseuses were younger and younger. When asked how young, Mr. Alessi stated they appeared to be sixteen or seventeen years of age at the most. The massages would occur in Epstein's bedroom or bathroom. He knew this because he often set up the massage tables. I asked if there were things going on other than a massage. Alessi stated that there were times towards the end of his employment that he would have to wash off a massager/vibrator and a long rubber penis, which were in the sink after the massage. Additionally, he stated the bed would almost always have to be made after the massage.

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Date: 05/01/2006

EFTA00231960

On January 4, 2006 I interviewed another former houseman, Mr Alfredo Rodriguez. During a sworn taped statement, Mr. Rodriguez stated he was employed by Jeffrey Epstein for approximately six months, from November 2004 through May of 2005. His responsibilities as house manager included being the butler, chauffeur, chef, houseman, run errands for Epstein and provide for Epstein's guests. I asked Rodriguez about masseuses coming to the house. Rodriguez stated Epstein would have two massages a day. Epstein would have one massage in the morning and one massage in the afternoon everyday he was in residence. Rodriguez stated he would be informed to expect someone and make them comfortable until either [redacted] or Epstein would meet with them. Rodriguez stated once the masseuses would arrive, he would allow them entry into the kitchen area and offer them something to drink or eat. They would then be encountered by either [redacted] or Epstein. They would be taken upstairs to provide the massage. I asked Rodriguez if any of the masseuses appeared young in age. Rodriguez stated the girls that would come appeared to be too young to be masseuses. He stated one time under Epstein's direction, he delivered a dozen roses to [redacted] High School for one of the girls that came to provide a massage. He knew the girls were still in high school and were of high school age. I asked Rodriguez about the massages. He felt there was a lot more going on than just massages. He would often clean Mr. Epstein's bedroom after the alleged massages and would discover massagers/vibrators and sex toys scattered on the floor. He also said he would wipe down the vibrators and sex toys and put them away in an armoire. He described the armoire as a small wood armoire which was on the wall close to Epstein's bed. On one occasion Epstein ordered Rodriguez to go to the Dollar rent a car and rent a car for the same girl he brought the roses to, so that she could drive her self to Epstein's house without incident. Rodriguez said the girl always needed rides to and from the house. Rodriguez produced a green folder which contained documents, and a note with Mr. Epstein's stationary with direction to deliver a bucket of roses to [redacted] High School after [redacted] high school drama performance. Also in that same note was direction to rent a car for [redacted] and direction to extend the rental contract.

During the course of the investigation, subpoenas were obtained for cell phone and home phone records from several victims and witnesses along with the cell phone records of [redacted]. An analysis of these records was conducted which found numerous telephone calls were made between [redacted] and the victims. These records indicate the dates the calls were made are consistent with the dates and times they victims/witnesses stated they were contacted. Specifically, The phone records showed [redacted] called [redacted] during the exact times and dates when victim [redacted] advised the incident occurred. [redacted] also coordinated the encounters with [redacted] during the time frame the girls stated they occurred.

Pursuant to a lawful subpoena I obtained Epstein's private plane records for 2005 from Jet

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Date: 05/01/2006

EFTA00231961

Aviation. The plane records show arrival and departure of Epstein's plane at Palm Beach International airport. These records were compared to the cell phone records of [redacted] This comparison found that all the phone calls [redacted] made to [redacted] and the victims were made in the days just prior to their arrival or during the time Epstein was in Palm Beach.

Jeffrey Epstein, who at the time of these incidents was fifty one years of age, did have vaginal intercourse either with his penis or digitally with [redacted] and [redacted] who were minors at the time this occurred, and who at the time of the incident was fifty two years of age, did use a vibrator on the external vaginal area of [redacted] a fourteen year old minor. Therefore, as [redacted] coordinated and aided in the recruitment of minors to frequent Epstein's house so that sexual services were provided to Epstein, scheduled the said minors to return to the work for Epstein, secured their appointments for the purpose of sexual activity and lewd and lascivious acts and arranged the bedroom for said minors, there is sufficient probable cause to charge [redacted] with four counts of Principal in the 1st degree Unlawful Sexual Activity with a Minor, in violation of Florida State Statute 794.05(1) , a second degree felony and there is sufficient probable cause to charge her with Lewd and Lascivious Molestation, in violation of Florida State Statute 800.04 (5), a second degree felony.

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Date: 05/01/2006

EFTA00231962

REQ FOR EPSTEIN WARR

EFTA00231963

REQUEST FOR WARRANT

DEFENDANT: Jeffrey Esptein DATE OF BIRTH [redacted]

HABITUAL OFFENDER: YES _____ NO _____ A/K/A _____

VICTIM RELATED / ACQUAINTED WITH DEFENDANT? YES XX NO _____

AGENCY CASE NUMBER: 05-368 (1)

LEAD OFFICER: Det. Joe Recaery

AGENCY: **PALM BEACH POLICE DEPARTMENT** PHONE NUMBER: [redacted]

CURRENT SHIFT HOURS: 8 am TO 5 pm DAYS OFF: _____

LEAVE / SHIFT CHANGE INFO: _____

WAS ARREST MADE FOR, OR IN CONJUNCTION WITH ANOTHER AGENCY. IF SO, WHAT AGENCY?:

_____

SENTENCING RECOMMENDATIONS: CONTACT DETECTIVE

ADDITIONAL COMMENTS: _____

****

FILING DOCUMENTS ATTACHED:

- X ARREST FORM
- X P.C. AFFIDAVIT (2 COPIES)
- X WITNESS / EVIDENCE LIST Previously Given to ASA BELOHLAVEK
- ____ SWORN STATEMENT OF MATERIAL WITNESS(ES)
- X OFFENSE REPORT (2 COPIES)
- ____ ACCIDENT REPORTS (ALL)
- ____ WITNESS STATEMENTS (ALL)
- X FCIC/NCIC CRIMINAL HISTORY Previously Given to ASA BELOHLAVEK
- ____ REQUEST FOR CONVICTION LETTERS
- X PROPERTY RECEIPT Previous given to ASA BELOHLAVEK
- ____ VEHICLE TOW RECEIPT
- ____ OTHER ATTACHMENTS INCLUDE:

_____

_____

INITIAL FOR COMPLETENESS: JR (OFFICER) 7915 (ID#) 050106 (DATE)

_____ (SUPERVISOR) _____ (ID#) 5-01-06 (DATE)

DELIVERED BY: Recarey (DETECTIVE) 7915 (ID#) 050106 (DATE)

RECEIVED
MAY 01 2006
OINTAKE

RECEIVED, STATE ATTORNEY'S OFFICE ON: 5/01/06 BY: [signature]

ARREST / NOTICE TO APPEAR
Juvenile Referral Report

1 Arrest 3 Request for Warrant
2 NTA 4 Request for Capias

Juvenile

ADMINISTRATIVE

OBTS Number

Agency ORI Number: FLO 5 0 0 6 0 0

Agency Name: PALM BEACH POLICE DEPARTMENT

Agency Report Number (N.T.A.'s only): 7 6 - -

Charge Type (Check as many as apply): ☐ 1. Felony ☐ 3. Misdemeanor ☐ 5. Ordinance ☐ 2. Traffic Felony ☐ 4. Traffic Misdemeanor ☐ 6. Other

If Weapon Seized — Enter Type

Multiple Clearance Indicator

Location of Arrest (Including Name of Business)

Location of Offenses (Business Name, Address)

Date of Arrest	Time of Arrest	Booking Date	Booking Time	Jail Date	Jail Time	Location of Vehicle

DEFENDANT

Name (Last, First, Middle)

Alias (Name, DOB, Soc. Sec. #, Etc.)

Race (W - White, B - Black, I - American Indian, O - Oriental/Asian)	Sex	Height	Weight	Eye Color	Hair Color	Complexion	Build

Scars, Marks, Tattoos, Unique Physical Features (Location, Type, Description)

Marital Status

Religion

Indication of: Alcohol Influence ☐ Y ☐ N ☐ Unk; Drug Influence ☐ Y ☐ N ☐ Unk

Local Address (Street, Apt. Number) (City) (State) (Zip) Phone ( ) Residence Type: 1. City 2. County 3. Florida 4. Out of State

Permanent Address (Street, Apt. Number) (City) (State) (Zip) Phone ( ) Address Source

Business Address (Name, Street) (City) (State) (Zip) Phone ( ) Occupation

D/L Number, State	Soc. Sec. Number	INS Number	Place of Birth (City, State)	Citizenship

CO-DEF.

Co-Defendant Name (Last, First, Middle)	Race	Sex	Date of Birth	☐ 1. Arrested ☐ 2. At Large	☐ 3. Felony ☐ 4. Misdemeanor ☐ 5. Juvenile
Co-Defendant Name (Last, First, Middle)	Race	Sex	Date of Birth	☐ 1. Arrested ☐ 2. At Large	☐ 3. Felony ☐ 4. Misdemeanor ☐ 5. Juvenile

JUVENILE

☐ Parent ☐ Legal Custodian ☐ Other: Name (Last) (First) (Middle) Residence Phone ( )

Address (Street, Apt. Number) (City) (State) (Zip) Business Phone ( )

TOT JAC Date Time

The above address was provided by ☐ defendant and / or ☐ defendant's parents. The child and / or parent was told to keep the Juvenile Court Clerk's Office (Phone 355-2526) informed of any change of address.
☐ Yes, by: (Name) ☐ No: (Reason)

School Attended Grade

Property Crime? ☐ Yes ☐ No

Description of Property

Value of Property

CODE

Drug Activity: N. N/A, P. Possess, S. Sell, B. Buy, T. Traffic, R. Smuggle, D. Deliver, E. Use, K. Dispense/Distribute, M. Manufacture/Produce/Cultivate, Z. Other

Drug Type: N. N/A, A. Amphetamine, B. Barbiturate, C. Cocaine, E. Heroin, H. Hallucinogen, M. Marijuana, O. Opium/Deriv., P. Paraphernalia/Equipment, S. Synthetic, U. Unknown, Z. Other

CHARGE

Charge Description	Counts	Domestic Violence	Statute Violation Number	Violation of ORD #
		☐ Y ☐ N		

Drug Activity	Drug Type	Amount / Unit	Offense #	Warrant / Capias Number	Bond

CHARGE

Charge Description	Counts	Domestic Violence	Statute Violation Number	Violation of ORD #
		☐ Y ☐ N		

Drug Activity	Drug Type	Amount / Unit	Offense #	Warrant / Capias Number	Bond

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Charge Description	Counts	Domestic Violence	Statute Violation Number	Violation of ORD #
		☐ Y ☐ N		

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CHARGE

Charge Description	Counts	Domestic Violence	Statute Violation Number	Violation of ORD #
		☐ Y ☐ N		

Drug Activity	Drug Type	Amount / Unit	Offense #	Warrant / Capias Number	Bond

NOTICE TO APPEAR

☐ Instruction No. 1 Mandatory Appearance in Court

☐ Instruction No. 2 You need not appear in Court but must comply with instructions on Reverse Side.

Location (Court, Room Number, Address)

Court Date and Time: Month Day Year Time A.M. P.M.

I AGREE TO APPEAR AT THE TIME AND PLACE DESIGNATED TO ANSWER THE OFFENSE CHARGED OR TO PAY THE FINE SUBSCRIBED. I UNDERSTAND THAT SHOULD I WILLFULLY FAIL TO APPEAR BEFORE THE COURT AS REQUIRED BY THIS **NOTICE TO APPEAR**, THAT I MAY BE HELD IN CONTEMPT OF COURT AND A WARRANT FOR MY ARREST SHALL BE ISSUED.

Signature of Defendant (or Juvenile and Parent / Custodian) Date Signed

ADMIN.

HOLD for other Agency
Name:

☐ Dangerous ☐ Resisted Arrest
☐ Suicidal ☐ Other:

Signature of Arresting Officer
X

Name of Arresting Officer (Print) I.D. #

Name Verification (Printed by Arrestee)
(PRINT)

Intake Deputy	I.D. #	Pouch	Transporting Officer	I.D. #	Agency

Witness here if subject signed with an "X".

PAGE ____ OF ____

DISTRIBUTION: WHITE — COURT COPY GREEN — STATE ATTORNEY YELLOW — AGENCY PINK — JAIL GOLD - DEFENDANT (N.T.A's ONLY)

ARREST / NOTICE TO APPEAR
Juvenile Referral Report

1 Arrest 2 NTA 3 Request for Warrant 4 Request for Capia — Juvenile

ADMINISTRATIVE

OBTS Number

Agency ORI Number: FLO 5 0 0 6 0 0

Agency Name: PALM BEACH POLICE DEPARTMENT

Agency Report Number (N.T.A.'s only): 7 6 - - ( )

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If Weapon Seized — Enter Type

Multiple Clearance Indicator

Location of Arrest (Including Name of Business)

Location of Offenses (Business Name, Address)

Date of Arrest	Time of Arrest	Booking Date	Booking Time	Jail Date	Jail Time	Location of Vehicle

DEFENDANT

Name (Last, First, Middle)

Alias (Name, DOB, Soc. Sec. #, Etc.)

Race (W - White, B - Black, I - American Indian, O - Oriental/Asian)	Sex	Date of Birth	Height	Weight	Eye Color	Hair Color	Complexion	Build

Scars, Marks, Tattoos, Unique Physical Features (Location, Type, Description) | Marital Status | Religion | Indication of: Alcohol Influence ☐ Y ☐ N ☐ Unk; Drug Influence ☐ Y ☐ N ☐ Unk

Local Address (Street, Apt. Number) (City) (State) (Zip) | Phone ( ) | Residence Type: 1. City 2. County 3. Florida 4. Out of State

Permanent Address (Street, Apt. Number) (City) (State) (Zip) | Phone ( ) | Address Source

Business Address (Name, Street) (City) (State) (Zip) | Phone ( ) | Occupation

D/L Number, State	Soc. Sec. Number	INS Number	Place of Birth (City, State)	Citizenship

CO-DEF.

Co-Defendant Name (Last, First, Middle)	Race	Sex	Date of Birth	☐ 1. Arrested ☐ 2. At Large	☐ 3. Felony ☐ 4. Misdemeanor ☐ 5. Juvenile
Co-Defendant Name (Last, First, Middle)	Race	Sex	Date of Birth	☐ 1. Arrested ☐ 2. At Large	☐ 3. Felony ☐ 4. Misdemeanor ☐ 5. Juvenile

JUVENILE

☐ Parent ☐ Legal Custodian ☐ Other: Name (Last) (First) (Middle) | Residence Phone ( )

Address (Street, Apt. Number) (City) (State) (Zip) | Business Phone ( )

TOT JAC | Date | Time

The above address was provided by ☐ defendant and / or ☐ defendant's parents. The child and / or parent was told to keep the Juvenile Court Clerk's Office (Phone 355-2526) informed of any change of address. ☐ Yes, by: (Name) ☐ No: (Reason) | School Attended | Grade

Property Crime? ☐ Yes ☐ No | Description of Property | Value of Property

CODE

Drug Activity: N. N/A, P. Possess, S. Sell, B. Buy, T. Traffic, R. Smuggle, D. Deliver, E. Use, K. Dispense/ Distribute, M. Manufacture/ Produce/ Cultivate, Z. Other

Drug Type: N. N/A, A. Amphetamine, B. Barbiturate, C. Cocaine, E. Heroin, H. Hallucinogen, M. Marijuana, O. Opium/Deriv., P. Paraphernalia/ Equipment, S. Synthetic, U. Unknown, Z. Other

CHARGE

Charge Description	Counts	Domestic Violence ☐ Y ☐ N	Statute Violation Number	Violation of ORD #

Drug Activity	Drug Type	Amount / Unit	Offense #	Warrant / Capias Number	Bond

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Charge Description	Counts	Domestic Violence ☐ Y ☐ N	Statute Violation Number	Violation of ORD #

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NOTICE TO APPEAR

☐ Instruction No. 1 Mandatory Appearance in Court

☐ Instruction No. 2 You need not appear in Court but must comply with instructions on Reverse Side.

Location (Court, Room Number, Address)

Court Date and Time: Month Day Year Time A.M. P.M.

I AGREE TO APPEAR AT THE TIME AND PLACE DESIGNATED TO ANSWER THE OFFENSE CHARGED OR TO PAY THE FINE SUBSCRIBED. I UNDERSTAND THAT SHOULD I WILLFULLY FAIL TO APPEAR BEFORE THE COURT AS REQUIRED BY THIS NOTICE TO APPEAR, THAT I MAY BE HELD IN CONTEMPT OF COURT AND A WARRANT FOR MY ARREST SHALL BE ISSUED.

Signature of Defendant (or Juvenile and Parent / Custodian) Date Signed

ADMIN.

HOLD for other Agency — Name:

☐ Dangerous ☐ Resisted Arrest ☐ Suicidal ☐ Other:

Intake Deputy I.D. # Pouch

Signature of Arresting Officer — X

Name of Arresting Officer (Print) I.D. #

Transporting Officer I.D. # Agency

Name Verification (Printed by Arrestee) (PRINT)

Witness here if subject signed with an "X".

PAGE ____ OF ____

DISTRIBUTION: WHITE — COURT COPY GREEN — STATE ATTORNEY YELLOW — AGENCY PINK — JAIL GOLD - DEFENDANT (N.T.A's ONLY)

EFTA00231966

Probable Cause Affidavit

Palm Beach Police Department

Agency ORI# FLO 500600

Police Case#: 05-368 (1)

Defendant: **Jeffrey Epstein**
Race/Sex: **White Male**
DOB: [redacted]
Charges: **Unlawful Sexual Activity with a Minor (4) counts**
Lewd and Lascivious Molestation

From March 15, 2005, through February 2006, the Palm Beach Police Department conducted a sexual battery investigation involving Jeffrey Epstein, [redacted] and [redacted] Sworn taped statements were taken from five victims and seventeen witnesses concerning massages and unlawful sexual activity that took place at the residence of Jeffrey Epstein, 358 El Brillo Way, Palm Beach. Several of the victims were recruited by and brought to the residence by [redacted] to perform massages for Epstein, for which [redacted] received monetary compensation. During the visit they would be introduced to [redacted], Epstein's assistant, who in turn would record their telephone numbers and name. The victims would be brought to Epstein's bedroom to provide the massage. Epstein would enter the room and order the victims to remove their clothing to provide the massage. As the victims complied and provided the massages, Epstein would rub his fingers on their vaginas. On occasion, Epstein would introduce a massager/vibrator and rub the victims vaginas as they provided the massage. On three separate occasions, Epstein had intercourse and inserted his penis/fingers in the victims vaginas. At the conclusion of the massages the victims were paid sums of money ranging from $200 - $1,000. The facts, as reported, are as follows:

On 03/15/2005, A fourteen year old white female, hereinafter referred to as "[redacted] dob [redacted] and her family reported unlawful sexual activity which occurred at a residence within the Town of Palm Beach. [redacted] reported that a subject known to her as "Jeff" had touched her vaginal area with a vibrator/massager while within his residence. "Jeff" was later identified as Jeffrey Epstein through a photo line up.

During a sworn taped interview, [redacted] stated that [redacted] dob [redacted] a cousin of [redacted]s boyfriend and classmate at [redacted] High School, worked for a wealthy man and did sexual favors for him. She also admitted that [redacted] had offered her an opportunity to make money. During the beginning of the month of February 2005, [redacted] explained that she was first approached by [redacted] to go with her to Epstein's house. [redacted] stated that [redacted] along with a Hispanic female, later identified at [redacted] pick her up at her father's house on a Sunday. [redacted] was not sure of the exact dates but knew it was a Sunday. [redacted] told her father that they were going shopping but in reality [redacted] drove them to Palm Beach. During the drive a

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The foregoing instrument was sworn to or affirmed before me this 1st day of May, 2006 by Det Joe Recarey, who is personally known to me.

Signature of Police Officer (F.S.S. 117.10)

State of Florida
County of Palm Beach

Signature/Arresting Officer

Date: 05/01/2006

EFTA00231967

conversation occurred between [redacted] and [redacted] whereas [redacted] reportedly told [redacted] that if Jeff asked her age, she should say she was eighteen. It was later confirmed by the [redacted] father that [redacted] picked his daughter up on February 6, 2005. According to [redacted] father, [redacted] drove a pick up truck.

[redacted] described Epstein's house as a two-story pink house with a Cadillac Escalade parked in the driveway. She recalled that Jeff's house was on a dead end street. Upon arriving at the house [redacted] stated that they walked up a driveway, past what appeared to be a small guard/security room. A male approaching them asking what they wanted. [redacted] stated they were there to see Epstein. The male allowed them to continue walking up to the house. [redacted] stated the man told them that Epstein was not there but was expected back. He allowed them to enter the house, via the kitchen. He offered them something to drink while they waited inside. Shortly thereafter, Epstein and his assistant, described as white female with blond hair and later identified as [redacted], entered the kitchen. Epstein introduced himself to [redacted] [redacted] described Epstein as being approximately forty-five years old, having a long face and bushy eyebrows, with graying hair.

[redacted] and Epstein left the kitchen leaving [redacted] alone in the kitchen. They returned a short time later. They all spoke briefly in the kitchen. [redacted] was instructed to follow [redacted] upstairs. [redacted] recalled walking up a flight of stairs, lined with photographs, to a room that had a massage table in it. Upon entering the room there was a large bathroom to the right and a hot pink and green sofa in the room. There was a door on each side of the sofa. [redacted] recalled there being a mural of a naked woman in the room, as well as several photographs of naked women on a shelf. [redacted] told the victim that Epstein would be up in a second.

Epstein entered the room wearing only a towel and told [redacted] to take off her clothes. [redacted] stated Epstein was stern when he told her to take off her clothes. [redacted] said she did not know what to do as she was the only one there in the room so she took off her shirt leaving her bra on. Epstein had removed his towel and told the [redacted] to take off everything. [redacted] stated Epstein was nude when he took his towel off, placing it on the floor as he laid down on the table. [redacted] stated she then removed her pants leaving her thong panties on. Epstein then instructed her to give him a massage pointing to a specific lotion for her to use. As [redacted] began to give Epstein the massage, he told her to get on his back. [redacted] stated she straddled herself on Epstein's back whereby her exposed buttocks were touching Epstein's bare buttocks. [redacted] said Epstein was specific in his instruction to her on how to massage him, telling her to go clockwise or counter clockwise. Epstein then turned over and instructed [redacted] to massage his chest. [redacted] was now standing on the ground and resumed massaging Epstein's chest area. [redacted] stated Epstein held onto the small of her back as she massaged his chest and shoulder area. Epstein then turned to his side and started to rub his penis in an up and down motion. Epstein then pulled out a purple vibrator and began to

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EFTA00231968

massage [redacted] vaginal area. [redacted] stated there was no penetration as the vibrator was on top of her underwear. [redacted] recalled Epstein ejaculating because he had to use the towel to wipe himself as he got off the table. Epstein then left the room and [redacted] got dressed. She went back downstairs where she met with [redacted] [redacted] said she was paid three hundred dollars in cash from Epstein. Before she left, Epstein asked [redacted] to leave her phone number. As [redacted] [redacted] and [redacted] were leaving the house, [redacted] told [redacted] she received two hundred dollars that day for bringing her.

During the course of the investigation, parental consent was granted for [redacted] to assist with the investigation. At our direction [redacted] conducted controlled taped phone calls to [redacted] cellular telephone 561-[redacted]. [redacted] spoke with [redacted] in an attempt to arrange another meeting with Epstein. [redacted] asked [redacted] what did she need to do to make more money. [redacted] stated, "the more you do, the more you get paid." [redacted] had subsequently called back [redacted] and left a voice mail message for her indicating that she had set up an appointment for [redacted] to go to Epstein's house at 11:00 am on April 5, 2005. This message was recorded from [redacted] s voice mail.

Based on the above, trash pulls were established at Epstein's residence with Supervisor Tony Higgins of the Sanitation Bureau of the Town of Palm Beach. The trash pull from April 5, 2005 revealed a telephone message for Epstein which stated [redacted] and [redacted] name at 11:00 am. This was the time frame [redacted] had informed [redacted] to be ready to go work at Epstein's house.

On October 3, 2005, Sgt Frick and I went to [redacted] residence and viewed her vehicle parked in the driveway, a red Dodge Neon. Sgt. Frick and I knocked on the door and met with [redacted] [redacted] was told that we were investigating a claim involving Jeffrey Epstein of El Brillo Way, in Palm Beach. [redacted] was asked if she would accompany us back to the police station for further questioning. She was also told that at the conclusion of the interview she would be returned home. [redacted] voluntarily came with us back to the Palm Beach Police Department.

Upon our arrival at the police station, [redacted] was brought to the interview room in the Detective Bureau where I obtained a taped, sworn statement. I began the interview by asking [redacted] how she became acquainted with Epstein. [redacted] stated that approximately two years ago, just after she turned 17 years of age, she was approached by a friend named [redacted] at the Canopy Beach Resort in Rivera Beach. [redacted] was asked if she wanted to make money. She was told she would have to provide a massage and should make $200.00. [redacted] thought about the offer and agreed to meet with Jeffrey.

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County of Palm Beach

Signature Arresting Officer

Date: 05/01/2006

EFTA00231969

[redacted] (Unknown last name) and [redacted] (Unknown last name) picked [redacted] up and she was taken to Epstein's house. Upon her arrival to the house she was introduced to Epstein in the kitchen of the house. She was also introduced to a white female known to her as [redacted]. She was led upstairs to the main bedroom known to her as Jeff Epstein's bedroom. [redacted] arranged the massage table and covered the table with a sheet. She brought out the massage oils and laid them next to the massage bed. [redacted], then left the room and informed [redacted] Jeff would be in, in a minute. Jeff entered the bedroom wearing only a towel. He removed the towel and laid nude on the massage table. He laid on the table onto his stomach and picked a massage oil for [redacted] to rub on him. During the massage, [redacted] stated "He tried to touch me and I stopped him." I asked how he tried to touch her. [redacted] stated that Epstein grabbed her buttocks and she felt uncomfortable. [redacted] told Epstein, I'll massage you but I don't want to be touched. [redacted] stated she performed the massage naked. At the conclusion of the massage, Epstein paid [redacted] $200.

After the massage Epstein stated to [redacted] that he understood she was not comfortable, but he would pay her if she brought over some girls. He told her the younger the better. [redacted] stated she once tried to bring a 23 year old female and Epstein stated that the female was too old. [redacted] stated that in total she only remembers six girls that she brought to see Epstein, each time she was paid $200. [redacted] stated she had brought the following girls: [redacted] (a16 year old female), [redacted] (a 16 year old female) and [redacted] said that at the time she brought these girls to Epstein's house they were all14 through 16 years of age. I asked [redacted] which one was the youngest. [redacted] advised [redacted] was the youngest as she was fourteen when the massage occurred. [redacted] stated every girl she brought knew what to expect when they arrived. They were told they would provide a massage, possibly naked, and allow some touching. I asked her if [redacted] was aware. She stated every girl she brought knew what to expect. She explained she knew that [redacted] wanted to make money. She approached [redacted] and explained about going to work for Jeff, [redacted] agreed and arrangements were made to bring her to Epstein's house on a weekend. [redacted] stated that she and [redacted] (Later identified as [redacted] picked up [redacted] at her house. [redacted] stated that at that time she was driving a red pickup truck. They traveled to Epstein's house and entered through the kitchen door. They met with the house chef and Epstein's assistant [redacted]. [redacted] was introduced to Epstein while they were in the kitchen area. [redacted] led [redacted] upstairs and Epstein went upstairs. When the massage was over [redacted] returned to the kitchen area. [redacted] stated she was paid $200.00 for bringing [redacted] to Epstein's house. [redacted] stated [redacted] told her she was paid $300.00 for the massage.

[redacted] stated that [redacted] was the last person she brought to Epstein's house. She had changed her cellular number to avoid being contacted by [redacted]. She continued stating that she had no direct contact with Epstein

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Date: 05/01/2006

EFTA00231970

when he was going to travel to Palm Beach. [redacted] said when Epstein announces to his assistant, [redacted], that he is traveling to Palm Beach, [redacted] would then contact [redacted] to arrange girls to "work" for Epstein. [redacted] stated that once her parents discovered that she was visiting Epstein, they disapproved of the encounters with him and she stopped. [redacted] further stated that [redacted] still tries to call [redacted] house and leaves messages.

Sgt Frick entered the room and explained to [redacted] that based on her own statements, she had implicated herself by bringing underage girls to Epstein's house. [redacted] provided cellular telephone numbers for the girls she had mentioned previously. Additionally, she also provided possible addresses and areas in which they lived.

As [redacted] was being taken home in the vehicle, a tape recorder was placed within the vehicle to record any conversations within the vehicle. During the drive back to her home, [redacted] made the comment " I'm like a Heidi Fleiss." (Hollywood Madam who sent girls to clients for sexual favors in California). [redacted] was dropped off at her house without incident.

On October 3, 2005, Sgt Frick and I went to speak with [redacted] a sixteen year-old female who was brought to Epstein's residence by [redacted] We met with [redacted] mother at their front door. We explained the ongoing investigation and asked to speak with [redacted] as we had information that she had "worked" for Jeff. Mrs. [redacted] introduced us to her husband and allowed us entry into the home. We sat in the dining room and met with [redacted] Date of Birth [redacted]. As she was under the age of eighteen, Mrs [redacted] was advised we would be speaking with her. She expressed if her daughter had information, she wanted to assist. We interviewed [redacted] who denied having any inappropriate encounters with Jeff (Epstein). She stated she had gone to Jeff's house with [redacted] approximately eight months ago and sat in the kitchen with the house chef, but nothing happened. As the parents were present during the interview, we felt that [redacted] was withholding information from us. She made several comments as to putting the entire incident behind her. I left my telephone number and advised should she wish to speak with me again to telephone me. Sgt Frick and I thanked Mrs. [redacted] for her time and left the area. She stated she would ask [redacted] again after we left as to what happened at Epstein's house. I informed her that [redacted] had my telephone number and hopefully she would call.

On October 4, 2005, Det Dawson and I drove to the [redacted] home and met with [redacted] and [redacted] dob [redacted] During a sworn taped statement, [redacted] stated approximately a year ago when she was seventeen years old, she was taken to a house by [redacted] stated she knows [redacted] because they both attend [redacted] High School. She was told she could make money working

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EFTA00231971

for Jeff. She was told she would have to provide a massage to Jeff. [redacted] stated upon her arrival to the house she was brought to the kitchen area by [redacted] They met with the house chef who was already in the kitchen area. [redacted] stated [redacted] would wait for her in the kitchen. [redacted] was introduced to [redacted], Jeff's assistant, who brought her upstairs to the master bedroom. [redacted] prepared the room and massage table for a massage. Epstein entered the room wearing only a towel and she provided a massage. [redacted] stated she kept her clothes on during the massage. She advised sometime during the massage, Epstein grabbed her buttocks and pulled her close to him. [redacted] said she was uncomfortable by the incident involving Jeff. At the conclusion of the massage, she was paid $200.00 for the massage. I asked [redacted] if she has any formal training in massages to which she replied no. I asked her if [redacted] received any monies for taking her to perform the massage. [redacted] stated [redacted] had received money for taking her there but was unsure in the amount. [redacted] stated she returned to Epstein's house on another occasion with [redacted] and another girl, [redacted] stated she waited in the kitchen with [redacted] while [redacted] was taken upstairs by [redacted]. [redacted] stated she only did the massage once as she was uncomfortable with the whole experience.

At the conclusion of the interview, the tape was stopped. I was informed that [redacted] had attempted to reach [redacted] via cell phone. A voice mail message on October 4, 2005 at 10:59 am, revealed a female voice who identified herself as [redacted] who requested [redacted] to call her back reference the police questioning. [redacted] provided the incoming telephone number as [redacted]. [redacted] stated she inadvertently told [redacted] about the police investigation because [redacted] had called her to tell her about how she just received a rental car from Jeff Epstein. [redacted] had called her to tell her that she was given a rental car, a 2005 Silver Nissan Sentra, to utilize to visit family and visit Epstein. [redacted] asked her what was going on at the house that the police would be asking questions. [redacted] stated [redacted] then called Jeff and [redacted] and asked what was going on reference the ongoing police investigation. According to [redacted] has since then been trying to contact her to ask about the police questions. I instructed [redacted] not to contact [redacted] and do not provide any more information to [redacted] as she would notify Jeff Epstein and [redacted] what was transpiring.

On October4, 2005, I made telephone contact with [redacted] who had left several messages for me to contact her. During the message, she advised she was not completely truthful when we met in person but would like to speak with me to advise what had happened. She further advised she did not want to speak of this incident in front of her mother. At approximately 3:48 pm I made telephone contact with [redacted] During a taped recorded statement [redacted] stated the following: approximately a year ago, when she was sixteen years of age, [redacted] took her to Epstein's house twice. She knows [redacted] because they both attend [redacted] High School. The first time she went, [redacted] drove to the house. They entered through the kitchen area where she was

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Date: 05/01/2006

EFTA00231972

introduced to [redacted] and Epstein. She was taken upstairs to a bedroom by [redacted] who set the room up with a massage bed and brought out the oils to use. Epstein then entered the room wearing a towel. He laid on the table and picked out a lotion for [redacted] to rub on him. At one point during the massage he tried to remove her shirt, at which point she became very upset and discontinued the massage. Both [redacted] and Epstein had a verbal disagreement, at which time she left without being paid. She got with [redacted] who was sitting in the kitchen and told her "let's go." [redacted] advised she received no money for that day. [redacted] also said that [redacted] had told her if she was uncomfortable with what was going on, to let him know and he'll stop. She knew that the more you do the more you get paid. [redacted] advised that several weeks later she agreed to be taken a second time by [redacted] Once they arrived at the residence, [redacted] sat in the kitchen and [redacted] took her upstairs to the master bedroom again. [redacted] set the room up with a massage bed and brought out the oils to use. Epstein then entered the room wearing a towel. He laid on the table and picked out a lotion for [redacted] to rub on him. At one point during the massage he tried to touch her buttocks. As [redacted] was wearing tight jeans and had a tight belt on Epstein was unable to touch her buttocks. Epstein then rolled onto his back during the massage and then attempted to touch her breasts. [redacted] then became upset again and told Epstein she didn't want to be touched. [redacted] discontinued the massage and was paid $200.00. [redacted] then went downstairs where [redacted] was waiting for her. She told [redacted] she wanted to leave. [redacted] said she never returned to the house. [redacted] stated she is aware that her friend, [redacted] was also at the house and had a problem with Epstein.

I later researched [redacted] dob [redacted], and met with her at her residence. During a sworn taped statement, [redacted] stated the following: on or about November 2004, she was approached at [redacted] High School by [redacted] a fellow student. [redacted] asked [redacted] if she wanted to make money. She agreed and was told she would provide a massage to wealthy man in Palm Beach. [redacted] picked her up and drove her to a house in Palm Beach. She was brought into the kitchen area of the house. She further stated that fellow [redacted] High School students [redacted] and [redacted] ([redacted] came with them. They were brought into the kitchen where she was introduced to Epstein and other females. [redacted] stated she was introduced to a female helper of Epstein, the female was described as white female (unknown name), with blond hair. She stated that the assistant was familiar with [redacted] The assistant brought her upstairs into a master bedroom area. The assistant set up the massage table and put out lotions to be used. She told [redacted] Epstein would be available in a minute. Epstein entered the room wearing only a towel. Epstein removed his towel, and laid naked on the massage table and picked a lotion to rub on his thighs and back. [redacted] further stated during the massage, Epstein asked her to remove her clothes. She complied and removed her pants and blouse. [redacted] didn't remember if she had removed her bra but feels that she did. [redacted] was certain that she stayed in her thong underwear. [redacted] continued the massage and at one point she climbed onto the massage

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Date: 05/01/2006

EFTA00231973

table, straddling Epstein to massage his back. While doing this her buttocks were touching Epsteins. [redacted] was instructed to return to the ground at which time Epstein turned to have his chest rubbed. [redacted] advised she was sure he was masturbating based on his hand movements going up and down on his penis area. [redacted] did not want to look at his penis area because she was uncomfortable. Epstein removed a large white vibrator which was next to the massage table and turned it on. [redacted] stated Epstein began rubbing the vibrator over her thong underwear on her vaginal area. Shortly thereafter, Epstein ejaculated and removed himself from the table. He walked over to where the shower was and opened the glass door. She waited as he was taking a shower in her direct view. When I asked [redacted] how old she was when this occurred, she stated she had just turned seventeen. At the conclusion of the shower, [redacted] was paid either $350.00 or $400.00. She stated she wasn't sure, but knows it was close to $400.00. [redacted] stated she never returned to provide a massage for Epstein.

At approximately 2:10 pm, Det Dawson and I met with [redacted] dob [redacted], at her residence. As [redacted] was only seventeen years of age, I had notified her mother, that she would be interviewed reference an ongoing investigation in Palm Beach. I assured her that her daughter was not a suspect. I explained the possibility of her being either a witness or victim. Mrs [redacted] advised she wanted [redacted] to cooperate and consented to the interview.

During a sworn taped statement, [redacted] stated the following: at the age of sixteen, during the month of September 2004, she was approached by [redacted] for a chance to make money. [redacted] was friends with associates of [redacted] and knew the same people. [redacted] had been previously told by her friends from [redacted] High School, what [redacted] did for Epstein. [redacted] called a person known to [redacted] as [redacted] and scheduled the appointment. [redacted] picked [redacted] up and drove her to Palm Beach to a street called "Brillo Way". They drove to the end of the street and entered a large driveway. They entered the kitchen area of the house and met with Epstein. [redacted] was introduced to Jeff Epstein. [redacted] led [redacted] upstairs to the main bedroom area and set up the room with a massage table and set out the oils. [redacted] stated that while going up the stairs and into the bedroom she observed numerous photographs of naked young girls. [redacted] dimmed the lights and turned on soft music. [redacted] exited the room and Epstein entered the room wearing only a towel. Epstein picked oils and instructed her to rub his legs, under his buttocks, back and chest area. Epstein asked her to get comfortable. [redacted] advised she did not remove her clothes. She was wearing tight jeans and a cropped tank top exposing her belly area. During the massage, Epstein removed his towel and laid on the massage table naked. As [redacted] rubbed Epstein's chest area, he attempted to reach down her pants to touch her buttocks area however was unable to due so due to the tightness of the jeans and a tight belt. [redacted] advised Epstein began to masturbate as she rubbed his chest. Epstein moaned as she rubbed his chest. She observed he was continuing to masturbate and

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EFTA00231974

attempted to reach up her tank top and touch her breasts. [redacted] pulled back and Epstein stopped, however he kept masturbating until he climaxed. He cleaned himself with the towel he was previously wearing. [redacted] was paid $200.00 for the massage and left the area. She met with [redacted] who was waiting in the kitchen area and left the house.

[redacted] then explained she never provided another massage for Epstein. She did however, go to the house with [redacted] and [redacted] ([redacted] as they took another friend of [redacted] [redacted] advised she was present when [redacted] went to work for Epstein. She advised she rode over and sat in the kitchen area with [redacted] to wait for [redacted] [redacted] advised while they waited for [redacted] the house chef prepared lunch for them as it was almost lunchtime when they went. When [redacted] was finished with the massage they left the area. I asked [redacted] if [redacted] ever told her what would be expected when she provided a massage. [redacted] stated yes, [redacted] told her that a massage would be expected, possibly naked and possibly some touching involved. [redacted] has no formal training in providing massages. [redacted] spoke about a third and last time she went to Epstein's house. [redacted] drove another girl, [redacted] (sixteen years of age) who is [redacted] friend, to Epstein's house. [redacted] stated [redacted] knew that [redacted] had made money massaging Epstein and wanted to make money herself. [redacted] took them in the kitchen area of the house and introduced [redacted] to [redacted]. [redacted] and [redacted] took [redacted] upstairs to the main bedroom. [redacted] advised she doesn't know what happened as [redacted] did not speak about what happened in the room. [redacted] received $100.00 from [redacted] for going with her to Epstein's house and recommending [redacted]

On October 6, 2005, at 11:45 am, I met with [redacted] dob [redacted], at Lynn University and explained to her why we there to interview her. She advised she was aware of the ongoing investigation. [redacted] stated she had previously spoken with [redacted] who told her she was interviewed by detectives. During a sworn taped statement, [redacted] stated she knew that [redacted] worked for Jeff Epstein in Palm Beach. [redacted] advised she originally had been taken to the Epstein house by [redacted] whom she met when they both attended [redacted] High School. She began going to the house when she was sixteen years of age and stated she had been there a lot of times to provide massages over the past two years. I asked her if she had formal training in providing massages, which [redacted] stated she had not. [redacted] advised she was told what was expected of her by providing massages and she would have to remove clothing but if she felt uncomfortable just to say so and Epstein would stop pushing the issue. [redacted] began providing massages and advised she kept her clothes on. She considered Epstein a pervert and he kept pushing to go further and further. [redacted] explained she would keep telling him she had a boyfriend and would not be right to her boyfriend. It wasn't until recently that [redacted] began removing her clothes and staying in her thong underwear to provide a massage. [redacted] explained

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State of Florida
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Signature Arresting Officer

Date: 05/01/2006

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Epstein wanted to be rubbed on his back and recently he began turning over and have her rub his chest as he masturbated. He would try to touch her breasts as she rubbed his chest. [redacted] stated "Jeff would try to get away with more and more on each massage". [redacted] stated Epstein would try to touch her more and on one occasion he attempted to use a massager/vibrator on her. [redacted] drove [redacted] to the house for the original massage. [redacted] left [redacted] her cell phone number and every time Epstein would come into town, [redacted] would call her for an appointment to "work". Each time she went, [redacted] would meet her at the kitchen door area. She would bring her upstairs and prepare the massage table. [redacted] advised Epstein would ask her questions about herself. Epstein knew she was a soccer player and would be attending Lynn University. I asked [redacted] if Epstein knew her real age. [redacted] stated Epstein did and didn't care. The most recent massage she provided was on October 1, 2005. During the massage, she asked Epstein if she could borrow one of his vehicles to visit her family and boyfriend in Orlando, Florida. Epstein had told her she could borrow one of his vehicles but later stated he would rent her a car. She continued with the massage as Epstein grabbed her buttocks and caressed the buttocks cheeks. I asked [redacted] if she was wearing undergarments to which she replied her thong underwear. Once he tried to touch her breasts, she would pull away from him and he would stop. [redacted] was asked if he ever used a vibrator on her. [redacted] was aware of the vibrator but advised she never would allow him to use the vibrator on her. She described the vibrator as the large white vibrator with a huge head on the tip of the vibrator. She stated he kept the vibrator in a closet near the massage table.

[redacted] stated that on October 3, 2005, she was contacted by Epstein's assistant, [redacted], who informed her that Jeff Epstein had rented her a new Nissan Sentra and she should come by the house to pick it up. [redacted] informed [redacted] she would have the car for a month. [redacted] stated Epstein knew her car was not working properly and that she had missed appointments in the past because of her car being inoperable. [redacted] explained the car is currently parked next to the Lynn University Gym field. I asked her if she ever took any one to the house. [redacted] explained she took [redacted] a friend of hers who attended [redacted] High School, who has relocated to Orlando to attend college. I asked if she ever allowed another female in the room. [redacted] advised no one was brought into the room with her.

At the conclusion of the interview, Det Dawson and I went to the gym area of Lynn University and located the Silver Nissan Sentra bearing Florida tag [redacted]. The vehicle is registered to Dollar Rent a Car out of the Palm Beach International Airport. The vehicle was rented by Janusz Banasiack, later learned to be Epstein's houseman, and paid with Epstein's credit card.

On September 11, 2005, w/f [redacted] dob [redacted] was arrested by the Palm Beach Police Department

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for misdemeanor possession of marijuana. During the arrest [redacted] told the arresting officer that she had information about sexual activity taking place at the residence of Jeffrey Epstein. Additionally, during the ongoing trash pulls from Epstein's residence, discarded papers were found which contained [redacted] name and cell phone number.

On October, 11, 2005, Det Dawson and I met with [redacted] and obtained a sworn taped statement. [redacted] explained she had been going to Epstein's house since 2002, when she was sixteen years of age. Since then she has gone to the house hundreds of times. [redacted] stated she became his "number one girl." She explained that on her first visit she was brought to the house by fellow [redacted] High School classmate, [redacted] [redacted] said she was brought through the kitchen area where she met [redacted] for the first time. [redacted] was led to the master bedroom, Epstein s room. [redacted] explained that as she was walking up the stairs she observed several photographs of naked women along the walls and tables of the house. [redacted] further explained that she was brought into the bedroom, where [redacted] prepared the room by setting up the massage table and provided the oils for her to rub on Epstein. [redacted] explained she remembered the steam room area, which contained two large showers. Epstein entered the room from the steam room area and introduced himself. Epstein lay on the table and told her to get comfortable. [redacted] removed her skirt and kept her shirt on. Epstein then instructed her to remove her shirt. [redacted] removed her shirt and remembered she was not wearing a bra. [redacted] stated she provided the massage wearing only her panties. She continued rubbing his legs, thighs and feet. [redacted] advised he turned over onto his back. Epstein touched her breasts and began to masturbate. Epstein ejaculated which meant the massage was over. At the conclusion of the massage, [redacted] was paid $200.00. They walked together downstairs where [redacted] and [redacted] were waiting. [redacted] stated [redacted] received an unknown amount of money for taking her to Epstein. Epstein instructed to leave her cellular telephone number so that he could contact her when he is in town.

[redacted] stated that during her many visits a routine was established between her and Epstein. She would enter the house and get naked in the bedroom. She would then start with a back massage. Epstein would roll on to his back and allow her to massage his chest area. [redacted] stated Epstein would then began to masturbate himself and at the same time would insert his fingers in her vagina and masturbate her with his fingers. [redacted] explained Epstein would continue this process until he ejaculated. He would then utilize a vibrator/massager on her vagina until [redacted] climaxed. [redacted] advised that during her frequent visits, Epstein asked for her real age, [redacted] stated she was sixteen. Epstein advised her not to tell anyone her real age. [redacted] advised that things escalated within the home as Epstein would instruct and pay [redacted] to have intercourse with his female friend, [redacted] [redacted] explained the intercourse included using strap on dildos, large rubber penis' and other devices that Epstein had at his disposal. Epstein would watch them have intercourse and masturbate himself . Occasionally, Epstein would then join in

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during the female on female intercourse and provide oral sex to both [redacted] and [redacted]. This occurred during the time [redacted] was sixteen years of age.

[redacted] advised this continued to escalate during two years. The routine became familiar to [redacted] Epstein's assistant [redacted] would telephone her every time Epstein was in the Town of Palm Beach and would place appointments for her to visit and work for Epstein. Each time something new was introduced, additional monies were produced and offered for [redacted] to allow the acts to happen. [redacted] consented to perform all these acts but was adamant that there was an understanding with Epstein that no vaginal penetration would occur with his penis. [redacted] explained that Epstein's penis was deformed. [redacted] explained that his penis was oval shaped. [redacted] claimed when Epstein's penis was erect, it was thick toward the bottom but was thin and small toward the head portion. [redacted] called Epstein's penis "egg-shaped." [redacted] stated Epstein would photograph [redacted] and her naked and having sex and proudly display the photographs within the home. [redacted] stated during one visit to Epstein's house in which she provided a massage to Epstein, his female friend [redacted] was also present. [redacted] provided the massage in which [redacted] and her would fondle each others breasts and kiss for Epstein to enjoy. Towards the end of this massage, Epstein grabbed [redacted] and turned her over onto her stomach on the massage table and forcibly inserted his penis into her vagina. [redacted] stated Epstein began to pump his penis in her vagina. [redacted] became upset over this. She said her head was being held against the table forcibly, as he continued to pump inside her. She screamed "No!" and Epstein stopped. She told him that she did not want to have his penis inside of her. Epstein did not ejaculate inside of her and apologized for his actions and subsequently paid her a thousand dollars for that visit. [redacted] stated she knows he still displays her photographs through out the house.

On October 12, 2005, Det Dawson and I met with [redacted] dob [redacted], who stated during a sworn taped statement, that nothing happened between her and Epstein. [redacted] appeared nervous during the interview. I assured her that I have spoken with other people who advised differently. [redacted] stated on several occasions she provided a massage to Epstein. She stated she was brought to the Epstein house in March of 2005. [redacted] a classmate at [redacted] High School, approached her and asked her if she wanted to "work". [redacted] made the arrangements with [redacted] Epstein's assistant. [redacted] who has no formal training in providing massages, stated she provided a massage, fully clothed for $200.00 . As I sensed hesitancy in her answers, I asked [redacted] if she had been contacted by anyone from Epstein's organizations or his house. [redacted] stated she was interviewed already by a private investigator for Epstein. He identified himself as "[redacted] and inquired about the police investigation, and left his telephone number [redacted] for additional contact. [redacted] provided no additional information, as it appeared her responses were almost scripted.

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EFTA00231978

Probable Cause Affidavit

Palm Beach Police Department

Agency ORI# FLO 500600

On November 6, 2005, at approximately 3:30 pm, I met with [redacted] dob [redacted], at the Palm Beach Police Department. [redacted] was identified as a potential witness/victim through information obtained during the trash pulls. During the sworn taped statement, [redacted] advised she was at Jeffrey Epstein's house one time, approximately two months ago. She was approached by a girl, [redacted] who was dating [redacted] roommate, for an opportunity to make some quick money. [redacted] advised she needed to make some quick cash to make the rent that month. She agreed to go to the house. She had been told by [redacted] that the massage would have to be done in her underwear. She advised [redacted] drove with her and brought her into the house. They walked into the kitchen area, and took the stairs upstairs. [redacted] further stated she was brought into a master bedroom area. She advised she recalled seeing portraits of naked women throughout the room. A massage table was already out near the sauna/shower area in the master bedroom. Epstein entered the room wearing only a towel and introduced himself as "Jeff." At Epstein's direction, [redacted] and [redacted] removed their clothing down to their panties, Epstein laid on his stomach area and they provided a massage on his legs and feet area. I asked [redacted] if she had any formal massage training and she replied "no." [redacted] advised she was topless and the panties she wore were the boy shorts lace panties. She and [redacted] continued the massage until the last ten minutes of the massage, Epstein, told [redacted] to leave the room so that [redacted] could finish the massage. [redacted] got dressed, and left the room as Epstein turned over onto his back. Epstein then removed the towel and laid naked . Epstein requested that [redacted] rub his chest area. [redacted] stated as she did this, Epstein, began masturbating. [redacted] stated Epstein pulled down her boy short panties, and he produced a large white vibrator with a large head. She stated it was within his reach in a drawer in his master bathroom. He rubbed the vibrator on her vaginal area. [redacted] advised he never penetrated her vagina with the vibrator. He continued to rub her vagina with the vibrator as he continued to masturbate. [redacted] stated she was very uncomfortable during the incident but knew it was almost over. Epstein climaxed and started to remove himself from the table. He wiped himself with the towel he had on previously and went into the shower area. [redacted] got dressed and met with [redacted] in the kitchen area. Epstein came into the kitchen and provided [redacted] $200.00 for bringing [redacted] and paid $200.00 to [redacted] for providing the massage. [redacted] was told to leave her telephone number with [redacted] for future contact. [redacted] provided her cellular telephone number. [redacted] was asked if she was recently contacted about this investigation by anyone from the Epstein organization. She replied she was called but it was for work. She stated she was called by [redacted] for her to return to "work" for Epstein. [redacted] stated "work" is the term used by [redacted] to provide the massages and other things. [redacted] advised she declined as she was not comfortable in providing that type of "work."

On November 7, 2005, Det Sandman and I met with [redacted] dob [redacted] During a sworn taped statement, [redacted] stated she met Jeffrey Epstein through [redacted] when they were still

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attending [redacted] High School. [redacted] would approach females who wished to work for Epstein. [redacted] stated she was offered to work for Epstein but declined. [redacted] explained that "work" means give massages. She was asked about any formal training in providing massages which she said "no." [redacted] said she accompanied [redacted] and other females who were taken to Epstein's house to provide massages. [redacted] further stated she had been to the house approximately 4 or 5 times in the past year. She accompanied [redacted] with [redacted] and [redacted] Each time the girls were taken over, they were previously told they would have to provide a massage, possibly naked. They were also told that should Epstein require them to do anything extra, and they were not comfortable just to tell him and he would stop. [redacted] stated [redacted] received $200.00 for each girl she brought over to massage Jeffrey Epstein. When I asked which girl appeared to be the youngest, she replied, [redacted] who was really young, fifteen years old at the most. [redacted] further stated each time she went to the house, she sat in the kitchen and waited with [redacted] until the massage was over. She further stated that the cook would make lunch or a snack for them as they waited. I asked her if there was anything that caught her attention within the home. [redacted] stated there were a lot of naked girls in photographs throughout the house.

On November 8, 2005, at approximately 2:00pm , I met with [redacted] dob [redacted] at the Palm Beach Police Department. During a sworn taped statement, [redacted] stated she had met Epstein approximately two years ago when she was first approached by [redacted] a classmate at [redacted] High School. [redacted] approached her about working for Epstein and providing a massage to him for $200.00. [redacted] had made the arrangements however was unable to take her the day the arrangements were made. [redacted] had [redacted] take [redacted] also attended [redacted] High School and was familiar with Epstein. [redacted] recalled she was brought there and entered through the back kitchen door. She had met with an assistant [redacted] and another assistant [redacted]. [redacted] brought her upstairs as she observed several photographs of naked females throughout the house. [redacted] stated Epstein came in the room, wearing only a towel, and laid on the table. [redacted] stated he picked out the oils he wanted her to use and requested she remove her clothing to provide the massage. [redacted] stated that on the first massage she provided she did not remove her clothing. [redacted] stated she had returned several times after that. Each time she returned it was more than a massage. Epstein would walk into the master bedroom/bathroom area wearing only a towel. He would masturbate as she provided a massage. [redacted] stated she was unsure if he climaxed as he masturbated under the towel. Additionally, she never looked below his waist. She claimed that Epstein would convince her to remove her clothes. She eventually removed her clothes and stayed in her thong panties. On occasion, Epstein would use a massager/vibrator, which she described as white in color and a large head. Epstein would rub the vibrator/massager on her vaginal area as he would masturbate. [redacted] stated she had been to the house

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numerous times. [redacted] added she has no formal training in providing a massage. [redacted] stated she brought two females during her visits to provide massages. [redacted] stated she brought a girl named "[redacted] and [redacted] from [redacted] High School. [redacted] stated she received $200.00 for each girl she brought.

On November 8, 2005, I met with [redacted] W[redacted]at the Palm Beach Police Department. During a sworn taped statement, [redacted] stated she had met Jeffrey Epstein approximately one year ago. She was approached by a subject known to her as [redacted] had asked her if she wanted to make money providing massages to Epstein. [redacted] had heard that several girls from [redacted] High School were doing this and making money. She agreed and was taken to the house by [redacted] had introduced her to [redacted] and Epstein and brought her upstairs to a master bedroom where a massage table was prepared and the proper oils were selected. [redacted] left the room and waited downstairs for her. [redacted] stated Epstein entered the room wearing a towel and laid on his stomach. She provided a massage wearing only her thong panties. [redacted] advised Epstein had masturbated every time she provided a massage. She stated Epstein continued to masturbate until he climaxed. Once that occurred the massage was over. She felt the whole situation was weird but she advised she was paid $200.00 for providing the massage. She also stated [redacted] was paid $200.00 by Epstein for bringing [redacted] stated she had gone a total of 15 times to Epstein's residence to provide a massage and things had escalated from just providing a massage. Epstein began touching her on her buttocks and grabbed her closer to him as he masturbated. Epstein also grabbed her breasts and fondled her breasts with his hands as she provided the massage. [redacted] stated on one occasion, while she was only seventeen years of age, he offered extra monies to have vaginal intercourse. She stated this all occurred on the massage table. [redacted] stated Epstein penetrated her vagina with his penis and began having intercourse with her until he reached the point of climax. Epstein removed his penis from her vagina and climaxed onto the massage table. [redacted] received $350.00 for her massage. I asked her if she had any formal training in providing massages, [redacted] stated she did not. [redacted] continued to state on one other occasion, Epstein introduced his girlfriend [redacted], into the massage. [redacted] was brought into room with [redacted] to provide a massage. Epstein had them kiss and fondle each other around the breasts and buttocks as they provided a massage to Epstein. Epstein, watched and masturbated as this occurred. On other occasions, Epstein, introduced the large white vibrator/massager in the massage. Epstein stroked the vibrator/massager on [redacted] vagina as she provided the massage.

On November 14, 2005, Det Sandman and I met with [redacted] dob[redacted] During a sworn taped statement she advised she started going to the house approximately one year ago and has been there approximately five or six times. [redacted] also stated she was sixteen years old when she first went to Epstein's house. On her first visit she was brought by a fellow student from [redacted] High School known to her

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as [redacted] [redacted] stated [redacted] brought her into the house and she was introduced to [redacted]. [redacted] then brought her upstairs into a master bathroom, located within the bedroom. [redacted] stated she met Epstein in the bathroom. He laid on the table and picked the massage oils. She provided the massage as he laid naked on the massage bed. She stated she rubbed his calves and back area. Upon the end of the massage, Epstein removed himself from the massage table and paid her $300.00 for the massage. [redacted] said each subsequent time she went to the house, she was notified by [redacted] that Epstein was in town and would like her to "work". [redacted] stated she returned to the house and was again led upstairs by [redacted]. She provided the massage, clothed. [redacted] was asked if she ever removed her clothing to provide a massage. [redacted] stated it was not until the third time that she went that she removed her clothing. [redacted] stated she was notified by [redacted] that Epstein wanted her to come to work. She arrived at the house and was led upstairs by [redacted]. She started providing the massage when Epstein asked her to remove her clothing. [redacted] removed her pants, shirt and bra. She stayed in her thong panties and continued rubbing Epstein. Epstein turned over onto his back and she rubbed his chest area. [redacted] stated she knew he was masturbating himself as she providing the massage. [redacted] stated she believed he climaxed based on his breathing. She did not want to view either the climax or the fact that he was masturbating. [redacted] stated once the breathing relaxed he got up and told her to get dressed. She was paid $300.00 for her services. [redacted] stated on the last time she went to provide a massage, she was notified by [redacted] to come to the house and "work". [redacted] stated she was now dating her current boyfriend and did not feel comfortable going. She recalled it was approximately January 2005. She said she went, already thinking that this would be the last time. She went upstairs and went into the master bathroom. She met with Epstein, who was wearing only a towel, and laid onto the table. [redacted] stated Epstein caught her looking at the clock on several occasions. Epstein asked her if she was in a hurry. [redacted] stated her boyfriend was in the car waiting for her. [redacted] further stated that Epstein got upset as he wasn't enjoying the massage. She told him that she didn't want to continue and she would not be back. Epstein told her to leave as she was ruining his massage. [redacted] advised she had no formal training in providing any massages. [redacted] stated although she had a falling out with Epstein, she still received a Christmas bonus from Epstein. [redacted] stated she was wired money from Western Union for her Christmas bonus. Subpoena results from Western Union revealed money was sent from Jeffrey Epstein on December 23, 2004. [redacted] received $200.00 from Epstein for her Christmas bonus.

On November 15, 2005, Det. Sandman and I met with [redacted] dob [redacted] During a sworn taped statement, [redacted] stated she met Jeffrey Epstein over a year ago. She was sixteen years of age and was approached by [redacted] [redacted] a fellow [redacted] High School student, who informed her that she could make $200.00 providing a massage to Epstein. [redacted] had informed her that she would have to provide this

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massage topless. [redacted] made the arrangements with Epstein and his assistants and took [redacted] to the house. [redacted] stated [redacted] and she entered through a glass door that led into a kitchen. She was taken upstairs by [redacted] to a master bedroom. She recalled the master bathroom had a large pink couch, sauna and matching shower. Epstein entered into the room wearing only a towel. [redacted] and [redacted] removed their clothing remaining only in thong underwear. She further stated that Epstein laid on his chest on the table. The oils were selected on which ones to use. Both [redacted] and [redacted] provided the massage on his legs, back and feet. Forty minutes into the massage, Epstein turned over onto his back and requested [redacted] wait downstairs in the kitchen area for [redacted] Epstein instructed [redacted] to finish the massage. As [redacted] got dressed, [redacted] starting rubbing Epstein's chest. [redacted] left the room, and Epstein began masturbating as [redacted] rubbed Epstein's chest. [redacted] stated Epstein continued masturbating until he climaxed on the towel he was wearing. When asked if he had removed the towel she stated he turned the towel around so that the opening would allow him to expose himself. After he cleaned himself off with the towel he instructed [redacted] the massage was done and to get dressed and meet with him downstairs. [redacted] got dressed and met with Epstein in the kitchen area. She was paid $200.00 dollars for providing the massage. [redacted] stated she was aware that [redacted] also received monies for the same thing. The second time she went to the house she was again approached by [redacted] advised if she wanted to return to the house to provide another massage. [redacted] agreed and the arrangements were made by [redacted] for her to return to the house. [redacted] stated [redacted] drove her to the house and knocked on the same glass door which leads to the kitchen area. They were allowed entry into the house by one of the staff members. [redacted] led her upstairs to the master bedroom and master bathroom area. [redacted] left [redacted] this time to do the massage alone. Epstein entered the room again wearing only a towel. [redacted] began removing her clothing as she did the last time she was at the house. Epstein instructed her to get naked. He laid on the table onto his stomach as [redacted] began massaging his legs and back. As [redacted] finished with Epstein's back and legs, Epstein then turned over onto his back. [redacted] started to rub his chest and he began masturbating. As [redacted] rubbed his chest, Epstein leaned over and produced a massager/vibrator. He turned it on and began rubbing [redacted]s vagina and masturbating himself at the same time. [redacted] stated she continued to rub his chest as this was occurring. She described the vibrator/massager as large grey with a large head. Epstein rubbed her vagina for approximately two to three minutes with the massager/vibrator. He then removed the vibrator from her vaginal area and concentrated on masturbating himself. [redacted] stated Epstein climaxed onto the towel again and informed her that the massage was done. [redacted] got dressed and met with [redacted] who was waiting in the kitchen area. She received $200.00 for the massage. [redacted] said she never returned to the house and had no desire to return to the house. [redacted] was asked if she received any formal massage training. She advised she had no formal training. [redacted] was asked if Epstein knew her real age. [redacted] stated he knew, as he asked her questions about herself and high school. He was aware she attended, and is still attending [redacted] High School.

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State of Florida
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Signature Arresting Officer

Date: 05/01/2006

EFTA00231983

During the course of the investigation a search warrant was executed at Jeffrey Epstein's home located at 358 El Brillo Way in Palm Beach. While in the home I observed the pink and green couch within the master bedroom area just as the girls previously mentioned. The stairway, which is located from the kitchen area to the master bedroom area, is lined with photos of naked young girls. Additionally, numerous photographs of naked young females, some of which appeared to be the girls I previously interviewed, were on display throughout the house. Also located in the house were various phone message books. The telephone message books have a duplicate copy (Carbon Copy) which, once a phone message is written into the book, the top copy is then torn on the perforated edge and the carbon copy is left in the book. First names of girls, dates and telephone numbers were on the copy of the messages. I recognized various numbers and names of girls that had already been interviewed. The body of the messages were time of the day that they called for confirmation of "work." Other names and telephone numbers were located in which the body of the messages were, "I have girls for him" or "I have 2 girls for him." These messages were taken by [redacted], who signed the bottom of the messages. During the execution of the warrant, I located a [redacted] High School transcript for [redacted] in Epstein's bedroom desk. This desk had stationary marked Jeffrey E Epstein. I located a wood colored armoire beside Epstein's bed that contained a bottle of "Joy Jelly," which is used to provide a warm massage. Several massage tables were located throughout the second floor of the residence, including a massage table found in Epstein's bedroom. On the first floor of the residence I found two covert cameras hidden within clocks. One was located in the garage and the other located in the library area on a shelf behind Epstein's desk. A computer was located which was believed to contain the images from the covert cameras. The computer's hard drive was reviewed which showed several images of [redacted] [redacted] and other witnesses that have been interviewed. All of these images appeared to come from the camera positioned behind Epstein's desk.

On December 13, 2005, Det. Dawson and I met with [redacted] dob [redacted] During a sworn taped statement, [redacted] stated that when she was sixteen years old she was taken to Epstein's house to provide a massage for money. [redacted] stated it was before Christmas last year (2004) when an associate, [redacted] approached her and asked if she needed to make money for Christmas. [redacted] made arrangements to take [redacted] to the house and drove [redacted] to the house to "work." They were encountered by a white female with long blond hair. [redacted] was unable to remember the name of the white female with blond hair but knew she was Epstein's assistant. She was led upstairs by the white female who explained that there would be lotions out already and Epstein would choose the lotion he wanted her to use. She was led through a spiral staircase which led to a master bedroom and bathroom. The massage table was already set up in the bathroom. [redacted] described the bathroom as a large spacious bathroom with a steam room and shower beside it. [redacted] was introduced to Epstein who was on the phone when she entered the room. Epstein was wearing a white towel and laid on his stomach so that [redacted] may

The foregoing instrument was sworn to or affirmed before me this 1st day of May, 2006 by Det Joe Recarey, who is personally known to me.

Signature of Police Officer (F.S.S. 117.10)

State of Florida
County of Palm Beach

Signature/Arresting Officer

Date: 05/01/2006

EFTA00231984

massage his feet and calves. [redacted] started the massage with the oils Epstein chose and rubbed his feet and calves. Epstein got off the phone and requested she massage his back as well. [redacted] began rubbing his back and got to the small of his back. During the rubbing of his back, Epstein asked her to get comfortable. He requested she remove her pants and shirt. [redacted] removed her shirt and pulled her pants off. [redacted] stayed in her bra and thong panties. As she finished massaging the small of Epstein's back, he then turned onto his back. Epstein instructed [redacted] to rub his chest and pinch his nipples. As she began to rub his chest, Epstein asked her questions about herself. [redacted] remembered telling him she attended [redacted] High School. Epstein asked her if she was sexually active. Before [redacted] could answer, he also asked what sexual position does she enjoy. [redacted] stated she was shy and didn't like talking about those things. She continued rubbing his chest. Epstein reached up and unsnapped her bra from the front. [redacted] explained the bra she used had a front snapping device. Epstein rubbed her breasts and asked her if she like having her breasts rubbed. [redacted] said "no, I don't like that." Epstein then removed his towel and laid on the bed naked exposing his penis to [redacted] He began touching his penis and masturbated as he touched her breasts. [redacted] explained Epstein then touched her vaginal area by rubbing her vagina with his fingers on the outside of her thong panties. [redacted] tensed up and stated Epstein was aware that she was uncomfortable. [redacted] stated that Epstein said to her, "Relax, I'm not going inside." She further explained Epstein commented to her how beautiful and sexy she was. Epstein then moved her thong panties to one side and began stroking her clitoris. [redacted] said, "He commented how hard my clit was." He then inserted two fingers in her vagina and was stroking her within her vagina. She tried pulling back to pull out his fingers from within her vagina. Epstein removed his fingers from within her vagina and apologized for putting his fingers inside her. During this time, he kept his hand on her vaginal area and continued to rub her vagina. [redacted] stated he rubbed her really hard as he was masturbating. [redacted] said he climaxed onto the towel he had been previously wearing and got up from the table. Epstein told her there was $200.00 dollars for her on the dresser within the master bathroom. Epstein also told her that there was an additional $100.00 that was to be given to [redacted] for bringing her there to massage him. Epstein told her to leave her telephone number with his assistant as he wanted to see her again. Epstein stated his assistant would contact her to work again soon. I asked her if she ever received any formal massage training to which [redacted] stated she did not. [redacted] stated it was the only time she ever went to work for Jeff and knew what happened to her was wrong. She further stated that she had never been contacted for any additional work.

On January 9, 2006, I located and interviewed another victim, [redacted] dob [redacted] [redacted] was identified as a potential victim/witness from information obtained during trash pulls from Epstein's residence. [redacted] stated she met Epstein when she was fifteen years of age. She was approached by a friend from [redacted] High School, [redacted] [redacted] to be taken to Jeffrey Epstein's house to work. She was originally told she would be able

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Date: 05/01/2006

EFTA00231985

to model lingerie for a wealthy Palm Beacher. [redacted] was taken to Epstein's house located on El BrilloWay. [redacted] introduced [redacted] to Jeffrey Epstein. Epstein had his personal chef prepare dinner for [redacted] and [redacted] At the conclusion of dinner, [redacted] and Epstein brought [redacted] upstairs into a master bedroom area. [redacted] observed a large massage table with a sheet on it. Epstein entered through a door and exited wearing only a towel. [redacted] informed [redacted] that they were going to provide a massage on Epstein. [redacted] asked why were they doing this instead of modeling lingerie. [redacted] explained to [redacted] that this was his routine and to rub his calves and feet. Epstein had told [redacted] to get comfortable. [redacted] removed her pants and blouse. [redacted] stated she stayed only in panties as she did not wear a bra that evening. [redacted] stated while rubbing his calves and feet, Epstein turned over onto his back. Epstein told [redacted] to rub his chest and rub his nipples. [redacted] stated that as she started rubbing his chest, Epstein began masturbating himself. Epstein touched her breasts and stroked her vagina with his fingers. Epstein continued to masturbate himself as he stroked her vagina. Epstein ejaculated on his towel and paid [redacted] $200.00 for the massage. Epstein told [redacted] that if she told anyone what happened at his house that bad things could happen. [redacted] and [redacted] were brought home by Epstein's houseman and [redacted] was afraid that Epstein knew where she lived. [redacted] stated that several days later she received a telephone call from [redacted] who coordinated for [redacted] to return to "work." [redacted] returned to the house and was brought to Epstein's bedroom area by [redacted] who prepared the room for the massage. Epstein entered the room wearing only a towel. Epstein had [redacted] remove her clothing and provide the massage naked. [redacted] began rubbing his feet and calves and Epstein turned over onto his back. Epstein rubbed her vagina with his fingers. Epstein began to masturbate himself with an upwards and downward motion on his penis. Epstein continued to touch her vagina with one hand and masturbate with the other hand. Once Epstein ejaculated onto the towel he was wearing, the massage was over. [redacted] was paid $200.00 for the massage. Epstein again told [redacted] not to speak of what happened at his house or bad things would happen. [redacted] wanted to notify authorities however she was afraid of what would happen to either her or her family.

During the course of the investigation, several subjects were identified as a potential witness/victim through information obtained during the trash pulls, physical surveillance and telephone message books retrieved from the search warrant. While conducting research on the subjects, I discovered that the females were age eighteen or older. Interviews were conducted on the consenting adults whose statements provided the same massage routine when they went to "work" for Epstein. The females would be notified by [redacted], and made appointments for the females to "work" for Epstein. The females would come to Epstein's house and were led upstairs, through a stairwell from the kitchen area, by [redacted] to Epstein's bedroom. Epstein would then enter the room wearing only a towel, and ask them to get comfortable. The females would then provide the massage naked as Epstein would either touch their vaginas with his fingers and/or utilize the massager/vibrator on

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Signature/Arresting Officer

Date: 05/01/2006

EFTA00231986

their vaginal area. He would masturbate during the massage and upon his climaxing, the massage would end. The girls were then paid two or three hundred dollars for the massage.

On November 21, 2005 I interviewed Jose Alessi, a former houseman for Jeffrey Epstein. Alessi stated he was employed for eleven years with Mr. Epstein, from approximately 1993 through 2004. Alessi stated he was the house manager, driver and house maintenance person. It was his responsibility to prepare the house for Epstein s arrival. When asked about cooks or assistants, Alessi stated they traveled with Epstein on his private plane. I asked Mr. Alessi about the massages that have occurred at Epstein's home. Alessi stated Epstein receives three massages a day. Each masseuse that visited the house was different. Alessi stated that towards the end of his employment, the masseuses were younger and younger. When asked how young, Mr. Alessi stated they appeared to be sixteen or seventeen years of age at the most. The massages would occur in Epstein's bedroom or bathroom. He knew this because he often set up the massage tables. I asked if there were things going on other than a massage. Alessi stated that there were times towards the end of his employment that he would have to wash off a massager/vibrator and a long rubber penis, which were in the sink after the massage. Additionally, he stated the bed would almost always have to be made after the massage.

On January 4, 2006 I interviewed another former houseman, Mr Alfredo Rodriguez. During a sworn taped statement, Mr. Rodriguez stated he was employed by Jeffrey Epstein for approximately six months, from November 2004 through May of 2005. His responsibilities as house manager included being the butler, chauffeur, chef, houseman, run errands for Epstein and provide for Epstein's guests. I asked Rodriguez about masseuses coming to the house. Rodriguez stated Epstein would have two massages a day. Epstein would have one massage in the morning and one massage in the afternoon everyday he was in residence. Rodriguez stated he would be informed to expect someone and make them comfortable until either [redacted] or Epstein would meet with them. Rodriguez stated once the masseuses would arrive, he would allow them entry into the kitchen area and offer them something to drink or eat. They would then be encountered by either [redacted] or Epstein. They would be taken upstairs to provide the massage. I asked Rodriguez if any of the masseuses appeared young in age. Rodriguez stated the girls that would come appeared to be too young to be masseuses. He stated one time under Epstein's direction, he delivered a dozen roses to [redacted] High School for one of the girls that came to provide a massage. He knew the girls were still in high school and were of high school age. I asked Rodriguez about the massages. He felt there was a lot more going on than just massages. He would often clean Mr. Epstein's bedroom after the alleged massages and would discover massagers/vibrators and sex toys scattered on the floor. He also said he would wipe down the vibrators and sex toys and put them away in an armoire. He described the armoire as a small wood armoire which was on the wall close to Epstein's

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County of Palm Beach

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Date: 05/01/2006

EFTA00231987

bed. On one occasion Epstein ordered Rodriguez to go to the Dollar rent a car and rent a car for the same girl he brought the roses to, so that she could drive her self to Epstein's house without incident. Rodriguez said the girl always needed rides to and from the house.

Rodriguez produced a green folder which contained documents, and a note with Mr. Epstein's stationary with direction to deliver a bucket of roses to [redacted] High School after [redacted] high school drama performance. Also in that same note was direction to rent a car for [redacted] and direction to extend the rental contract.

During the course of the investigation, subpoenas were obtained for cell phone and home phone records from several victims and witnesses along with the cell phone records of [redacted]. An analysis of these records was conducted which found numerous telephone calls were made between [redacted] and the victims. These records indicate the dates the calls were made are consistent with the dates and times they victims/witnesses stated they were contacted. Specifically, The phone records showed [redacted] called [redacted] during the exact times and dates when victim [redacted] advised the incident occurred. [redacted] also coordinated the encounters with [redacted] and [redacted] during the time frame the girls stated they occurred.

Pursuant to a lawful subpoena I obtained Epstein's private plane records for 2005 from Jet Aviation. The plane records show arrival and departure of Epstein's plane at Palm Beach International airport. These records were compared to the cell phone records of [redacted] This comparison found that all the phone calls [redacted] made to [redacted] and the victims were made in the days just prior to their arrival or during the time Epstein was in Palm Beach.

Therefore, as Jeffrey Epstein, who at the time of these incidents was fifty one years of age, did have vaginal intercourse either with his penis or digitally with [redacted] and [redacted] who were minors at the time this occurred, there is sufficient probable cause to charge Jeffrey Epstein with four counts of Unlawful Sexual Activity with a Minor, in violation of Florida State Statute 794.05(1), a second degree felony. As Epstein, who at the time of the incident was fifty two years of age, did use a vibrator on the external vaginal area of [redacted] a fourteen year old minor, there is sufficient probable cause to charge him with Lewd and Lascivious Molestation, in violation of Florida State Statute 800.04 (5), a second degree felony.

The foregoing instrument was sworn to or affirmed before me this 1st day of May, 2006 by Det Joe Recarey, who is personally known to me.

State of Florida
County of Palm Beach

Signature/Arresting Officer

Signature of Police Officer (F.S.S. 117.10)

Date: 05/01/2006

EFTA00231988

REQ FOR [redacted] WARR.

EFTA00231989

REQUEST FOR WARRANT

DEFENDANT: [redacted] DATE OF BIRTH [redacted]

HABITUAL OFFENDER: YES _____ NO _____ A/K/A _____

VICTIM RELATED / ACQUAINTED WITH DEFENDANT? YES XX NO _____

AGENCY CASE NUMBER: 05-368 (3)

LEAD OFFICER: Det. Joe Recarey

AGENCY: **PALM BEACH POLICE DEPARTMENT** PHONE NUMBER: [redacted]

CURRENT SHIFT HOURS: 8 am TO 5 pm DAYS OFF: _____

LEAVE / SHIFT CHANGE INFO: _____

WAS ARREST MADE FOR, OR IN CONJUNCTION WITH ANOTHER AGENCY. IF SO, WHAT AGENCY?:

_____

SENTENCING RECOMMENDATIONS: CONTACT DETECTIVE

ADDITIONAL COMMENTS: _____

**********[redacted]**********

FILING DOCUMENTS ATTACHED:

- X ARREST FORM
- X P.C. AFFIDAVIT (2 COPIES)
- X WITNESS / EVIDENCE LIST PREVIOUSLY GIVEN TO ASA BELOHLAVEK
- ____ SWORN STATEMENT OF MATERIAL WITNESS(ES)
- X OFFENSE REPORT (2 COPIES)
- ____ ACCIDENT REPORTS (ALL)
- ____ WITNESS STATEMENTS (ALL)
- X FCIC/NCIC CRIMINAL HISTORY PREVIOUSLY GIVEN TO ASA BELOHLAVEK
- ____ REQUEST FOR CONVICTION LETTERS
- X PROPERTY RECEIPT PREVIOUSLY GIVEN TO ASA BELOHLAVEK
- ____ VEHICLE TOW RECEIPT
- ____ OTHER ATTACHMENTS INCLUDE:

_____

_____

INITIAL FOR COMPLETENESS: JR (OFFICER) 7915 (ID#) 050106 (DATE)

_____ (SUPERVISOR) _____ (ID#) _____ (DATE)

DELIVERED BY: Recarey (DETECTIVE) 7915 (ID#) 050106 (DATE)

RECEIVED
MAY 01 2006
INTAKE

RECEIVED, STATE ATTORNEY'S OFFICE ON: 5/01/06 BY: S. Hartsfield

ARREST / NOTICE TO APPEAR
Juvenile Referral Report

1 Arrest 2 NTA 3 Request for Warrant 4 Request for Capia — Juvenile

ADMINISTRATIVE

OBTS Number

Agency ORI Number: FLO 5 0 0 6 0 0

Agency Name: PALM BEACH POLICE DEPARTMENT

Agency Report Number (N.T.A.'s only): 7 6 - -

Charge Type (Check as many as apply): ☐ 1. Felony ☐ 3. Misdemeanor ☐ 5. Ordinance ☐ 2. Traffic Felony ■ 4. Traffic Misdemeanor ☐ 6. Other

If Weapon Seized — Enter Type

Multiple Clearance Indicator

Location of Arrest (Including Name of Business)

Location of Offenses (Business Name, Address)

Date of Arrest	Time of Arrest	Booking Date	Booking Time	Jail Date	Jail Time	Location of Vehicle

DEFENDANT

Name (Last, First, [redacted]

Race: W - White I - American B - Black O - Oriental/Asian

Height

Complexion

Build

Scars, Marks, Tattoos, Unique Physical Features (Location, Type, Description)

Indication of: Alcohol Influence ☐ Y ☐ N ☐ Unk; Drug Influence ☐ Y ☐ N ☐ Unk

(Zip) Phone ( ) Residence Type: 1. City 2. County 3. Florida 4. Out of State

(Zip) Phone ( ) Address Source

(Zip) Phone ( ) Occupation

INS Number | Place of Birth (City, State) | Citizenship

CO-DEF.

Co-Defendant Name (Last, First, Middle)	Race	Sex	Date of Birth	☐ 1. Arrested ☐ 2. At Large	☐ 3. Felony ☐ 4. Misdemeanor ☐ 5. Juvenile
Co-Defendant Name (Last, First, Middle)	Race	Sex	Date of Birth	☐ 1. Arrested ☐ 2. At Large	☐ 3. Felony ☐ 4. Misdemeanor ☐ 5. Juvenile

JUVENILE

☐ Parent ☐ Legal Custodian ☐ Other: Name (Last) (First) (Middle) — Residence Phone ( )

Address (Street, Apt. Number) (City) (State) (Zip) — Business Phone ( )

TOT JAC | Date | Time

The above address was provided by ☐ defendant and / or ☐ defendant's parents. The child and / or parent was told to keep the Juvenile Court Clerk's Office (Phone 355-2526) informed of any change of address. ☐ Yes, by: (Name) ☐ No: (Reason)

School Attended | Grade

Property Crime? ☐ Yes ☐ No — Description of Property — Value of Property

CODE

Drug Activity: N. N/A P. Possess S. Sell B. Buy T. Traffic R. Smuggle D. Deliver E. Use K. Dispense/ Distribute ■ Manufacture/ Produce/ Cultivate Z. Other

Drug Type: N. N/A A. Amphetamine B. Barbiturate ■ Cocaine E. Heroin H. Hallucinogen M. Marijuana O. Opium/Deriv. P. Paraphernalia/ Equipment S. Synthetic U. Unknown Z. Other

CHARGE

Charge Description	Counts	Domestic Violence ☐ Y ☐ N	Statute Violation Number	Violation of ORD #

Drug Activity	Drug Type	Amount / Unit	Offense #	Warrant / Capias Number	Bond

CHARGE

Charge Description	Counts	Domestic Violence ☐ Y ☐ N	Statute Violation Number	Violation of ORD #

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NOTICE TO APPEAR

☐ Instruction No. 1 Mandatory Appearance in Court

☐ Instruction No. 2 You need not appear in Court but must comply with instructions on Reverse Side.

Location (Court, Room Number, Address)

Court Date and Time — Month Day Year Time A.M. P.M.

I AGREE TO APPEAR ■ THE TIME AND PLACE DESIGNATED TO ANSWER THE OFFENSE CHARGED OR TO PAY THE FINE SUBSCRIBED. I UNDERSTAND THAT SHOULD I WILLFULLY FAIL TO APPEAR BEFORE THE COURT AS REQUIRED BY THIS **NOTICE TO APPEAR**, THAT I MAY BE HELD IN CONTEMPT OF COURT AND A WARRANT FOR MY ARREST SHALL BE ISSUED.

Signature of Defendant (or Juvenile and Parent / Custodian) — Date Signed

ADMIN.

HOLD for other Agency — Name:

☐ Dangerous ☐ Resisted Arrest ☐ Suicidal ☐ Other:

Intake Deputy I.D. # Pouch

Signature of Arresting Officer — X

Name of Arresting Officer (Print) I.D. #

Transporting Officer I.D. # Agency

Name Verification (Printed by Arrestee) (PRINT)

Witness here if subject signed with an "X".

PAGE ____ OF ____

DISTRIBUTION: WHITE — COURT COPY GREEN — STATE ATTORNEY YELLOW — AGENCY PINK — JAIL GOLD - DEFENDANT (N.T.A's ONLY)

EFTA00231991

ARREST / NOTICE TO APPEAR
Juvenile Referral Report

1 Arrest 3 Request for Warrant
2 NTA 4 Request for Capia

Juvenile

ADMINISTRATIVE

OBTS Number

Agency ORI Number: FLO 5 0 0 6 0 0

Agency Name: PALM BEACH POLICE DEPARTMENT

Agency Report Number (N.T.A.'s only): 7 6 -

Charge Type (Check as many as apply): ☐ 1. Felony ☐ 3. Misdemeanor ☐ 5. Ordinance ☐ 2. Traffic Felony ☐ 4. Traffic Misdemeanor ☐ 6. Other

If Weapon Seized — Enter Type

Multiple Clearance Indicator

Location of Arrest (Including Name of Business)

Location of Offenses (Business Name, Address)

Date of Arrest	Time of Arrest	Booking Date	Booking Time	Jail Date	Jail Time	Location of Vehicle

DEFENDANT

Name (Last, First, Middle)

Alias (Name, DOB, Soc. Sec., Etc.)

Race (W - White, B - Black, I - American Indian, O - Oriental/Asian)	Sex	Date of Birth	Height	Weight	Eye Color	Hair Color	Complexion	Build

Scars, Marks, Tattoos, Unique Physical Features (Location, Type, Description) | Marital Status | Religion | Indication of: Alcohol Influence ☐ Y ☐ N ☐ Unk; Drug Influence ☐ Y ☐ N ☐ Unk

Local Address (Street, Apt. Number) (City) (State) (Zip) | Phone ( ) | Residence Type: 1. City 2. County 3. Florida 4. Out of State

Permanent Address (Street, Apt. Number) (City) (State) (Zip) | Phone ( ) | Address Source

Business Address (Name, Street) (City) (State) (Zip) | Phone ( ) | Occupation

D/L Number, State	Soc. Sec. Number	INS Number	Place of Birth (City, State)	Citizenship

CO-DEF.

Co-Defendant Name (Last, First, Middle) | Race | Sex | Date of Birth | ☐ 1. Arrested ☐ 2. At Large | ☐ 3. Felony ☐ 4. Misdemeanor ☐ 5. Juvenile

Co-Defendant Name (Last, First, Middle) | Race | Sex | Date of Birth | ☐ 1. Arrested ☐ 2. At Large | ☐ 3. Felony ☐ 4. Misdemeanor ☐ 5. Juvenile

JUVENILE

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Address (Street, Apt. Number) (City) (State) (Zip) | Business Phone ( )

TOT JAC | Date | Time

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☐ Yes, by: (Name) ☐ No: (Reason)

School Attended | Grade

Property Crime? ☐ Yes ☐ No | Description of Property | Value of Property

CODE

Drug Activity: N. N/A, P. Possess, S. Sell, B. Buy, T. Traffic, R. Smuggle, D. Deliver, E. Use, K. Dispense/Distribute, M. Manufacture/Produce/Cultivate, Z. Other

Drug Type: N. N/A, A. Amphetamine, B. Barbiturate, C. Cocaine, E. Heroin, H. Hallucinogen, M. Marijuana, O. Opium/Deriv., P. Paraphernalia/Equipment, S. Synthetic, U. Unknown, Z. Other

CHARGE

Charge Description | Counts | Domestic Violence ☐ Y ☐ N | Statute Violation Number | Violation of ORD #

Drug Activity | Drug Type | Amount / Unit | Offense # | Warrant / Capias Number | Bond

CHARGE

Charge Description | Counts | Domestic Violence ☐ Y ☐ N | Statute Violation Number | Violation of ORD

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Charge Description | Counts | Domestic Violence ☐ Y ☐ N | Statute Violation Number | Violation of ORD

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Month Day Year Time A.M. P.M.

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Signature of Defendant (or Juvenile and Parent / Custodian) Date Signed

ADMIN.

HOLD for other Agency
Name:

☐ Dangerous ☐ Resisted Arrest
☐ Suicidal ☐ Other:

Intake Deputy I.D. # Pouch

Signature of Arresting Officer
X

Name of Arresting Officer (Print) I.D.

Transporting Officer I.D. # Agency

Name Verification (Printed by Arrestee)
(PRINT)

Witness here if subject signed with an "X".

PAGE ____ OF ____

DISTRIBUTION: WHITE — COURT COPY GREEN — STATE ATTORNEY YELLOW — AGENCY PINK — JAIL GOLD - DEFENDANT (N.T.A's ONLY)

EFTA00231992

Probable Cause Affidavit

Palm Beach Police Department

Agency ORI# FLO 500600

Police Case#: 05-368 (3)

Defendant: [redacted]
Race/Sex: White Female
DOB: [redacted]
Charges: Lewd and Lascivious Act on a child under 16 years of age 800.04(6)(2b)

From March 15, 2005, through February 2006, the Palm Beach Police Department conducted a sexual battery investigation involving Jeffrey Epstein, [redacted] and [redacted] Sworn taped statements were taken from five victims and seventeen witnesses concerning massages and unlawful sexual activity that took place at the residence of Jeffrey Epstein, 358 El Brillo Way, Palm Beach. Several of the victims were recruited by and brought to the residence by [redacted] to perform massages for Epstein, for which [redacted] received monetary compensation. During the visit they would be introduced to [redacted], Epstein's assistant, who in turn would record their telephone numbers and name. The victims would be brought to Epstein's bedroom to provide the massage. Epstein would enter the room and order the victims to remove their clothing to provide the massage. As the victims complied and provided the massages, Epstein would rub his fingers on their vaginas. On occasion, Epstein would introduce a massager/vibrator and rub the victims vaginas as they provided the massage. On three separate occasions, Epstein had intercourse and inserted his penis/fingers in the victims vaginas. At the conclusion of the massages the victims were paid sums of money ranging from $200 - $1,000. The facts, as reported, are as follows:

On 03/15/2005, A fourteen year old white female, hereinafter referred to as "[redacted] dob [redacted] and her family reported unlawful sexual activity which occurred at a residence within the Town of Palm Beach. [redacted] reported that a subject known to her as "Jeff" had touched her vaginal area with a vibrator/massager while within his residence. "Jeff" was later identified as Jeffrey Epstein through a photo line up.

During a sworn taped interview, [redacted] stated that [redacted] dob [redacted], a cousin of [redacted] boyfriend and classmate at [redacted] High School, worked for a wealthy man and did sexual favors for him. She also admitted that [redacted] had offered her an opportunity to make money. During the beginning of the month of February 2005, [redacted] explained that she was first approached by [redacted] to go with her to Epstein's house. [redacted] stated that [redacted] along with a Hispanic female, later identified at [redacted] pick her up at her father's house on a Sunday. [redacted] was not sure of the exact dates but knew it was a Sunday. [redacted] told her father that they were going shopping but in reality [redacted] drove them to Palm Beach. During the drive a conversation occurred between [redacted] and [redacted] whereas [redacted] reportedly told [redacted] that if Jeff asked her age,

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Date: 05/01/2006

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she should say she was eighteen. It was later confirmed by the [redacted]s father that [redacted] picked his daughter up on February 6, 2005. According to [redacted] father, [redacted] drove a pick up truck.

[redacted] described Epstein's house as a two-story pink house with a Cadillac Escalade parked in the driveway. She recalled that Jeff's house was on a dead end street. Upon arriving at the house [redacted] stated that they walked up a driveway, past what appeared to be a small guard/security room. A male approaching them asking what they wanted. [redacted] stated they were there to see Epstein. The male allowed them to continue walking up to the house. [redacted] stated the man told them that Epstein was not there but was expected back. He allowed them to enter the house, via the kitchen. He offered them something to drink while they waited inside. Shortly thereafter, Epstein and his assistant, described as white female with blond hair and later identified as [redacted], entered the kitchen. Epstein introduced himself to [redacted] [redacted] described Epstein as being approximately forty-five years old, having a long face and bushy eyebrows, with graying hair.

[redacted] and Epstein left the kitchen leaving [redacted] alone in the kitchen. They returned a short time later. They all spoke briefly in the kitchen. [redacted] was instructed to follow [redacted] upstairs. [redacted] recalled walking up a flight of stairs, lined with photographs, to a room that had a massage table in it. Upon entering the room there was a large bathroom to the right and a hot pink and green sofa in the room. There was a door on each side of the sofa. [redacted] recalled there being a mural of a naked woman in the room, as well as several photographs of naked women on a shelf. [redacted] told the victim that Epstein would be up in a second.

Epstein entered the room wearing only a towel and told [redacted] to take off her clothes. [redacted] stated Epstein was stern when he told her to take off her clothes. [redacted] said she did not know what to do as she was the only one there in the room so she took off her shirt leaving her bra on. Epstein had removed his towel and told the [redacted] to take off everything. [redacted] stated Epstein was nude when he took his towel off, placing it on the floor as he laid down on the table. [redacted] stated she then removed her pants leaving her thong panties on. Epstein then instructed her to give him a massage pointing to a specific lotion for her to use. As [redacted] began to give Epstein the massage, he told her to get on his back. [redacted] stated she straddled herself on Epstein's back whereby her exposed buttocks were touching Epstein's bare buttocks. [redacted] said Epstein was specific in his instruction to her on how to massage him, telling her to go clockwise or counter clockwise. Epstein then turned over and instructed [redacted] to massage his chest. [redacted] was now standing on the ground and resumed massaging Epstein's chest area. [redacted] stated Epstein held onto the small of her back as she massaged his chest and shoulder area. Epstein then turned to his side and started to rub his penis in an up and down motion. Epstein then pulled out a purple vibrator and began to

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massage [redacted] vaginal area. [redacted] stated there was no penetration as the vibrator was on top of her underwear. [redacted] recalled Epstein ejaculating because he had to use the towel to wipe himself as he got off the table. Epstein then left the room and [redacted] got dressed. She went back downstairs where she met with [redacted] [redacted] said she was paid three hundred dollars in cash from Epstein. Before she left, Epstein asked [redacted] to leave her phone number. As [redacted] [redacted] and [redacted] were leaving the house, [redacted] told [redacted] she received two hundred dollars that day for bringing her.

During the course of the investigation, parental consent was granted for [redacted] to assist with the investigation. At our direction [redacted] conducted controlled taped phone calls to [redacted] cellular telephone 561-[redacted] [redacted] spoke with [redacted] in an attempt to arrange another meeting with Epstein. [redacted] asked [redacted] what did she need to do to make more money. [redacted] stated, "the more you do, the more you get paid." [redacted] had subsequently called back [redacted] and left a voice mail message for her indicating that she had set up an appointment for [redacted] to go to Epstein's house at 11:00 am on April 5, 2005. This message was recorded from [redacted] s voice mail.

Based on the above, trash pulls were established at Epstein's residence with Supervisor Tony Higgins of the Sanitation Bureau of the Town of Palm Beach. The trash pull from April 5, 2005 revealed a telephone message for Epstein which stated [redacted] and [redacted] s name at 11:00 am. This was the time frame [redacted] had informed [redacted] to be ready to go work at Epstein's house.

On October 3, 2005, Sgt Frick and I went to [redacted] residence and viewed her vehicle parked in the driveway, a red Dodge Neon. Sgt. Frick and I knocked on the door and met with [redacted] [redacted] was told that we were investigating a claim involving Jeffrey Epstein of El Brillo Way, in Palm Beach. [redacted] was asked if she would accompany us back to the police station for further questioning. She was also told that at the conclusion of the interview she would be returned home. [redacted] voluntarily came with us back to the Palm Beach Police Department.

Upon our arrival at the police station, [redacted] was brought to the interview room in the Detective Bureau where I obtained a taped, sworn statement. I began the interview by asking [redacted] how she became acquainted with Epstein. [redacted] stated that approximately two years ago, just after she turned 17 years of age, she was approached by a friend named [redacted] at the Canopy Beach Resort in Rivera Beach. [redacted] was asked if she wanted to make money. She was told she would have to provide a massage and should make $200.00. [redacted] thought about the offer and agreed to meet with Jeffrey.

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[redacted] (Unknown last name) and [redacted] (Unknown last name) picked [redacted] up and she was taken to Epstein's house. Upon her arrival to the house she was introduced to Epstein in the kitchen of the house. She was also introduced to a white female known to her as [redacted]. She was led upstairs to the main bedroom known to her as Jeff Epstein's bedroom. [redacted] arranged the massage table and covered the table with a sheet. She brought out the massage oils and laid them next to the massage bed. [redacted], then left the room and informed [redacted] Jeff would be in, in a minute. Jeff entered the bedroom wearing only a towel. He removed the towel and laid nude on the massage table. He laid on the table onto his stomach and picked a massage oil for [redacted] to rub on him. During the massage, [redacted] stated "He tried to touch me and I stopped him." I asked how he tried to touch her. [redacted] stated that Epstein grabbed her buttocks and she felt uncomfortable. [redacted] told Epstein, I'll massage you but I don't want to be touched. [redacted] stated she performed the massage naked. At the conclusion of the massage, Epstein paid [redacted] $200.

After the massage Epstein stated to [redacted] that he understood she was not comfortable, but he would pay her if she brought over some girls. He told her the younger the better. [redacted] stated she once tried to bring a 23 year old female and Epstein stated that the female was too old. [redacted] stated that in total she only remembers six girls that she brought to see Epstein, each time she was paid $200. [redacted] stated she had brought the following girls: [redacted] Faith [redacted] (a16 year old female), [redacted] (a 16 year old female) and [redacted] said that at the time she brought these girls to Epstein's house they were all14 through 16 years of age. I asked [redacted] which one was the youngest. [redacted] advised [redacted] was the youngest as she was fourteen when the massage occurred. [redacted] stated every girl she brought knew what to expect when they arrived. They were told they would provide a massage, possibly naked, and allow some touching. I asked her if [redacted] was aware. She stated every girl she brought knew what to expect. She explained she knew that [redacted] wanted to make money. She approached [redacted] and explained about going to work for Jeff, [redacted] agreed and arrangements were made to bring her to Epstein's house on a weekend. [redacted] stated that she and [redacted] (Later identified as [redacted] picked up [redacted] at her house. [redacted] stated that at that time she was driving a red pickup truck. They traveled to Epstein's house and entered through the kitchen door. They met with the house chef and Epstein's assistant [redacted]. [redacted] was introduced to Epstein while they were in the kitchen area. [redacted] led [redacted] upstairs and Epstein went upstairs. When the massage was over [redacted] returned to the kitchen area. [redacted] stated she was paid $200.00 for bringing [redacted] to Epstein's house. [redacted] stated [redacted] told her she was paid $300.00 for the massage.

[redacted] stated that [redacted] was the last person she brought to Epstein's house. She had changed her cellular number to avoid being contacted by [redacted]. She continued stating that she had no direct contact with Epstein

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when he was going to travel to Palm Beach. [redacted] said when Epstein announces to his assistant, [redacted], that he is traveling to Palm Beach, [redacted] would then contact [redacted] to arrange girls to "work" for Epstein. [redacted] stated that once her parents discovered that she was visiting Epstein, they disapproved of the encounters with him and she stopped. [redacted] further stated that [redacted] still tries to call [redacted] house and leaves messages.

Sgt Frick entered the room and explained to [redacted] that based on her own statements, she had implicated herself by bringing underage girls to Epstein's house. [redacted] provided cellular telephone numbers for the girls she had mentioned previously. Additionally, she also provided possible addresses and areas in which they lived.

As [redacted] was being taken home in the vehicle, a tape recorder was placed within the vehicle to record any conversations within the vehicle. During the drive back to her home, [redacted] made the comment " I'm like a Heidi Fleiss." (Hollywood Madam who sent girls to clients for sexual favors in California). [redacted] was dropped off at her house without incident.

On October 3, 2005, Sgt Frick and I went to speak with [redacted] a sixteen year-old female who was brought to Epstein's residence by [redacted] We met with [redacted] mother at their front door. We explained the ongoing investigation and asked to speak with [redacted] as we had information that she had "worked" for Jeff. [redacted] introduced us to her husband and allowed us entry into the home. We sat in the dining room and met with [redacted] Date of Birth [redacted] As she was under the age of eighteen, Mrs [redacted] was advised we would be speaking with her. She expressed if her daughter had information, she wanted to assist. We interviewed [redacted] who denied having any inappropriate encounters with Jeff (Epstein). She stated she had gone to Jeff's house with [redacted] approximately eight months ago and sat in the kitchen with the house chef, but nothing happened. As the parents were present during the interview, we felt that [redacted] was withholding information from us. She made several comments as to putting the entire incident behind her. I left my telephone number and advised should she wish to speak with me again to telephone me. Sgt Frick and I thanked Mrs. [redacted] for her time and left the area. She stated she would ask [redacted] again after we left as to what happened at Epstein's house. I informed her that [redacted] had my telephone number and hopefully she would call.

On October 4, 2005, Det Dawson and I drove to the [redacted] home and met with [redacted] and [redacted] dob [redacted] During a sworn taped statement, [redacted] stated approximately a year ago when she was seventeen years old, she was taken to a house by [redacted] stated she knows [redacted] because they both attend [redacted] High School. She was told she could make money working

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for Jeff. She was told she would have to provide a massage to Jeff. [redacted] stated upon her arrival to the house she was brought to the kitchen area by [redacted] They met with the house chef who was already in the kitchen area. [redacted] stated [redacted] would wait for her in the kitchen. [redacted] was introduced to [redacted], Jeff's assistant, who brought her upstairs to the master bedroom. [redacted] prepared the room and massage table for a massage. Epstein entered the room wearing only a towel and she provided a massage. [redacted] stated she kept her clothes on during the massage. She advised sometime during the massage, Epstein grabbed her buttocks and pulled her close to him. [redacted] said she was uncomfortable by the incident involving Jeff. At the conclusion of the massage, she was paid $200.00 for the massage. I asked [redacted] if she has any formal training in massages to which she replied no. I asked her if [redacted] received any monies for taking her to perform the massage. [redacted] stated [redacted] had received money for taking her there but was unsure in the amount. [redacted] stated she returned to Epstein's house on another occasion with [redacted] and another girl, [redacted] stated she waited in the kitchen with [redacted] while [redacted] was taken upstairs by [redacted]. [redacted] stated she only did the massage once as she was uncomfortable with the whole experience.

At the conclusion of the interview, the tape was stopped. I was informed that [redacted] had attempted to reach [redacted] via cell phone. A voice mail message on October 4, 2005 at 10:59 am, revealed a female voice who identified herself as [redacted] who requested [redacted] to call her back reference the police questioning. [redacted] provided the incoming telephone number as [redacted]. [redacted] stated she inadvertently told [redacted] about the police investigation because [redacted] had called her to tell her about how she just received a rental car from Jeff Epstein. [redacted] had called her to tell her that she was given a rental car, a 2005 Silver Nissan Sentra, to utilize to visit family and visit Epstein. [redacted] asked her what was going on at the house that the police would be asking questions. [redacted] stated [redacted] then called Jeff and [redacted] and asked what was going on reference the ongoing police investigation. According to [redacted] has since then been trying to contact her to ask about the police questions. I instructed [redacted] not to contact [redacted] and do not provide any more information to [redacted] as she would notify Jeff Epstein and [redacted] what was transpiring.

On October4, 2005, I made telephone contact with [redacted] who had left several messages for me to contact her. During the message, she advised she was not completely truthful when we met in person but would like to speak with me to advise what had happened. She further advised she did not want to speak of this incident in front of her mother. At approximately 3:48 pm I made telephone contact with [redacted] During a taped recorded statement [redacted] stated the following: approximately a year ago, when she was sixteen years of age, [redacted] took her to Epstein's house twice. She knows [redacted] because they both attend Royal Pal Beach High School. The first time she went, [redacted] drove to the house. They entered through the kitchen area where she was

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introduced to [redacted] and Epstein. She was taken upstairs to a bedroom by [redacted] who set the room up with a massage bed and brought out the oils to use. Epstein then entered the room wearing a towel. He laid on the table and picked out a lotion for [redacted] to rub on him. At one point during the massage she tried to remove her shirt, at which point she became very upset and discontinued the massage. Both [redacted] and Epstein had a verbal disagreement, at which time she left without being paid. She got with [redacted] who was sitting in the kitchen and told her "let's go." [redacted] advised she received no money for that day. [redacted] also said that [redacted] had told her if she was uncomfortable with what was going on, to let him know and he'll stop. She knew that the more you do the more you get paid. [redacted] advised that several weeks later she agreed to be taken a second time by [redacted] Once they arrived at the residence, [redacted] sat in the kitchen and [redacted] took her upstairs to the master bedroom again. [redacted] set the room up with a massage bed and brought out the oils to use. Epstein then entered the room wearing a towel. He laid on the table and picked out a lotion for [redacted] to rub on him. At one point during the massage he tried to touch her buttocks. As [redacted] was wearing tight jeans and had a tight belt on Epstein was unable to touch her buttocks. Epstein then rolled onto his back during the massage and then attempted to touch her breasts. [redacted] then became upset again and told Epstein she didn't want to be touched. [redacted] discontinued the massage and was paid $200.00. [redacted] then went downstairs where [redacted] was waiting for her. She told [redacted] she wanted to leave. [redacted] said she never returned to the house. [redacted] stated she is aware that her friend, [redacted] was also at the house and had a problem with Epstein.

I later researched [redacted] dob [redacted], and met with her at her residence. During a sworn taped statement, [redacted] stated the following: on or about November 2004, she was approached at [redacted] High School by [redacted] a fellow student. [redacted] asked [redacted] if she wanted to make money. She agreed and was told she would provide a massage to wealthy man in Palm Beach. [redacted] picked her up and drove her to a house in Palm Beach. She was brought into the kitchen area of the house. She further stated that fellow [redacted] High School students [redacted] and [redacted] ([redacted] came with them. They were brought into the kitchen where she was introduced to Epstein and other females. [redacted] stated she was introduced to a female helper of Epstein, the female was described as white female (unknown name), with blond hair. She stated that the assistant was familiar with [redacted] The assistant brought her upstairs into a master bedroom area. The assistant set up the massage table and put out lotions to be used. She told [redacted] Epstein would be available in a minute. Epstein entered the room wearing only a towel. Epstein removed his towel, and laid naked on the massage table and picked a lotion to rub on his thighs and back. [redacted] further stated during the massage, Epstein asked her to remove her clothes. She complied and removed her pants and blouse. [redacted] didn't remember if she had removed her bra but feels that she did. [redacted] was certain that she stayed in her thong underwear. [redacted] continued the massage and at one point she climbed onto the massage

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table, straddling Epstein to massage his back. While doing this her buttocks were touching Epsteins. [redacted] was instructed to return to the ground at which time Epstein turned to have his chest rubbed. [redacted] advised she was sure he was masturbating based on his hand movements going up and down on his penis area. [redacted] did not want to look at his penis area because she was uncomfortable. Epstein removed a large white vibrator which was next to the massage table and turned it on. [redacted] stated Epstein began rubbing the vibrator over her thong underwear on her vaginal area. Shortly thereafter, Epstein ejaculated and removed himself from the table. He walked over to where the shower was and opened the glass door. She waited as he was taking a shower in her direct view. When I asked [redacted] how old she was when this occurred, she stated she had just turned seventeen. At the conclusion of the shower, [redacted] was paid either $350.00 or $400.00. She stated she wasn't sure, but knows it was close to $400.00. [redacted] stated she never returned to provide a massage for Epstein.

At approximately 2:10 pm, Det Dawson and I met with [redacted] dob [redacted], at her residence. As [redacted] was only seventeen years of age, I had notified her mother, that she would be interviewed reference an ongoing investigation in Palm Beach. I assured her that her daughter was not a suspect. I explained the possibility of her being either a witness or victim. Mrs [redacted] advised she wanted [redacted] to cooperate and consented to the interview.

During a sworn taped statement [redacted] stated the following: at the age of sixteen, during the month of September 2004, she was approached by [redacted] [redacted] for a chance to make money. [redacted] was friends with associates of [redacted] and knew the same people. [redacted] had been previously told by her friends from [redacted] [redacted] High School, what [redacted] did for Epstein. [redacted] called a person known to [redacted] as [redacted] and scheduled the appointment. [redacted] picked [redacted] up and drove her to Palm Beach to a street called "Brillo Way". They drove to the end of the street and entered a large driveway. They entered the kitchen area of the house and met with Epstein. [redacted] was introduced to Jeff Epstein. [redacted] led [redacted] upstairs to the main bedroom area and set up the room with a massage table and set out the oils. [redacted] stated that while going up the stairs and into the bedroom she observed numerous photographs of naked young girls. [redacted] dimmed the lights and turned on soft music. [redacted] exited the room and Epstein entered the room wearing only a towel. Epstein picked oils and instructed her to rub his legs, under his buttocks, back and chest area. Epstein asked her to get comfortable. [redacted] advised she did not remove her clothes. She was wearing tight jeans and a cropped tank top exposing her belly area. During the massage, Epstein removed his towel and laid on the massage table naked. As [redacted] rubbed Epstein's chest area, he attempted to reach down her pants to touch her buttocks area however was unable to due so due to the tightness of the jeans and a tight belt. [redacted] advised Epstein began to masturbate as she rubbed his chest. Epstein moaned as she rubbed his chest. She observed he was continuing to masturbate and

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attempted to reach up her tank top and touch her breasts. [redacted] pulled back and Epstein stopped, however he kept masturbating until he climaxed. He cleaned himself with the towel he was previously wearing. [redacted] was paid $200.00 for the massage and left the area. She met with [redacted] who was waiting in the kitchen area and left the house.

[redacted] then explained she never provided another massage for Epstein. She did however, go to the house with [redacted] and [redacted] ([redacted] as they took another friend of [redacted] [redacted] advised she was present when [redacted] went to work for Epstein. She advised she rode over and sat in the kitchen area with [redacted] to wait for [redacted] [redacted] advised while they waited for [redacted] the house chef prepared lunch for them as it was almost lunchtime when they went. When [redacted] was finished with the massage they left the area. I asked [redacted] if [redacted] ever told her what would be expected when she provided a massage. [redacted] stated yes, [redacted] told her that a massage would be expected, possibly naked and possibly some touching involved. [redacted] has no formal training in providing massages. [redacted] spoke about a third and last time she went to Epstein's house. [redacted] drove another girl, [redacted] (sixteen years of age) who is [redacted] friend, to Epstein's house. [redacted] stated [redacted] knew that [redacted] had made money massaging Epstein and wanted to make money herself. [redacted] took them in the kitchen area of the house and introduced [redacted] to [redacted]. [redacted] and [redacted] took [redacted] upstairs to the main bedroom. [redacted] advised she doesn't know what happened as [redacted] did not speak about what happened in the room. [redacted] received $100.00 from [redacted] for going with her to Epstein's house and recommending [redacted]

On October 6, 2005, at 11:45 am, I met with [redacted] dob [redacted], at Lynn University and explained to her why we there to interview her. She advised she was aware of the ongoing investigation. [redacted] stated she had previously spoken with [redacted] who told her she was interviewed by detectives. During a sworn taped statement, [redacted] stated she knew that [redacted] worked for Jeff Epstein in Palm Beach. [redacted] advised she originally had been taken to the Epstein house by [redacted] whom she met when they both attended [redacted] High School. She began going to the house when she was sixteen years of age and stated she had been there a lot of times to provide massages over the past two years. I asked her if she had formal training in providing massages, which [redacted] stated she had not. [redacted] advised she was told what was expected of her by providing massages and she would have to remove clothing but if she felt uncomfortable just to say so and Epstein would stop pushing the issue. [redacted] began providing massages and advised she kept her clothes on. She considered Epstein a pervert and he kept pushing to go further and further. [redacted] explained she would keep telling him she had a boyfriend and would not be right to her boyfriend. It wasn't until recently that [redacted] began removing her clothes and staying in her thong underwear to provide a massage. [redacted] explained

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Epstein wanted to be rubbed on his back and recently he began turning over and have her rub his chest as he masturbated. He would try to touch her breasts as she rubbed his chest. [redacted] stated "Jeff would try to get away with more and more on each massage". [redacted] stated Epstein would try to touch her more and on one occasion he attempted to use a massager/vibrator on her. [redacted] drove [redacted] to the house for the original massage. [redacted] left [redacted] her cell phone number and every time Epstein would come into town, [redacted] would call her for an appointment to "work". Each time she went, [redacted] would meet her at the kitchen door area. She would bring her upstairs and prepare the massage table. [redacted] advised Epstein would ask her questions about herself. Epstein knew she was a soccer player and would be attending Lynn University. I asked [redacted] if Epstein knew her real age. [redacted] stated Epstein did and didn't care. The most recent massage she provided was on October 1, 2005. During the massage, she asked Epstein if she could borrow one of his vehicles to visit her family and boyfriend in Orlando, Florida. Epstein had told her she could borrow one of his vehicles but later stated he would rent her a car. She continued with the massage as Epstein grabbed her buttocks and caressed the buttocks cheeks. I asked [redacted] if she was wearing undergarments to which she replied her thong underwear. Once he tried to touch her breasts, she would pull away from him and he would stop. [redacted] was asked if he ever used a vibrator on her. [redacted] was aware of the vibrator but advised she never would allow him to use the vibrator on her. She described the vibrator as the large white vibrator with a huge head on the tip of the vibrator. She stated he kept the vibrator in a closet near the massage table.

[redacted] stated that on October 3, 2005, she was contacted by Epstein's assistant, [redacted], who informed her that Jeff Epstein had rented her a new Nissan Sentra and she should come by the house to pick it up. [redacted] informed [redacted] she would have the car for a month. [redacted] stated Epstein knew her car was not working properly and that she had missed appointments in the past because of her car being inoperable. [redacted] explained the car is currently parked next to the Lynn University Gym field. I asked her if she ever took any one to the house. [redacted] explained she took [redacted] a friend of hers who attended [redacted] High School, who has relocated to Orlando to attend college. I asked if she ever allowed another female in the room. [redacted] advised no one was brought into the room with her.

At the conclusion of the interview, Det Dawson and I went to the gym area of Lynn University and located the Silver Nissan Sentra bearing Florida tag [redacted]. The vehicle is registered to Dollar Rent a Car out of the Palm Beach International Airport. The vehicle was rented by Janusz Banasiack, later learned to be Epstein's houseman, and paid with Epstein's credit card.

On September 11, 2005, w/f [redacted] dob [redacted], was arrested by the Palm Beach Police Department

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for misdemeanor possession of marijuana. During the arrest [redacted] told the arresting officer that she had information about sexual activity taking place at the residence of Jeffrey Epstein. Additionally, during the ongoing trash pulls from Epstein's residence, discarded papers were found which contained [redacted] s name and cell phone number.

On October, 11, 2005, Det Dawson and I met with [redacted] and obtained a sworn taped statement. [redacted] explained she had been going to Epstein's house since 2002, when she was sixteen years of age. Since then she has gone to the house hundreds of times. [redacted] stated she became his "number one girl." She explained that on her first visit she was brought to the house by fellow [redacted] High School classmate, [redacted] [redacted] said she was brought through the kitchen area where she met [redacted] for the first time. [redacted] was led to the master bedroom, Epstein s room. [redacted] explained that as she was walking up the stairs she observed several photographs of naked women along the walls and tables of the house. [redacted] further explained that she was brought into the bedroom, where [redacted] prepared the room by setting up the massage table and provided the oils for her to rub on Epstein. [redacted] explained she remembered the steam room area, which contained two large showers. Epstein entered the room from the steam room area and introduced himself. Epstein lay on the table and told her to get comfortable. [redacted] removed her skirt and kept her shirt on. Epstein then instructed her to remove her shirt. [redacted] removed her shirt and remembered she was not wearing a bra. [redacted] stated she provided the massage wearing only her panties. She continued rubbing his legs, thighs and feet. [redacted] advised he turned over onto his back. Epstein touched her breasts and began to masturbate. Epstein ejaculated which meant the massage was over. At the conclusion of the massage, [redacted] was paid $200.00. They walked together downstairs where [redacted] and [redacted] [redacted] were waiting. [redacted] stated [redacted] received an unknown amount of money for taking her to Epstein. Epstein instructed to leave her cellular telephone number so that he could contact her when he is in town.

[redacted] stated that during her many visits a routine was established between her and Epstein. She would enter the house and get naked in the bedroom. She would then start with a back massage. Epstein would roll on to his back and allow her to massage his chest area. [redacted] stated Epstein would then began to masturbate himself and at the same time would insert his fingers in her vagina and masturbate her with his fingers. [redacted] explained Epstein would continue this process until he ejaculated. He would then utilize a vibrator/massager on her vagina until [redacted] climaxed. [redacted] advised that during her frequent visits, Epstein asked for her real age, [redacted] stated she was sixteen. Epstein advised her not to tell anyone her real age. [redacted] advised that things escalated within the home as Epstein would instruct and pay [redacted] to have intercourse with his female friend, [redacted] [redacted] explained the intercourse included using strap on dildos, large rubber penis' and other devices that Epstein had at his disposal. Epstein would watch them have intercourse and masturbate himself . Occasionally, Epstein would then join in

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Signature of Police Officer (F.S.S. 117.10)

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during the female on female intercourse and provide oral sex to both [redacted] and [redacted]. This occurred during the time [redacted] was sixteen years of age.

[redacted] advised this continued to escalate during two years. The routine became familiar to [redacted] Epstein's assistant [redacted] would telephone her every time Epstein was in the Town of Palm Beach and would place appointments for her to visit and work for Epstein. Each time something new was introduced, additional monies were produced and offered for [redacted] to allow the acts to happen. [redacted] consented to perform all these acts but was adamant that there was an understanding with Epstein that no vaginal penetration would occur with his penis. [redacted] explained that Epstein's penis was deformed. [redacted] explained that his penis was oval shaped. [redacted] claimed when Epstein's penis was erect, it was thick toward the bottom but was thin and small toward the head portion. [redacted] called Epstein's penis "egg-shaped." [redacted] stated Epstein would photograph [redacted] and her naked and having sex and proudly display the photographs within the home. [redacted] stated during one visit to Epstein's house in which she provided a massage to Epstein, his female friend, [redacted] was also present. [redacted] provided the massage in which [redacted] and her would fondle each others breasts and kiss for Epstein to enjoy. Towards the end of this massage, Epstein grabbed [redacted] and turned her over onto her stomach on the massage table and forcibly inserted his penis into her vagina. [redacted] stated Epstein began to pump his penis in her vagina. [redacted] became upset over this. She said her head was being held against the table forcibly, as he continued to pump inside her. She screamed "No!" and Epstein stopped. She told him that she did not want to have his penis inside of her. Epstein did not ejaculate inside of her and apologized for his actions and subsequently paid her a thousand dollars for that visit. [redacted] stated she knows he still displays her photographs through out the house.

On October 12, 2005, Det Dawson and I met with [redacted] dob [redacted] who stated during a sworn taped statement, that nothing happened between her and Epstein. [redacted] appeared nervous during the interview. I assured her that I have spoken with other people who advised differently. [redacted] stated on several occasions she provided a massage to Epstein. She stated she was brought to the Epstein house in March of 2005. [redacted] a classmate at [redacted] High School, approached her and asked her if she wanted to "work". [redacted] made the arrangements with [redacted] Epstein's assistant. [redacted] who has no formal training in providing massages, stated she provided a massage, fully clothed for $200.00 . As I sensed hesitancy in her answers, I asked [redacted] if she had been contacted by anyone from Epstein's organizations or his house. [redacted] stated she was interviewed already by a private investigator for Epstein. He identified himself as '[redacted] and inquired about the police investigation, and left his telephone number [redacted] for additional contact. [redacted] provided no additional information, as it appeared her responses were almost scripted.

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On November 6, 2005, at approximately 3:30 pm, I met with [redacted] dob [redacted] at the Palm Beach Police Department. [redacted] was identified as a potential witness/victim through information obtained during the trash pulls. During the sworn taped statement, [redacted] advised she was at Jeffrey Epstein's house one time, approximately two months ago. She was approached by a girl, [redacted] who was dating [redacted] roommate, for an opportunity to make some quick money. [redacted] advised she needed to make some quick cash to make the rent that month. She agreed to go to the house. She had been told by [redacted] that the massage would have to be done in her underwear. She advised [redacted] drove with her and brought her into the house. They walked into the kitchen area, and took the stairs upstairs. [redacted] further stated she was brought into a master bedroom area. She advised she recalled seeing portraits of naked women throughout the room. A massage table was already out near the sauna/shower area in the master bedroom. Epstein entered the room wearing only a towel and introduced himself as "Jeff." At Epstein's direction, [redacted] and [redacted] removed their clothing down to their panties, Epstein laid on his stomach area and they provided a massage on his legs and feet area. I asked [redacted] if she had any formal massage training and she replied "no." [redacted] advised she was topless and the panties she wore were the boy shorts lace panties. She and [redacted] continued the massage until the last ten minutes of the massage, Epstein, told [redacted] to leave the room so that [redacted] could finish the massage. [redacted] got dressed, and left the room as Epstein turned over onto his back. Epstein then removed the towel and laid naked . Epstein requested that [redacted] rub his chest area. [redacted] stated as she did this, Epstein, began masturbating. [redacted] stated Epstein pulled down her boy short panties, and he produced a large white vibrator with a large head. She stated it was within his reach in a drawer in his master bathroom. He rubbed the vibrator on her vaginal area. [redacted] advised he never penetrated her vagina with the vibrator. He continued to rub her vagina with the vibrator as he continued to masturbate. [redacted] stated she was very uncomfortable during the incident but knew it was almost over. Epstein climaxed and started to remove himself from the table. He wiped himself with the towel he had on previously and went into the shower area. [redacted] got dressed and met with [redacted] in the kitchen area. Epstein came into the kitchen and provided [redacted] $200.00 for bringing [redacted] and paid $200.00 to [redacted] for providing the massage. [redacted] was told to leave her telephone number with [redacted] for future contact. [redacted] provided her cellular telephone number. [redacted] was asked if she was recently contacted about this investigation by anyone from the Epstein organization. She replied she was called but it was for work. She stated she was called by [redacted] for her to return to "work" for Epstein. [redacted] stated "work" is the term used by [redacted] to provide the massages and other things. [redacted] advised she declined as she was not comfortable in providing that type of "work."

On November 7, 2005, Det Sandman and I met with [redacted] dob [redacted] During a sworn taped statement, [redacted] stated she met Jeffrey Epstein through [redacted] when they were still

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attending [redacted] High School. [redacted] would approach females who wished to work for Epstein. [redacted] stated she was offered to work for Epstein but declined. [redacted] explained that "work" means give massages. She was asked about any formal training in providing massages which she said "no." [redacted] said she accompanied [redacted] and other females who were taken to Epstein's house to provide massages. [redacted] further stated she had been to the house approximately 4 or 5 times in the past year. She accompanied [redacted] with [redacted] and [redacted] Each time the girls were taken over, they were previously told they would have to provide a massage, possibly naked. They were also told that should Epstein require them to do anything extra, and they were not comfortable just to tell him and he would stop. [redacted] stated [redacted] received $200.00 for each girl she brought over to massage Jeffrey Epstein. When I asked which girl appeared to be the youngest, she replied, [redacted] who was really young, fifteen years old at the most. [redacted] further stated each time she went to the house, she sat in the kitchen and waited with [redacted] until the massage was over. She further stated that the cook would make lunch or a snack for them as they waited. I asked her if there was anything that caught her attention within the home. [redacted] stated there were a lot of naked girls in photographs throughout the house.

On November 8, 2005, at approximately 2:00pm , I met with [redacted] dob [redacted], at the Palm Beach Police Department. During a sworn taped statement, [redacted] stated she had met Epstein approximately two years ago when she was first approached by [redacted] a classmate at [redacted] High School. [redacted] approached her about working for Epstein and providing a massage to him for $200.00. [redacted] had made the arrangements however was unable to take her the day the arrangements were made. [redacted] had [redacted] take [redacted] also attended [redacted] High School and was familiar with Epstein. [redacted] recalled she was brought there and entered through the back kitchen door. She had met with an assistant [redacted] and another assistant [redacted]. [redacted] brought her upstairs as she observed several photographs of naked females throughout the house. [redacted] stated Epstein came in the room, wearing only a towel, and laid on the table. [redacted] stated he picked out the oils he wanted her to use and requested she remove her clothing to provide the massage. [redacted] stated that on the first massage she provided she did not remove her clothing. [redacted] stated she had returned several times after that. Each time she returned it was more than a massage. Epstein would walk into the master bedroom/bathroom area wearing only a towel. He would masturbate as she provided a massage. [redacted] stated she was unsure if he climaxed as he masturbated under the towel. Additionally, she never looked below his waist. She claimed that Epstein would convince her to remove her clothes. She eventually removed her clothes and stayed in her thong panties. On occasion, Epstein would use a massager/vibrator, which she described as white in color and a large head. Epstein would rub the vibrator/massager on her vaginal area as he would masturbate. [redacted] stated she had been to the house

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numerous times. [redacted] added she has no formal training in providing a massage. [redacted] stated she brought two females during her visits to provide massages. [redacted] stated she brought a girl named "[redacted] and [redacted] from [redacted] High School. [redacted] stated she received $200.00 for each girl she brought.

On November 8, 2005, I met with [redacted] W/F, [redacted] at the Palm Beach Police Department. During a sworn taped statement, [redacted] stated she had met Jeffrey Epstein approximately one year ago. She was approached by a subject known to her as [redacted] had asked her if she wanted to make money providing massages to Epstein. [redacted] had heard that several girls from [redacted] High School were doing this and making money. She agreed and was taken to the house by [redacted] had introduced her to [redacted] and Epstein and brought her upstairs to a master bedroom where a massage table was prepared and the proper oils were selected. [redacted] left the room and waited downstairs for her. [redacted] stated Epstein entered the room wearing a towel and laid on his stomach. She provided a massage wearing only her thong panties. [redacted] advised Epstein had masturbated every time she provided a massage. She stated Epstein continued to masturbate until he climaxed. Once that occurred the massage was over. She felt the whole situation was weird but she advised she was paid $200.00 for providing the massage. She also stated [redacted] was paid $200.00 by Epstein for bringing [redacted] stated she had gone a total of 15 times to Epstein's residence to provide a massage and things had escalated from just providing a massage. Epstein began touching her on her buttocks and grabbed her closer to him as he masturbated. Epstein also grabbed her breasts and fondled her breasts with his hands as she provided the massage. [redacted] stated on one occasion, while she was only seventeen years of age, he offered extra monies to have vaginal intercourse. She stated this all occurred on the massage table. [redacted] stated Epstein penetrated her vagina with his penis and began having intercourse with her until he reached the point of climax. Epstein removed his penis from her vagina and climaxed onto the massage table. [redacted] received $350.00 for her massage. I asked her if she had any formal training in providing massages, [redacted] stated she did not. [redacted] continued to state on one other occasion, Epstein introduced his girlfriend, [redacted] into the massage. [redacted] was brought into room with [redacted] to provide a massage. Epstein had them kiss and fondle each other around the breasts and buttocks as they provided a massage to Epstein. Epstein, watched and masturbated as this occurred. On other occasions, Epstein, introduced the large white vibrator/massager in the massage. Epstein stroked the vibrator/massager on [redacted] vagina as she provided the massage.

On November 14, 2005, Det Sandman and I met with [redacted] dob [redacted] During a sworn taped statement she advised she started going to the house approximately one year ago and has been there approximately five or six times. [redacted] also stated she was sixteen years old when she first went to Epstein's house. On her first visit she was brought by a fellow student from [redacted] High School known to her

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as [redacted] [redacted] stated [redacted] brought her into the house and she was introduced to [redacted]. [redacted] then brought her upstairs into a master bathroom, located within the bedroom. [redacted] stated she met Epstein in the bathroom. He laid on the table and picked the massage oils. She provided the massage as he laid naked on the massage bed. She stated she rubbed his calves and back area. Upon the end of the massage, Epstein removed himself from the massage table and paid her $300.00 for the massage. [redacted] said each subsequent time she went to the house, she was notified by [redacted] that Epstein was in town and would like her to "work". [redacted] stated she returned to the house and was again led upstairs by [redacted]. She provided the massage, clothed. [redacted] was asked if she ever removed her clothing to provide a massage. [redacted] stated it was not until the third time that she went that she removed her clothing. [redacted] stated she was notified by [redacted] that Epstein wanted her to come to work. She arrived at the house and was led upstairs by [redacted]. She started providing the massage when Epstein asked her to remove her clothing. [redacted] removed her pants, shirt and bra. She stayed in her thong panties and continued rubbing Epstein. Epstein turned over onto his back and she rubbed his chest area. [redacted] stated she knew he was masturbating himself as she providing the massage. [redacted] stated she believed he climaxed based on his breathing. She did not want to view either the climax or the fact that he was masturbating. [redacted] stated once the breathing relaxed he got up and told her to get dressed. She was paid $300.00 for her services. [redacted] stated on the last time she went to provide a massage, she was notified by [redacted] to come to the house and "work". [redacted] stated she was now dating her current boyfriend and did not feel comfortable going. She recalled it was approximately January 2005. She said she went, already thinking that this would be the last time. She went upstairs and went into the master bathroom. She met with Epstein, who was wearing only a towel, and laid onto the table. [redacted] stated Epstein caught her looking at the clock on several occasions. Epstein asked her if she was in a hurry. [redacted] stated her boyfriend was in the car waiting for her. [redacted] further stated that Epstein got upset as he wasn't enjoying the massage. She told him that she didn't want to continue and she would not be back. Epstein told her to leave as she was ruining his massage. [redacted] advised she had no formal training in providing any massages. [redacted] stated although she had a falling out with Epstein, she still received a Christmas bonus from Epstein. [redacted] stated she was wired money from Western Union for her Christmas bonus. Subpoena results from Western Union revealed money was sent from Jeffrey Epstein on December 23, 2004. [redacted] received $200.00 from Epstein for her Christmas bonus.

On November 15, 2005, Det. Sandman and I met with [redacted] dob [redacted] During a sworn taped statement, [redacted] stated she met Jeffrey Epstein over a year ago. She was sixteen years of age and was approached by [redacted] [redacted] a fellow [redacted] High School student, who informed her that she could make $200.00 providing a massage to Epstein. [redacted] had informed her that she would have to provide this

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massage topless. [redacted] made the arrangements with Epstein and his assistants and took [redacted] to the house. [redacted] stated [redacted] and she entered through a glass door that led into a kitchen. She was taken upstairs by [redacted] to a master bedroom. She recalled the master bathroom had a large pink couch, sauna and matching shower. Epstein entered into the room wearing only a towel. [redacted] and [redacted] removed their clothing remaining only in thong underwear. She further stated that Epstein laid on his chest on the table. The oils were selected on which ones to use. Both [redacted] and [redacted] provided the massage on his legs, back and feet. Forty minutes into the massage, Epstein turned over onto his back and requested [redacted] wait downstairs in the kitchen area for [redacted] Epstein instructed [redacted] to finish the massage. As [redacted] got dressed, [redacted] starting rubbing Epstein's chest. [redacted] left the room, and Epstein began masturbating as [redacted] rubbed Epstein's chest. [redacted] stated Epstein continued masturbating until he climaxed on the towel he was wearing. When asked if he had removed the towel she stated he turned the towel around so that the opening would allow him to expose himself. After he cleaned himself off with the towel he instructed [redacted] the massage was done and to get dressed and meet with him downstairs. [redacted] got dressed and met with Epstein in the kitchen area. She was paid $200.00 dollars for providing the massage. [redacted] stated she was aware that [redacted] also received monies for the same thing. The second time she went to the house she was again approached by [redacted] advised if she wanted to return to the house to provide another massage. [redacted] agreed and the arrangements were made by [redacted] for her to return to the house. [redacted] stated [redacted] drove her to the house and knocked on the same glass door which leads to the kitchen area. They were allowed entry into the house by one of the staff members. [redacted] led her upstairs to the master bedroom and master bathroom area. [redacted] left [redacted] this time to do the massage alone. Epstein entered the room again wearing only a towel. [redacted] began removing her clothing as she did the last time she was at the house. Epstein instructed her to get naked. He laid on the table onto his stomach as [redacted] began massaging his legs and back. As [redacted] finished with Epstein's back and legs, Epstein then turned over onto his back. [redacted] started to rub his chest and he began masturbating. As [redacted] rubbed his chest, Epstein leaned over and produced a massager/vibrator. He turned it on and began rubbing [redacted] vagina and masturbating himself at the same time. [redacted] stated she continued to rub his chest as this was occurring. She described the vibrator/massager as large grey with a large head. Epstein rubbed her vagina for approximately two to three minutes with the massager/vibrator. He then removed the vibrator from her vaginal area and concentrated on masturbating himself. [redacted] stated Epstein climaxed onto the towel again and informed her that the massage was done. [redacted] got dressed and met with [redacted] who was waiting in the kitchen area. She received $200.00 for the massage. [redacted] said she never returned to the house and had no desire to return to the house. [redacted] was asked if she received any formal massage training. She advised she had no formal training. [redacted] was asked if Epstein knew her real age. [redacted] stated he knew, as he asked her questions about herself and high school. He was aware she attended, and is still attending [redacted] High School.

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During the course of the investigation a search warrant was executed at Jeffrey Epstein's home located at 358 El Brillo Way in Palm Beach. While in the home I observed the pink and green couch within the master bedroom area just as the girls previously mentioned. The stairway, which is located from the kitchen area to the master bedroom area, is lined with photos of naked young girls. Additionally, numerous photographs of naked young females, some of which appeared to be the girls I previously interviewed, were on display throughout the house. Also located in the house were various phone message books. The telephone message books have a duplicate copy (Carbon Copy) which, once a phone message is written into the book, the top copy is then torn on the perforated edge and the carbon copy is left in the book. First names of girls, dates and telephone numbers were on the copy of the messages. I recognized various numbers and names of girls that had already been interviewed. The body of the messages were time of the day that they called for confirmation of "work." Other names and telephone numbers were located in which the body of the messages were, "I have girls for him" or "I have 2 girls for him." These messages were taken by [redacted], who signed the bottom of the messages. During the execution of the warrant, I located a [redacted] High School transcript for [redacted] in Epstein's bedroom desk. This desk had stationary marked Jeffrey E Epstein. I located a wood colored armoire beside Epstein's bed that contained a bottle of "Joy Jelly," which is used to provide a warm massage. Several massage tables were located throughout the second floor of the residence, including a massage table found in Epstein's bedroom. On the first floor of the residence I found two covert cameras hidden within clocks. One was located in the garage and the other located in the library area on a shelf behind Epstein's desk. A computer was located which was believed to contain the images from the covert cameras. The computer's hard drive was reviewed which showed several images of [redacted] [redacted] and other witnesses that have been interviewed. All of these images appeared to come from the camera positioned behind Epstein's desk.

On December 13, 2005, Det. Dawson and I met with [redacted] dob [redacted] During a sworn taped statement, [redacted] stated that when she was sixteen years old she was taken to Epstein's house to provide a massage for money. [redacted] stated it was before Christmas last year (2004) when an associate, [redacted] approached her and asked if she needed to make money for Christmas. [redacted] made arrangements to take [redacted] to the house and drove [redacted] to the house to "work." They were encountered by a white female with long blond hair. [redacted] was unable to remember the name of the white female with blond hair but knew she was Epstein's assistant. She was led upstairs by the white female who explained that there would be lotions out already and Epstein would choose the lotion he wanted her to use. She was led through a spiral staircase which led to a master bedroom and bathroom. The massage table was already set up in the bathroom. [redacted] described the bathroom as a large spacious bathroom with a steam room and shower beside it. [redacted] was introduced to Epstein who was on the phone when she entered the room. Epstein was wearing a white towel and laid on his stomach so that [redacted] may

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massage his feet and calves. [redacted] started the massage with the oils Epstein chose and rubbed his feet and calves. Epstein got off the phone and requested she massage his back as well. [redacted] began rubbing his back and got to the small of his back. During the rubbing of his back, Epstein asked her to get comfortable. He requested she remove her pants and shirt. [redacted] removed her shirt and pulled her pants off. [redacted] stayed in her bra and thong panties. As she finished massaging the small of Epstein's back, he then turned onto his back. Epstein instructed [redacted] to rub his chest and pinch his nipples. As she began to rub his chest, Epstein asked her questions about herself. [redacted] remembered telling him she attended [redacted] High School. Epstein asked her if she was sexually active. Before [redacted] could answer, he also asked what sexual position does she enjoy. [redacted] stated she was shy and didn't like talking about those things. She continued rubbing his chest. Epstein reached up and unsnapped her bra from the front. [redacted] explained the bra she used had a front snapping device. Epstein rubbed her breasts and asked her if she like having her breasts rubbed. [redacted] said "no, I don't like that." Epstein then removed his towel and laid on the bed naked exposing his penis to [redacted] He began touching his penis and masturbated as he touched her breasts. [redacted] explained Epstein then touched her vaginal area by rubbing her vagina with his fingers on the outside of her thong panties. [redacted] tensed up and stated Epstein was aware that she was uncomfortable. [redacted] stated that Epstein said to her, "Relax, I'm not going inside." She further explained Epstein commented to her how beautiful and sexy she was. Epstein then moved her thong panties to one side and began stroking her clitoris. [redacted] said, "He commented how hard my clit was." He then inserted two fingers in her vagina and was stroking her within her vagina. She tried pulling back to pull out his fingers from within her vagina. Epstein removed his fingers from within her vagina and apologized for putting his fingers inside her. During this time, he kept his hand on her vaginal area and continued to rub her vagina. [redacted] stated he rubbed her really hard as he was masturbating. [redacted] said he climaxed onto the towel he had been previously wearing and got up from the table. Epstein told her there was $200.00 dollars for her on the dresser within the master bathroom. Epstein also told her that there was an additional $100.00 that was to be given to [redacted] for bringing her there to massage him. Epstein told her to leave her telephone number with his assistant as he wanted to see her again. Epstein stated his assistant would contact her to work again soon. I asked her if she ever received any formal massage training to which [redacted] stated she did not. [redacted] stated it was the only time she ever went to work for Jeff and knew what happened to her was wrong. She further stated that she had never been contacted for any additional work.

On January 9, 2006, I located and interviewed another victim, [redacted] dob [redacted] [redacted] was identified as a potential victim/witness from information obtained during trash pulls from Epstein's residence. [redacted] stated she met Epstein when she was fifteen years of age. She was approached by a friend from [redacted] High School, [redacted] [redacted] to be taken to Jeffrey Epstein's house to work. She was originally told she would be able

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Date: 05/01/2006

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to model lingerie for a wealthy Palm Beacher. [redacted] was taken to Epstein's house located on El BrilloWay. [redacted] introduced [redacted] to Jeffrey Epstein. Epstein had his personal chef prepare dinner for [redacted] and [redacted] At the conclusion of dinner, [redacted] and Epstein brought [redacted] upstairs into a master bedroom area. [redacted] observed a large massage table with a sheet on it. Epstein entered through a door and exited wearing only a towel. [redacted] informed [redacted] that they were going to provide a massage on Epstein. [redacted] asked why were they doing this instead of modeling lingerie. [redacted] explained to [redacted] that this was his routine and to rub his calves and feet. Epstein had told [redacted] to get comfortable. [redacted] removed her pants and blouse. [redacted] stated she stayed only in panties as she did not wear a bra that evening. [redacted] stated while rubbing his calves and feet, Epstein turned over onto his back. Epstein told [redacted] to rub his chest and rub his nipples. [redacted] stated that as she started rubbing his chest, Epstein began masturbating himself . Epstein touched her breasts and stroked her vagina with his fingers. Epstein continued to masturbate himself as he stroked her vagina. Epstein ejaculated on his towel and paid [redacted] $200.00 for the massage. Epstein told [redacted] that if she told anyone what happened at his house that bad things could happen. [redacted] and [redacted] were brought home by Epstein's houseman and [redacted] was afraid that Epstein knew where she lived. [redacted] stated that several days later she received a telephone call from [redacted] who coordinated for [redacted] to return to "work." [redacted] returned to the house and was brought to Epstein's bedroom area by [redacted] who prepared the room for the massage. Epstein entered the room wearing only a towel. Epstein had [redacted] remove her clothing and provide the massage naked. [redacted] began rubbing his feet and calves and Epstein turned over onto his back. Epstein rubbed her vagina with his fingers. Epstein began to masturbate himself with an upwards and downward motion on his penis. Epstein continued to touch her vagina with one hand and masturbate with the other hand. Once Epstein ejaculated onto the towel he was wearing, the massage was over. [redacted] was paid $200.00 for the massage. Epstein again told [redacted] not to speak of what happened at his house or bad things would happen. [redacted] wanted to notify authorities however she was afraid of what would happen to either her or her family.

During the course of the investigation, several subjects were identified as a potential witness/victim through information obtained during the trash pulls, physical surveillance and telephone message books retrieved from the search warrant. While conducting research on the subjects, I discovered that the females were age eighteen or older. Interviews were conducted on the consenting adults whose statements provided the same massage routine when they went to "work" for Epstein. The females would be notified by [redacted], and made appointments for the females to "work" for Epstein. The females would come to Epstein's house and were led upstairs, through a stairwell from the kitchen area, by [redacted] to Epstein's bedroom. Epstein would then enter the room wearing only a towel, and ask them to get comfortable. The females would then provide the massage naked as Epstein would either touch their vaginas with his fingers and/or utilize the massager/vibrator on

The foregoing instrument was sworn to or affirmed before me this 1st day of May, 2006 by Det Joe Recarey, who is personally known to me.

Signature of Police Officer (F.S.S. 117.10)

State of Florida
County of Palm Beach

Signature/Arresting Officer

Date: 05/01/2006

EFTA00232012

their vaginal area. He would masturbate during the massage and upon his climaxing, the massage would end. The girls were then paid two or three hundred dollars for the massage.

On November 21, 2005 I interviewed Jose Alessi, a former houseman for Jeffrey Epstein. Alessi stated he was employed for eleven years with Mr. Epstein, from approximately 1993 through 2004. Alessi stated he was the house manager, driver and house maintenance person. It was his responsibility to prepare the house for Epstein s arrival. When asked about cooks or assistants, Alessi stated they traveled with Epstein on his private plane. I asked Mr. Alessi about the massages that have occurred at Epstein's home. Alessi stated Epstein receives three massages a day. Each masseuse that visited the house was different. Alessi stated that towards the end of his employment, the masseuses were younger and younger. When asked how young, Mr. Alessi stated they appeared to be sixteen or seventeen years of age at the most. The massages would occur in Epstein's bedroom or bathroom. He knew this because he often set up the massage tables. I asked if there were things going on other than a massage. Alessi stated that there were times towards the end of his employment that he would have to wash off a massager/vibrator and a long rubber penis, which were in the sink after the massage. Additionally, he stated the bed would almost always have to be made after the massage.

On January 4, 2006 I interviewed another former houseman, Mr Alfredo Rodriguez. During a sworn taped statement, Mr. Rodriguez stated he was employed by Jeffrey Epstein for approximately six months, from November 2004 through May of 2005. His responsibilities as house manager included being the butler, chauffeur, chef, houseman, run errands for Epstein and provide for Epstein's guests. I asked Rodriguez about masseuses coming to the house. Rodriguez stated Epstein would have two massages a day. Epstein would have one massage in the morning and one massage in the afternoon everyday he was in residence. Rodriguez stated he would be informed to expect someone and make them comfortable until either [redacted] or Epstein would meet with them. Rodriguez stated once the masseuses would arrive, he would allow them entry into the kitchen area and offer them something to drink or eat. They would then be encountered by either [redacted] or Epstein. They would be taken upstairs to provide the massage. I asked Rodriguez if any of the masseuses appeared young in age. Rodriguez stated the girls that would come appeared to be too young to be masseuses. He stated one time under Epstein's direction, he delivered a dozen roses to [redacted] High School for one of the girls that came to provide a massage. He knew the girls were still in high school and were of high school age. I asked Rodriguez about the massages. He felt there was a lot more going on than just massages. He would often clean Mr. Epstein's bedroom after the alleged massages and would discover massagers/vibrators and sex toys scattered on the floor. He also said he would wipe down the vibrators and sex toys and put them away in an armoire. He described the armoire as a small wood armoire which was on the wall close to Epstein's

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Signature of Police Officer (F.S.S. 117.10)

State of Florida
County of Palm Beach

Signature/Arresting Officer

Date: 05/01/2006

EFTA00232013

bed. On one occasion Epstein ordered Rodriguez to go to the Dollar rent a car and rent a car for the same girl he brought the roses to, so that she could drive her self to Epstein's house without incident. Rodriguez said the girl always needed rides to and from the house.

Rodriguez produced a green folder which contained documents, and a note with Mr. Epstein's stationary with direction to deliver a bucket of roses to [redacted] High School after [redacted] high school drama performance. Also in that same note was direction to rent a car for [redacted] and direction to extend the rental contract.

During the course of the investigation, subpoenas were obtained for cell phone and home phone records from several victims and witnesses along with the cell phone records of [redacted]. An analysis of these records was conducted which found numerous telephone calls were made between [redacted] and the victims. These records indicate the dates the calls were made are consistent with the dates and times they victims/witnesses stated they were contacted. Specifically, The phone records showed [redacted] called [redacted] during the exact times and dates when victim [redacted] advised the incident occurred. [redacted] also coordinated the encounters with [redacted] and [redacted] during the time frame the girls stated they occurred.

Pursuant to a lawful subpoena I obtained Epstein's private plane records for 2005 from Jet Aviation. The plane records show arrival and departure of Epstein's plane at Palm Beach International airport. These records were compared to the cell phone records of [redacted] This comparison found that all the phone calls [redacted] made to [redacted] and the victims were made in the days just prior to their arrival or during the time Epstein was in Palm Beach.

As Epstein, who at the time of the incident was fifty two years of age, did commit lewd and lascivious molestation on [redacted] a fourteen year old minor, by using a vibrator on her external vaginal area and as [redacted] recruited, set up the appointment and drove to Epstein's residence, knowing that [redacted] was fourteen years old and knowing there would be unlawful sexual activity between [redacted] and Epstein that [redacted] received monetary compensation for taking said fourteen year old female by Epstein, there is sufficient probable cause to arrest [redacted] for Lewd and Lascivious Act on victim under 16 years of age in violation of Florida State Statue 800.04 (6)(2b) a second degree felony.

The foregoing instrument was sworn to or affirmed before me this 1st day of May, 2006 by Det Joe Recarey, who is personally known to me.

Signature of Police Officer (F.S.S. 117.10)

State of Florida
County of Palm Beach

Signature/Arresting Officer

Date: 05/01/2006

EFTA00232014

REQ FOR KELLOGWARE

EFTA00232015

REQUEST FOR WARRANT

DEFENDANT: [redacted] DATE OF BIRTH [redacted]

HABITUAL OFFENDER: YES _____ NO _____ A/K/A _____

VICTIM RELATED / ACQUAINTED WITH DEFENDANT? YES XX NO _____

AGENCY CASE NUMBER: 05-368 (2)

LEAD OFFICER: Det. Joe Recaery

AGENCY: **PALM BEACH POLICE DEPARTMENT** PHONE NUMBER: [redacted]

CURRENT SHIFT HOURS: 8 am TO 5 pm DAYS OFF: _____

LEAVE / SHIFT CHANGE INFO: _____

WAS ARREST MADE FOR, OR IN CONJUNCTION WITH ANOTHER AGENCY. IF SO, WHAT AGENCY?:

_____

SENTENCING RECOMMENDATIONS: CONTACT DETECTIVE

ADDITIONAL COMMENTS: _____

****

FILING DOCUMENTS ATTACHED:

- X ARREST FORM
- X P.C. AFFIDAVIT (2 COPIES)
- X WITNESS / EVIDENCE LIST Previously given to ASA Belohlavek
- ____ SWORN STATEMENT OF MATERIAL WITNESS(ES)
- X OFFENSE REPORT (2 COPIES)
- ____ ACCIDENT REPORTS (ALL)
- ____ WITNESS STATEMENTS (ALL)
- X FCIC/NCIC CRIMINAL HISTORY Previously Given to ASA Belohlavek
- ____ REQUEST FOR CONVICTION LETTERS
- X PROPERTY RECEIPT Previously Given to ASA Belohlavek
- ____ VEHICLE TOW RECEIPT
- ____ OTHER ATTACHMENTS INCLUDE:

_____

_____

INITIAL FOR COMPLETENESS: JR (OFFICER) 7915 (ID#) 050106 (DATE)

_____ (SUPERVISOR) _____ (ID#) _____ (DATE)

DELIVERED BY: Recarey (DETECTIVE) 7915 (ID#) 050106 (DATE)

RECEIVED
MAY 01 2006
INTAKE

RECEIVED, STATE ATTORNEY'S OFFICE ON: 5/1/06 BY: [signature]

EFTA00232016

ARREST / NOTICE TO APPEAR
Juvenile Referral Report

1 Arrest 3 Request for Warrant
2 N T A 4 Request for Capia

Juvenile ☐

ADMINISTRATIVE

OBTS Number

Agency ORI Number: FL0 5 0 0 6 0 0

Agency Name: PALM BEACH POLICE DEPARTMENT

Agency Report Number (N.T.A.'s only): 7 6 -

Charge Type — Check as many as apply: ☐ 1. Felony ☐ 3. Misdemeanor ☐ 5. Ordinance ☐ 2. Traffic Felony ☐ 4. Traffic Misdemeanor ☐ 6. Other

If Weapon Seized — Enter Type

Multiple Clearance Indicator

Location of Arrest (Including Name of Business)

Location of Offenses (Business Name, Address)

Date of Arrest	Time of Arrest	Booking Date	Booking Time	Jail Date	Jail Time	Location of Vehicle

DEFENDANT

Name (Last, First, Middle)

Alias (Name, DOB, Soc. Sec. #, Etc.)

Race (W - White, B - Black, I - American Indian, O - Oriental/Asian)	Sex	[redacted]	Height	Weight	Eye Color	Hair Color	Complexion	Build

Scars, Marks, Tattoos, Unique Physical Features (Location, Type, Description)

Marital Status

Religion

Indication of: Alcohol Influence ☐ Drug Influence ☐ — Y ☐ ☐ — N ☐ ☐ — Unk. ☐ ☐

Local Address (Street, Apt. Number) (City) (State) (Zip) Phone ( )

Residence Type: 1. City 2. County 3. Florida 4. Out of State

Permanent Address (Street, Apt. Number) [redacted] (City) (State) (Zip) Phone ( )

Address Source

Business Address (Name, Street) (City) (State) (Zip) Phone ( )

Occupation

Dl. Number, State	Soc. Sec. Number	INS Number	Place of Birth (City, State)	Citizenship
[redacted]				

CO-DEF.

Co-Defendant Name (Last, First, Middle)	Race	Sex	Date of Birth	☐ 1. Arrested ☐ 2. At Large	☐ 3. Felony ☐ 4. Misdemeanor ☐ 5. Juvenile
Co-Defendant Name (Last, First, Middle)	Race	Sex	Date of Birth	☐ 1. Arrested ☐ 2. At Large	☐ 3. Felony ☐ 4. Misdemeanor ☐ 5. Juvenile

JUVENILE

☐ Parent ☐ Legal Custodian ☐ Other: Name (Last) (First) (Middle)

Residence Phone ( )

Address (Street, Apt. Number) (City) (State) (Zip)

Business Phone ( )

TOT JAC

Date

Time

The above address was provided by ☐ defendant and / or ☐ defendant's parents. The child and / or parent was told to keep the Juvenile Court Clerk's Office (Phone 355-2526) informed of any change of address.
☐ Yes, by: (Name) ☐ No: (Reason)

School Attended

Grade

Property Crime? ☐ Yes ☐ No

Description of Property

Value of Property

CODE

Drug Activity: N. N/A P. Possess — S. Sell B. Buy T. Traffic — R. Smuggle D. Deliver E. Use — K. Dispense/ Distribute — M. Manufacture/ Produce/ Cultivate — Z. Other

Drug Type: N. N/A A. Amphetamine — B. Barbiturate C. Cocaine E. Heroin — H. Hallucinogen M. Marijuana O. Opium/Deriv. — P. Paraphernalia/ Equipment S. Synthetic — U. Unknown Z. Other

CHARGE

Charge Description	Counts	Domestic Violence ☐ Y ☐ N	Statute Violation Number	Violation of ORD #

Drug Activity	Drug Type	Amount / Unit	Offense #	Warrant / Capias Number	Bond

CHARGE

Charge Description	Counts	Domestic Violence ☐ Y ☐ N	Statute Violation Number	Violation of ORD #

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CHARGE

Charge Description	Counts	Domestic Violence ☐ Y ☐ N	Statute Violation Number	Violation of ORD #

Drug Activity	Drug Type	Amount / Unit	Offense #	Warrant / Capias Number	Bond

NOTICE TO APPEAR

☐ Instruction No. 1 Mandatory Appearance in Court
☐ Instruction No. 2 You need not appear in Court but must comply with instructions on Reverse Side.

Location (Court, Room Number, Address)

Court Date and Time — Month Day Year Time A.M. P.M.

I AGREE TO APPEAR [redacted] THE TIME AND PLACE DESIGNATED TO ANSWER THE OFFENSE CHARGED OR TO PAY THE FINE SUBSCRIBED. I UNDERSTAND THAT SHOULD I WILLFULLY FAIL TO APPEAR BEFORE THE COURT AS REQUIRED BY THIS **NOTICE TO APPEAR**, THAT I MAY BE HELD IN CONTEMPT OF COURT AND A WARRANT FOR MY ARREST SHALL BE ISSUED.

Signature of Defendant (or Juvenile and Parent / Custodian) Date Signed

ADMIN.

HOLD for other Agency
Name:

☐ Dangerous ☐ Resisted Arrest
☐ Suicidal ☐ Other:

Intake Deputy I.D. # Pouch

Signature of Arresting Officer
X

Name of Arresting Officer (Print) I.D. #

Transporting Officer I.D. # Agency

Name Verification (Printed by Arrestee)

(PRINT)

Witness here if subject signed with an "X".

PAGE ____ OF ____

DISTRIBUTION: WHITE — COURT COPY GREEN — STATE ATTORNEY YELLOW — AGENCY PINK — JAIL GOLD - DEFENDANT (N.T.A.'s ONLY)

EFTA00232017

ARREST / NOTICE TO APPEAR
Juvenile Referral Report

1 Arrest 2 NTA 3 Request for Warrant 4 Request for Capia — Juvenile

ADMINISTRATIVE

OBTS Number

Agency ORI Number: FLO 5 0 0 6 0 0

Agency Name: PALM BEACH POLICE DEPARTMENT

Agency Report Number (N.T.A.'s only): 7 6 - - ( )

Charge Type (Check as many as apply): ☐ 1. Felony ☐ 2. Traffic Felony ☐ 3. Misdemeanor ☐ 4. Traffic Misdemeanor ☐ 5. Ordinance ☐ 6. Other

If Weapon Seized — Enter Type

Multiple Clearance Indicator

Location of Arrest (Including Name of Business)

Location of Offenses (Business Name, Address)

Date of Arrest | Time of Arrest | Booking Date | Booking Time | Jail Date | Jail Time | Location of Vehicle

DEFENDANT

Name (Last, First, Middle) | Alias (Name, DOB, Soc. Sec. #, Etc.)

Race (W - White, B - Black, I - American Indian, O - Oriental/Asian) | Sex | Date of Birth | Height | Weight | Eye Color | Hair Color | Complexion | Build

Scars, Marks, Tattoos, Unique Physical Features (Location, Type, Description) | Marital Status | Religion | Indication of Alcohol Influence / Drug Influence: Y ☐ N ☐ Unk. ☐

Local Address (Street, Apt. Number) (City) (State) (Zip) | Phone ( ) | Residence Type: 1. City 2. County 3. Florida 4. Out of State

Permanent Address (Street, Apt. Number) (City) (State) (Zip) | Phone ( ) | Address Source

Business Address (Name, Street) (City) (State) (Zip) | Phone ( ) | Occupation

D/L Number, State | Soc. Sec. Number | INS Number | Place of Birth (City, State) | Citizenship

CO-DEF.

Co-Defendant Name (Last, First, Middle) | Race | Sex | Date of Birth | ☐ 1. Arrested ☐ 2. At Large | ☐ 3. Felony ☐ 4. Misdemeanor ☐ 5. Juvenile

Co-Defendant Name (Last, First, Middle) | Race | Sex | Date of Birth | ☐ 1. Arrested ☐ 2. At Large | ☐ 3. Felony ☐ 4. Misdemeanor ☐ 5. Juvenile

JUVENILE

☐ Parent ☐ Legal Custodian ☐ Other: Name (Last) (First) (Middle) | Residence Phone ( )

Address (Street, Apt. Number) (City) (State) (Zip) | Business Phone ( )

TOT JAC | Date | Time

The above address was provided by ☐ defendant and / or ☐ defendant's parents. The child and / or parent was told to keep the Juvenile Court Clerk's Office (Phone 355-2526) informed of any change of address.
☐ Yes, by: (Name) ☐ No: (Reason)

School Attended | Grade

Property Crime? ☐ Yes ☐ No | Description of Property | Value of Property

CODE

Drug Activity: N. N/A, P. Possess, S. Sell, B. Buy, T. Traffic, R. Smuggle, D. Deliver, E. Use, K. Dispense/Distribute, M. Manufacture/Produce/Cultivate, Z. Other

Drug Type: N. N/A, A. Amphetamine, B. Barbiturate, C. Cocaine, E. Heroin, H. Hallucinogen, M. Marijuana, O. Opium/Deriv., P. Paraphernalia/Equipment, S. Synthetic, U. Unknown, Z. Other

CHARGE

Charge Description | Counts | Domestic Violence ☐ Y ☐ N | Statute Violation Number | Violation of ORD #

Drug Activity | Drug Type | Amount / Unit | Offense # | Warrant / Capias Number | Bond

CHARGE

Charge Description | Counts | Domestic Violence ☐ Y ☐ N | Statute Violation Number | Violation of ORD #

Drug Activity | Drug Type | Amount / Unit | Offense # | Warrant / Capias Number | Bond

CHARGE

Charge Description | Counts | Domestic Violence ☐ Y ☐ N | Statute Violation Number | Violation of ORD #

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CHARGE

Charge Description | Counts | Domestic Violence ☐ Y ☐ N | Statute Violation Number | Violation of ORD #

Drug Activity | Drug Type | Amount / Unit | Offense # | Warrant / Capias Number | Bond

NOTICE TO APPEAR

☐ Instruction No. 1 Mandatory Appearance in Court
☐ Instruction No. 2 You need not appear in Court but must comply with instructions on Reverse Side.

Location (Court, Room Number, Address)

Court Date and Time: Month Day Year Time A.M. P.M.

I AGREE TO APPEAR AT THE TIME AND PLACE DESIGNATED TO ANSWER THE OFFENSE CHARGED OR TO PAY THE FINE SUBSCRIBED. I UNDERSTAND THAT SHOULD I WILLFULLY FAIL TO APPEAR BEFORE THE COURT AS REQUIRED BY THIS **NOTICE TO APPEAR,** THAT I MAY BE HELD IN CONTEMPT OF COURT AND A WARRANT FOR MY ARREST SHALL BE ISSUED.

Signature of Defendant (or Juvenile and Parent / Custodian) | Date Signed

ADMIN.

HOLD for other Agency
Name:
☐ Dangerous ☐ Resisted Arrest
☐ Suicidal ☐ Other:

Intake Deputy | I.D. # | Pouch

Signature of Arresting Officer
X
Name of Arresting Officer (Print) | I.D. #

Transporting Officer | I.D. # | Agency

Name Verification (Printed by Arrestee)
(PRINT)

Witness here if subject signed with an "X".

PAGE ____ OF ____

DISTRIBUTION: WHITE — COURT COPY GREEN — STATE ATTORNEY YELLOW — AGENCY PINK — JAIL GOLD - DEFENDANT (N.T.A.'s ONLY)

EFTA00232018

Probable Cause Affidavit

Palm Beach Police Department

Agency ORI# FLO 500600

Police Case#: 05-368 (2)

Defendant: [redacted]
Race/Sex: White Female
DOB: [redacted]
Charges: **Principal in the 1st Unlawful Sexual Activity with a Minor (4) counts**
Principal in the 1st Lewd and Lascivious Molestation (1) count

From March 15, 2005, through February 2006, the Palm Beach Police Department conducted a sexual battery investigation involving Jeffrey Epstein, [redacted] and [redacted] Sworn taped statements were taken from five victims and seventeen witnesses concerning massages and unlawful sexual activity that took place at the residence of Jeffrey Epstein, 358 El Brillo Way, Palm Beach. Several of the victims were recruited by and brought to the residence by [redacted] to perform massages for Epstein, for which [redacted] received monetary compensation. During the visit they would be introduced to [redacted], Epstein's assistant, who in turn would record their telephone numbers and name. The victims would be brought to Epstein's bedroom to provide the massage. Epstein would enter the room and order the victims to remove their clothing to provide the massage. As the victims complied and provided the massages, Epstein would rub his fingers on their vaginas. On occasion, Epstein would introduce a massager/vibrator and rub the victims vaginas as they provided the massage. On three separate occasions, Epstein had intercourse and inserted his penis/fingers in the victims vaginas. At the conclusion of the massages the victims were paid sums of money ranging from $200 - $1,000. The facts, as reported, are as follows:

On 03/15/2005, A fourteen year old white female, hereinafter referred to as "[redacted] dob [redacted] and her family reported unlawful sexual activity which occurred at a residence within the Town of Palm Beach. [redacted] reported that a subject known to her as "Jeff" had touched her vaginal area with a vibrator/massager while within his residence. "Jeff" was later identified as Jeffrey Epstein through a photo line up.

During a sworn taped interview, [redacted] stated that [redacted] dob [redacted], a cousin of [redacted] boyfriend and classmate at [redacted] High School, worked for a wealthy man and did sexual favors for him. She also admitted that [redacted] had offered her an opportunity to make money. During the beginning of the month of February 2005, [redacted] explained that she was first approached by [redacted] to go with her to Epstein's house. [redacted] stated that [redacted] along with a Hispanic female, later identified at [redacted] pick her up at her father's house on a Sunday. [redacted] was not sure of the exact dates but knew it was a Sunday. [redacted] told her father that they were going shopping but in reality [redacted] drove them to Palm Beach. During the drive a

The foregoing instrument was sworn to or affirmed before me this 1st day of May, 2006 by Det Joe Recarey, who is personally known to me.

Signature of Police Officer (F.S.S. 117.10)

State of Florida
County of Palm Beach

Signature/Arresting Officer

Date: 05/01/2006

EFTA00232019

conversation occurred between [redacted] and [redacted] whereas [redacted] reportedly told [redacted] that if Jeff asked her age, she should say she was eighteen. It was later confirmed by the [redacted] father that [redacted] picked his daughter up on February 6, 2005. According to [redacted] father, [redacted] drove a pick up truck.

[redacted] described Epstein's house as a two-story pink house with a Cadillac Escalade parked in the driveway. She recalled that Jeff's house was on a dead end street. Upon arriving at the house [redacted] stated that they walked up a driveway, past what appeared to be a small guard/security room. A male approaching them asking what they wanted. [redacted] stated they were there to see Epstein. The male allowed them to continue walking up to the house. [redacted] stated the man told them that Epstein was not there but was expected back. He allowed them to enter the house, via the kitchen. He offered them something to drink while they waited inside. Shortly thereafter, Epstein and his assistant, described as white female with blond hair and later identified as [redacted], entered the kitchen. Epstein introduced himself to [redacted] [redacted] described Epstein as being approximately forty-five years old, having a long face and bushy eyebrows, with graying hair.

[redacted] and Epstein left the kitchen leaving [redacted] alone in the kitchen. They returned a short time later. They all spoke briefly in the kitchen. [redacted] was instructed to follow [redacted] upstairs. [redacted] recalled walking up a flight of stairs, lined with photographs, to a room that had a massage table in it. Upon entering the room there was a large bathroom to the right and a hot pink and green sofa in the room. There was a door on each side of the sofa. [redacted] recalled there being a mural of a naked woman in the room, as well as several photographs of naked women on a shelf. [redacted] told the victim that Epstein would be up in a second.

Epstein entered the room wearing only a towel and told [redacted] to take off her clothes. [redacted] stated Epstein was stern when he told her to take off her clothes. [redacted] said she did not know what to do as she was the only one there in the room so she took off her shirt leaving her bra on. Epstein had removed his towel and told the [redacted] to take off everything. [redacted] stated Epstein was nude when he took his towel off, placing it on the floor as he laid down on the table. [redacted] stated she then removed her pants leaving her thong panties on. Epstein then instructed her to give him a massage pointing to a specific lotion for her to use. As [redacted] began to give Epstein the massage, he told her to get on his back. [redacted] stated she straddled herself on Epstein's back whereby her exposed buttocks were touching Epstein's bare buttocks. [redacted] said Epstein was specific in his instruction to her on how to massage him, telling her to go clockwise or counter clockwise. Epstein then turned over and instructed [redacted] to massage his chest. [redacted] was now standing on the ground and resumed massaging Epstein's chest area. [redacted] stated Epstein held onto the small of her back as she massaged his chest and shoulder area. Epstein then turned to his side and started to rub his penis in an up and down motion. Epstein then pulled out a purple vibrator and began to

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Signature of Police Officer (F.S.S. 117.10)

State of Florida
County of Palm Beach

Signature/Arresting Officer

Date: 05/01/2006

EFTA00232020

massage [redacted] vaginal area. [redacted] stated there was no penetration as the vibrator was on top of her underwear. [redacted] recalled Epstein ejaculating because he had to use the towel to wipe himself as he got off the table. Epstein then left the room and [redacted] got dressed. She went back downstairs where she met with [redacted] [redacted] said she was paid three hundred dollars in cash from Epstein. Before she left, Epstein asked [redacted] to leave her phone number. As [redacted] [redacted] and [redacted] were leaving the house, [redacted] told [redacted] she received two hundred dollars that day for bringing her.

During the course of the investigation, parental consent was granted for [redacted] to assist with the investigation. At our direction [redacted] conducted controlled taped phone calls to [redacted] cellular telephone 561-[redacted]. [redacted] spoke with [redacted] in an attempt to arrange another meeting with Epstein. [redacted] asked [redacted] what did she need to do to make more money. [redacted] stated, "the more you do, the more you get paid." [redacted] had subsequently called back [redacted] and left a voice mail message for her indicating that she had set up an appointment for [redacted] to go to Epstein's house at 11:00 am on April 5, 2005. This message was recorded from [redacted] voice mail.

Based on the above, trash pulls were established at Epstein's residence with Supervisor Tony Higgins of the Sanitation Bureau of the Town of Palm Beach. The trash pull from April 5, 2005 revealed a telephone message for Epstein which stated [redacted] and [redacted] name at 11:00 am. This was the time frame [redacted] had informed [redacted] to be ready to go work at Epstein's house.

On October 3, 2005, Sgt Frick and I went to [redacted] residence and viewed her vehicle parked in the driveway, a red Dodge Neon. Sgt. Frick and I knocked on the door and met with [redacted] [redacted] was told that we were investigating a claim involving Jeffrey Epstein of El Brillo Way, in Palm Beach. [redacted] was asked if she would accompany us back to the police station for further questioning. She was also told that at the conclusion of the interview she would be returned home. [redacted] voluntarily came with us back to the Palm Beach Police Department.

Upon our arrival at the police station, [redacted] was brought to the interview room in the Detective Bureau where I obtained a taped, sworn statement. I began the interview by asking [redacted] how she became acquainted with Epstein. [redacted] stated that approximately two years ago, just after she turned 17 years of age, she was approached by a friend named [redacted] at the Canopy Beach Resort in Rivera Beach. [redacted] was asked if she wanted to make money. She was told she would have to provide a massage and should make $200.00. [redacted] thought about the offer and agreed to meet with Jeffrey.

The foregoing instrument was sworn to or affirmed before me this 1st day of May, 2006 by Det Joe Recarey, who is personally known to me.

Signature of Police Officer (F.S.S. 117.10)

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[redacted] (Unknown last name) and [redacted] (Unknown last name) picked [redacted] up and she was taken to Epstein's house. Upon her arrival to the house she was introduced to Epstein in the kitchen of the house. She was also introduced to a white female known to her as [redacted]. She was led upstairs to the main bedroom known to her as Jeff Epstein's bedroom. [redacted] arranged the massage table and covered the table with a sheet. She brought out the massage oils and laid them next to the massage bed. [redacted], then left the room and informed [redacted] Jeff would be in, in a minute. Jeff entered the bedroom wearing only a towel. He removed the towel and laid nude on the massage table. He laid on the table onto his stomach and picked a massage oil for [redacted] to rub on him. During the massage, [redacted] stated "He tried to touch me and I stopped him." I asked how he tried to touch her. [redacted] stated that Epstein grabbed her buttocks and she felt uncomfortable. [redacted] told Epstein, I'll massage you but I don't want to be touched. [redacted] stated she performed the massage naked. At the conclusion of the massage, Epstein paid [redacted] $200.

After the massage Epstein stated to [redacted] that he understood she was not comfortable, but he would pay her if she brought over some girls. He told her the younger the better. [redacted] stated she once tried to bring a 23 year old female and Epstein stated that the female was too old. [redacted] stated that in total she only remembers six girls that she brought to see Epstein, each time she was paid $200. [redacted] stated she had brought the following girls: [redacted] Faith [redacted] (a16 year old female), [redacted] (a 16 year old female) and [redacted] said that at the time she brought these girls to Epstein's house they were all14 through 16 years of age. I asked [redacted] which one was the youngest. [redacted] advised [redacted] was the youngest as she was fourteen when the massage occurred. [redacted] stated every girl she brought knew what to expect when they arrived. They were told they would provide a massage, possibly naked, and allow some touching. I asked her if [redacted] was aware. She stated every girl she brought knew what to expect. She explained she knew that [redacted] wanted to make money. She approached [redacted] and explained about going to work for Jeff, [redacted] agreed and arrangements were made to bring her to Epstein's house on a weekend. [redacted] stated that she and [redacted] (Later identified as [redacted] picked up [redacted] at her house. [redacted] stated that at that time she was driving a red pickup truck. They traveled to Epstein's house and entered through the kitchen door. They met with the house chef and Epstein's assistant [redacted]. [redacted] was introduced to Epstein while they were in the kitchen area. [redacted] led [redacted] upstairs and Epstein went upstairs. When the massage was over [redacted] returned to the kitchen area. [redacted] stated she was paid $200.00 for bringing [redacted] to Epstein's house. [redacted] stated [redacted] told her she was paid $300.00 for the massage.

[redacted] stated that [redacted] was the last person she brought to Epstein's house. She had changed her cellular number to avoid being contacted by [redacted]. She continued stating that she had no direct contact with Epstein

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when he was going to travel to Palm Beach. [redacted] said when Epstein announces to his assistant, [redacted], that he is traveling to Palm Beach, [redacted] would then contact [redacted] to arrange girls to "work" for Epstein. [redacted] stated that once her parents discovered that she was visiting Epstein, they disapproved of the encounters with him and she stopped. [redacted] further stated that [redacted] still tries to call [redacted] house and leaves messages.

Sgt Frick entered the room and explained to [redacted] that based on her own statements, she had implicated herself by bringing underage girls to Epstein's house. [redacted] provided cellular telephone numbers for the girls she had mentioned previously. Additionally, she also provided possible addresses and areas in which they lived.

As [redacted] was being taken home in the vehicle, a tape recorder was placed within the vehicle to record any conversations within the vehicle. During the drive back to her home, [redacted] made the comment " I'm like a Heidi Fleiss." (Hollywood Madam who sent girls to clients for sexual favors in California). [redacted] was dropped off at her house without incident.

On October 3, 2005, Sgt Frick and I went to speak with [redacted] a sixteen year-old female who was brought to Epstein's residence by [redacted] We met with [redacted] mother at their front door. We explained the ongoing investigation and asked to speak with [redacted] as we had information that she had "worked" for Jeff. Mrs. [redacted] introduced us to her husband and allowed us entry into the home. We sat in the dining room and met with [redacted] Date of Birth [redacted] As she was under the age of eighteen, Mrs [redacted] was advised we would be speaking with her. She expressed if her daughter had information, she wanted to assist. We interviewed [redacted] who denied having any inappropriate encounters with Jeff (Epstein). She stated she had gone to Jeff's house with [redacted] approximately eight months ago and sat in the kitchen with the house chef, but nothing happened. As the parents were present during the interview, we felt that [redacted] was withholding information from us. She made several comments as to putting the entire incident behind her. I left my telephone number and advised should she wish to speak with me again to telephone me. Sgt Frick and I thanked Mrs. [redacted] for her time and left the area. She stated she would ask [redacted] again after we left as to what happened at Epstein's house. I informed her that [redacted] had my telephone number and hopefully she would call.

On October 4, 2005, Det Dawson and I drove to the [redacted] home and met with [redacted] and [redacted] dob [redacted] During a sworn taped statement, [redacted] stated approximately a year ago when she was seventeen years old, she was taken to a house by [redacted] stated she knows [redacted] because they both attend [redacted] High School. She was told she could make money working

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for Jeff. She was told she would have to provide a massage to Jeff. [redacted] stated upon her arrival to the house she was brought to the kitchen area by [redacted] They met with the house chef who was already in the kitchen area. [redacted] stated [redacted] would wait for her in the kitchen. [redacted] was introduced to [redacted], Jeff's assistant, who brought her upstairs to the master bedroom. [redacted] prepared the room and massage table for a massage. Epstein entered the room wearing only a towel and she provided a massage. [redacted] stated she kept her clothes on during the massage. She advised sometime during the massage, Epstein grabbed her buttocks and pulled her close to him. [redacted] said she was uncomfortable by the incident involving Jeff. At the conclusion of the massage, she was paid $200.00 for the massage. I asked [redacted] if she has any formal training in massages to which she replied no. I asked her if [redacted] received any monies for taking her to perform the massage. [redacted] stated [redacted] had received money for taking her there but was unsure in the amount. [redacted] stated she returned to Epstein's house on another occasion with [redacted] and another girl, [redacted] stated she waited in the kitchen with [redacted] while [redacted] was taken upstairs by [redacted]. [redacted] stated she only did the massage once as she was uncomfortable with the whole experience.

At the conclusion of the interview, the tape was stopped. I was informed that [redacted] had attempted to reach [redacted] via cell phone. A voice mail message on October 4, 2005 at 10:59 am, revealed a female voice who identified herself as [redacted] who requested [redacted] to call her back reference the police questioning. [redacted] provided the incoming telephone number as [redacted]. [redacted] stated she inadvertently told [redacted] about the police investigation because [redacted] had called her to tell her about how she just received a rental car from Jeff Epstein. [redacted] had called her to tell her that she was given a rental car, a 2005 Silver Nissan Sentra, to utilize to visit family and visit Epstein. [redacted] asked her what was going on at the house that the police would be asking questions. [redacted] stated [redacted] then called Jeff and [redacted] and asked what was going on reference the ongoing police investigation. According to [redacted] has since then been trying to contact her to ask about the police questions. I instructed [redacted] not to contact [redacted] and do not provide any more information to [redacted] as she would notify Jeff Epstein and [redacted] what was transpiring.

On October4, 2005, I made telephone contact with [redacted] who had left several messages for me to contact her. During the message, she advised she was not completely truthful when we met in person but would like to speak with me to advise what had happened. She further advised she did not want to speak of this incident in front of her mother. At approximately 3:48 pm I made telephone contact with [redacted] During a taped recorded statement [redacted] stated the following: approximately a year ago, when she was sixteen years of age, [redacted] took her to Epstein's house twice. She knows [redacted] because they both attend Royal Pal Beach High School. The first time she went, [redacted] drove to the house. They entered through the kitchen area where she was

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introduced to [redacted] and Epstein. She was taken upstairs to a bedroom by [redacted] who set the room up with a massage bed and brought out the oils to use. Epstein then entered the room wearing a towel. He laid on the table and picked out a lotion for [redacted] to rub on him. At one point during the massage he tried to remove her shirt, at which point she became very upset and discontinued the massage. Both [redacted] and Epstein had a verbal disagreement, at which time she left without being paid. She got with [redacted] who was sitting in the kitchen and told her "let's go." [redacted] advised she received no money for that day. [redacted] also said that [redacted] had told her if she was uncomfortable with what was going on, to let him know and he'll stop. She knew that the more you do the more you get paid. [redacted] advised that several weeks later she agreed to be taken a second time by [redacted] Once they arrived at the residence, [redacted] sat in the kitchen and [redacted] took her upstairs to the master bedroom again. [redacted] set the room up with a massage bed and brought out the oils to use. Epstein then entered the room wearing a towel. He laid on the table and picked out a lotion for [redacted] to rub on him. At one point during the massage he tried to touch her buttocks. As [redacted] was wearing tight jeans and had a tight belt on Epstein was unable to touch her buttocks. Epstein then rolled onto his back during the massage and then attempted to touch her breasts. [redacted] then became upset again and told Epstein she didn't want to be touched. [redacted] discontinued the massage and was paid $200.00. [redacted] then went downstairs where [redacted] was waiting for her. She told [redacted] she wanted to leave. [redacted] said she never returned to the house. [redacted] stated she is aware that her friend, [redacted] was also at the house and had a problem with Epstein.

I later researched [redacted] dob [redacted] and met with her at her residence. During a sworn taped statement, [redacted] stated the following: on or about November 2004, she was approached at [redacted] High School by [redacted] a fellow student. [redacted] asked [redacted] if she wanted to make money. She agreed and was told she would provide a massage to wealthy man in Palm Beach. [redacted] picked her up and drove her to a house in Palm Beach. She was brought into the kitchen area of the house. She further stated that fellow [redacted] High School students [redacted] and [redacted] ([redacted] came with them. They were brought into the kitchen where she was introduced to Epstein and other females. [redacted] stated she was introduced to a female helper of Epstein, the female was described as white female (unknown name), with blond hair. She stated that the assistant was familiar with [redacted] The assistant brought her upstairs into a master bedroom area. The assistant set up the massage table and put out lotions to be used. She told [redacted] Epstein would be available in a minute. Epstein entered the room wearing only a towel. Epstein removed his towel, and laid naked on the massage table and picked a lotion to rub on his thighs and back. [redacted] further stated during the massage, Epstein asked her to remove her clothes. She complied and removed her pants and blouse. [redacted] didn't remember if she had removed her bra but feels that she did. [redacted] was certain that she stayed in her thong underwear. [redacted] continued the massage and at one point she climbed onto the massage

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table, straddling Epstein to massage his back. While doing this her buttocks were touching Epsteins. [redacted] was instructed to return to the ground at which time Epstein turned to have his chest rubbed. [redacted] advised she was sure he was masturbating based on his hand movements going up and down on his penis area. [redacted] did not want to look at his penis area because she was uncomfortable. Epstein removed a large white vibrator which was next to the massage table and turned it on. [redacted] stated Epstein began rubbing the vibrator over her thong underwear on her vaginal area. Shortly thereafter, Epstein ejaculated and removed himself from the table. He walked over to where the shower was and opened the glass door. She waited as he was taking a shower in her direct view. When I asked [redacted] how old she was when this occurred, she stated she had just turned seventeen. At the conclusion of the shower, [redacted] was paid either $350.00 or $400.00. She stated she wasn't sure, but knows it was close to $400.00. [redacted] stated she never returned to provide a massage for Epstein.

At approximately 2:10 pm, Det Dawson and I met with [redacted] dob [redacted], at her residence. As [redacted] was only seventeen years of age, I had notified her mother, that she would be interviewed reference an ongoing investigation in Palm Beach. I assured her that her daughter was not a suspect. I explained the possibility of her being either a witness or victim. Mrs [redacted] advised she wanted [redacted] to cooperate and consented to the interview.

During a sworn taped statement [redacted] stated the following: at the age of sixteen, during the month of September 2004, she was approached by [redacted] for a chance to make money. [redacted] was friends with associates of [redacted] and knew the same people. [redacted] had been previously told by her friends from [redacted] High School, what [redacted] did for Epstein. [redacted] called a person known to [redacted] as [redacted] and scheduled the appointment. [redacted] picked [redacted] up and drove her to Palm Beach to a street called "Brillo Way". They drove to the end of the street and entered a large driveway. They entered the kitchen area of the house and met with Epstein. [redacted] was introduced to Jeff Epstein. [redacted] led [redacted] upstairs to the main bedroom area and set up the room with a massage table and set out the oils. [redacted] stated that while going up the stairs and into the bedroom she observed numerous photographs of naked young girls. [redacted] dimmed the lights and turned on soft music. [redacted] exited the room and Epstein entered the room wearing only a towel. Epstein picked oils and instructed her to rub his legs, under his buttocks, back and chest area. Epstein asked her to get comfortable. [redacted] advised she did not remove her clothes. She was wearing tight jeans and a cropped tank top exposing her belly area. During the massage, Epstein removed his towel and laid on the massage table naked. As [redacted] rubbed Epstein's chest area, he attempted to reach down her pants to touch her buttocks area however was unable to due so due to the tightness of the jeans and a tight belt. [redacted] advised Epstein began to masturbate as she rubbed his chest. Epstein moaned as she rubbed his chest. She observed he was continuing to masturbate and

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attempted to reach up her tank top and touch her breasts. [redacted] pulled back and Epstein stopped, however he kept masturbating until he climaxed. He cleaned himself with the towel he was previously wearing. [redacted] was paid $200.00 for the massage and left the area. She met with [redacted] who was waiting in the kitchen area and left the house.

[redacted] then explained she never provided another massage for Epstein. She did however, go to the house with [redacted] and [redacted] ([redacted] as they took another friend of [redacted] [redacted] advised she was present when [redacted] went to work for Epstein. She advised she rode over and sat in the kitchen area with [redacted] to wait for [redacted] [redacted] advised while they waited for [redacted] the house chef prepared lunch for them as it was almost lunchtime when they went. When [redacted] was finished with the massage they left the area. I asked [redacted] if [redacted] ever told her what would be expected when she provided a massage. [redacted] stated yes, [redacted] told her that a massage would be expected, possibly naked and possibly some touching involved. [redacted] has no formal training in providing massages. [redacted] spoke about a third and last time she went to Epstein's house. [redacted] drove another girl, [redacted] (sixteen years of age) who is [redacted] friend, to Epstein's house. [redacted] stated [redacted] knew that [redacted] had made money massaging Epstein and wanted to make money herself. [redacted] took them in the kitchen area of the house and introduced [redacted] to [redacted]. [redacted] and [redacted] took [redacted] upstairs to the main bedroom. [redacted] advised she doesn't know what happened as [redacted] did not speak about what happened in the room. [redacted] received $100.00 from [redacted] for going with her to Epstein's house and recommending [redacted]

On October 6, 2005, at 11:45 am, I met with [redacted] [redacted] dob [redacted] at Lynn University and explained to her why we there to interview her. She advised she was aware of the ongoing investigation. [redacted] stated she had previously spoken with [redacted] [redacted] who told her she was interviewed by detectives. During a sworn taped statement, [redacted] stated she knew that [redacted] [redacted] worked for Jeff Epstein in Palm Beach. [redacted] advised she originally had been taken to the Epstein house by [redacted] [redacted] whom she met when they both attended [redacted] High School. She began going to the house when she was sixteen years of age and stated she had been there a lot of times to provide massages over the past two years. I asked her if she had formal training in providing massages, which [redacted] stated she had not. [redacted] advised she was told what was expected of her by providing massages and she would have to remove clothing but if she felt uncomfortable just to say so and Epstein would stop pushing the issue. [redacted] began providing massages and advised she kept her clothes on. She considered Epstein a pervert and he kept pushing to go further and further. [redacted] explained she would keep telling him she had a boyfriend and would not be right to her boyfriend. It wasn't until recently that [redacted] began removing her clothes and staying in her thong underwear to provide a massage. [redacted] explained

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Epstein wanted to be rubbed on his back and recently he began turning over and have her rub his chest as he masturbated. He would try to touch her breasts as she rubbed his chest. [redacted] stated "Jeff would try to get away with more and more on each massage". [redacted] stated Epstein would try to touch her more and on one occasion he attempted to use a massager/vibrator on her. [redacted] drove [redacted] to the house for the original massage. [redacted] left [redacted] her cell phone number and every time Epstein would come into town, [redacted] would call her for an appointment to "work". Each time she went, [redacted] would meet her at the kitchen door area. She would bring her upstairs and prepare the massage table. [redacted] advised Epstein would ask her questions about herself. Epstein knew she was a soccer player and would be attending Lynn University. I asked [redacted] if Epstein knew her real age. [redacted] stated Epstein did and didn't care. The most recent massage she provided was on October 1, 2005. During the massage, she asked Epstein if she could borrow one of his vehicles to visit her family and boyfriend in Orlando, Florida. Epstein had told her she could borrow one of his vehicles but later stated he would rent her a car. She continued with the massage as Epstein grabbed her buttocks and caressed the buttocks cheeks. I asked [redacted] if she was wearing undergarments to which she replied her thong underwear. Once he tried to touch her breasts, she would pull away from him and he would stop. [redacted] was asked if he ever used a vibrator on her. [redacted] was aware of the vibrator but advised she never would allow him to use the vibrator on her. She described the vibrator as the large white vibrator with a huge head on the tip of the vibrator. She stated he kept the vibrator in a closet near the massage table.

[redacted] stated that on October 3, 2005, she was contacted by Epstein's assistant, [redacted], who informed her that Jeff Epstein had rented her a new Nissan Sentra and she should come by the house to pick it up. [redacted] informed [redacted] she would have the car for a month. [redacted] stated Epstein knew her car was not working properly and that she had missed appointments in the past because of her car being inoperable. [redacted] explained the car is currently parked next to the Lynn University Gym field. I asked her if she ever took any one to the house. [redacted] explained she took [redacted] a friend of hers who attended [redacted] High School, who has relocated to Orlando to attend college. I asked if she ever allowed another female in the room. [redacted] advised no one was brought into the room with her.

At the conclusion of the interview, Det Dawson and I went to the gym area of Lynn University and located the Silver Nissan Sentra bearing Florida tag [redacted]. The vehicle is registered to Dollar Rent a Car out of the Palm Beach International Airport. The vehicle was rented by Janusz Banasiack, later learned to be Epstein's houseman, and paid with Epstein's credit card.

On September 11, 2005, w/f [redacted] dob [redacted] was arrested by the Palm Beach Police Department

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for misdemeanor possession of marijuana. During the arrest [redacted] told the arresting officer that she had information about sexual activity taking place at the residence of Jeffrey Epstein. Additionally, during the ongoing trash pulls from Epstein's residence, discarded papers were found which contained [redacted] name and cell phone number.

On October, 11, 2005, Det Dawson and I met with [redacted] and obtained a sworn taped statement. [redacted] explained she had been going to Epstein's house since 2002, when she was sixteen years of age. Since then she has gone to the house hundreds of times. [redacted] stated she became his "number one girl." She explained that on her first visit she was brought to the house by fellow [redacted] High School classmate, [redacted] [redacted] said she was brought through the kitchen area where she me[redacted] for the first time. [redacted] was led to the master bedroom, Epstein s room. [redacted] explained that as she was walking up the stairs she observed several photographs of naked women along the walls and tables of the house. [redacted] further explained that she was brought into the bedroom, where [redacted] prepared the room by setting up the massage table and provided the oils for her to rub on Epstein. [redacted] explained she remembered the steam room area, which contained two large showers. Epstein entered the room from the steam room area and introduced himself. Epstein lay on the table and told her to get comfortable. [redacted] removed her skirt and kept her shirt on. Epstein then instructed her to remove her shirt. [redacted] removed her shirt and remembered she was not wearing a bra. [redacted] stated she provided the massage wearing only her panties. She continued rubbing his legs, thighs and feet. [redacted] advised he turned over onto his back. Epstein touched her breasts and began to masturbate. Epstein ejaculated which meant the massage was over. At the conclusion of the massage, [redacted] was paid $200.00. They walked together downstairs where [redacted] and [redacted] [redacted] were waiting. [redacted] stated [redacted] received an unknown amount of money for taking her to Epstein. Epstein instructed to leave her cellular telephone number so that he could contact her when he is in town.

[redacted] stated that during her many visits a routine was established between her and Epstein. She would enter the house and get naked in the bedroom. She would then start with a back massage. Epstein would roll on to his back and allow her to massage his chest area. [redacted] stated Epstein would then began to masturbate himself and at the same time would insert his fingers in her vagina and masturbate her with his fingers. [redacted] explained Epstein would continue this process until he ejaculated. He would then utilize a vibrator/massager on her vagina until [redacted] climaxed. [redacted] advised that during her frequent visits, Epstein asked for her real age, [redacted] stated she was sixteen. Epstein advised her not to tell anyone her real age. [redacted] advised that things escalated within the home as Epstein would instruct and pay [redacted] to have intercourse with his female friend, [redacted] [redacted] explained the intercourse included using strap on dildos, large rubber penis' and other devices that Epstein had at his disposal. Epstein would watch them have intercourse and masturbate himself . Occasionally, Epstein would then join in

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during the female on female intercourse and provide oral sex to both [redacted] and [redacted]. This occurred during the time [redacted] was sixteen years of age.

[redacted] advised this continued to escalate during two years. The routine became familiar to [redacted] Epstein's assistant [redacted] would telephone her every time Epstein was in the Town of Palm Beach and would place appointments for her to visit and work for Epstein. Each time something new was introduced, additional monies were produced and offered for [redacted] to allow the acts to happen. [redacted] consented to perform all these acts but was adamant that there was an understanding with Epstein that no vaginal penetration would occur with his penis. [redacted] explained that Epstein's penis was deformed. [redacted] explained that his penis was oval shaped. [redacted] claimed when Epstein's penis was erect, it was thick toward the bottom but was thin and small toward the head portion. [redacted] called Epstein's penis "egg-shaped." [redacted] stated Epstein would photograph [redacted] and her naked and having sex and proudly display the photographs within the home. [redacted] stated during one visit to Epstein's house in which she provided a massage to Epstein, his female friend [redacted] was also present. [redacted] provided the massage in which [redacted] and her would fondle each others breasts and kiss for Epstein to enjoy. Towards the end of this massage, Epstein grabbed [redacted] and turned her over onto her stomach on the massage table and forcibly inserted his penis into her vagina. [redacted] stated Epstein began to pump his penis in her vagina. [redacted] became upset over this. She said her head was being held against the table forcibly, as he continued to pump inside her. She screamed "No!" and Epstein stopped. She told him that she did not want to have his penis inside of her. Epstein did not ejaculate inside of her and apologized for his actions and subsequently paid her a thousand dollars for that visit. [redacted] stated she knows he still displays her photographs through out the house.

On October 12, 2005, Det Dawson and I met with [redacted] dob [redacted] who stated during a sworn taped statement, that nothing happened between her and Epstein. [redacted] appeared nervous during the interview. I assured her that I have spoken with other people who advised differently. [redacted] stated on several occasions she provided a massage to Epstein. She stated she was brought to the Epstein house in March of 2005. [redacted] a classmate at [redacted] High School, approached her and asked her if she wanted to "work". [redacted] made the arrangements with [redacted], Epstein's assistant. [redacted] who has no formal training in providing massages, stated she provided a massage, fully clothed for $200.00 . As I sensed hesitancy in her answers, I asked [redacted] if she had been contacted by anyone from Epstein's organizations or his house. [redacted] stated she was interviewed already by a private investigator for Epstein. He identified himself as "[redacted] and inquired about the police investigation, and left his telephone number [redacted] for additional contact. [redacted] provided no additional information, as it appeared her responses were almost scripted.

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Date: 05/01/2006

EFTA00232030

On November 6, 2005, at approximately 3:30 pm, I met with [redacted] dob [redacted], at the Palm Beach Police Department. [redacted] was identified as a potential witness/victim through information obtained during the trash pulls. During the sworn taped statement, [redacted] advised she was at Jeffrey Epstein's house one time, approximately two months ago. She was approached by a girl, [redacted] who was dating [redacted] roommate, for an opportunity to make some quick money. [redacted] advised she needed to make some quick cash to make the rent that month. She agreed to go to the house. She had been told by [redacted] that the massage would have to be done in her underwear. She advised [redacted] drove with her and brought her into the house. They walked into the kitchen area, and took the stairs upstairs. [redacted] further stated she was brought into a master bedroom area. She advised she recalled seeing portraits of naked women throughout the room. A massage table was already out near the sauna/shower area in the master bedroom. Epstein entered the room wearing only a towel and introduced himself as "Jeff." At Epstein's direction, [redacted] and [redacted] removed their clothing down to their panties, Epstein laid on his stomach area and they provided a massage on his legs and feet area. I asked [redacted] if she had any formal massage training and she replied "no." [redacted] advised she was topless and the panties she wore were the boy shorts lace panties. She and [redacted] continued the massage until the last ten minutes of the massage, Epstein, told [redacted] to leave the room so that [redacted] could finish the massage. [redacted] got dressed, and left the room as Epstein turned over onto his back. Epstein then removed the towel and laid naked . Epstein requested that [redacted] rub his chest area. [redacted] stated as she did this, Epstein, began masturbating. [redacted] stated Epstein pulled down her boy short panties, and he produced a large white vibrator with a large head. She stated it was within his reach in a drawer in his master bathroom. He rubbed the vibrator on her vaginal area. [redacted] advised he never penetrated her vagina with the vibrator. He continued to rub her vagina with the vibrator as he continued to masturbate. [redacted] stated she was very uncomfortable during the incident but knew it was almost over. Epstein climaxed and started to remove himself from the table. He wiped himself with the towel he had on previously and went into the shower area. [redacted] got dressed and met with [redacted] in the kitchen area. Epstein came into the kitchen and provided [redacted] $200.00 for bringing [redacted] and paid $200.00 to [redacted] for providing the massage. [redacted] was told to leave her telephone number with [redacted] for future contact. [redacted] provided her cellular telephone number. [redacted] was asked if she was recently contacted about this investigation by anyone from the Epstein organization. She replied she was called but it was for work. She stated she was called by [redacted] for her to return to "work" for Epstein. [redacted] stated "work" is the term used by [redacted] to provide the massages and other things. [redacted] advised she declined as she was not comfortable in providing that type of "work."

On November 7, 2005, Det Sandman and I met with [redacted] dob [redacted] During a sworn taped statement, [redacted] stated she met Jeffrey Epstein through [redacted] when they were still

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State of Florida
County of Palm Beach

[redacted]

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Signature/Arresting Officer

Date: 05/01/2006

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attending [redacted] High School. [redacted] would approach females who wished to work for Epstein. [redacted] stated she was offered to work for Epstein but declined. [redacted] explained that "work" means give massages. She was asked about any formal training in providing massages which she said "no." [redacted] said she accompanied [redacted] and other females who were taken to Epstein's house to provide massages. [redacted] further stated she had been to the house approximately 4 or 5 times in the past year. She accompanied [redacted] with [redacted] and [redacted] Each time the girls were taken over, they were previously told they would have to provide a massage, possibly naked. They were also told that should Epstein require them to do anything extra, and they were not comfortable just to tell him and he would stop. [redacted] stated [redacted] received $200.00 for each girl she brought over to massage Jeffrey Epstein. When I asked which girl appeared to be the youngest, she replied, [redacted] who was really young, fifteen years old at the most. [redacted] further stated each time she went to the house, she sat in the kitchen and waited with [redacted] until the massage was over. She further stated that the cook would make lunch or a snack for them as they waited. I asked her if there was anything that caught her attention within the home. [redacted] stated there were a lot of naked girls in photographs throughout the house.

On November 8, 2005, at approximately 2:00pm , I met with [redacted] dob [redacted], at the Palm Beach Police Department. During a sworn taped statement, [redacted] stated she had met Epstein approximately two years ago when she was first approached by [redacted] a classmate at [redacted] High School. [redacted] approached her about working for Epstein and providing a massage to him for $200.00. [redacted] had made the arrangements however was unable to take her the day the arrangements were made. [redacted] had [redacted] take [redacted] also attended [redacted] High School and was familiar with Epstein. [redacted] recalled she was brought there and entered through the back kitchen door. She had met with an assistant [redacted] and another assistant [redacted]. [redacted] brought her upstairs as she observed several photographs of naked females throughout the house. [redacted] stated Epstein came in the room, wearing only a towel, and laid on the table. [redacted] stated he picked out the oils he wanted her to use and requested she remove her clothing to provide the massage. [redacted] stated that on the first massage she provided she did not remove her clothing. [redacted] stated she had returned several times after that. Each time she returned it was more than a massage. Epstein would walk into the master bedroom/bathroom area wearing only a towel. He would masturbate as she provided a massage. [redacted] stated she was unsure if he climaxed as he masturbated under the towel. Additionally, she never looked below his waist. She claimed that Epstein would convince her to remove her clothes. She eventually removed her clothes and stayed in her thong panties. On occasion, Epstein would use a massager/vibrator, which she described as white in color and a large head. Epstein would rub the vibrator/massager on her vaginal area as he would masturbate. [redacted] stated she had been to the house

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Date: 05/01/2006

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numerous times. [redacted] added she has no formal training in providing a massage. [redacted] stated she brought two females during her visits to provide massages. [redacted] stated she brought a girl named "[redacted] and [redacted] from [redacted] High School. [redacted] stated she received $200.00 for each girl she brought.

On November 8, 2005, I met with [redacted] W/F, [redacted] at the Palm Beach Police Department. During a sworn taped statement, [redacted] stated she had met Jeffrey Epstein approximately one year ago. She was approached by a subject known to her as [redacted] had asked her if she wanted to make money providing massages to Epstein. [redacted] had heard that several girls from [redacted] High School were doing this and making money. She agreed and was taken to the house by [redacted] had introduced her to [redacted] and Epstein and brought her upstairs to a master bedroom where a massage table was prepared and the proper oils were selected. [redacted] left the room and waited downstairs for her. [redacted] stated Epstein entered the room wearing a towel and laid on his stomach. She provided a massage wearing only her thong panties. [redacted] advised Epstein had masturbated every time she provided a massage. She stated Epstein continued to masturbate until he climaxed. Once that occurred the massage was over. She felt the whole situation was weird but she advised she was paid $200.00 for providing the massage. She also stated [redacted] was paid $200.00 by Epstein for bringing [redacted] stated she had gone a total of 15 times to Epstein's residence to provide a massage and things had escalated from just providing a massage. Epstein began touching her on her buttocks and grabbed her closer to him as he masturbated. Epstein also grabbed her breasts and fondled her breasts with his hands as she provided the massage. [redacted] stated on one occasion, while she was only seventeen years of age, he offered extra monies to have vaginal intercourse. She stated this all occurred on the massage table. [redacted] stated Epstein penetrated her vagina with his penis and began having intercourse with her until he reached the point of climax. Epstein removed his penis from her vagina and climaxed onto the massage table. [redacted] received $350.00 for her massage. I asked her if she had any formal training in providing massages, [redacted] stated she did not. [redacted] continued to state on one other occasion, Epstein introduced his girlfriend [redacted] into the massage. [redacted] was brought into room with [redacted] to provide a massage. Epstein had them kiss and fondle each other around the breasts and buttocks as they provided a massage to Epstein. Epstein, watched and masturbated as this occurred. On other occasions, Epstein, introduced the large white vibrator/massager in the massage. Epstein stroked the vibrator/massager on [redacted] vagina as she provided the massage.

On November 14, 2005, Det Sandman and I met with [redacted] dob [redacted] During a sworn taped statement she advised she started going to the house approximately one year ago and has been there approximately five or six times. [redacted] also stated she was sixteen years old when she first went to Epstein's house. On her first visit she was brought by a fellow student from [redacted] High School known to her

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as [redacted] [redacted] stated [redacted] brought her into the house and she was introduced to [redacted]. [redacted] then brought her upstairs into a master bathroom, located within the bedroom. [redacted] stated she met Epstein in the bathroom. He laid on the table and picked the massage oils. She provided the massage as he laid naked on the massage bed. She stated she rubbed his calves and back area. Upon the end of the massage, Epstein removed himself from the massage table and paid her $300.00 for the massage. [redacted] said each subsequent time she went to the house, she was notified by [redacted] that Epstein was in town and would like her to "work". [redacted] stated she returned to the house and was again led upstairs by [redacted]. She provided the massage, clothed. [redacted] was asked if she ever removed her clothing to provide a massage. [redacted] stated it was not until the third time that she went that she removed her clothing. [redacted] stated she was notified by [redacted] that Epstein wanted her to come to work. She arrived at the house and was led upstairs by [redacted]. She started providing the massage when Epstein asked her to remove her clothing. [redacted] removed her pants, shirt and bra. She stayed in her thong panties and continued rubbing Epstein. Epstein turned over onto his back and she rubbed his chest area. [redacted] stated she knew he was masturbating himself as she providing the massage. [redacted] stated she believed he climaxed based on his breathing. She did not want to view either the climax or the fact that he was masturbating. [redacted] stated once the breathing relaxed he got up and told her to get dressed. She was paid $300.00 for her services. [redacted] stated on the last time she went to provide a massage, she was notified by [redacted] to come to the house and "work". [redacted] stated she was now dating her current boyfriend and did not feel comfortable going. She recalled it was approximately January 2005. She said she went, already thinking that this would be the last time. She went upstairs and went into the master bathroom. She met with Epstein, who was wearing only a towel, and laid onto the table. [redacted] stated Epstein caught her looking at the clock on several occasions. Epstein asked her if she was in a hurry. [redacted] stated her boyfriend was in the car waiting for her. [redacted] further stated that Epstein got upset as he wasn't enjoying the massage. She told him that she didn't want to continue and she would not be back. Epstein told her to leave as she was ruining his massage. [redacted] advised she had no formal training in providing any massages. [redacted] stated although she had a falling out with Epstein, she still received a Christmas bonus from Epstein. [redacted] stated she was wired money from Western Union for her Christmas bonus. Subpoena results from Western Union revealed money was sent from Jeffrey Epstein on December 23, 2004. [redacted] received $200.00 from Epstein for her Christmas bonus.

On November 15, 2005, Det. Sandman and I met with [redacted] dob [redacted]. During a sworn taped statement, [redacted] stated she met Jeffrey Epstein over a year ago. She was sixteen years of age and was approached by [redacted] [redacted] a fellow [redacted] High School student, who informed her that she could make $200.00 providing a massage to Epstein. [redacted] had informed her that she would have to provide this

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massage topless. [redacted] made the arrangements with Epstein and his assistants and took [redacted] to the house. [redacted] stated [redacted] and she entered through a glass door that led into a kitchen. She was taken upstairs by [redacted] to a master bedroom. She recalled the master bathroom had a large pink couch, sauna and matching shower. Epstein entered into the room wearing only a towel. [redacted] and [redacted] removed their clothing remaining only in thong underwear. She further stated that Epstein laid on his chest on the table. The oils were selected on which ones to use. Both [redacted] and [redacted] provided the massage on his legs, back and feet. Forty minutes into the massage, Epstein turned over onto his back and requested [redacted] wait downstairs in the kitchen area for [redacted] Epstein instructed [redacted] to finish the massage. As [redacted] got dressed, [redacted] starting rubbing Epstein's chest. [redacted] left the room, and Epstein began masturbating as [redacted] rubbed Epstein's chest. [redacted] stated Epstein continued masturbating until he climaxed on the towel he was wearing. When asked if he had removed the towel she stated he turned the towel around so that the opening would allow him to expose himself. After he cleaned himself off with the towel he instructed [redacted] the massage was done and to get dressed and meet with him downstairs. [redacted] got dressed and met with Epstein in the kitchen area. She was paid $200.00 dollars for providing the massage. [redacted] stated she was aware that [redacted] also received monies for the same thing. The second time she went to the house she was again approached by [redacted] advised if she wanted to return to the house to provide another massage. [redacted] agreed and the arrangements were made by [redacted] for her to return to the house. [redacted] stated [redacted] drove her to the house and knocked on the same glass door which leads to the kitchen area. They were allowed entry into the house by one of the staff members. [redacted] led her upstairs to the master bedroom and master bathroom area. [redacted] left [redacted] this time to do the massage alone. Epstein entered the room again wearing only a towel. [redacted] began removing her clothing as she did the last time she was at the house. Epstein instructed her to get naked. He laid on the table onto his stomach as [redacted] began massaging his legs and back. As [redacted] finished with Epstein's back and legs, Epstein then turned over onto his back. [redacted] started to rub his chest and he began masturbating. As [redacted] rubbed his chest, Epstein leaned over and produced a massager/vibrator. He turned it on and began rubbing [redacted] vagina and masturbating himself at the same time. [redacted] stated she continued to rub his chest as this was occurring. She described the vibrator/massager as large grey with a large head. Epstein rubbed her vagina for approximately two to three minutes with the massager/vibrator. He then removed the vibrator from her vaginal area and concentrated on masturbating himself. [redacted] stated Epstein climaxed onto the towel again and informed her that the massage was done. [redacted] got dressed and met with [redacted] who was waiting in the kitchen area. She received $200.00 for the massage. [redacted] said she never returned to the house and had no desire to return to the house. [redacted] was asked if she received any formal massage training. She advised she had no formal training. [redacted] was asked if Epstein knew her real age. [redacted] stated he knew, as he asked her questions about herself and high school. He was aware she attended, and is still attending [redacted] High School.

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Date: 05/01/2006

EFTA00232035

During the course of the investigation a search warrant was executed at Jeffrey Epstein's home located at 358 El Brillo Way in Palm Beach. While in the home I observed the pink and green couch within the master bedroom area just as the girls previously mentioned. The stairway, which is located from the kitchen area to the master bedroom area, is lined with photos of naked young girls. Additionally, numerous photographs of naked young females, some of which appeared to be the girls I previously interviewed, were on display throughout the house. Also located in the house were various phone message books. The telephone message books have a duplicate copy (Carbon Copy) which, once a phone message is written into the book, the top copy is then torn on the perforated edge and the carbon copy is left in the book. First names of girls, dates and telephone numbers were on the copy of the messages. I recognized various numbers and names of girls that had already been interviewed. The body of the messages were time of the day that they called for confirmation of "work." Other names and telephone numbers were located in which the body of the messages were, "I have girls for him" or "I have 2 girls for him." These messages were taken by [redacted], who signed the bottom of the messages. During the execution of the warrant, I located a [redacted] High School transcript for [redacted] in Epstein's bedroom desk. This desk had stationary marked Jeffrey E Epstein. I located a wood colored armoire beside Epstein's bed that contained a bottle of "Joy Jelly," which is used to provide a warm massage. Several massage tables were located throughout the second floor of the residence, including a massage table found in Epstein's bedroom. On the first floor of the residence I found two covert cameras hidden within clocks. One was located in the garage and the other located in the library area on a shelf behind Epstein's desk. A computer was located which was believed to contain the images from the covert cameras. The computer's hard drive was reviewed which showed several images of [redacted] [redacted] and other witnesses that have been interviewed. All of these images appeared to come from the camera positioned behind Epstein's desk.

On December 13, 2005, Det. Dawson and I met with [redacted] dob [redacted] During a sworn taped statement, [redacted] stated that when she was sixteen years old she was taken to Epstein's house to provide a massage for money. [redacted] stated it was before Christmas last year (2004) when an associate, [redacted] approached her and asked if she needed to make money for Christmas. [redacted] made arrangements to take [redacted] to the house and drove [redacted] to the house to "work." They were encountered by a white female with long blond hair. [redacted] was unable to remember the name of the white female with blond hair but knew she was Epstein's assistant. She was led upstairs by the white female who explained that there would be lotions out already and Epstein would choose the lotion he wanted her to use. She was led through a spiral staircase which led to a master bedroom and bathroom. The massage table was already set up in the bathroom. [redacted] described the bathroom as a large spacious bathroom with a steam room and shower beside it. [redacted] was introduced to Epstein who was on the phone when she entered the room. Epstein was wearing a white towel and laid on his stomach so that [redacted] may

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massage his feet and calves. [redacted] started the massage with the oils Epstein chose and rubbed his feet and calves. Epstein got off the phone and requested she massage his back as well. [redacted] began rubbing his back and got to the small of his back. During the rubbing of his back, Epstein asked her to get comfortable. He requested she remove her pants and shirt. [redacted] removed her shirt and pulled her pants off. [redacted] stayed in her bra and thong panties. As she finished massaging the small of Epstein's back, he then turned onto his back. Epstein instructed [redacted] to rub his chest and pinch his nipples. As she began to rub his chest, Epstein asked her questions about herself. [redacted] remembered telling him she attended [redacted] High School. Epstein asked her if she was sexually active. Before [redacted] could answer, he also asked what sexual position does she enjoy. [redacted] stated she was shy and didn't like talking about those things. She continued rubbing his chest. Epstein reached up and unsnapped her bra from the front. [redacted] explained the bra she used had a front snapping device. Epstein rubbed her breasts and asked her if she like having her breasts rubbed. [redacted] said "no, I don't like that." Epstein then removed his towel and laid on the bed naked exposing his penis to [redacted] He began touching his penis and masturbated as he touched her breasts. [redacted] explained Epstein then touched her vaginal area by rubbing her vagina with his fingers on the outside of her thong panties. [redacted] tensed up and stated Epstein was aware that she was uncomfortable. [redacted] stated that Epstein said to her, "Relax, I'm not going inside." She further explained Epstein commented to her how beautiful and sexy she was. Epstein then moved her thong panties to one side and began stroking her clitoris. [redacted] said, "He commented how hard my clit was." He then inserted two fingers in her vagina and was stroking her within her vagina. She tried pulling back to pull out his fingers from within her vagina. Epstein removed his fingers from within her vagina and apologized for putting his fingers inside her. During this time, he kept his hand on her vaginal area and continued to rub her vagina. [redacted] stated he rubbed her really hard as he was masturbating. [redacted] said he climaxed onto the towel he had been previously wearing and got up from the table. Epstein told her there was $200.00 dollars for her on the dresser within the master bathroom. Epstein also told her that there was an additional $100.00 that was to be given to [redacted] for bringing her there to massage him. Epstein told her to leave her telephone number with his assistant as he wanted to see her again. Epstein stated his assistant would contact her to work again soon. I asked her if she ever received any formal massage training to which [redacted] stated she did not. [redacted] stated it was the only time she ever went to work for Jeff and knew what happened to her was wrong. She further stated that she had never been contacted for any additional work.

On January 9, 2006, I located and interviewed another victim, [redacted] dob [redacted] [redacted] was identified as a potential victim/witness from information obtained during trash pulls from Epstein's residence. [redacted] stated she met Epstein when she was fifteen years of age. She was approached by a friend from [redacted] High School, [redacted] [redacted] to be taken to Jeffrey Epstein's house to work. She was originally told she would be able

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to model lingerie for a wealthy Palm Beacher. [redacted] was taken to Epstein's house located on El BrilloWay. [redacted] introduced [redacted] to Jeffrey Epstein. Epstein had his personal chef prepare dinner for [redacted] and [redacted] At the conclusion of dinner, [redacted] and Epstein brought [redacted] upstairs into a master bedroom area. [redacted] observed a large massage table with a sheet on it. Epstein entered through a door and exited wearing only a towel. [redacted] informed [redacted] that they were going to provide a massage on Epstein. [redacted] asked why were they doing this instead of modeling lingerie. [redacted] explained to [redacted] that this was his routine and to rub his calves and feet. Epstein had told [redacted] to get comfortable. [redacted] removed her pants and blouse. [redacted] stated she stayed only in panties as she did not wear a bra that evening. [redacted] stated while rubbing his calves and feet, Epstein turned over onto his back. Epstein told [redacted] to rub his chest and rub his nipples. [redacted] stated that as she started rubbing his chest, Epstein began masturbating himself . Epstein touched her breasts and stroked her vagina with his fingers. Epstein continued to masturbate himself as he stroked her vagina. Epstein ejaculated on his towel and paid [redacted] $200.00 for the massage. Epstein told [redacted] that if she told anyone what happened at his house that bad things could happen. [redacted] and [redacted] were brought home by Epstein's houseman and [redacted] was afraid that Epstein knew where she lived. [redacted] stated that several days later she received a telephone call from [redacted] who coordinated for [redacted] to return to "work." [redacted] returned to the house and was brought to Epstein's bedroom area by [redacted] who prepared the room for the massage. Epstein entered the room wearing only a towel. Epstein had [redacted] remove her clothing and provide the massage naked. [redacted] began rubbing his feet and calves and Epstein turned over onto his back. Epstein rubbed her vagina with his fingers. Epstein began to masturbate himself with an upwards and downward motion on his penis. Epstein continued to touch her vagina with one hand and masturbate with the other hand. Once Epstein ejaculated onto the towel he was wearing, the massage was over. [redacted] was paid $200.00 for the massage. Epstein again told [redacted] not to speak of what happened at his house or bad things would happen. [redacted] wanted to notify authorities however she was afraid of what would happen to either her or her family.

During the course of the investigation, several subjects were identified as a potential witness/victim through information obtained during the trash pulls, physical surveillance and telephone message books retrieved from the search warrant. While conducting research on the subjects, I discovered that the females were age eighteen or older. Interviews were conducted on the consenting adults whose statements provided the same massage routine when they went to "work" for Epstein. The females would be notified by [redacted], and made appointments for the females to "work" for Epstein. The females would come to Epstein's house and were led upstairs, through a stairwell from the kitchen area, by [redacted] to Epstein's bedroom. Epstein would then enter the room wearing only a towel, and ask them to get comfortable. The females would then provide the massage naked as Epstein would either touch their vaginas with his fingers and/or utilize the massager/vibrator on

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their vaginal area. He would masturbate during the massage and upon his climaxing, the massage would end. The girls were then paid two or three hundred dollars for the massage.

On November 21, 2005 I interviewed Jose Alessi, a former houseman for Jeffrey Epstein. Alessi stated he was employed for eleven years with Mr. Epstein, from approximately 1993 through 2004. Alessi stated he was the house manager, driver and house maintenance person. It was his responsibility to prepare the house for Epstein s arrival. When asked about cooks or assistants, Alessi stated they traveled with Epstein on his private plane. I asked Mr. Alessi about the massages that have occurred at Epstein's home. Alessi stated Epstein receives three massages a day. Each masseuse that visited the house was different. Alessi stated that towards the end of his employment, the masseuses were younger and younger. When asked how young, Mr. Alessi stated they appeared to be sixteen or seventeen years of age at the most. The massages would occur in Epstein's bedroom or bathroom. He knew this because he often set up the massage tables. I asked if there were things going on other than a massage. Alessi stated that there were times towards the end of his employment that he would have to wash off a massager/vibrator and a long rubber penis, which were in the sink after the massage. Additionally, he stated the bed would almost always have to be made after the massage.

On January 4, 2006 I interviewed another former houseman, Mr Alfredo Rodriguez. During a sworn taped statement, Mr. Rodriguez stated he was employed by Jeffrey Epstein for approximately six months, from November 2004 through May of 2005. His responsibilities as house manager included being the butler, chauffeur, chef, houseman, run errands for Epstein and provide for Epstein's guests. I asked Rodriguez about masseuses coming to the house. Rodriguez stated Epstein would have two massages a day. Epstein would have one massage in the morning and one massage in the afternoon everyday he was in residence. Rodriguez stated he would be informed to expect someone and make them comfortable until either [redacted] or Epstein would meet with them. Rodriguez stated once the masseuses would arrive, he would allow them entry into the kitchen area and offer them something to drink or eat. They would then be encountered by either [redacted] or Epstein. They would be taken upstairs to provide the massage. I asked Rodriguez if any of the masseuses appeared young in age. Rodriguez stated the girls that would come appeared to be too young to be masseuses. He stated one time under Epstein's direction, he delivered a dozen roses to [redacted] High School for one of the girls that came to provide a massage. He knew the girls were still in high school and were of high school age. I asked Rodriguez about the massages. He felt there was a lot more going on than just massages. He would often clean Mr. Epstein's bedroom after the alleged massages and would discover massagers/vibrators and sex toys scattered on the floor. He also said he would wipe down the vibrators and sex toys and put them away in an armoire. He described the armoire as a small wood armoire which was on the wall close to Epstein's

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bed. On one occasion Epstein ordered Rodriguez to go to the Dollar rent a car and rent a car for the same girl he brought the roses to, so that she could drive her self to Epstein's house without incident. Rodriguez said the girl always needed rides to and from the house. Rodriguez produced a green folder which contained documents, and a note with Mr. Epstein's stationary with direction to deliver a bucket of roses to [redacted] High School after [redacted] high school drama performance. Also in that same note was direction to rent a car for [redacted] and direction to extend the rental contract.

During the course of the investigation, subpoenas were obtained for cell phone and home phone records from several victims and witnesses along with the cell phone records of [redacted]. An analysis of these records was conducted which found numerous telephone calls were made between [redacted] and the victims. These records indicate the dates the calls were made are consistent with the dates and times they victims/witnesses stated they were contacted. Specifically, The phone records showed [redacted] called [redacted] during the exact times and dates when victim [redacted] advised the incident occurred. [redacted] also coordinated the encounters with [redacted] and [redacted] during the time frame the girls stated they occurred.

Pursuant to a lawful subpoena I obtained Epstein's private plane records for 2005 from Jet Aviation. The plane records show arrival and departure of Epstein's plane at Palm Beach International airport. These records were compared to the cell phone records of [redacted] This comparison found that all the phone calls [redacted] made to [redacted] and the victims were made in the days just prior to their arrival or during the time Epstein was in Palm Beach.

Jeffrey Epstein, who at the time of these incidents was fifty one years of age, did have vaginal intercourse either with his penis or digitally with [redacted] and [redacted] who were minors at the time this occurred, and who at the time of the incident was fifty two years of age, did use a vibrator on the external vaginal area of [redacted] a fourteen year old minor. Therefore, as [redacted] coordinated and aided in the recruitment of minors to frequent Epstein's house so that sexual services were provided to Epstein, scheduled the said minors to return to the work for Epstein, secured their appointments for the purpose of sexual activity and lewd and lascivious acts and arranged the bedroom for said minors, there is sufficient probable cause to charge [redacted] with four counts of Principal in the 1st degree Unlawful Sexual Activity with a Minor, in violation of Florida State Statute 794.05(1) , a second degree felony and there is sufficient probable cause to charge her with Lewd and Lascivious Molestation, in violation of Florida State Statute 800.04 (5), a second degree felony.

The foregoing instrument was sworn to or affirmed before me this 1st day of May, 2006 by Det Joe Recarey, who is personally known to me.

State of Florida
County of Palm Beach

Signature/Arresting Officer

Signature of Police Officer (F.S.S. 117.10)

Date: 05/01/2006

EFTA00232040

INCIDENT REPORT

1
01L

EFTA00232041

Case No. . . . : 1-05-000368
SPECIAL NOTES : DO NOT RELEASE Occur From Date: 1/27/05 0000
Occur To Date : 1/27/05 0000 Report Date . : 3/14/05 1600
Day Of Week . : Thursday
Common/Location: 358 EL BRILLO WY
City . . . . . : PALM BEACH, FL
Location Type : RESIDENCE-SINGLE FAMILY
Beat Assignment: DETECTIVE BUREAU Map Reference : 10
Dept Class . . : SEXUAL BATTERY Report Officer : PAGAN, MICHELE
Case Status . : OPEN / ACTIVE Case Status Dt : 3/14/05
Supervisory Dt.: [redacted], [redacted] 3/14/05
Entry Date . . : [redacted], [redacted] 4/06/05
Names? . . . . : Property? . . :
Vehicles? . . : Offenses? . . :
Narrative? . . : Related Cases? :

********* V E H I C L E I N F O R M A T I O N # 1 **********
Case number . : 1-05-000368 Category . . . :
State Veh Type : Year . . . . . : 0
Make . . . . . : Model . . . . . :
Model Name . . : Permit Number :
Style . . . . : Color - Top . :
Color - Bottom : License # . . :
VIN . . . . . : Stolen value . : 0
Disposition . : Insured . . . :
Insured by . . : Keys in car . :
Vehicle locked : Lein holder . :
Date recovered : 0/00/00 Recovery value : 0
Street number :
City . . . . . :
Recovery code : NCIC number . :
Be On Look Out?:

********* P E R S O N R E P O R T I N G I N F O - # 1 *********
Case Number . : 1-05-000368 Last Name . . : [redacted]
Street Number : [redacted]
City . . . . . : [redacted] 33412
Birth Date/Age : [redacted] Employer? . . :
Occupation . . : Oper Lic No. . : [redacted]
Home Phone No. : [redacted] Race . . . . . : White
Sex . . . . . : Female Height . . . . : 0
Weight . . . . : 0 Other Phone Nbr:

********** S U S P E C T / A R R E S T E E I N F O R M A T I O N - # 1 **
Case Number . : 1-05-000368 Prompt valid in: [redacted]
Street Number : [redacted]
City . . . . . : ROYAL PALM BEACH, FL 334121460
Birth Date . . : [redacted] Maximum Age . : 18
Employer? . . : Occupation . . :
Oper Lic No. . : [redacted] Home Phone No. :
Other Phone Nbr: Race . . . . . : White
Sex . . . . . : Female Minimum Height : 0
Minimum Weight : 0 Maximum Height : 0

Case No. . . . : 1-05-000368 (Continued)

Maximum Weight	0	Misc. ID#	
Aliases?		MO/Crime Spec?	
Hair Color		Hair Length	
Hair Style		Eye Color	
Glasses		Complexion	
Facial Hair		Build	
Teeth		Speech	
Hat		Coat	
Shirt		Pants	
Shoes		Body Marks #1	
Body Marks #2		Body Marks #3	
Body Marks #4		Status	STILL SUSPECT
Arrest Case No.		Additional UCR?	

********** S U S P E C T / A R R E S T E E I N F O R M A T I O N - # 2 **

Case Number	1-05-000368	Prompt valid in:	[redacted]
Street Number	358 EL BRILLO WY		
City	PALM BEACH, FL 000033480		
Birth Date	[redacted]	Maximum Age	25
Employer?		Occupation	PERSONAL ASST/EPSTEIN
Oper Lic No.	[redacted]	Home Phone No.	[redacted]
Other Phone Nbr	[redacted]	Race	White
Sex	Female	Minimum Height	0
Minimum Weight	0	Maximum Height	0
Maximum Weight	0	Misc. ID#	
Aliases?		MO/Crime Spec?	
Hair Color		Hair Length	
Hair Style		Eye Color	
Glasses		Complexion	
Facial Hair		Build	
Teeth		Speech	
Hat		Coat	
Shirt		Pants	
Shoes		Body Marks #1	
Body Marks #2		Body Marks #3	
Body Marks #4		Status	STILL SUSPECT
Arrest Case No.		Additional UCR?	

********** S U S P E C T / A R R E S T E E I N F O R M A T I O N - # 3 **

Case Number	1-05-000368	Prompt valid in:	EPSTEIN, JEFFREY
Street Number	358 EL BRILLO WY		
City	PALM BEACH, FL 000033480		
Birth Date	[redacted]	Maximum Age	52
Employer?		Occupation	
Oper Lic No.	[redacted]	Home Phone No.	
Other Phone Nbr		Race	White
Sex	Male	Minimum Height	0
Minimum Weight	0	Maximum Height	0
Maximum Weight	0	Misc. ID#	
Aliases?		MO/Crime Spec?	
Hair Color		Hair Length	
Hair Style		Eye Color	

Case No. . . . : 1-05-000368 (Continued)

Glasses . . . :		Complexion . . :	
Facial Hair . :		Build . . . . :	
Teeth . . . . :		Speech . . . . :	
Hat . . . . . :		Coat . . . . . :	
Shirt . . . . :		Pants . . . . :	
Shoes . . . . :		Body Marks #1 :	
Body Marks #2 :		Body Marks #3 :	
Body Marks #4 :		Status . . . . :	STILL SUSPECT
Arrest Case No.:		Additional UCR?:	

********** V I C T I M I N F O R M A T I O N - # 1 **********

Case Number . :	1-05-000368		
Prompt valid in:	[redacted]		
Street Number :	[redacted]		
City . . . . . :	[redacted]33412		
Birth Date/Age :	[redacted]	Employer? . . :	
Occupation . . :	STUDENT	Oper Lic No. . :	
Home Phone No. :	[redacted]	Race . . . . . :	White
Sex . . . . . :	Female	Height . . . . :	0
Weight . . . . :	0	Misc. ID# . . :	
Be On Look Out?:		Other Phone Nbr:	
Victim Type . :	JUVENILE	Residency Type :	
Residency Sts :		File Charges . :	
Can Identify . :		Victim Sobriety:	
Injury Extent :		Injury Type 1 :	
Injury Type 2 :		Hospital ID . :	
Med Treatment :		Phys First Name:	
Phys Last Name :			

********** V I C T I M I N F O R M A T I O N - # 2 **********

Case Number . :	1-05-000368	Prompt valid in:	[redacted] M
Street Number :			
City . . . . . :	PALM BEACH, FL 000033480		
Birth Date/Age :	[redacted]	Employer? . . :	
Occupation . . :		Oper Lic No. . :	
Home Phone No. :	[redacted]	Race . . . . . :	White
Sex . . . . . :	Female	Height . . . . :	0
Weight . . . . :	0	Misc. ID# . . :	
Be On Look Out?:		Other Phone Nbr:	[redacted]
Victim Type . :	ADULT	Residency Type :	
Residency Sts :		File Charges . :	
Can Identify . :		Victim Sobriety:	
Injury Extent :		Injury Type 1 :	
Injury Type 2 :		Hospital ID . :	
Med Treatment :		Phys First Name:	
Phys Last Name :			

********** V I C T I M I N F O R M A T I O N - # 3 **********

Case Number . :	1-05-000368	Prompt valid in:	[redacted]
Street Number :			
City . . . . . :	PALM BEACH, FL 000033480		
Birth Date/Age :	[redacted]	Employer? . . :	

Case No. . . . : 1-05-000368 (Continued)

Occupation . . :		Oper Lic No. . :	
Home Phone No. :	[redacted]	Race . . . . . :	White
Sex . . . . . :	Female	Height . . . . :	0
Weight . . . . :	0	Misc. ID# . . :	
Be On Look Out?:		Other Phone Nbr:	[redacted]
Victim Type . :	JUVENILE	Residency Type :	
Residency Sts :		File Charges . :	
Can Identify . :		Victim Sobriety:	
Injury Extent :		Injury Type 1 :	
Injury Type 2 :		Hospital ID . :	
Med Treatment :		Phys First Name:	
Phys Last Name :			

********** V I C T I M I N F O R M A T I O N - # 4 **********

Case Number . :	1-05-000368	Prompt valid in:	[redacted] [redacted]
Street Number :			
City . . . . . :	PALM BEACH, FL 000033480		
Birth Date/Age :	[redacted]	Employer? . . :	
Occupation . . :		Oper Lic No. . :	
Home Phone No. :	[redacted]	Race . . . . . :	White
Sex . . . . . :	Female	Height . . . . :	0
Weight . . . . :	0	Misc. ID# . . :	
Be On Look Out?:		Other Phone Nbr:	[redacted]
Victim Type . :	JUVENILE	Residency Type :	
Residency Sts :		File Charges . :	
Can Identify . :		Victim Sobriety:	
Injury Extent :		Injury Type 1 :	
Injury Type 2 :		Hospital ID . :	
Med Treatment :		Phys First Name:	
Phys Last Name :			

********** V I C T I M I N F O R M A T I O N - # 5 **********

Case Number . :	1-05-000368	Prompt valid in:	[redacted] [redacted] A
Street Number :			
City . . . . . :	PALM BEACH, FL 000033480		
Birth Date/Age :	[redacted]	Employer? . . :	
Occupation . . :		Oper Lic No. . :	
Home Phone No. :	[redacted]	Race . . . . . :	White
Sex . . . . . :	Female	Height . . . . :	0
Weight . . . . :	0	Misc. ID# . . :	
Be On Look Out?:		Other Phone Nbr:	[redacted]
Victim Type . :	ADULT	Residency Type :	
Residency Sts :		File Charges . :	
Can Identify . :		Victim Sobriety:	
Injury Extent :		Injury Type 1 :	
Injury Type 2 :		Hospital ID . :	
Med Treatment :		Phys First Name:	
Phys Last Name :			

********** V I C T I M I N F O R M A T I O N - # 6 **********

Case Number . : 1-05-000368
Prompt valid in: [redacted] [redacted] [redacted]

Case No. . . . : 1-05-000368 (Continued)
Street Number :
City . . . . . : PALM BEACH, FL 000033480
Birth Date/Age : [redacted] Employer? . . :
Occupation . . : Oper Lic No. . :
Home Phone No. : [redacted] Race . . . . . : White
Sex . . . . . : Female Height . . . . : 0
Weight . . . . : 0 Misc. ID# . . :
Be On Look Out?: Other Phone Nbr: [redacted]
Victim Type . : JUVENILE Residency Type :
Residency Sts : File Charges . :
Can Identify . : Victim Sobriety:
Injury Extent : Injury Type 1 :
Injury Type 2 : Hospital ID . :
Med Treatment : Phys First Name:
Phys Last Name :

********** V I C T I M I N F O R M A T I O N - # 7 **********
Case Number . : 1-05-000368 Prompt valid in: [redacted]
Street Number :
City . . . . . : PALM BEACH, FL 000033480
Birth Date/Age : [redacted] Employer? . . :
Occupation . . : Oper Lic No. . :
Home Phone No. : [redacted] Race . . . . . : White
Sex . . . . . : Female Height . . . . : 0
Weight . . . . : 0 Misc. ID# . . :
Be On Look Out?: Other Phone Nbr: [redacted]
Victim Type . : JUVENILE Residency Type :
Residency Sts : File Charges . :
Can Identify . : Victim Sobriety:
Injury Extent : Injury Type 1 :
Injury Type 2 : Hospital ID . :
Med Treatment : Phys First Name:
Phys Last Name :

********** V I C T I M I N F O R M A T I O N - # 8 **********
Case Number . : 1-05-000368 Prompt valid in: [redacted]
Street Number :
City . . . . . : PALM BEACH, FL 000033480
Birth Date/Age : [redacted] Employer? . . :
Occupation . . : Oper Lic No. . :
Home Phone No. : [redacted] Race . . . . . : White
Sex . . . . . : Female Height . . . . : 0
Weight . . . . : 0 Misc. ID# . . :
Be On Look Out?: Other Phone Nbr: [redacted]
Victim Type . : JUVENILE Residency Type :
Residency Sts : File Charges . :
Can Identify . : Victim Sobriety:
Injury Extent : Injury Type 1 :
Injury Type 2 : Hospital ID . :
Med Treatment : Phys First Name:
Phys Last Name :

********** V I C T I M I N F O R M A T I O N - # 9 **********

Case No. . . . . : 1-05-000368 (Continued)
Case Number . . : 1-05-000368 Prompt valid in: [redacted]
Street Number . :
City . . . . . : PALM BEACH, FL 000033480
Birth Date/Age : [redacted] Employer? . . :
Occupation . . . : Oper Lic No. . :
Home Phone No. : [redacted] Race . . . . . : White
Sex . . . . . : Female Height . . . . : 0
Weight . . . . : 0 Misc. ID# . . :
Be On Look Out?: Other Phone Nbr: [redacted]
Victim Type . . : JUVENILE Residency Type :
Residency Sts . : File Charges . :
Can Identify . : Victim Sobriety:
Injury Extent . : Injury Type 1 . :
Injury Type 2 . : Hospital ID . . :
Med Treatment . : Phys First Name:
Phys Last Name :

********** V I C T I M I N F O R M A T I O N - # 10 **********
Case Number . . : 1-05-000368
Prompt valid in: [redacted]
Street Number . :
City . . . . . : PALM BEACH, FL 000033480
Birth Date/Age : [redacted] Employer? . . :
Occupation . . . : Oper Lic No. . :
Home Phone No. : [redacted] Race . . . . . : White
Sex . . . . . : Female Height . . . . : 0
Weight . . . . : 0 Misc. ID# . . :
Be On Look Out?: Other Phone Nbr: [redacted]
Victim Type . . : JUVENILE Residency Type :
Residency Sts . : File Charges . :
Can Identify . : Victim Sobriety:
Injury Extent . : Injury Type 1 . :
Injury Type 2 . : Hospital ID . . :
Med Treatment . : Phys First Name:
Phys Last Name :

********** V I C T I M I N F O R M A T I O N - # 11 **********
Case Number . . : 1-05-000368 Prompt valid in: [redacted]
Street Number . :
City . . . . . : PALM BEACH, FL 000033480
Birth Date/Age : 8/09/1986 18 Employer? . . :
Occupation . . . : Oper Lic No. . :
Home Phone No. : [redacted] Race . . . . . : White
Sex . . . . . : Female Height . . . . : 0
Weight . . . . : 0 Misc. ID# . . :
Be On Look Out?: Other Phone Nbr: [redacted]
Victim Type . . : ADULT Residency Type :
Residency Sts . : File Charges . :
Can Identify . : Victim Sobriety:
Injury Extent . : Injury Type 1 . :
Injury Type 2 . : Hospital ID . . :
Med Treatment . : Phys First Name:

Case No. . . . : 1-05-000368 (Continued)
Phys Last Name :

********** V I C T I M I N F O R M A T I O N - # 12 **********

Case Number . :	1-05-000368	Prompt valid in:	[redacted]
Street Number :			
City . . . . . :	PALM BEACH, FL 000033480		
Birth Date/Age :	[redacted]	Employer? . . :	
Occupation . . :		Oper Lic No. . :	
Home Phone No. :	[redacted]	Race . . . . . :	White
Sex . . . . . :	Female	Height . . . . :	0
Weight . . . . :	0	Misc. ID# . . :	
Be On Look Out?:		Other Phone Nbr:	[redacted]
Victim Type . :	ADULT	Residency Type :	
Residency Sts :		File Charges . :	
Can Identify . :		Victim Sobriety:	
Injury Extent :		Injury Type 1 :	
Injury Type 2 :		Hospital ID . :	
Med Treatment :		Phys First Name:	
Phys Last Name :			

********** V I C T I M I N F O R M A T I O N - # 13 **********

Case Number . :	1-05-000368	Prompt valid in:	[redacted]
Street Number :			
City . . . . . :	PALM BEACH, FL 000033480		
Birth Date/Age :	[redacted]	Employer? . . :	
Occupation . . :		Oper Lic No. . :	
Home Phone No. :	[redacted]	Race . . . . . :	White
Sex . . . . . :	Female	Height . . . . :	0
Weight . . . . :	0	Misc. ID# . . :	
Be On Look Out?:		Other Phone Nbr:	[redacted]
Victim Type . :	JUVENILE	Residency Type :	
Residency Sts :		File Charges . :	
Can Identify . :		Victim Sobriety:	
Injury Extent :		Injury Type 1 :	
Injury Type 2 :		Hospital ID . :	
Med Treatment :		Phys First Name:	
Phys Last Name :			

[redacted]

********** V I C T I M I N F O R M A T I O N - # 14 **********

Case Number . :	1-05-000368	Prompt valid in:	[redacted]
Street Number :			
City . . . . . :	PALM BEACH, FL 000033480		
Birth Date/Age :	[redacted]	Employer? . . :	
Occupation . . :		Oper Lic No. . :	
Home Phone No. :	[redacted]	Race . . . . . :	White
Sex . . . . . :	Female	Height . . . . :	0
Weight . . . . :	0	Misc. ID# . . :	
Be On Look Out?:		Other Phone Nbr:	[redacted]
Victim Type . :	JUVENILE	Residency Type :	
Residency Sts :		File Charges . :	
Can Identify . :		Victim Sobriety:	
Injury Extent :		Injury Type 1 :	

Case No. . . . : 1-05-000368 (Continued)
Injury Type 2 : Hospital ID . :
Med Treatment : Phys First Name:
Phys Last Name :

********** V I C T I M I N F O R M A T I O N - # 15 **********
Case Number . : 1-05-000368 Prompt valid in: [redacted]
Street Number :
City . . . . . : PALM BEACH, FL 000033480
Birth Date/Age : [redacted] Employer? . . :
Occupation . . : Oper Lic No. . :
Home Phone No. : [redacted] Race . . . . . : White
Sex . . . . . : Female Height . . . . : 0
Weight . . . . : 0 Misc. ID# . . :
Be On Look Out?: Other Phone Nbr: [redacted]
Victim Type . : [redacted] Residency Type :
Residency Sts : File Charges . :
Can Identify . : Victim Sobriety:
Injury Extent : Injury Type 1 :
Injury Type 2 : Hospital ID . :
Med Treatment : Phys First Name:
Phys Last Name :

********** [redacted] I N F O R M A T I O N - # 16 **********
Case Number . : [redacted] Prompt valid in: [redacted]
Street Number :
City . . . . . : [redacted] 000033480
Birth Date[redacted] : [redacted] Employer? . . :
[redacted] . . : Oper Lic No. . :
[redacted] : [redacted] Race . . . . . : White
. . : Female Height . . . . : 0
. . : 0 Misc. ID# . . :
Be On Look Out?: Other Phone Nbr: [redacted]
Victim Type . : JUVENILE Residency Type :
Residency Sts : File Charges . :
Can Identify . : Victim Sobriety:
Injury Extent : Injury Type 1 :
Injury Type 2 : Hospital ID . :
Med Treatment : Phys First Name:
Phys Last Name :

********** V I C T I M I N F O R M A T I O N - # 17 **********
Case Number . : 1-05-000368 Prompt valid in: [redacted]
Street Number :
City . . . . . : PALM BEACH, FL 000033480
Birth Date/Age : [redacted] Employer? . . :
Occupation . . : Oper Lic No. . :
Home Phone No. : [redacted] Race . . . . . : White
Sex . . . . . : Female Height . . . . : 0
Weight . . . . : 0 Misc. ID# . . :
Be On Look Out?: Other Phone Nbr: [redacted]
Victim Type . : JUVENILE Residency Type :
Residency Sts : File Charges . :

Case No. . . . : 1-05-000368 (Continued)
Can Identify . : Victim Sobriety:
Injury Extent : Injury Type 1 :
Injury Type 2 : Hospital ID . :
Med Treatment : Phys First Name:
Phys Last Name :

********* O T H E R P E R S O N I N F O R M A T I O N - # 1 *********
Case Number . : 1-05-000368 Last Name . . [redacted]
Street Number : [redacted]
City . . . . . : WEST PALM BEACH, FL 33411
Birth Date/Age : [redacted] Employer? . . :
Occupation . . : STUDENT Oper Lic No. . :
Home Phone No. : [redacted] Race . . . . . : White
Sex . . . . . : Female Height . . . . : 0
Weight . . . . : 0 Person Type . : OTHER PERSON
Other Phone Nbr:

********* O T H E R P E R S O N I N F O R M A T I O N - # 2 *********
Case Number . : 1-05-000368 Last Name . . : [redacted]
Street Number : 358 EL BRILLO WY
City . . . . . : PALM BEACH, FL 000033480
Birth Date/Age : [redacted] Employer? . . :
Occupation . . : Oper Lic No. . : [redacted]
Home Phone No. : Race . . . . . : White
Sex . . . . . : Female Height . . . . : 510
Weight . . . . : 0 Person Type . : OTHER PERSON
Other Phone Nbr:

********* O T H E R P E R S O N I N F O R M A T I O N - # 3 *********
Case Number . : 1-05-000368 Last Name . . : [redacted]
Street Number : [redacted]
City . . . . . : ROYAL PALM BEACH, FL 33411
Birth Date/Age : [redacted] Employer? . . :
Occupation . . : Oper Lic No. . :
Home Phone No. : [redacted] Race . . . . . : White
Sex . . . . . : Female Height . . . . : 0
Weight . . . . : 0 Person Type . : OTHER PERSON
Other Phone Nbr: [redacted]

********* O T H E R P E R S O N I N F O R M A T I O N - # 4 *********
Case Number . : 1-05-000368 Last Name . . : [redacted] L
Street Number : [redacted]
City . . . . . : [redacted] 33411
Birth Date/Age : [redacted] Employer? . . :
Occupation . . : PAINTER Oper Lic No. . :
Home Phone No. : [redacted] Race . . . . . : White
Sex . . . . . : Male Height . . . . : 0
Weight . . . . : 0 Person Type . : OTHER PERSON
Other Phone Nbr:

********* O T H E R P E R S O N I N F O R M A T I O N - # 5 *********
Case Number . : 1-05-000368 Last Name . . : [redacted]

Case No. . . . : 1-05-000368 (Continued)
Street Number :
City . . . . . :
Birth Date/Age : 0/00/0000 0 Employer? . . :
Occupation . . : FAMILY THERAPIST Oper Lic No. . :
Home Phone No. : [redacted] Race . . . . . : White
Sex . . . . . : Female Height . . . . : 0
Weight . . . . : 0 Person Type . : OTHER PERSON
Other Phone Nbr: [redacted]

EMPLOYER INFORMATION
Case Number . : 1-05-000368
Employer Name : PBC DIVISON OF YOUTH AFFAIRS
Address . . . : 4200 N AUSTRALIAN AV
City/State/Zip : WEST PALM BEACH, FL 33407
Phone Number . : [redacted]

********* O T H E R P E R S O N I N F O R M A T I O N - # 6 *********
Case Number . : 1-05-000368 Last Name . . : [redacted]
Street Number : [redacted]
City . . . . . : WELLINGTON, FL 33414
Birth Date/Age : [redacted] Employer? . . :
[redacted] . . : [redacted] Oper Lic No. . :
Home Phone No. : [redacted] Race . . . . . : White
Sex . . . . . : Male Height . . . . : 0
Weight . . . . : 0 Person Type . : OTHER PERSON
Other Phone Nbr:

EMPLOYER INFORMATION
Case Number . : 1-05-000368 Employer Name : [redacted]
Address . . . : [redacted]
City/State/Zip : WEST PALM BEACH, FL 33415
Phone Number . :

********* O T H E R P E R S O N I N F O R M A T I O N - # 7 *********
Case Number . : 1-05-000368 Last Name . . : [redacted]
Street Number : [redacted]
City . . . . . : WEST PALM BEACH, FL 33412
Birth Date/Age : 0/00/0000 0 Employer? . . :
Occupation . . : Oper Lic No. . :
Home Phone No. : 561/[redacted] Race . . . . . : White
Sex . . . . . : Male Height . . . . : 0
Weight . . . . : 0 Person Type . : OTHER PERSON
Other Phone Nbr:

********* O T H E R P E R S O N I N F O R M A T I O N - # 8 *********
Case Number . : 1-05-000368 Last Name . . : [redacted]
Street Number : [redacted]
City . . . . . : [redacted] FL 33411
Birth Date/Age : 0/00/0000 0 Employer? . . :
Occupation . . : Oper Lic No. . :
Home Phone No. : 561/[redacted] Race . . . . . :
Sex . . . . . : Female Height . . . . : 0

Case No. . . . : 1-05-000368 (Continued)
Weight . . . . : 0 Person Type . : OTHER PERSON
Other Phone Nbr:

********* O T H E R P E R S O N I N F O R M A T I O N - # 9 *********
Case Number . : 1-05-000368 Last Name . . : [redacted]
Street Number : [redacted]
City . . . . . : WEST PALM BEACH, FL 33417
Birth Date/Age : [redacted] 16 Employer? . . :
Occupation . . : Oper Lic No. . : [redacted] FL
Home Phone No. : [redacted] Race . . . . . : White
Sex . . . . . : Female Height . . . . : 0
Weight . . . . : 0 Person Type . : OTHER PERSON
Other Phone Nbr: [redacted]

********** N A R R A T I V E # 1 **********
Original Report LO Reported By: [redacted] 9/20/05
Entered By.: [redacted] 9/20/05

On 03/14/2005, I received a call from a woman who did not wish to identify herself (later identified as [redacted]. She stated that her fourteen year old step daughter (later identified as [redacted] possibly may have been molested in Palm Beach by a wealthy man. According to [redacted] she learned of the possible molestation by a third party. She explained that she had received a call from the mother of her stepdaughter's friend. The mother claimed to have overheard a conversation between her daughter and a male friend; they were talking about [redacted] The conversation was about how [redacted] had met with a 45-year-old man and had sex with him and was paid for it. I advised [redacted] that I would like to meet with her to obtain a more detailed statement and facts. [redacted] stated she did not know what to do and had to discuss the matter with her husband. At this point [redacted] did not provide me with a call back number or any other information. She stated that she would contact me once she had spoken with her husband and [redacted] mother.

On 03/14/2005 received a call from Mr. & Mrs. [redacted] They stated it was all right to speak to their daughter [redacted] via cell phone 561 [redacted] Her mother [redacted] had been made aware of the case. They agreed to meet me at the police department later this date. (561[redacted].

On 03/14/2005, Mr. [redacted] accompanied by his wife [redacted] came to the Palm Beach Police Department where they advised me that they believed their fourteen year old daughter may have had some type of sexual relationship with an older male who resided in Palm Beach. Neither knew the suspect's name or address. Both stated that their daughter did not talk to them about the incident, nor would she admit to it.

[redacted] identified his daughter as [redacted] w/f, DOB [redacted] resides with her biological mother [redacted] at [redacted]. [redacted] is a [redacted],

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her sister [redacted] resides with Mr. [redacted] Both [redacted] and [redacted] are currently attending [redacted] vocational school, which is an involuntary admitted juvenile educational facility. [redacted] stays at the facility during the week and comes home on the weekend. According to [redacted] she was admitted to the school because of disciplinary problems that recently escalated. The facility also coordinates with the families to provide one on one as well as family counseling.

According to Mrs. [redacted] she believes the incident occurred on Sunday, Feb 6, 2005. A friend of [redacted] named [redacted] picked her up at their house and left. They believe [redacted] initiated the relationship with the older gentleman, though they do not have any proof. [redacted] lives close by with her mother. Mrs. [redacted] further explained that [redacted] was introduced to [redacted] by [redacted] [redacted] a boy she was dating (goes to [redacted], plays baseball). Mrs. [redacted] continued that on Sunday, [redacted] picked up [redacted] and drove to Palm Beach where they met the man. Supposedly, the man has a lot of money and often has young girls come over to his house. [redacted] offers these girls a way to make fast cash. The man starts with a massage. If he likes them, he keeps them around and does more. The [redacted] did not have any information on [redacted] other than she lives on 72nd Place North, the last house on right side (north side).

Mrs. [redacted] talked of a conversation that she had with [redacted] the mother of [redacted] [redacted] a former friend of [redacted] She found it strange that they were no longer friends until she received the call from her mother telling her of the conversation she overheard between [redacted] and a boy named [redacted].

Mrs. [redacted] told me of an incident that occurred on 02/09/2005. [redacted] got into a fight at school ([redacted] HS). Mrs. Brown Assistant Principal, found over $300.00 in [redacted] s purse. [redacted] gave different explanations for the large sum of money. Initially the school administration thought it was drug related but then dismissed the claim. Since that day, [redacted] did not return to school; she ran away Thursday, 02/10th or Friday 02/11 and returned to her mother's house later that night after midnight. It was not until after [redacted] received the call from [redacted] mother, [redacted] 561[redacted], that she learned [redacted] was the girl that got into the fight with [redacted] The fight was instigated when [redacted] accused [redacted] of being a prostitute.

[redacted] who has legal joint custody of his daughter [redacted] signed the affidavit of prosecution indicating he wished to prosecute against the inappropriate sexual behavior with his fourteen-year-old daughter.

Mr. [redacted] stated that he had no objections with our agency speaking with his daughter [redacted] about the incident. Mr. [redacted] stated that [redacted] mother [redacted] is aware of the allegations and also was willing to cooperate. According to Mrs. [redacted] she does not believe her daughter had any additional contact with the suspect as she was with

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her mother and then placed into [redacted].

I contacted the School Board Police who provided me the information for [redacted], also known as [redacted] Family Center 840 - 4540. 4200 N Australian Avenue, West Palm Beach, Florida. Checking the school board records for [redacted] and [redacted] there was no disciplinary record found. I was advised if no disciplinary action was taken for a fight, such as an expulsion or detention, the incident may not have been recorded. This was at the discretion of the individual school security and principal.

03/15/2005, I called the Palm Beach County Sheriff's Office and left a message for PBSP Sgt. Chris Keen, Child Abuse Unit.

On 03/15/2005, I went to [redacted] where I met with white female [redacted] Also present was [redacted], [redacted] therapist. During an audiotaped interview, I spoke with [redacted] about the allegations that were made. [redacted] initially denied anything had happened, only admitting to going with [redacted] (later identified as [redacted] to Palm Beach to pick up money [redacted] was owed. [redacted] identified [redacted] as the cousin of her former boyfriend [redacted] She ultimately admitted to knowing that [redacted] worked for a wealthy man and possibly did sexual favors for him. She also admitted that [redacted] had offered her an opportunity to make money.

[redacted] identified [redacted] boss as a white male named "Jeff" who lived in Palm Beach (later positively identified as Jeffrey Epstein). [redacted] explained that she was first approached by [redacted] to go with her to Jeff's house, when they were at [redacted] house. According to [redacted] she was not sure exactly what was going on with [redacted] but agreed to go with her. [redacted] ([redacted] boyfriend) became angry when he heard [redacted] inviting [redacted] to accompany her. [redacted] believed it was to pick up money the man owed [redacted] [redacted] stated [redacted] told her that she would pick her up at her house on Sunday. [redacted] was not sure of the exact dates but knew it was a Sunday. According to [redacted] along with an unknown, possibly Hispanic female, picked her up at her father's house on [redacted] told her father that they were going shopping. It was later confirmed by Daniel [redacted] that [redacted] picked his daughter up. According to Mr. [redacted] drove a pick up truck.

[redacted] drove [redacted] along with the unknown female to Palm Beach. Sometime on the way there, a conversation occurred between [redacted] and [redacted] whereby [redacted] told [redacted] that if Jeff asked her ([redacted] age, she should say she was eighteen.

[redacted] recalled that Jeff's house was on a dead end street. All three girls walked up a driveway, past what appeared to be a small guard/security room. In fact, [redacted] recalled a male approaching them asking what they wanted. [redacted] stated they were there to see Jeff. The male allowed them to continue walking up to the house.

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[redacted] stated the man told them that Epstein was not there but was expected back. He allowed them to enter the house, via the kitchen. He offered them something to drink while they waited inside. Shortly after, Epstein and a woman, described as white with blond hair entered the kitchen. [redacted] believed the woman was Epstein's Assistant. [redacted] added that the woman did not seem friendly and kept her responses short and direct. Epstein introduced himself to [redacted] as Jeff . [redacted] got the impression that Epstein and [redacted] friend knew each other. [redacted] described Epstein as being approximately forty-five years old, a long face, and bushy eyebrows, with graying hair.

[redacted] and Epstein left the kitchen leaving [redacted] and [redacted] friend alone in the kitchen. They returned a short time later. They all spoke briefly in the kitchen. While speaking to me, [redacted] became upset and started to cry. [redacted] stated the woman instructed her to follow her upstairs, which she did. According to [redacted] the woman led her to a room that had a massage table in it. The woman started to fix up the room, putting the covers on the table and taking lotions out. She then told [redacted] that Epstein would be up in a second. The woman left the room, and soon after, Epstein walked in and told [redacted] to take off her clothes. As [redacted] was telling me what had happened, she looked away from me, and with a pointed finger, repeatedly pressed it into her thigh. [redacted] stated he was stern when he told her to take off her clothes. [redacted] said she did not know what to do as she was the only one there. [redacted] took off her shirt leaving her bra on. Epstein, dressed in a towel told her to take off everything. [redacted] stated she removed her pants leaving her thong panties on. Epstein then instructed her to give him a massage pointing to a specific lotion for her to use. Epstein laid on the table, face down. As [redacted] began to give Epstein the massage, he told her to get on his back. [redacted] stated she straddled herself on Epstein's back. [redacted] stated her exposed buttocks were touching Epstein s bare buttocks. As [redacted] was giving Epstein the massage, he turned around, and wacked off ([redacted] later explained that wacking off was masturbating). [redacted] stated she was disgusted by Epstein's actions but did not say anything. According to [redacted] Epstein told her that she "had a really hot body." Epstein excused himself and went to the bathroom where she believed he masturbated again. Epstein returned to the room and told [redacted] that he was done and gave her three hundred dollars. They went back down stairs where they met [redacted] Epstein said good-bye and they left. [redacted] asked [redacted] how did it go and asked what did she ([redacted] do. When [redacted] told [redacted] that Epstein asked for a massage, [redacted] allegedly stated "I know." [redacted] stated they then went shopping. [redacted] stated [redacted] also got paid, but that she did not know why since she was confident that [redacted] did not do anything.

[redacted] described Epstein's house as a two [redacted] pink house with a Cadillac Escalade parked in the driveway. There were gates leading into the property. From the kitchen, [redacted] recalled walking up a flight of stairs, lined with photographs, to a room. Upon entering

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the room there was a large bathroom to the right. [redacted] recalled a hot pink and green sofa in the room. There was a door on each side of the sofa. [redacted] recalled there being a mural of a naked woman in the room, as well as several photographs of naked women on a shelf.

[redacted] stated Epstein did not change in front of her but did take off his towel, exposing himself. [redacted] recalled Epstein being hairy especially on his chest. Epstein also had a hairline that continued to his buttocks. [redacted] admitted to seeing his penis. I asked [redacted] if she knew what being circumcised meant and she stated no. [redacted] then said that she thought Epstein was on steroids because he was a "really built guy and his wee wee was very tiny." [redacted] would explain that when she stated "wee wee" she meant penis. [redacted] stated Epstein exposed himself when he took his towel off, placing it on the floor as he laid down on the table.

[redacted] said Epstein was specific in his instruction to her on how to massage, telling her to go clockwise, etc. [redacted] recalled that Epstein got up from the table and went to the bathroom where she heard him making, what she believed to be sexual type of noises. (moaning) He then returned to the room where he again laid down on the table. Epstein then turned over and instructed [redacted] to massage his boobs. As she did this, Epstein continued to make moaning noises.

[redacted] resumed massaging his chest area. [redacted] was now standing on the ground. Epstein turned to his side, and with the towel on the ground started to rub his penis in an up and down motion. [redacted] stated Epstein held on to the small of her back as she massaged his chest, back and shoulder area. [redacted] recalled Epstein ejaculating because he had to use the towel to wipe himself as he got off the table. [redacted] also recalled Epstein having a noticeable freckle on his chest.

Epstein then left the room and [redacted] got dressed. She went back downstairs where she met [redacted] and the unknown white female. [redacted] admitted to getting paid three hundred dollars in cash from Epstein. Before they left, Epstein asked [redacted] to leave her phone number. As they were leaving the house, [redacted] asked [redacted] what had happened and how much she was paid. [redacted] stated [redacted] seemed upset or jealous when she told her that she received three hundred dollars. [redacted] stated received only two hundred dollars that day. [redacted] stated that she believed [redacted] was paid two hundred dollars for bringing her.

[redacted] told [redacted] that if they do this every Saturday, they could be rich; [redacted] agreed. They then went shopping, though she is not sure where. Possibly at TJ Maxx or Marshall's. [redacted] stated she never saw [redacted] again as she got into a fight at school. She had not spoken with [redacted] either as her mother took away her cell phone.

I asked [redacted] if she was aware of any video equipment while she was in the room. She stated no.

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[redacted] stated she was afraid that [redacted] would retaliate against her or her family if she ever went to the police regarding the incident. [redacted] stated that her father's vehicle was recently vandalized. [redacted] admitted to telling [redacted] what had happened with Epstein. According to [redacted] became angry and upset, punching a hole in the wall. [redacted] guessed that it was [redacted] who told [redacted] about the incident, and now there were rumors in school about [redacted] and what she did with Epstein.

I then talked to [redacted] about truth and lying. We talked about the color sweater she was wearing. [redacted] denied having sexual intercourse with Epstein. She denied touching his penis. [redacted] again admitted to observing Epstein masturbate.

[redacted] agreed to cooperating with the police department in placing a phone call to [redacted] in a controlled setting. I met with Ms. [redacted] and advised her of the families' as well as [redacted] willingness to cooperate with this investigation. Copies of this interview were placed into evidence.

I made contact with [redacted] mother of [redacted] I advised her briefly of my investigation. She was aware of the incident and stated that she overheard a portion of a conversation that her daughter was having with a boy named [redacted] stated that it was her opinion that both girls liked [redacted] recalled hearing her daughter calling [redacted] a whore. [redacted] admitted that she did not listen to the entire conversation but did confront her daughter about it later. [redacted] told her mother that something to the effect that [redacted] had slept with an older man for money. [redacted] stated that she would not object to me speaking with her daughter. It was [redacted] s belief that everyone in the school may have known about this because of the fight that her daughter [redacted] and [redacted] had gotten into. I reminded [redacted] that this was an ongoing investigation and requested she not discuss the fact that I had contacted her. She agreed.

On 03/16/2005, PBSO Sgt. Chris Keen left a message that he was returning my call. I spoke with Keen and discussed the case with him and inquired if he had any open allegations or cases where the suspect resided in Palm Beach. Keen stated he was unaware of any. Keen offered any assistance if needed. Keen stated it was his experience that due to the age of the parties involved, it would be difficult to interview them and expect the investigation to remain confidential.

Because of the time delay, there was no need for the victim to be taken to a medical facility for a physical for the purpose of obtaining evidence. There was also no need to take her to CPT as she was already in a juvenile facility, with an assigned therapist, in which coordinating a day and time to obtain a statement could be made.

On 03/17/2005, I queried Jeffery Epstein on the internet and obtained

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a photo of Epstein to be used in a photo line up. I met with [redacted] at which time she viewed the photo line up. She immediately recognized Epstein and pointed to him (Position #5). [redacted] signed the photo line up under Epstein's picture. This signed line up was placed into evidence.

On 03/18/2005, I met with [redacted] at her residence for the purpose of placing a controlled call to [redacted] spoke with [redacted] and asked if she could arrange another meeting with Jeff. [redacted] stated that she would have to call him and make the arrangements. A copy of this conversation was placed into evidence.

03/19/2005, I spoke with [redacted] and was advised that [redacted] left the state to visit with her aunt and uncle. [redacted] is scheduled to return to Florida on 03/27/2005

03/21/2005, I coordinated with PB BSF Unit and OCVAN to initiate surveillance on 358 El Brillo.

03/21/2005, Coordinated with Det. Lee regarding trash pulls from 358 El Brillo. On this same date I called [redacted] to schedule an appointment to speak with [redacted] She stated the school guidance counselor was reluctant to have police presence at the school. I assured her that I would respond to the school in civilian clothes and an unmarked vehicle.

[redacted] called me back and advised that I did not need to make an appointment to see [redacted]

I received a return phone call from [redacted] stating that [redacted] would be attending the family therapy sessions with [redacted]

I received messages from [redacted]

I conducted a computer query on Epstein. The results of this query indicated the most recent driver's license on file for Epstein was for the state of Florida, which had expired.

A cross reference of Epstein s residence, 358 El Brillo, Palm Beach, revealed the following affiliated names: [redacted] w/f, dob [redacted] Mark L. Epstein, w/m dob [redacted], & Ghislaine N. Maxwell, uk/f, dob [redacted]. A computer query for both returned no history.

On 03/23/2005, I spoke with [redacted] cell phone wk [redacted] I requested that she not discuss the incident with anyone including her daughter [redacted] as I did not want the investigation compromised. I was told at this time, that [redacted] and [redacted] have not been getting along due to the fact that [redacted] has decided to continue living with her father.

On 03/29/2005, I placed telephone calls to both the [redacted] and [redacted] residences requesting to speak with them regarding the

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investigation. I received return phone calls from Mrs. [redacted] and Mrs. [redacted] and advised them that I would be contacting [redacted], family therapist to coordinate a time to meet with [redacted]. This was at the request of both Back and Mrs. [redacted] that [redacted] strict classroom and therapy schedule be disrupted as little as possible. I also updated them to the investigation thus far. Both [redacted] and [redacted] stated they had no objection to my meeting with [redacted]. In speaking with Ms. [redacted] she identified the cell phone number of (561) [redacted] as being the phone assigned to [redacted] Ms. [redacted] had no objections and provided consent to giving it to the police department for the use of placing controlled phone calls from it. [redacted] stated the phone had been taken away from [redacted] as part of her punishment for not doing well in school. According to [redacted] used to be an excellent student, but in the past two months has become irritable, verbally abusive to the family and has run away. [redacted] stated her daughter's recent behavior is the opposite of what she normally is. [redacted] stated they are going through family therapy sessions with the school but none of this had come up. Arrangements were made for Det. Captain Gudger to retrieve the cell phone from [redacted] at her place of employment.

I called [redacted] Family Center, 840-4540 and requested to speak with Ms. [redacted]. Upon speaking with Ms. [redacted] she advised me that she was in the middle of therapy sessions and would call me back once the sessions were completed. Ms. [redacted] stated the sessions should be concluded by 7:00 PM. At approximately 8:00PM I had called Ms. [redacted] at which time I left a message on her voice mail requesting a return phone call. I spoke with Ms. [redacted] and advised her that I did not meet with her daughter and that I would again attempt to coordinate a time with the counselor so as not to disrupt [redacted] s school schedule. [redacted] had no objections. Shortly after speaking with Ms. [redacted] I received a call from Ms. [redacted]. I explained the situation and requested a time to meet with [redacted] [redacted] reviewed [redacted] s schedule and advised that [redacted] would be available after 3:00PM.

On 03/30/2005, I met with Ms. [redacted] and [redacted] at [redacted] Family Center. I reminded [redacted] of her conversation with Robson. During this time [redacted] initiated a conversation with me in which she admitted that she was not telling me everything that had happened during the time she was alone with Epstein. According to [redacted] while she and Epstein were alone on the second floor, Epstein used a purple vibrator to massage her vaginal area. [redacted] stated there was no penetration as the vibrator was on top of her underwear. I asked [redacted] if Epstein ever asked her age and she stated he had. [redacted] stated she told him she was eighteen. When Epstein asked what school she was in, [redacted] responded she was in the twelfth grade at Wellington. During the course of this incident, [redacted] stated Epstein told her that [redacted] had worked for him for years.

We then continued with the controlled call to [redacted] At approximately 3:35pm [redacted] from her cell phone, made a call to [redacted] s home, (561) [redacted] [redacted] was not home. [redacted] was told

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that [redacted] was at working a double and could be reached on her cell phone, (561) [redacted]. W/F, [redacted] is employed at The Olive Garden Restaurant, located on Forest Hills Blvd in Wellington.

[redacted] called [redacted] During the conversation between [redacted] and [redacted] asked [redacted] what happened, stating that she had heard rumors that [redacted] was going to press charges. [redacted] asked if they, meaning [redacted] parents, knew about Jeffery. [redacted] claimed to have heard that [redacted] father had found out about Jeffrey. [redacted] told [redacted] that they (her parents) did not know anything about Epstein. [redacted] told [redacted] that Epstein needed someone to work tomorrow and asked if she was available. [redacted] stated she would call Epstein and then call [redacted] back.

During the course of these conversations with [redacted] she would at times appear to be articulate and well spoken. She would then start to act in an immature manner, by looking around, not paying attention, drawing on a paper. [redacted] would offer me a high five whenever she claimed to have told me the truth in the details of the afternoon at Epstein's house. [redacted] would sit in the chair, with her knees propped up to her chest as she admitted that she did not tell me the all the details of her encounter with Epstein during our first meeting. As a means of positive reinforcement I would high five [redacted]

On 03/31/2005, subpoena requests for T-Mobile Wireless (561) [redacted] and Cingular Wireless, (561) [redacted] ([redacted] and [redacted] phone numbers) were drafted.

On 04/01/2005, I met with members of PB BSF Unit for the purpose of conducting surveillance on 358 El Brillo. Cross-reference supplement.

On 04/01/2005, I met with Det. Krauel of the Palm Beach Police Department who provided me a copy of the concealed weapons permit for Mr. Epstein. It revealed Epstein had a valid permit. There was no current photo attached to the renewal notice.

On this same date I queried various different web sites for a possible identification of the purple item retrieved from the trash pull from 358 El Brillo. The item was similar in description as the one described by [redacted] and used by Epstein.

I made contact with Spicygear.com and spoke with the owner John. I emailed a photograph of the item for his opinion. He identified the items as a Jelly Anal Wand of some sort. The item is easily available at sex shops in South Florida.

04/06/2005, I conducted business queries into Epstein utilizing the internet. I located articles relating to financial reports. There was no local history.

On 04/01/2005 - 04/03/2005, with the assistance of BSF, there was

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continued surveillance on the property.

On 04/04/2005, I obtained a copy of voice mail messages, dated 03/31 and 04/01 from [redacted] to [redacted] A female identifying herself as [redacted] states that she could pick [redacted] up to take her to Epstein's house for an eleven o clock appointment. A copy of this was placed into evidence.

On 04/05/2005, a trash pull was conducted at 358 El Brillo by Det. [redacted] and me. There were several messages written on various forms of papers. There was a message from [redacted] indicating [redacted] 11:00. The following was additional information obtained from trash retrieved from 358 El Brillo: Jean Luc 6:20 AM; David [redacted] ;655-0995; [redacted] 1x; fuliias Friday 5:30PM; [redacted] & [redacted] a message receipt dated 4/4 1:05- [redacted] She is looking to speak to you .;[redacted]

On 04/06/2005, I faxed subpoena requests to SA [redacted] office for Epstein, [redacted] and [redacted] s phone records. (Phone numbers (561) [redacted], (561) [redacted], (561) [redacted] & (561) [redacted]).

On 04/06/2005, I called [redacted] School, [redacted], ext 311, and spoke with Principal Rick [redacted] He confirmed that they had a student by the name of [redacted] He requested a written request prior to releasing any additional information. On this same date I faxed [redacted] a request for student and parent information on [redacted] I advised [redacted] that due to this being an open investigation he was not to discuss the matter with anyone.

On 04/08/2005, I received a message from [redacted] providing me the following information: [redacted] w/m DOB [redacted], [redacted], Wellington, Florida, 33414. Parents name: [redacted]

Det. Lee provided me with trash obtained from 358 El Brillo for 04/06 04/07/05. The following information was retrieved: Jet Aviation [redacted] itinerary, indicating a departure date of 04/05/2005 at 4:00 PM with an arrival in New York City of 6:15PM. Flight crew captain David Rodgers, co-captain, Larry Visoski, flight engineer Larry Morrison. Call sign [redacted]; a note stating Bye J. thank you [redacted] hand written notes & messages 11-Glenn, 12:30 chicken, [redacted] 4, 3 September [redacted] Big Screen x8, [redacted] work Sunday @ 4PM, [redacted] Monday after school?; left message for [redacted] works 4-9 Monday and Tuesday, leaves school @ 11:30 AM; [redacted] will be here tomorrow @ 10:30 Am; Mrs. Business [redacted] There was no trash for 04/08/05.

04/22/05 received the results of a subpoena request from Bellsouth for [redacted]. The results only provided subscriber information. I contacted Alice Grant Investigative Subpoena Compliance Center who stated the request was not complete and the results would be sent to

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me as soon as the query was finished.

Cross-referencing the names [redacted] and [redacted] as well as phone numbers, which were obtained from message notes via trash pulls, I identified the before mentioned individuals as being acquainted with someone at 358 El Brillo. [redacted] DOB [redacted], FL DL #[redacted] and [redacted] DOB [redacted] FL DL[redacted] are both above the legal age of consent.

On 05/03/2005, I spoke with [redacted] and updated her on the investigation. [redacted] stated that [redacted] was doing well in the school. Her contact with the outside is limited as they do not have access to the phones. [redacted] comes home on the weekends and she is not allowed to go anywhere alone.

On 05/11/2005, I made arrangements to meet with [redacted] and [redacted]

On Thursday, 05/12/05, I spoke with [redacted] regarding the case. They will be moving to GA in July 2005. They will be very busy over the next few weeks but would be available via phone. Will coordinate a date to meet to discuss the matter further.

During this week I conducted surveillance at Epstein s residence and at the airport, but there was nothing to indicate that Epstein was in town.

Due to conflicting appointments, rescheduled until 06/02/2005, to meet with Ms. [redacted]

I also spoke with [redacted] and updated her to the investigation.

On 06/02/2005, I met with [redacted] and [redacted] Sandborn advised that she could be reached via her cell phone until she is able to provide me with her new contact information.

I also received a message from [redacted] Attempted call back but the line was busy.

June 14, 2005, I received information that Epstein's plane was at Jet Aviation. I spoke with Det. Lee regarding surveillance.

I called the Olive Garden and asked for [redacted] I was advised she was not working today. This would indicate that [redacted] was still employed there.

On 07/07/2005, I faxed subpoena requests to SA [redacted] office for Epstein, [redacted] and [redacted] s phone records. (Phone numbers (561[redacted] (561)[redacted] and (561[redacted]). The original subpoena requests only provided subscriber and billing information.

On 07/20/2005, conducted a trash pull arranged by Ofc. Lee. Inside there were misc. papers with phone numbers and names. There were

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misc. female hygiene products in the trash. Based on a prior Auto Track report done on 358 El Brillo, a possible subject residing at the residence is [redacted]. [redacted] fit the description provided by officers who had conducted surveillance in the area of a female seen entering and leaving the residence.

On 07/21/05, I received the Duces Tecum dated 07/18/05, which was clerked by ASO

On 07/26/2005, I received the results of Bell South Subpoena.

On 08/04/05, I received DHL Express from T mobile with the results of the query.

I spoke with [redacted] who confirmed that [redacted] was still living out of state. It appeared that all was going well.

I left a message for [redacted] at [redacted].

On 08/08/2005, I received the results of Cingular cell phone subpoena.

During the week of 09/08/2005, I checked 358 El Brillo and the Palm Beach International Airport but there was no direct indication that Epstein was in town.

On 09/08/2005, I reviewed the case notes of this file, as the case will be turned over to Det. Recarey.

On 09/11/2005, while on patrol, I conducted a check at Epstein's residence and found that it still had the hurricane shutters on. On a drive by the Palm Beach International Airport later that afternoon, I did not observe Epstein's plane.

On 09/14/2005, I conducted a check at the Palm Beach International Airport but did not see Epstein s plane.

On 09/19/2005, I spoke with [redacted] to keep her updated and to find out if there was any change of address or phone numbers for [redacted] in order to provide her with Detective Recarey s information.

********** N A R R A T I V E # 2 **********

NA Reported By: RECAREY, JOSEPH 9/21/05
Entered By.: ALTOMARO, NICKIE A. 9/21/05

On September 19, 2005, I met with Officer Pagan and received the information pertaining to this case. Members of the Burglary Strike Force had previously been conducting surveillance on both Epstein and [redacted] Officer Munyan was assigned to monitor the Epstein home and Sgt Sorge and Officer Minot were assigned to monitor [redacted] Both teams provided a surveillance log that will be placed into the

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attachment file.

Det. Dawson was assigned to relieve Officer Munyan at 4:00 pm; he informed me that at approximately 8:00 pm, Epstein had left for the airport and his private jet was sitting on the tarmac. Epstein's private vehicle drove to the jet and unloaded packages into the jet. It appeared that Epstein left the county at this time. Surveillance will continue to determine when Epstein will return.

Inv Continues.

********** N A R R A T I V E # 3 **********

NA Reported By: PARKINSON, GREGORY A. 9/23/05
Entered By.: ALTOMARO, NICKIE A. 9/23/05

On Friday, September 23, 2005 at approximately 1:45 p.m., I began to copy a tape micro cassette, under case number 05-368 and property number 05-243, tape number 1. I placed the tape in the telex copy-et, series 2 machine and began to go through the copying process. Approximately 1/2 through the tape, the tape wrapped around the spindle and became locked and stretched the tape. I examined it and determined that it was in the best interest to leave it as it is as a prior copy had been made and turned over to Sergeant Frick. I immediately took the tape to Sergeant Frick and allowed him to examine it and then obtained the copy from him and Detective Recarey and brought the copy of the tape down and made a copy for him based on that. The tape was placed back in the original container and is retained in the evidence bag under the previously mentioned property number of 05-243. It is not advisable to attempt to copy this tape as further damage could result to the recorded material and there is an existing copy anyway.

********** N A R R A T I V E # 4 **********

NA Reported By: PARKINSON, GREGORY A. 9/26/05
Entered By.: ALTOMARO, NICKIE A. 9/26/05

On 3-24-05 at 11:00 pm, a copy of tape 2 (case number 05-294) had been made for Det. Pagan by Evidence Specialist [redacted]. The copy was turned over to Detective Recarey.

On Friday, 09-23-05 at approimately 2:15 pm, I was in the process of reproducing audio tapes (micro and standard) to standard size when it was discovered, in the test review process, that tape number 2 was blank. I notified Sgt. Frick and Det. Recarey. I was informed that they had a prior copy and I could use it to make a master tape. I did so and when reviewing and signing the evidence sheet, I noticed Evidence Specialist Badger had written "#2 is blank."

I obtained that copy from Det. Recarey and made a new copy on a standard size tape. The new copy was placed in the evidence bag under

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property number 05-294 with the blank tape.

********** N A R R A T I V E # 5 **********
NA Reported By: RECAREY, JOSEPH 9/26/05
Entered By.: ALTOMARO, NICKIE A. 9/28/05

Copies of the tapes that were submitted into evidence were requested. Additionally, trash pulls were started on September 21, 2005. Sgt. Szarszewski made telephone contact with Tony Higgins, Supervisor of the Sanitation Department, and requested that trash be collected at the Epstein House located at 358 El Brillo in Palm Beach. Sgt Szarszewski met with Sanitation worker, Jeff Williams and observed him enter the property at 358 El Brillo. Shortly thereafter, Williams exited the property and placed the three white trash bags in the empty well in the rear of the truck. Williams then drove away where he met with Sgt. Szarszewski who removed the bags from the well and placed them into one large black trash bag. The bag was returned to the Police Station where I was waiting for him. Upon his arrival, we inspected the bags where several notes and papers were found. These notes contained names of girls with times. Additionally, there was a note from [redacted] and [redacted] to Jeffrey Epstein on a notepad, which stated,"For a good time call [redacted] and [redacted] at [redacted]." Also, there was another telephone number on the note [redacted]. Also found was a written note, which stated, [redacted] can not come at 7 p.m. tomorrow because of soccer. These items were written on notepads that contain Jeffrey Epstein on the bottom of the notes. These items were placed into evidence for future follow up. I requested subpoenas for subscriber information on the telephone numbers listed above on the note from [redacted] and [redacted] The cellular telephones [redacted] and [redacted] are both assigned to Cingular Cellular Service. Other notes were found within the trash on Jeffrey Epstein pad, papers that contained telephone numbers. One note had "[redacted] with [redacted] written on it. This cellular number is assigned to Cingular Cellular Service. Another sheet had written [redacted] which is assigned to Bell South Telecommunications. The subpoenas were picked up and submitted to Cingular and Bell South Telecommunication for subscriber information.

On September 22, 2005, I was informed by Sgt. Szarszewski that there would be no trash pick up as it was recycle pick up day. A request for copies of the micro and standard size cassettes were requested from crime scene to familiarize myself with the interviews conducted.

On September 23, 2005, the tapes were received and I began to become familiar with the interviews that were conducted. Det. Krauel had met with Town of Palm Beach Sanitation worker, Jeff Williams and observed him enter the property of 358 El Brillo. Shortly thereafter, Williams exited the property and placed the three white trash bags in the empty well in the rear of the truck. Williams then drove away where he met with Det. Krauel who removed the bags from the well and placed them into one large black trash bag. The bag was returned to the Police Station where I was waiting for him. Upon his arrival, we inspected

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the bags where several notes and papers were found. The notes will be inspected for future use. The items collected were placed into evidence.

It became evident that some of the recordings were recorded with background noise and some interference. The calls most affected were the control phone calls from the victim to the suspect [redacted] I obtained the graphic equalizer and discovered that the calls are able to be legible with the use of the equalizer by lowering the background noise and increasing voice gain. I also learned that a tape was broken during the coping of the tape. I returned the copy of the tape marked Property Number 05-243 to have it recopied to have an original in evidence and a working copy with the file.

Upon researching the file, it was discovered that the suspect, [redacted] cellular calls were subpoenaed incorrectly. The suspect telephone number was 561-[redacted] and the original request was for 561[redacted]. I requested the information through Cingular Cellular Service from February 2005 through the present. The purpose was to have a record of [redacted] making calls to victim, Jeffrey Epstein and the frequency of calls. The request was submitted to the State Attorney's Office.

Investigation Continues....

********** N A R R A T I V E # 6 **********

NA Reported By: KRAUEL, CURTIS D. 10/06/05
Entered By.: ALTOMARO, NICKIE A. 10/06/05

On or about September 23, 2005 at approximately 0915 hours, I responded to 358 El Brillo and met with PB Sanitation worker Jeff Williams. Williams had been previously notified to assist in trash pulls at the residence of Jeffrey Epstein, 358 El Brillo, Palm Beach, Florida. I observed Williams enter the driveway of 358 El Brillo and remove several plastic bags of trash and place the contents into the back of an empty sanitation truck.

I then followed Williams to a predetermined location and seized the trash from the truck. The trash was transported to the Palm Beach Police Department where I began sifting through its contents. There was a total of 4 white in color plastic bags and each contained documentation and correspondence for 358 El Brillo and Jeffrey Epstein. All documents of evidentiary value were removed and turned over to Det. Recarey for follow-up.

On or about September 26, 2005 at approximately 0900 hours, I responded to 358 El Brillo and met with PB Sanitation worker Jessie Jones. Jones had been previously notified to assist in trash pulls at the residence of Jeffrey Epstein, 358 El Brillo, Palm Beach, Florida. I observed Jones enter the driveway of 358 El Brillo, where no trash was located within the receptacles. I left the area without incident

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and notified Det. Recarey to that affect.

On or about September 27, 2005 at approximately 0915 hours, I responded to 358 El Brillo and met with PB Sanitation worker Jesse Jones. I observed Jones enter the driveway of 358 El Brillo and remove one plastic bag of trash and place it in the back of an empty sanitation truck.

I then followed Jones to a predetermined location and seized the trash from the truck. The trash was transported to the Palm Beach Police Department where I began sifting through its contents. There was a total of 1 white in color plastic bag which contained correspondence for 358 El Brillo. All documents of evidentiary value were removed and turned over to Det. Recarey for follow-up.

On or about Monday October 3, 2005 at approximately 0915 hours, I responded to 358 El Brillo and met with PB Sanitation worker Jeff Williams. I observed Williams enter the driveway of 358 El Brillo and remove several plastic bags of trash and place the contents into the back of an empty sanitation truck.

I then followed Williams to a predetermined location and seized the trash from the truck. The trash was transported to the Palm Beach Police Department where I began sifting through its contents. There was a total of 7 white in color plastic bags with a red tie and 1 black in color bag which contained 2 white in color plastic bags with a red tie. Each of the bags contained documentation and correspondence for 358 El Brillo and Jeffrey Epstein. Inside of one of the white in color bags, I located a broken piece of a hard plastic or clear acrylic stick, which was shaped with small ridges. This device is commonly used as a sexual toy which is inserted into the vagina or anus for stimulation. This item, along with all documents of evidentiary value were removed and turned over to Det. Recarey for follow-up.

On or about Tuesday October 4, 2005 at approximately 0928 hours, I responded to 358 El Brillo and met with PB Sanitation worker Jeff Williams. I observed Williams enter the driveway of 358 El Brillo and remove several plastic bags of trash and place the contents into the side well of the sanitation truck. This side of the truck is separate from the rear of the truck and does not come into contact with other trash.

I then followed Williams to a predetermined location and seized the trash from the truck. The trash was transported to the Palm Beach Police Department where I began sifting through its contents. There was a total of 2 white in color plastic bags which were tied at the top. Each of the bags contained documentation and correspondence for 358 El Brillo and Jeffrey Epstein. All documents of evidentiary value were removed and turned over to Det. Recarey for follow-up.

On or about Wednesday October 5, 2005 at approximately 0928 hours, I

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responded to 358 El Brillo and met with PB Sanitation worker Jeff Williams. I observed Williams enter the driveway of 358 El Brillo and remove several plastic bags of trash and place the contents into the bed of the sanitation truck.

I then followed Williams to a predetermined location and seized the trash from the truck. The trash was transported to the Palm Beach Police Department where I began sifting through its contents, with the assistance of Det. Recarey. There were a total of 2 bags, one of which was white in color and tied in a knot at the top, and the other was a black in color bag, which contained two white in color trash bags along with loose debris. Each of the bags contained documentation and correspondence for 358 El Brillo and Jeffrey Epstein. All documents of evidentiary value were removed and turned over to Det. Recarey for follow-up.

********** N A R R A T I V E # 7 **********

NA Reported By: RECAREY, JOSEPH 10/07/05
Entered By.: ALTOMARO, NICKIE A. 10/07/05

I met with Det. Krauel and requested further assistance to maintain trash collections at Epstein's residence at 358 El Brillo Road. On October 3, 2005, at approximately 10:30 am, I was contacted by Sgt. Frick to respond to the Palm Beach Police Station. Det. Krauel had observed Jeff Epstein riding his bicycle on South County Road. Upon my arrival, I met with Sgt Frick who advised, as Epstein was currently in Town; we interview [redacted] as to her involvement with Epstein and the girls that are brought to his house. As we were to interview [redacted] in the county, (outside of our jurisdiction), I contacted the State Attorney s Office Investigation Division, and made contact with Assistant Supervisor Investigator Carlos Ortiz. I requested assistance to interview [redacted] as the interview may occur in the county. Supervisor Ortiz assigned Investigator Mike Waites to assist us at the location and interview of [redacted]

Det. Dicks had responded to the address of [redacted] and viewed her vehicle parked in the driveway. [redacted] vehicle a red Plymouth Neon baring Florida Tag of [redacted] was parked in the driveway of [redacted] in Loxahatchee. Sgt Frick and I responded to [redacted] and awaited the arrival of Investigator Mike Waites. Upon his arrival, he was briefed that should she wish to be interviewed within her home he would be needed. However, should [redacted] agree to return to the police station for further questioning, he would not be needed. Sgt. Frick and I knocked on the door and met with [redacted] was told that we were investigating a claim involving Jeffrey Epstein of El Brillo in Palm Beach. [redacted] was asked if she wanted to accompany us back to the police station for further questioning. She was also told that at the conclusion of the interview she would be returned home. She agreed and wished to change her clothes prior to accompanying us back to the police station. At the conclusion of her changing clothes, she advised she was ready to go. I thanked Inv. Waites and advised she was going to voluntarily return to the police station.

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Upon [redacted] s entry in the unmarked Detective vehicle, I placed a tape recorder within the vehicle to record any conversations within the vehicle. During the ride back to the police station, [redacted] advised she is attending Palm Beach Community College at the Palm Beach Gardens Campus and is majoring in journalism.

Upon our arrival at the police station, [redacted] was brought to the interview room in the Detective Bureau. I explained to [redacted] that I appreciated her willingness to assist us and informed her that should she desire to leave at any time she may do so. I further explained the interview room door is only closed for privacy. [redacted] stated she understood. During the taped sworn interview, [redacted] was asked how she came in contact with Epstein. [redacted] stated back when she turned 17 years of age she was approached by a friend [redacted] in the Canopy Beach Resort in Rivera Beach. [redacted] was asked if she wanted to make money.

She was told she would have to provide a massage and should make $200.00. [redacted] thought about the offer and agreed to meet with Jeffrey. [redacted] (Unknown last name) and [redacted] (Unknown last name) picked her up and she was taken to Epstein's house. Upon her arrival at the house, she was introduced to Epstein in the kitchen of the house. She was also introduced to a white female known to her as [redacted]. She was led upstairs to the main bedroom known to her as Jeff Epstein s bedroom. [redacted] arranged the massage table and covered the table with a sheet. She brought out the massage oils and laid them next to the massage bed. [redacted] then left the room and informed her Jeff would be in a minute. Jeff entered the bedroom wearing only a towel. He lay on the table onto his stomach and picked massage oil for [redacted] to rub on him. During the massage, [redacted] stated, He tried to touch me and I stopped him. I asked how he tried to touch her. He grabbed her buttocks and she felt uncomfortable. [redacted] also stated Epstein has a vibrator, which is large and white in color. [redacted] told Epstein, I'll massage you but I don't want to be touched. [redacted] stated she performed the massage naked. At the conclusion of the massage, Epstein paid [redacted] $200.00 for the massage. He explained, I know you re not comfortable, but I'll pay you if you bring some girls. He told her the younger the better. [redacted] stated she once tried to bring a 23-year-old female and Epstein stated that the female was too old. [redacted] was asked how many girls she brought in total to Epstein. [redacted] stated six that she can remember. [redacted] stated she brought [redacted] and the victim in this case.

I asked [redacted] which one was the youngest. [redacted] advised the victim was the youngest. [redacted] stated every girl she brought knew what to expect when they arrived. They were told they would provide a massage, possibly naked, and some touching. I asked her if the victim was aware. She stated every girl she brought knew what to expect. She explained she knew the victim wanted to make money. She approached the victim and explained about going to work for Jeff. The

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victim agreed and arrangements were made to bring the victim to Epstein's house on a weekend. [redacted] stated that she and [redacted] (later identified as [redacted] picked up the victim at the victim s house. They traveled to Epstein's House and entered through the kitchen door. They met with the house chef and Epstein s assistant [redacted] The victim was introduced to Epstein while they were in the kitchen area. [redacted] led the victim upstairs and Epstein went upstairs. When the massage was over, the victim returned to the kitchen area. [redacted] stated she was paid $200.00 for bring the victim to Epstein's. [redacted] stated the victim told her she was paid $300.00 for the massage. Back in the vehicle, [redacted] asked the victim what happened. The victim told her about the massage and then they went shopping. [redacted] stated the victim was the last person she brought to Epstein. She further stated that she had changed her cellular number to avoid being contacted by [redacted]. She continued that when Epstein announces to his assistant that he is traveling to Palm Beach, [redacted] would contact [redacted] to arrange girls for Epstein. [redacted], later identified as [redacted] Date of Birth 05-25-1979, had told [redacted] that Jeff likes to have his fun with the girls.

[redacted] stated that once her parents discovered that she was visiting Epstein, they disapproved of the encounters with him and she stopped. [redacted] further stated that [redacted] still tries to call the house and leaves messages. With the assistance of [redacted] we were able to identify [redacted] DOB [redacted], [redacted] DOB [redacted]

Sgt Frick entered the room and explained that based on her own statements, she had implicated herself with bringing underage girls to Epstein's house. [redacted] was aware of what she had stated and wished to assist further in hopes to receive a lesser charge. [redacted] provided cellular telephone numbers for the girls she had mentioned previously. Additionally, she also provided possible addresses and areas in which they lived. As [redacted] was being taken home in the vehicle, a tape recorder was placed within the vehicle to record any conversations within the vehicle. During the drive back to her home, [redacted] made the comment I m like a Heidi Fliess. (Hollywood Madam who sent girls to clients for sexual favors in California). [redacted] was dropped off at her house without incident.

Sgt Frick and I went to [redacted] in Loxahatchee, Florida in an attempt to speak with [redacted] We met with Mrs. [redacted] ([redacted] s Mother) at the front door. We explained the ongoing investigation and felt that [redacted] may have additional information as we had information that she had worked for Jeff. Mrs. [redacted] introduced us to her husband and allowed us entry into the home. We sat in the dinning room and met with [redacted] Date of Birth [redacted]. As she was under the age of eighteen, Mrs. [redacted] was advised we would be speaking with her. She expressed, if her daughter had information she wanted to assist. As we interviewed [redacted] she denied having any inappropriate encounters with Jeff (Epstein). She stated she had gone to Jeff s

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House with [redacted] approximately eight months ago and sat in the kitchen with the house chef but nothing happened. As the parents were present during the interview, we felt that [redacted] was withholding information from us. She made several comments as to she has put the entire incident behind her. I left my direct telephone number and advised should she wish to speak with me again to telephone me. Sgt Frick and I thanked Mrs. [redacted] for her time and left the area. She stated she would ask her again after we left as to what happened at Epstein s house. I informed her that [redacted] had my telephone number and hopefully she would call.

Sgt Frick and I then attempted contact with [redacted] at [redacted] her daughter. [redacted] was at the Wellington Mall and was not home. We explained the ongoing investigation and felt the [redacted] may have additional information as we had information that she had worked for Jeff. We left our phone numbers and asked her to telephone me upon her daughter's return. We then left the area.

On October 4, 2005, at approximately, 8:05 am, Sgt Frick had retrieved a voice mail message from [redacted] She stated she had spoken with her daughter and she had information as to what occurred at Jeff s house. I contacted [redacted] who stated her daughter was in the shower at the moment and would be traveling back to Orlando to attend College. I informed her I would be en route to her home in Loxahatchee. Det. Dawson and I drove to the [redacted] home and met with [redacted] and [redacted] During a sworn taped statement, [redacted] stated she was taken to the house by [redacted] She was told she could make money working for Jeff. She was told she would have to provide a massage to Jeff. [redacted] stated upon her arrival to the house she was brought to the kitchen area by [redacted]

They met with the house chef and [redacted] stayed in the kitchen. She was introduced to [redacted], Jeff's assistant and was brought upstairs to the mater bedroom. [redacted] prepared the room and massage table for a massage. Epstein entered the room and she provided a massage. [redacted] stated she kept her clothes on during the massage. She stated sometime during the massage Epstein grabbed her buttocks and pulled her close to him. [redacted] said she was wierded out by the incident involving Jeff. At the conclusion of the massage, she was paid $200.00 for the massage. I asked [redacted] if she has any formal training in massages to which she replied no. I asked her if [redacted] received any monies for taking her to perform the massage. [redacted] stated [redacted] also received money for taking her there. [redacted] stated she went with [redacted] and another girl, [redacted] to Jeff's house once. [redacted] stated she waited in the kitchen with [redacted] while [redacted] was taken upstairs by [redacted]. [redacted] stated she only did the massage once, as she was wierded out by the whole experience. At the conclusion of the interview and the tape was stopped, I was informed that [redacted] had attempted to reach [redacted] via cell phone. A voice mail message on October 4, 2005 at 10:59 am, revealed a female voice who identified herself as [redacted] who requested her to call her back reference the

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police questioning. This voice mail message was recorded onto a micro cassette. [redacted] provided the incoming telephone number as [redacted]. [redacted] stated she inadvertently told [redacted] about the police investigation because [redacted] had called her to tell her about how she just received a rental car from Jeff Epstein. [redacted] had called her to tell her that she was given a rental car, a 2005 Silver Nissan Sentra, to utilize to visit family and visit Jeff. [redacted] asked her what was going on at the house that the police would be asking questions. [redacted] stated [redacted] then called Jeff and [redacted] and asked what was going on reference the ongoing police investigation. According to [redacted] [redacted] has since then been trying to contact her to ask about the police questions. I instructed [redacted] not to contact [redacted] and do not provide any more information to [redacted] as she would notify Jeff Epstein and [redacted] what was transpiring.

Investigation Continues...

********** N A R R A T I V E # 8 **********

NA Reported By: LEE, LA'MONT 10/07/05
Entered By.: ALTOMARO, NICKIE A. 10/07/05

On March 30, 2005, I was asked by Sgt. Daniel Szarszewski to begin conducting surveillance and trash pulls reference Detective Pagan conducting a criminal investigation involving Jeffrey Epstein. I was advised that Epstein was possibly engaging in sexual contact with young females.

On March 30, 2005, I made contact with Town of Palm Beach Sanitation Office Supervisor Tony Higgins and requested trash pulls for 358 El Brillo Way to begin on March 31, 2005.

On March 31, 2005 at 9:20 a.m., I responded to the area of 358 El Brillo Way and met with Town of Palm Beach sanitation employee, Jeffrey Williams. I observed Williams enter the driveway of 358 El Brillo Way, collect the trash bags from Epstein's property and place the contents into an empty sanitation truck. I followed Williams to a nearby area, were he turned over seventeen white plastic trash bags, which were collected from Epstein's property.

I took the trash bags to the sanitation department were I sifted through its contents. I collected mail correspondence from Armani Exchange addressed to [redacted] Jeffrey E. Epstein notepaper with [redacted] (561) [redacted], an important message notepaper addressed to [redacted] dated [redacted] at 8:15 p.m. reference [redacted], U.S Airways boarding pass copy for passenger, Janusz Banasiak, Montgomery County, Maryland Health Department food service ID [redacted] for Janusz Banasiak and Ghislaine Maxwell notepaper with names and phone numbers. Photocopies of the trash collected were attached with the supplement. Detective Pagan was advised of the contents that were collected for evidentiary value.

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On March 31, 2005, Sgt. Daniel Szarszewski requested that I set up a surveillance vehicle on El Brillo Way and conduct video surveillance of the front exterior of Epstein's residence. At 3:00 p.m., I set up a surveillance vehicle equipped with a video monitoring device. The surveillance vehicle was parked on El Brillo Way approximately fifty feet east of Epstein's driveway. The purpose of the video surveillance was to gather investigative intelligence by monitoring and recording all vehicle and pedestrian traffic entering and leaving Epstein's property.

The video surveillance tapes were changed daily with a new Maxell T-160 VHS tape. Video surveillance was established for Epstein s from March 31, 2005 through April 05, 2005. On April 05, 2005, video surveillance was concluded. I reviewed the video tapes and advised Detective Pagan the surveillance videos yielded no evidentiary value.

On April 01, 2005 at 9:30 a.m., I responded to the area of 358 El Brillo Way to meet with Town of Palm Beach sanitation employee, Jessie Jones. While parked in the area of 358 El Brillo Way waiting to collect Epstein s trash, I observed a white female, who I recognized as [redacted] from her Florida driver's license photograph. I made no contact with [redacted]. While parked in the area, I also observed Epstein s GMC Yukon truck leave the property as well as other vehicles arrive and park across the street from the property. The occupants of these vehicles appeared to be housekeepers, maintenance men, and gardeners.

At 9:38 a.m., I met with Town of Palm Beach sanitation employee, Jessie Jones. I observed Jones enter the driveway of 358 El Brillo Way and collect the trash from Epstein s property. I followed Jessie to a predetermined area at which time I collected the trash bags from the sanitation truck. I transported the trash bags to the sanitation department, where I sifted through its contents. I collected mail correspondences addressed to Jeffrey Epstein, automotive records and personal documents for Janusz Banasiak and Beata Banasiak as well as Jeffrey Epstein notepaper with the names and appointment times for [redacted] and [redacted] No last names or other personal information was written on the notepaper.

While sifting through Epstein s trash, I also collected a three-inch purple finger size object, which had a broken end. The object appeared to be a broke piece from a sexual toy similar to a (Cyclone Vibrator) possibly used for rectal gratification. The sexual object was photographed for Detective Pagan, packaged in a biohazard evidence bag (possible body fluids) and secured as investigative evidence. All items collected from Epstein s trash were turned over to Detective Pagan for evidentiary purposes.

On April 05, 2005 at 9:18 a.m., I met with Town of Palm Beach sanitation employee, Jessie Jones. I observed Jones enter the driveway of 358 El Brillo Way and collect the trash from Epstein s property. I followed Jessie to a predetermined area at which time I

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collected the trash bags from the sanitation truck. I transported the trash bags to the sanitation department, where I sifted through its contents. I collected mail correspondences addressed to Jeffrey Epstein as well as notepaper (Important Message) with names and telephone numbers. The following are items collected from Epstein s trash.

[redacted] ([redacted]
blank piece of white paper [redacted]
black paper ([redacted]
black paper ([redacted]
David ([redacted])
MSN Hotmail web page with email address ([redacted])

The following items were documented for Detective Pagan s investigation for evidentiary purposes.

On April 06, 08, 11, 12, 13, 15, 2005, at approximately 9:30 a.m, I met with Town of Palm Beach sanitation employees. I observed the employee enter the driveway of 358 El Brillo Way and collect the trash from Epstein's property. I followed the employee to a predetermined area at which time I collected the trash bags from the sanitation truck. I transported the trash bags to the sanitation department, where I sifted through its contents.

All of the documents collected from Epstein's trash during my assistance were turned over to Detective Pagan for evidentiary purposes.

On June 14, 2005, Detective [redacted] Pagan contacted me and advised that the airplane belonging to Jeffrey Epstein of 358 El Brillo Way was parked at the Palm Beach International Airport.

Detective Pagan requested that I begin trash pulls for the purpose of gathering evidence and intelligence.

I made contact with Town of Palm Beach Sanitation Office Supervisor Tony Higgins and requested trash pulls for 358 El Brillo Way to begin on June 15, 2005.

On June 15, 2005, I met with a sanitation employee. I observed the employee enter the driveway of 358 El Brillo Way and collect the trash from Epstein s property. I followed the employee to a predetermined area at which time I collected the trash bags from the sanitation truck. I transported the trash bags to the sanitation department, where I sifted through its contents. The trash yielded negative results and no evidence was collected.

No further trash was collected throughout the week due to the fact that Epstein s security gates remained closed throughout the week; therefore, the sanitation employees were unable to gain access onto the property for collection of the trash.

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All evidence and intelligence gathered by this officer has been turned over to the detective bureau and no further action has been taken by this officer.

End of supplement.

********** N A R R A T I V E # 9 **********

NA Reported By: RECAREY, JOSEPH 10/07/05
Entered By.: ALTOMARO, NICKIE A. 10/10/05

On October 4, 2005, I made telephone contact with [redacted] who had left several messages on voice mail. During the message, she advised she was not completely truthful when we met in person but would like to speak with me to advise what had happened. She further advised she did not want to speak of this incident in front of her mother. At approximately 15:48 pm, I made telephone contact with [redacted] at 561-[redacted] During a taped recorded statement, [redacted] stated the following: Approximately a year ago, when she was sixteen years of age, [redacted] took her to Jeff's house twice. The first time she went, [redacted] drove to the house. They entered through the kitchen area where she was introduced to [redacted] and Jeff. She was taken upstairs to a bedroom by [redacted] who set the room up with a massage bed and brought out the oils to use. Jeff then entered the room wearing a towel. He lay on the table and picked out a lotion for [redacted] to rub on him. At one point during the massage, he tried to remove her shirt at which point she became very upset and discontinued the massage. Both [redacted] and Jeffrey had a verbal disagreement at which time she left without being paid. She met with [redacted] who was sitting in the kitchen and told her let's go. [redacted] advised she received no money for that day. [redacted] also said that [redacted] had told her if she was uncomfortable with what was going on, to let him know and he'll stop. She knew that the more you do the more you are paid.

Several weeks later, [redacted] advised she agreed to be taken a second time by [redacted] Once they arrived at the residence, [redacted] sat in the kitchen and [redacted] took her upstairs to the master bedroom again. [redacted] set the room up with a massage bed and brought out the oils to use. Jeff then entered the room wearing a towel. He lay on the table and picked out a lotion for [redacted] to rub on him. At one point during the massage, he tried to touch her buttocks. As [redacted] was wearing tight jeans and had a tight belt on Jeff was unable to touch her buttocks. Jeff then rolled onto his back during the massage; he attempted to touch her breasts. [redacted] then became upset again and told him she didn't want to be touched. [redacted] discontinued the massage and was paid $200.00. [redacted] then went downstairs where [redacted] was waiting for her. She told [redacted] she wanted to leave. [redacted] said she never returned to the house. [redacted] stated she is aware that her friend, [redacted] was also at the house and had a problem with Jeff. She provided a telephone number

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for [redacted] The interview was concluded and the micro cassettes were turn in as evidence.

On October 5, 2005, I researched the incoming telephone number that had left [redacted] a message. The telephone number, [redacted], was assigned to ATT/Cingular Cellular service. I prepared a subpoena request and faxed the request to the State Attorney s Office. Information requested was subscriber information as well as all incoming and outgoing calls for the months of September and October 2005.

I later researched [redacted] and discovered she resides in Royal Palm Beach. Det. Dawson and I drove to Royal Palm Beach and met with [redacted] at her residence [redacted] in Royal Palm Beach.

[redacted] agreed to speak with us in the kitchen area. During a sworn taped statement, [redacted] stated the following: On or about November 2004, she was approached by [redacted] and asked if she wanted to make money. She agreed and was told she would provide a massage to wealthy man in Palm Beach. [redacted] picked her up and drove her to a house in Palm Beach. She was brought into the kitchen area of the house. She further stated that [redacted] and [redacted] ([redacted] went with them. They were brought into the kitchen where she was introduced to Jeff and other females. [redacted] stated she was introduced to a helper of Jeff; the female was described as white female (unknown name), with blond hair. She stated that the assistant was familiar with [redacted] The assistant set up the massage table and put out lotions to be used. She told [redacted] Jeff would available in a minute. Jeff entered the room wearing only a towel. Jeff lay on the massage table and picked a lotion to rub on his thighs and back. [redacted] further stated that during the massage Jeff asked her to remove her clothes. She complied and removed her pants and blouse. [redacted] didn't remember if she had removed her bra but feels that she did. [redacted] was certain that she stayed in her thong underwear. [redacted] continued the massage and at one point she straddled him to massage his back, which touched his buttocks with hers. [redacted] was instructed to return to the ground at which time Jeff turned to have his chest rubbed. [redacted] advised it was at this time she is sure he was masturbating. [redacted] did not want to look at his penis area because she was uncomfortable. Jeff removed a large white vibrator and turned it on. [redacted] stated he began rubbing the vibrator over her thong underwear on her vaginal area. Shortly thereafter, Jeff ejaculated and removed himself from the table. He walked over to where the shower was and opened the glass door. She waited as he was taking a shower in her direct view. When I asked [redacted] how old she was when this occurred, she stated she had just turned seventeen. At the conclusion of the shower, [redacted] was paid either $350.00 or $400.00. She stated she wasn't sure, but knows it was close to $400.00. At the conclusion of the interview, [redacted] stated she never returned to provide a massage for Jeff. She advised she was ashamed and uncomfortable with the situation.

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Det. Dawson and I then left the area and responded to the [redacted] High School where [redacted] and all the above-mentioned girls had attended. I met with School Police Officer, Off Williams. I explained I was looking for a previous student who attended [redacted] High School. I inquired about [redacted]s. I further explained that I was working a case in which most of the girls I have interviewed are either witnesses or victims and felt that [redacted] may be one as well. Officer Williams researched his previous student records and found [redacted] She attended the same year and graduated in the same year as the other girls. I was provided the last known address of [redacted]

At approximately 2:10 pm, Det. Dawson and I met with [redacted] at her residence, [redacted] years of age, I had notified her mother, Mrs. [redacted] that she would be interviewed reference an ongoing investigation in Palm Beach. I assured her that her daughter was not a suspect. I explained the possibility of her being either a witness or victim. Mrs. [redacted] advised she wanted [redacted] to cooperate and consented to the interview. During a sworn taped statement, [redacted] stated the following: at the age of sixteen, during the month of September 2004, she was approached by [redacted] for a chance to make money. [redacted] was friends with the friends of [redacted] and knew the same people. [redacted] had been previously told by her friends what [redacted] did for Jeff. [redacted] called a person known to [redacted] as [redacted] and scheduled the appointment. [redacted] picked [redacted] up and drove her to Palm Beach to a street called Brillo Way. They drove to the end of the street and entered a large driveway. They entered the kitchen area of the house and met with Jeff. [redacted] was introduced to Jeff. [redacted] led [redacted] upstairs to the main bedroom area and set up the room with a massage table and set out the oils. [redacted] dimmed the lights and turned on soft music. [redacted] exited the room and Jeff entered the room wearing only a towel. Jeff picked oils and instructed her to rub his legs, under his buttocks, back and chest area. Jeff asked her to get comfortable. [redacted] advised she did not remove her clothes. She was wearing tight jeans and a cropped tank top exposing her belly area. During the massage, Jeff removed his towel. As [redacted] rubbed his chest area, Jeff attempted to reach down her pants through the buttocks area, however was unable to due to the tightness of the jeans and a tight belt. [redacted] advised Jeff began to masturbate as she rubbed his chest. Jeff moaned as she rubbed his chest. She observed he was continuing to masturbate and attempted to reach up her tank top and touch her breasts. [redacted] pulled back and Jeff stopped. However, he kept masturbating until he climaxed. He cleaned himself with the towel he was previously wearing. I asked [redacted] if she knew the difference between circumcised and not circumcised. She explained she knew and advised Jeff was circumcised. [redacted] was paid $200.00 for the massage and left the area. She met with [redacted] who was waiting in the kitchen area and left the house.

[redacted] then explained she never provided another massage for Jeff. She did however, go to the house with [redacted] and [redacted] ([redacted] as they

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took another friend of [redacted] [redacted] advised she was present when [redacted] went to work for Jeff. She advised she rode over and sat in the kitchen area with [redacted] to wait for [redacted] [redacted] advised that while they waited for [redacted] the house chef prepared lunch for them, as it was almost lunchtime. As [redacted] was finished with the massage, they left the area. I asked [redacted] if [redacted] ever told what would be expected of her when she provided a massage. [redacted] stated yes, [redacted] told her that a massage would be expected possibly naked and possibly some touching involved. [redacted] has no formal training in providing massages.

[redacted] spoke about a third and last time she went to Jeff's house. [redacted] drove another girl, [redacted], who is [redacted] friend, to Jeff's house. [redacted] stated she knew that [redacted] had made money providing girls for Jeff and she wanted to do the same. [redacted] took them in the kitchen area of the house and introduced [redacted] to [redacted]. [redacted] and [redacted] took [redacted] upstairs to the main bedroom. [redacted] advised she doesn t know what happened as [redacted] did not speak about what happened in the room. [redacted] received $100.00 from [redacted] for going with her to Jeff s house and recommending [redacted] [redacted] was unable to remember [redacted] s telephone number. The interview was concluded and we left the area.

Investigation Continues...

********** N A R R A T I V E # 10 **********

NA Reported By: RECAREY, JOSEPH 10/09/05
Entered By.: ALTOMARO, NICKIE A. 10/10/05

On October 6, 2005, Det. Dawson and I went to Lynn University located in Boca Raton. We met with Dean of Students, [redacted] Turner. I explained to Mr. Turner that we were investigating a crime within the Town of Palm Beach and felt that a student, [redacted] [redacted] may have information. Turner confirmed that [redacted] is a student and currently on the soccer team for Lynn University. She was in computer class at the time of our arrival. Turner sent a security guard to locate [redacted] in class and bring her to the office. Mr. Turner allowed us to interview [redacted] in an empty conference room.

At 11:45 am I met with [redacted] [redacted] and explained to her why we there to interview her. She advised she was aware of the ongoing investigation. [redacted] stated she had previously spoken with [redacted] [redacted] who told her she was interviewed by detectives. During a sworn taped statement, [redacted] stated she knew that [redacted] [redacted] worked for Jeff in Palm Beach. [redacted] advised she has been there many times for massages. I asked her if she had formal training in providing massages, [redacted] stated she did not. [redacted] advised she was told what was expected of her by providing massages and would have to remove clothing but if she felt uncomfortable just to say so and Jeff would stop pushing the issue. [redacted] began providing massages and advised she kept her clothes on. She considered Jeff a pervert who kept

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pushing to go further and further. [redacted] explained she would keep telling him she had a boyfriend and that it would not be right to her boyfriend. It wasn t until recently [redacted] admitted to removing her clothes and staying in her thong underwear to provide a massage. [redacted] explained Jeff wanted to be rubbed on his back and recently he began turning over to have her rub his chest as he masturbated. He would try to touch her breasts as she rubbed his chest. [redacted] stated, Jeff would try to get away with more and more on each massage. Originally, [redacted] drove her to the house for the original massage. [redacted] left [redacted] her cell phone number and every time Jeff would come into town, [redacted] would call her for an appointment. Each time she went, [redacted] would meet her at the kitchen door area. She would bring her upstairs and prepare the massage table. [redacted] advised Jeff would ask her questions about herself. He knew she was a soccer player and would be attending Lynn University. I asked [redacted] if he knew her real age, [redacted] stated Jeff didn t care. The most recent massage she provided was on October 1, 2005. During the massage she asked Jeff if she could borrow one of his vehicles to visit her family and boyfriend in Orlando. Jeff had told she could borrow one of his vehicles but later stated he would rent her a car. She continued with the massage as Jeff grabbed her buttocks and caressed the buttocks cheeks. I asked [redacted] if she was wearing undergarments to which she replied her thong underwear. Once he tried to touch her breasts she would pull away from him and he would stop. [redacted] was asked if he ever used a vibrator on her. [redacted] was aware of the vibrator but advised she never would allow him to use the vibrator on her. She described the vibrator as a large white vibrator with a huge head on the tip of the vibrator. She stated he kept the vibrator in a closet near the massage table. [redacted] advised she had been doing the massage for approximately two years, which meant she would have started doing massages for Jeff at the age of sixteen.

[redacted] stated she was contacted by [redacted] on October 3, 2005. [redacted] had informed her that Jeff had rented her a new Nissan Sentra and she should come by the house to pick it up. [redacted] informed [redacted] she would have the car for a month. [redacted] stated Jeff knew her car was not working properly and had missed appointments in the past because of her car being inoperable. [redacted] explained the car is currently parked next to the Gym field. I asked her if she ever took any one to the house. [redacted] explained she took [redacted] [redacted] a friend of hers who has returned to Orlando to attend college. I asked she ever allowed another female in the room. [redacted] advised no one was brought into the room with her. At the conclusion of the interview, Det. Dawson and I went to the Gym area and located the Silver Nissan Sentra bearing Florida tag [redacted]. The vehicle is registered to Dollar rent a car out of the Palm Beach International Airport.

Telephone contact was made with [redacted] the victim's mother, at [redacted] I explained to her that I was following up on this case and provided a complete update on the case.

Investigation Continues.

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********** N A R R A T I V E # 11 **********
NA Reported By: RECAREY, JOSEPH 10/21/05
Entered By.: ALTOMARO, NICKIE A. 10/21/05

On October 10, 2005, at approximately 2:30 p.m., I made telephone contact with [redacted] During a taped conversation, [redacted] was told of an ongoing investigation in which I felt she had information pertaining to Jeffrey Epstein. [redacted] explained she met Epstein when she was just sixteen years of age. She was approached by [redacted] a friend who also had previously gone to Epstein's house for massages. [redacted] advised she was working at the Wellington Mall when she was approached. [redacted] told her that she would have to provide a massage to Epstein and she would have to perform this massage naked. [redacted] thought about the offer and stated she could make $200.00 for only 30 minutes of work. She agreed to perform the massage and [redacted] set the appointment for her that same day. [redacted] remembered it was a weekend as she only worked at the mall on the weekends. [redacted] took her to the house where she was introduced to [redacted], Jeff Epstein's assistant. [redacted] took her upstairs to a master bedroom. [redacted] explained that as she was walking up the stairs she observed several photographs of naked women along the walls and tables of the house. [redacted] further explained that she was brought into the bedroom where [redacted] prepared the room by setting up the massage table and provided the oils for her to rub on Epstein.

Epstein entered the room and introduced himself. Epstein lay on the table and told her to get comfortable. [redacted] could not remember if he was naked or if he entered the room with a towel. [redacted] stated she provided the massage wearing only her panties. She continued rubbing his legs, thighs and feet. [redacted] advised he turned over onto his back. She continued to rub his legs with the oils. Epstein touched her breasts and began to masturbate. I asked [redacted] if she knew what circumcised and un-circumcised meant. [redacted] stated circumcised is when the penis has no foreskin and the head of the penis is visible. [redacted] said Epstein is circumcised. [redacted] began to cry on the telephone and stated she had been to his house hundreds of times over a two-year period. She claimed to have made thousands of dollars during her visits. [redacted] stated she could not remember how many times exactly she went to Epstein's home but said it was a lot.

[redacted] became more upset, crying hysterically and stated she was paid and instructed to have sex with Epstein's assistant, [redacted] by Epstein. Epstein continued to watch them have sex and masturbated himself as they had sex with each other. She further stated that things escalated further and further. Epstein used sexual toys such as vibrators, rubber penises and strap-on penises on [redacted] Additionally, [redacted] stated he performed oral sex on her numerous times. She claimed he (Epstein) put his fingers inside her vagina while he masturbated in an attempt to make her climax. [redacted] could not continue and wanted some time to regain her composure. I explained to [redacted] to take her time. After taking several minutes to regain her composure I

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explained that I would travel to meet with her in person as I felt she had additional information to provide. I met with Sgt. Frick and explained the importance to meet with [redacted] in person. Sgt. Frick agreed and made arraignments for Det. Dawson and I to meet with [redacted] in Jacksonville, Florida.

On October 11, 2005, at 4:10 p.m., Det. Dawson and I met with [redacted] and her friend, [redacted] at [redacted] in Jacksonville, Florida. [redacted] wanted to have [redacted] present for support. I explained to her that I did not have a problem as long as she wanted [redacted] present during the interview. [redacted] stated she wanted her present. I explained that as [redacted] was present she was not allowed to comment or ask any questions during the interview. She was only there to comfort [redacted] should the interview upset her.

During a sworn taped statement, [redacted] explained how everything began. She said she was brought through the kitchen area where she met [redacted] for the first time. She was led to the master bedroom, Epstein s room. [redacted] explained that as she was walking up the stairs she observed several photographs of naked women along the walls and tables of the house. [redacted] further explained that she was brought into the bedroom, where [redacted] prepared the room by setting up the massage table and provided the oils for her to rub on Epstein. [redacted] explained she remembered the steam room area, which contained two large showers. Epstein entered the room from the steam room area and introduced himself. Epstein lay on the table and told her to get comfortable. [redacted] removed her skirt and kept her shirt on. She could not remember if he was naked or if he entered the room with a towel. Epstein then instructed her to remove her shirt. [redacted] removed her shirt and remembered she was not wearing a bra. [redacted] stated she provided the massage wearing only her panties. She continued rubbing his legs, thighs and feet. [redacted] advised he turned over onto his back. She continued to rub his legs with the oils. Epstein touched her breasts and began to masturbate. Epstein ejaculated which meant the massage was over. At the conclusion of the massage, [redacted] was paid $200.00. They walked together downstairs where [redacted] and [redacted] were waiting. [redacted] stated [redacted] received an unknown amount of money for taking her to Epstein. Epstein instructed to leave her cellular telephone number so that he could contact her when he is in town.

[redacted] explained that she continued to go to Epstein s house and became a regular at the house. She could not provide an exact number but claimed she had been their hundreds of times. She claimed sexual activities did not occur every time she was there. There were times she went to dinners and parties with Epstein. [redacted] explained that things began to escalate more than the massage. The encounters included bringing in his assistant, [redacted]. [redacted] explained Epstein had purchased her from her family in Yugoslavia. Epstein bragged he brought her into the United States to be his Yugoslavian sex slave. [redacted] advised [redacted] naked in the bedroom, she entered and removed her clothing. [redacted] entered the room from the steam room area already naked. He instructed [redacted] to perform oral sex on

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[redacted]. [redacted] refused to perform that act. Epstein offered her an additional $200.00 for her to perform oral sex on [redacted] for five minutes. [redacted] agreed to perform the oral sex for the additional $200.00. [redacted] explained that Epstein would masturbate while he watched them perform sexual acts.

Things continued to escalate by purchasing sex toys. [redacted] stated she had massagers, vibrators and strap on rubber penises used on her. Each time something new was introduced additional monies were produced and offered for [redacted] to allow the acts to happen. [redacted] was adamant that she performs all these acts but there was an understanding with Epstein that no vaginal penetration would occur with his penis. [redacted] explained that Epstein's penis was deformed. [redacted] explained that his penis was oval shaped. She claimed when Epstein's penis was erect, it was thick toward the bottom but was thin and small toward the head portion. She called it egg-shaped.

[redacted] continued that the sexual encounters with [redacted], Epstein and her became a ritual. [redacted] would arrive at the house and walk herself upstairs, where Marcinkova and Epstein were waiting. [redacted] would remove her clothing and join them on the bed. [redacted] explained [redacted] and she would begin by kissing and touching each other. [redacted] explained sex toys were brought into the bed by either Epstein or [redacted] and they would begin using the toys on each other. Epstein would perform oral sex on either person depending who was on top during the intercourse. [redacted] explanation revealed they were in a missionary position.

[redacted] advised one day, ([redacted] was unable to state and exact date when this incident occurred), she came to the house after [redacted] had informed her that Epstein had arrived. She arrived at the house and went upstairs to the master bedroom. [redacted] advised she immediately removed her clothing, as [redacted] and Epstein were already naked in the bedroom. [redacted] explained that [redacted] and she had a sexual encounter to include kissing, touching and oral sex. [redacted] remembered that she climaxed and was removing her self from the massage table. [redacted] asked for a sheet of paper and drew the massage table in the master bathroom and where Epstein, [redacted] and she were. Epstein turned [redacted] on to her stomach on the massage bed and inserted his penis into her vagina. [redacted] stated Epstein began to pump his penis in her vagina. [redacted] became upset over this. She said her head was being held against the bed forcibly, as he continued to pump inside her. She screamed no, and Epstein stopped. She told him that she did not want to have his penis inside of her. Epstein apologized for his actions and subsequently paid her a thousand dollars for that visit. Additionally, shortly thereafter, Epstein gave [redacted] a 2005 Doge Neon, blue in color for her personal use.

[redacted] advised there were times that she was so sore when she left Epstein's house. [redacted] advised she was ripped, torn, in her vagina area. [redacted] advised she had difficulty walking to the car after leaving the house because she was so sore. [redacted] advised that other

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than that one time, when Epstein inserted his penis inside her vagina, there was no other penile intercourse.

[redacted] provided names of girls that she knew of that have gone to Epstein's house. [redacted] provided the name of [redacted] [redacted] and feels she still may be going to the house to massage Epstein. According to [redacted] "[redacted] is still sucking his dick."

When asked if she had been recently contacted by anyone of the house, [redacted] advised she received an email from [redacted], from [redacted], which is her email account. The email was just a hello, how are you doing type of email. There had been no other contact from the house. The interview was concluded and [redacted] left the area. The tapes and drawing were submitted into evidence.

Investigation continues...

********** N A R R A T I V E # 12 **********

NA Reported By: RECAREY, JOSEPH 11/01/05
Entered By.: ALTOMARO, NICKIE A. 11/07/05

On October 12, 2005, Det. Dawson and I traveled to the Orlando area and made telephone contact with [redacted] [redacted] [redacted] agreed to meet with us as we were in the Orlando area. [redacted] provided directions to her apartment. Det. Dawson and I met with [redacted] who stated, during a sworn taped statement that nothing happened between her and Epstein. [redacted] appeared nervous during the interview. I assured her that I had spoken with other people who advised differently. [redacted] stated she only went a couple of times and provided a massage to Epstein. She stated she was brought to the Epstein house in March of 2005. [redacted] [redacted] brought her to work. [redacted] has no formal training in providing massages. [redacted] stated she provided a massage, fully clothed for $200.00. As I sensed hesitancy in her answers, I asked [redacted] if she had been contacted by anyone from the house. [redacted] stated she was interviewed already by an investigator for Epstein. He met with her on October 8, 2005, at a Roadhouse in Orlando. He identified himself as [redacted] and inquired about the police investigation and left his telephone number [redacted] for additional contact. [redacted] provided no additional information, as it appeared her responses were almost scripted. We left the area and returned to Palm Beach Police Department.

Based on the information acquired during the interviews, a search warrant was prepared for entry at the Epstein home. On October 18, 2005, I met with Judge Laura Johnson who reviewed the warrant request. She found there was sufficient probable cause and signed the warrant request. On October 20, 2005, at approximately 9:36 am, members of the Palm Beach Police Investigations Unit executed the search warrant at 358 El Brillo in Palm Beach. Members of the Investigations Unit included Capt Gudger, Sgt Frick, Det. Dicks, Det. Dawson, Det. Melnichok, Det. Sandman, Det. Krauel, the crime scene unit and myself.

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As we entered onto the property, we encountered the house manager, Janusz Banasiak who was in the guest portion of the house. The guesthouse section had open doors and no forced entry was made. I made contact with Banasiak, Date of Birth [redacted] Fl DL [redacted], and informed him of the search warrant for the premises. The members of the Police Department entered the residence and announced we had a search warrant. A safety search was done and members exited the home. I read the search warrant to Banasiak as Mgr Parkinson videotaped the search warrant execution. Several interior decorators were located on the property. I spoke with Mark Zeff, of 515 W 20th Street in New York. Mr. Zeff stated he is the designer for Mr. Epstein's homes. He advised he was contacted in March of 2005 to do a complete overhaul on the house. He advised he was on the phone with Mr. Epstein when officers announced the search warrant. Mr. Epstein was then made aware of the search warrant. Mr. Zeff advised, his contact with Epstein is strictly business and he has never witnessed Epstein with any girls except for his assistants, [redacted] or [redacted]

I then interviewed Daniel Estes, of [redacted] in New York. Mr. Estes stated he has worked for Zeff for seven years. He advised he personally worked on the New York and Palm Beach home for Mr. Epstein. He has previously met with [redacted] and [redacted], Epstein's assistants in New York and in Florida. Estes stated they travel with Epstein everywhere he goes.

I interviewed [redacted] of [redacted] Jersey City, New Jersey. [redacted] stated she just arrived from Scotland and has worked with Zeff for only one month. She stated she has never met Epstein and has not seen him. The interview was then concluded.

I then spoke with Douglas Schoettle of [redacted] Dr in New York City. Schoettle stated he has been Epstein's Architect for seven years. He further stated he deals with Epstein's assistants and speaks with Epstein on the phone. Schoettle stated he mainly speaks with [redacted], Epstein s main assistant, who travels with Epstein. Schoettle stated he only has contact with Epstein when his services are needed.

At approximately 10:30 am, I was informed that the videotaping was concluded. I entered the residence and located two covert (hidden) cameras. The first camera was a covert wall clock in the garage area. I traced the wire behind the clock and removed the RCA wire and unplugged the camera. The other covert camera was located within a desk clock beside Epstein's desk. I traced the wire behind the clock and unplugged the RCA wire. I could not locate another camera. I then began with the search of the residence for the specified evidence.

My search consisted of the second floor. Det. Krauel and I began in the master bedroom area where several items were located. They were

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marked to be retrieved by the evidence custodian. In the master desk with Epstein's notepads marked Jeffrey Epstein we located a high school transcript from [redacted] High School for [redacted] Also in the room, was the dresser /armoire where we located a bottle of peach flavored Joy Jelly (Sexual Lubricant). Additionally, there were several photographs of young naked teenage girls within the closet, which was consistent with what the witnesses said. The massage table was also located within the master bedroom. Video tapes were located beside the television, which were also collected. An itemized list of the property and locations was prepared on the property receipts. At approximately 2:55 pm, the house was secured; the exit of the residence was videotaped. Upon our exit of the property, I encountered Atty. Guy Fronstein who advised he was representing Mr. Epstein. He provided a business card and provided his assistance with the investigation.

Due to Hurricane Wilma, which struck South Florida causing massive power outages, the courthouse was closed due to the lack of power. I was previously told that the Chief Judge had extended the filing deadlines due to the hurricane and the Courthouse being closed. On October 27, and 28, 2005 the courthouse was closed and I could not file the search warrant and inventory at the clerk's office. On October 31, 2005, I responded to the courthouse and filed the paperwork along with an order to seal, signed by Judge Johnson, to deny any release of any paperwork on this case.

INV CONTINUES..

********** N A R R A T I V E # 13 **********

NA Reported By: PARKINSON, GREGORY A. 10/20/05
Entered By.: ALTOMARO, NICKIE A. 11/07/05

On October 20, 2005, at approximately 8:30 a.m., Thursday morning, I was advised by Captain Gudger that a search warrant would be executed and that I was to assemble the Crime Scene Investigative Team and stand by the south side of the building ready to go. I designated Evidence Specialist [redacted] to handle the inventory return, the documentation of the property receipts and the collection and bagging of the evidence at the scene. I further instructed CSI Kim Pavlik, ID # 8807, to accompany us and perform the role of photographing the scene and the items that may be taken into custody by the affiant, Detective Joseph Recarey, ID # 7915.

My responsibility was to go through from the reading of the warrant to the final exit from the residence and perform a video recording of the reading of the warrant, the initial walk through of the residence showing the current condition and then finally a walk through of the residence at the time of the police exit.

We started out towards the residence, which was located at 358 El Brillo and arrived at approximately 9:33 a.m. The search was conducted, items were collected by Evidence Specialists Badger,

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photographed by CSI Pavlik and then videotaped by myself. The search was concluded at approximately 3:05 p.m. whereupon Detective Recarey and I were the last two officers in the house. Upon securing the residence we met with the gentleman who identified himself to Detective Recarey as the lawyer for the defendant and he was informed that the residence was secured and that copies of the inventory return had been left on the first floor table of the personal assistant's office.

Detective Recarey and I returned to Police Headquarters and secured for the day.

********** N A R R A T I V E # 14 **********

NA Reported By: DAWSON, MICHAEL C. 11/07/05
Entered By.: ALTOMARO, NICKIE A. 11/07/05

On October 20, 2005, I assisted Defective Recarey in the execution of a search warrant at 358 El Brillo Way, Palm Beach, Florida, 33480.

Upon the announcement of the search warrant, immediate contact was made with three white males who came out of the house or surrounding structures. Those males were identified as Janusz Banasiak, Daniel Estes, and Mark Zeff. As other members of the police department cleared the home, I kept watch over these three males. Once the house was cleared, those males were turned over to Detective Recarey.

Detective Dicks and I were assigned to assist in the search of the main house, the cabana and the servant's quarters. We started in the garage. All areas of the garage were searched to include four vehicles. These vehicles were three black Mercedes Benz cars registered to Jeffrey Epstein. The fourth vehicle was a Harley Davidson motorcycle, green in color, registered to Jeffrey Epstein. Nothing was recovered from the garage.

A towel closet and pantry located off the kitchen were searched and yielded negative results.

The kitchen was searched and taken into evidence was a phone message book that was located near a house phone.

North of the kitchen was an office room which contained a computer. The room had a closet that contained a locked gun locker. The combination was entered by Banasiak in the presence of Sgt. Frick and the safe was opened. Items were taken from the room. See the completed property receipt for a detailed list.

A green bathroom located on the first floor was searched and nothing was taken.

A closet located just west of the green bathroom was searched. Two massage tables were located in the closet along with a photo of a nude

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female from the waist up. See the property receipt for details.

I searched two bedrooms and their adjoining bathrooms, which were located on the second floor on the East side of the house. In the Northeast bedroom closet I found adult sex toys called Twin Torpedoes. Soap made in the shape of a penis and vagina were also found in these upstair bedrooms. See the property receipt for details.

I searched the pool cabana located on the South side of the pool. Photos were taken from the wall. See the property receipt for details.

I assisted in the search of Banasiak's living quarters. Numerous CD s along with a message book was seized. See the property receipt for details.

********** N A R R A T I V E # 15 **********

NA Reported By: RECAREY, JOSEPH 11/08/05
Entered By.: ALTOMARO, NICKIE A. 11/08/05

On November 1, 2005, I was contacted by Atty. Gus Fronstin, who advised he was willing to assist with the investigation. Atty. Fronstin advised he would try to have his client, Jeffrey Epstein available to be interviewed. I explained I would be interested in conducting an interview with his client as well as other employees that are employed within the house. Atty. Fronstin advised he would return my call once he received confirmation on the interviews.

On November 6, 2005, I attempted contact with [redacted] [redacted] at her residence. I left a business card for her to return my call. Upon returning to the police department, I had received a telephone call from [redacted] [redacted] I returned her call at 561-[redacted]-[redacted] and spoke with [redacted] She made arrangements to respond to the station to provide an interview. At approximately 3:30 pm, she arrived at the Palm Beach Police Station with her boyfriend. Her boyfriend was allowed to sit in the lobby area while Ms. [redacted] was interviewed.

I took Ms [redacted] to the Detective Bureau Interview room. I closed the door for privacy and explained to her that I appreciated her coming to the police station for the interview. During the sworn taped statement, she advised she was at Jeffrey Epstein s house one time. Approximately two months ago, she was approached by a girl, [redacted] [redacted] who was dating her roommate, to make some quick money. [redacted] advised she was in need to make some quick cash to make the rent that month. She agreed to go to the house. She had been told by [redacted] [redacted] that the massage would have to be done in her underwear. She advised [redacted] drove with her and brought her into the house. They walked into the kitchen area and took the stairs upstairs. [redacted] further stated she was brought into a master bedroom area. She advised she recalled seeing portraits of naked women throughout the room. A massage table was already out near the sauna/shower area in the master bedroom. Epstein entered the room wearing only a towel and

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introduced himself as Jeff. [redacted] advised she recalled she and [redacted] removed their clothing down to their panties, Epstein lay on his stomach area and they provided a massage on his legs and feet area. I asked [redacted] if she had any formal massage training and she replied no. [redacted] advised she was topless and the panties she wore were the boy shorts lace panties. She and [redacted] continued the massage until the last ten minutes of the massage, Epstein, told [redacted] to leave the room so that [redacted] could finish the massage.

[redacted] got dressed and Epstein turned over onto his back. Epstein then removed the towel, which had been around his waist. Epstein laid there naked and requested that [redacted] rub his chest area. [redacted] stated as she did this, Epstein, began masturbating as she rubbed his chest. [redacted] stated he pulled down her boy short panties and he produced a large white vibrator with a large head. She stated it was within a drawer in his master bathroom. He rubbed the vibrator on her vagina area. [redacted] advised he never penetrated her vagina with the vibrator.

He continued to rub her vagina with the vibrator as he continued to masturbate. [redacted] stated she was very uncomfortable during the incident but knew it was almost over. Epstein climaxed and started to remove himself from the table. He wiped himself with the towel he had on previously and went into the shower area. [redacted] got dressed and met with [redacted] in the kitchen area. Epstein came into the kitchen and provided [redacted] $200.00 for bringing [redacted] and paid $200.00 to [redacted] for providing the massage. [redacted] was told to leave her telephone number with [redacted], his assistant for future contact. [redacted] provided her cellular telephone number for future contact. [redacted] was asked if she was recently contacted about this investigation by anyone from the Epstein organization. She replied she was called but it was for work. She stated she was called by [redacted] for her to return to work for Epstein. [redacted] stated work is the term used by [redacted] to provide the massage in underwear. [redacted] advised she declined, as she was not comfortable in providing that type of work. The interview was concluded and the videotape was placed into evidence.

Investigation Continues..

********** N A R R A T I V E # 16 **********

NA Reported By: RECAREY, JOSEPH 11/10/05
Entered By.: ALTOMARO, NICKIE A. 11/10/05

On November 7, 2005, I made telephone contact with [redacted] who advised she would be able to meet with me at her home. Det. Sandman and I traveled to her home in [redacted] and made contact with [redacted] During a sworn taped statement, [redacted] stated she met Jeffrey Epstein through [redacted] would approach females who wished to work for him. [redacted] stated she was asked to work for him but declined. [redacted] explained that work means give massages. She was asked about any formal training in providing massages to which she said no. [redacted] said she accompanied [redacted] and other females

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who were taken to Epstein s house to provide massages. [redacted] further stated she had been to the house approximately 4 or 5 times in the past year. She accompanied [redacted] with [redacted] the 14-year-old victim, and [redacted] Each time the girls were taken over, they were previously told they would have to provide a massage, possibly naked. It was also told that should Epstein require them to do anything extra and they were not comfortable just to tell him and he would stop. [redacted] stated [redacted] received $200.00 for each girl she brought over to massage Jeffrey Epstein. When I asked which girl appeared to be the youngest, she replied, the victim, as she stated she was fifteen years old at the most; she looked really young. [redacted] further stated each time she went to the house, she sat in the kitchen and waited with [redacted] until the massage was over. She further stated that the cook would make lunch or a snack for them as they waited. I asked her if there was anything that caught her attention within the home. [redacted] stated there were a lot of naked girls in photographs throughout the house. The interview was concluded and the tape was turned into evidence.

Investigation Continues..

********** N A R R A T I V E # 17 **********

NA Reported By: RECAREY, JOSEPH 11/10/05
Entered By.: ALTOMARO, NICKIE A. 11/10/05

Det. Dawson and I attempted contact with [redacted] in Royal Palm Beach. I left my business card at her front door. Ms [redacted] returned my call and arranged a meeting with me at the Palm Beach Police Department for November 8, 2005. At approximately 2:00pm, [redacted] arrived at the Palm Beach Police Department. She was brought into the interview room and the door was closed for privacy. She was told that I appreciated her coming to the police station for questioning regarding an on going investigation. She was told that I was investigating a crime involving Jeffrey Epstein and knew, based on the investigation, that she had encounters with him in the past. During a sworn taped statement, [redacted] stated she had met Epstein approximately two years ago. She was first introduced to Epstein by [redacted] approached her about working for Epstein and providing a massage to him for $200.00. The arrangements were made and as [redacted] could not take her the day the arrangements were made, [redacted] took [redacted] also attended [redacted] High School and was familiar with Epstein.

[redacted] recalled she was brought there and entered through the back kitchen door. She had met with an assistant [redacted] and another assistant [redacted]. [redacted] brought her upstairs as she observed several photographs of naked females throughout the house. [redacted] stated Epstein came in the room, wearing only a towel, and laid on the table. [redacted] stated he picked out the oils he wanted her to use and requested she remove her clothing to provide the massage. [redacted] stated that on the first massage she provided she did not remove her

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clothing. [redacted] stated she had returned several times after that. Each time she returned more things happened. [redacted] stated that the same thing would happen. Epstein would walk into the master bedroom/bathroom area wearing only a towel. He would masturbate as she provided a massage. [redacted] stated she was unsure if he climaxed as he masturbated under the towel. Additionally she never looked blow his waist. She claimed that Epstein would convince her to remove her clothes. She eventually removed her clothes and stayed in her thong panties. On occasion, Epstein would use a massager/vibrator, which she described as white in color with a large head, on her. Every time she provided a massage he would masturbate. [redacted] added she has no formal training in providing a massage. [redacted] stated she brought two females during her visits to provide massages. [redacted] stated she brought a girl named [redacted] and [redacted] [redacted] from [redacted] High School. [redacted] stated she received $200.00 for each girl she brought. Additionally, [redacted] was given $200.00 for taking her in the very beginning. The interview was concluded and the tape was placed into evidence.

Investigation continues...

********** N A R R A T I V E # 18 **********

NA Reported By: RECAREY, JOSEPH 11/13/05
Entered By.: ALTOMARO, NICKIE A. 11/14/05

On November 8, 2005, I made telephone contact with [redacted] [redacted] W/F, [redacted], at her residence. [redacted] responded to the police station for an interview reference an ongoing investigation. At approximately 2:30 pm, she arrived at the Palm Beach Police Station and was brought into the interview room for the interview. The door was closed for privacy and she was told that I appreciated her cooperation in this case. During a sworn taped statement, [redacted] stated she had met Jeffrey Epstein approximately one year ago. She was approached by a subject known to her as [redacted] [redacted] [redacted] had asked her if she wanted to make money providing massages to Epstein. [redacted] had heard that several girls from [redacted] High School were doing this and making money. She agreed and was taken to the house by [redacted] [redacted] had introduced her to [redacted] and Epstein and brought her upstairs to a master bedroom and Master bathroom where a massage table was prepared and the proper oils were taken out. [redacted] left the room and waited downstairs for [redacted] [redacted] stated Epstein entered the room wearing a towel and she provided a massage wearing only her thong panties. [redacted] advised Epstein had masturbated every time she provided a massage. She stated Epstein continued to masturbate until he climaxed; once that occurred the massage was over. She felt the whole situation was weird but she advised she was paid $200.00 for providing the massage. She also stated [redacted] received $200.00 for bring [redacted] to Epstein.

[redacted] stated she had gone a total of 15 times to his residence to provide a massage and things had escalated from just providing a

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massage. Epstein began touching her on her buttocks and grabbed her closer to him as he masturbated. Epstein also grabbed her breasts and fondled her breast with his hands as she provided the massage. [redacted] stated on one occasion, he offered extra monies to have vaginal intercourse. She stated this all occurred on the massage table. [redacted] stated Epstein penetrated her vagina with his penis and began having intercourse with her until he reached the point of climax. Epstein removed his penis from her vagina and climaxed onto the massage table. [redacted] received $350.00 for her massage. I asked her if she had any formal training in providing massages, [redacted] stated she did not.

[redacted] continued to state on one other occasion, Epstein introduced his assistant, [redacted], into the massage. [redacted] was brought into room with [redacted] to provide a massage. Epstein had them kiss and fondle each other around the breasts and buttocks as they provided a massage to Epstein. Epstein, watched and masturbated as this occurred. On other occasions, Epstein introduced the large white vibrator/massager during the massage. Epstein stroked the vibrator/massager on [redacted] vagina as she provided the massage.

[redacted] stated the last time she spoke with anyone at the house, was with [redacted] during the weekend of October 2 or 3, 2005. [redacted] stated she had brought two people to the Epstein house. She provided the names of [redacted] [redacted] and [redacted] (unknown last name). It should noted, [redacted] had been previously identified as [redacted] [redacted] and had been previously interviewed. The interview was concluded and the videotape was placed into evidence via the locker system.

On November 9, 2005, Sgt Frick and I traveled to 6791 Fairway Lakes Drive in Boynton Beach, Florida in hopes to interview Juan Alessi, the former houseman of Epstein's home. As no one was home, a business card was left for him to return my call. We then traveled to 11349 SW 86th Lane in Miami in hopes to interview Alfredo Rodriguez, a former house man of Epstein. We did not locate them at home. I left a business card for him to return my call.

We then traveled to Lynn University and met with Dean of Students, Mr. Turner. We requested to speak with [redacted] [redacted] [redacted] was re interviewed, as she still was in possession of the rental car that Epstein had acquired for her. [redacted] stated that [redacted] Epstein's assistant, had called her on her cellular telephone and informed her that rental was extended for her. [redacted] stated she had paid an additional $625.00 for her to keep the rental an extra month. [redacted] was asked if she had any additional contact with either Epstein or anyone from his organization. [redacted] stated she did not, other than the telephone call informing her that she could keep the car for an extra month. [redacted] did not provide any additional information.

On November 10, 2005, at approximately 9:47 am, Alfredo Rodriguez had telephoned reference my business card found on his door. Rodriguez stated he had worked with Epstein for approximately six months after

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the previous houseman left. Rodriguez stated that it was his responsibility to keep the identity of the masseuses private. Mr. Epstein had a massage in the morning and one in the afternoon. Mr. Rodriguez stated he would rather speak about this in private. He advised he would come to the police station to speak with me. Rodriguez stated he would return my call on Monday, November 14, 2005.

I then made telephone contact with Juan Alessi. He advised he found my card on his door and wanted to know what I needed to speak with him about. I explained to Alessi that I was conducting an investigation on his former employer, Mr. Epstein. Alessi stated he would return my call shortly as he was in the middle of a project at his home. I received a telephone call from Attorney Donald Morrell from 686-2700. Mr. Morrell stated he represented Mr. Alessi and did not want me speaking with his client. I then made telephone contact with the State Attorney s Office and confirmed that subpoenas would be issued to the former employees to assist in the investigation.

I then made telephone contact with Attorney Guy Fronstin, attorney for Mr. Epstein. I explained to Mr. Fronstin that I would like to speak with Mr. Epstein. He stated Mr. Epstein is not in residence in Florida at this time and would check with him to ascertain if he could be here by Wednesday November 16, 2005 for an interview. Mr. Fronstin stated he would return my call should Mr. Epstein decide to come in to the police station for an interview.

Investigation continues.

********** N A R R A T I V E # 19 **********

NA Reported By: RECAREY, JOSEPH 11/15/05
Entered By.: ALTOMARO, NICKIE A. 11/16/05

On November 14, 2005, Det. Sandman and I traveled to [redacted] in Loxahatchee, Florida and spoke with [redacted] She was told of the ongoing investigation involving Epstein. [redacted] advised she had gone to the house on several occasions. During a sworn taped statement, she advised she started going to the house approximately one year ago and was brought by [redacted] (Unknown last name). [redacted] stated [redacted] brought her into the house and she was introduced to a girl named [redacted]. Once she met her, [redacted] brought her upstairs into a master bedroom bathroom. [redacted] stated she met Jeffrey in the bathroom. He lay on the table and picked the massage oils. She provided the massage, as he lay naked on the massage bed. She stated she rubbed his calves and back area. Upon the end of the massage, Epstein removed himself from the massage table and paid her $300.00 for the massage.

[redacted] stated she had only been at the house approximately five or six times. [redacted] said each time she went to the house she was notified by [redacted], Epstein's assistant, that Epstein was in town and would like her to work. [redacted] stated she returned to the house and was again led upstairs by [redacted] She provided the massage, clothed.

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[redacted] advised it wasn't really weird until later on. [redacted] was asked if she ever removed her clothing to provide a massage. [redacted] stated it was not until the third time she went that she removed her clothing. [redacted] stated she was notified by [redacted] that Epstein wanted her to come to work. She arrived at the house and was led upstairs by [redacted]. She started providing the massage when Epstein asked her to remove her clothing. [redacted] removed her pants, shirt and bra. She stayed in her thong panties and continued rubbing Epstein. Epstein turned over onto his back and she rubbed his chest area. [redacted] stated she knew he was masturbating himself as she providing the massage. [redacted] stated she believed he climaxed based on his breathing. She did not want to view either the climax or the fact that he was masturbating. [redacted] stated once the breathing relaxed he got up and told her to get dressed. She was paid $300.00 for her services.

[redacted] stated on the last time she went to provide a massage, she was notified by [redacted] to come to the house and work. [redacted] stated she was now dating her current boyfriend and did not feel comfortable going. She recalled it was approximately January 2005. She said she went, already thinking that this would be the last time. She went upstairs and went into the master bathroom. She met with Epstein, who was wearing only a towel as he entered the room to lie on the table. [redacted] stated Epstein caught her looking at the clock on several occasions. Epstein asked her if she was in a hurry. [redacted] stated her boyfriend was in the car waiting for her. [redacted] further stated that Epstein got upset, as she wasn't enjoying the massage. She told him that she didn't want to continue and she would not be back. Epstein told her to leave as she was ruining his massage. I asked her if she had any contact with Epstein's organization. she stated she received $200.00 from Western Union in [redacted] and Okeechobee Blvd as a Christmas gift. [redacted] advised she had no formal training in provide any massages. [redacted] also stated she was sixteen years old when she first went to Epstein's house.

At approximately 4:22 pm, I made telephone contact with [redacted] at [redacted]. She agreed to meet with me at a public place. I suggested she come to the police station for an interview. [redacted] did not want to meet at the police station. I recommended we meet at the Palm Beach Gardens Mall in the food court area. She agreed and an appointment was made for November 15, 2005 at 5:00 pm at the food court.

Investigations Continue.

********** N A R R A T I V E # 20 **********

NA Reported By: SANDMAN, [redacted] R. 11/16/05
Entered By.: ALTOMARO, NICKIE A. 11/17/05

On 10/20/2005, I assisted executing a search warrant at 358 El Brillo Way in the Town of Palm Beach, Palm Beach County Florida under the direction of affiant Detective Joe Recarey.

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Detective Melnichok and I searched the pantry room that is west next to the kitchen. This room had all white cabinets with a dark grey and black counter top. We did not find anything in this room.

We searched the yellow and blue room that is west next to the pantry room. This room had a very large statue of man with a bow. Taken into evidence from this room were nine photographs in frames of various women.

We searched the main entrance foyer that is to the north of the yellow and blue room. This room contained two bamboo chairs and ottomans with cushions. It also contained a round table with numerous books.

We searched another blue room that is west of the foyer. This room had a stereo system and book shelves that were from the floor to the ceiling. Taken into evidence from this room were eight photographs in frames of various women and/or Epstein, the owner of the residence.

We searched the room to the west of the blue room that has sliding glass doors that lead out to the pool. In this room in a dresser were two DVD's and two VCR tapes. These items were taken into evidence.

We searched a 2004 black Chevy Suburban bearing Florida tag [redacted] registered to Jeffrey Epstein DOB [redacted] which was located on the east side of the driveway facing south. I found a Thrifty rental agreement between the passenger seat and the middle console. The name on the rental agreement was [redacted] from [redacted] Palm Beach Gardens, Florida 33410. The phone number on the rental agreement was (561) [redacted] The vehicle rented was a white 2005 Chrysler Sebring bearing Florida tag [redacted]. The vehicle was rented on 9/25/05 at 17:58 hours and was returned on 9/26/05 at 16:52 hours. The last four numbers of the credit card used are [redacted] Detective Melnichok found a piece of paper in the middle console that said I used the cash in here to fill up the tank and was signed by [redacted]

I searched the 2005 black Cadillac Escalade ESV bearing Florida tag [redacted], registered to Jeffrey Epstein dob[redacted], which was located on the west side of the driveway facing south. I did not find anything in this vehicle.

All of the items that were taken into evidence were photographed in the place they were located and then turned over to crime scene.

********** N A R R A T I V E # 21 **********
NA Reported By: RECAREY, JOSEPH 11/17/05
Entered By.: ALTOMARO, NICKIE A. 11/17/05

Case No. . . . : 1-05-000368 (Continued)

On November 15, 2005, Det. Sandman and I traveled to 2950 Fontana Place in Royal Palm Beach. We met with [redacted] a seventeen-year old juvenile who was not in school this day due to a cold from which she was suffering. [redacted] was told that I needed to speak with her in reference to an ongoing investigation involving a subject she would know as Jeffrey Epstein. Prior to speaking with her, I explained that because of the fact that she is a minor, I needed to speak with her parents prior to speaking with her. She telephoned her father, Mr. [redacted] on his cell phone and explained to him that Det. Sandman and I were there to speak with her. I spoke with Mr. [redacted] on the telephone and informed him I needed to speak with his daughter in reference to an ongoing investigation. Mr. [redacted] advised he had no problem with us speaking with his daughter.

During a sworn taped statement, [redacted] stated she met Jeffrey Epstein over a year ago. She was sixteen years of age and was approached by [redacted] who informed her that she could make monies providing a massage to Epstein for $200.00. [redacted] had informed her that she would have to provide this massage topless. [redacted] made the arrangements with Epstein and his assistants and took [redacted] to the house. [redacted] stated [redacted] and she entered through a glass door that led into a kitchen. [redacted] took her upstairs, to a master bedroom and master bathroom. She recalled the bathroom had a large pink couch, sauna and matching shower. Epstein entered into the room wearing only a towel. [redacted] and [redacted] removed their clothing remaining only in thong underwear. She further stated that Epstein lay on his chest on the table. Epstein selected which oils to use for the massage. Both [redacted] and [redacted] provided the massage on his legs, back and feet. Forty minutes into the massage, Epstein turned over onto his back and requested [redacted] wait downstairs in the kitchen area for [redacted] Epstein instructed [redacted] to finish the massage. As [redacted] got dressed, [redacted] starting rubbing his chest. [redacted] left the room, and Epstein began masturbating himself as [redacted] rubbed Epstein s chest. [redacted] stated he continued masturbating until he climaxed on the towel he was wearing. When asked if he had removed the towel she stated he turned the towel around so that the opening would allow him to expose himself. After he cleaned himself off with the towel, he instructed [redacted] the massage was done and to get dressed and met with him downstairs. [redacted] got dressed and met with Epstein in the kitchen area. She was paid $200.00 dollars for providing the massage. [redacted] stated she was aware that [redacted] also received monies for the same thing.

The second time she went to the house she was again approached by [redacted] [redacted] asked if she wanted to return to the house to provide another massage; [redacted] agreed and the arrangements were made by [redacted] for her to return to the house. [redacted] stated [redacted] drove her to the house and knocked on the same glass door that leads to the kitchen area. They were allowed entry into the house by one of the staff members. [redacted] led her upstairs to the master bedroom and

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master bathroom area. [redacted] left [redacted] this time to do the massage alone. Epstein entered the room again wearing only a towel. [redacted] began removing her clothing as she did the last time she was at the house. Epstein instructed her to get naked. He lay on the table on his stomach as [redacted] began massaging his legs and back.

As [redacted] finished with Epstein's back and legs, Epstein then turned over onto his back. [redacted] started to rub his chest and he began masturbating himself. As [redacted] rubbed his chest, Epstein leaned over and produced a massager/vibrator. He turned it on and began rubbing [redacted] s vagina and masturbating himself at the same time. [redacted] stated she continued to rub his chest as this was occurring. She described the vibrator/massager as large, grey with a large head. Epstein rubbed her vagina for approximately two to three minutes with the massager/vibrator. He then removed the vibrator from her vaginal area and concentrated on masturbating himself. [redacted] stated he climaxed onto the towel again and informed her that the massage was done. [redacted] got dressed and met with [redacted] who was waiting in the kitchen area. She received $200.00 for the massage. [redacted] said she never returned to the house and had no desire to return to the house. [redacted] was asked if she received any formal massage training. She advised she had no formal training. [redacted] was asked if Epstein knew her real age. [redacted] stated he knew as he asked her questions about herself and high school. He was aware she attended and is still attending [redacted] High School.

The interview was concluded. I suggested [redacted] inform her parents of what occurred at the Epstein house. [redacted] stated she would tell her father as he was unaware this had occurred. I left my business card for any questions they may have. We left the area and returned to the police station. The tape was placed into evidence.

Investigation Continues.

********** N A R R A T I V E # 22 **********

NA Reported By: RECAREY, JOSEPH 11/17/05
Entered By.: ALTOMARO, NICKIE A. 11/17/05

On November 15, 2005, Officer Munyan and I responded to the Palm Beach Gardens Mall food court section to meet with [redacted] [redacted] At approximately 5:10 p.m., [redacted] arrived and met with us at the food court. [redacted] provided a sworn taped statement in which she stated she had been at the Epstein house over fifty times. She began going to Epstein's house when she turned eighteen years old. [redacted] was asked if she knew of the on-going investigation. [redacted] stated she was aware there was an investigation as she had been told by other girls that were interviewed. Additionally, she has had several telephone conversations with Epstein's assistants as to what had been going on during the investigation.

I asked [redacted] how she was introduced to Epstein. [redacted] stated she did not want to disclose who brought her to the house but she would

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respond to any other questions. When I asked her what happened at the house, [redacted] stated everything happened. It all began with the massages. Each time she went more things happened. She would massage Epstein and he would masturbate and climax. She stated things escalated from there. She provided oral sex on Epstein and he provided oral sex on her. She stated he would also use a massager/vibrator on her vagina to stimulate her as she massaged him. He introduced his assistant [redacted] or [redacted] to have vaginal intercourse with [redacted]. She stated [redacted] or [redacted] would utilize a strap-on (synthetic penis) to have intercourse with her. She was told to masturbate herself as Epstein and [redacted] had sexual intercourse. All this was done at Epstein's direction.

[redacted] could not provide exact dates as she had been to the house so many times. [redacted] stated Epstein inserted his fingers in her vagina to stimulate her as she massaged him. When I asked her if there had been any vaginal intercourse with Epstein, she stated she did not have sex with him. She did admit having sex with [redacted], his assistant. [redacted] stated not every time she went involved sexual favors. Sometimes she would just talk with him and get paid. I asked her how much she was paid each time she went to Epstein s residence. [redacted] stated she got paid $300.00 every time she went to the house. She was told to bring other girls to him to provide massages. [redacted] declined stating that she does what she does and did not want to introduce anyone else to do what she does. [redacted] stated she had never received any formal training in providing massages.

I showed [redacted] a photo line up in which [redacted] was placed in position six. She reviewed the six photographs and immediately identified [redacted] as the person with whom she had intercourse. Additionally, it was the same person she watched have intercourse with Epstein. She signed the photo line-up under [redacted] s photo as the person she identified. We then left the mall and returned to the police station. The photo line up and tape were placed in to evidence.

Investigation Continues...

********** N A R R A T I V E # 23 **********

NA Reported By: RECAREY, JOSEPH 11/29/05
Entered By.: ALTOMARO, NICKIE A. 12/01/05

On November 17, 2005, I received a phone message from Atty. Guy Fronstin who advised to call his cellular phone reference his client Jeffrey Epstein. I telephoned his cell phone and left a message for him to return my call. I did not receive a call back on Thursday, November 17, 2005. On Friday, November 18 2005, I retrieved another voice mail from my work phone from Mr. Fronstin advising he would not produce his client Jeffrey Epstein for any statement. Fronstin stated he had spoken with ASA Lana Belohlavek and expressed Mr. Epstein has a passion for massages. I called ASA Lana Belohlavek and confirmed that

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Fronstin had telephoned her reference this case. Although nothing was discussed, Mr. Fronstin did advise her that Epstein is very passionate about massages.

I also spoke with ASA Daliah Weiss reference the previous employees, Juan and Maria Alessi. She advised that they had been served through a subpoena process server. They were both scheduled to appear on Monday November 21, 2005 at 12:00 p.m.

On November 21, 2005, I met with ASA Weiss, Atty. Donnie Murrell and Juan and Maria Alessi at the State Attorney Office. ASA Weiss had requested a court reporter to be present to take the statement of the Alessi s. I spoke with Maria Alessi, in the presence of her attorney, Donnie Murrell. She advised she had worked for Epstein for eight years, from the period of 1994 through 2002. She advised she had never had any direct conversations with him. She stated it was her husband who spoke directly with Epstein. Her work consisted of doing house cleaning, shopping and other preparations when Epstein would arrive in town. Alessi stated the preparations consisted of preparing the house and bathrooms for his arrival. She advised she did view several masseuses that arrived at the house. She advised that two or three girls would come during a day and provide the massages. The girls that arrived looked young in age. Mrs. Alessi did not know any of the girls personally and were always different. She was told that when Epstein was in residence he did not want to encounter the Alessis during his stay in Palm Beach.

I then spoke with Mr. Alessi in the presence of his attorney, Donnie Murrell. Mr. Alessi stated that he was employed for eleven years with Mr. Epstein. He originally was hired as a part time employee and then moved up into a full time position. His duties included everything. Alessi stated he was the house manager, driver and house maintenance person. It was his responsibility to prepare the house for Epstein s arrival. When asked about cooks or assistants, Alessi stated they traveled with Epstein on his private plane. He remembered dealing with his girlfriend, Ms. Maxwell originally and then dealt with Epstein directly.

I asked Mr. Alessi about massages that occurred within the home. Mr. Alessi stated Mr. Epstein had up to three massages a day. Each masseuse that visited the house was different. Alessi stated that towards the end of his employment, the masseuses were younger and younger. When asked how young, Mr. Alessi stated they appeared to be sixteen or seventeen years of age at the most. The massages would occur in Epstein's bedroom or bathroom. There were times he recalled that he would set up the massage tables either in Epstein s bedroom or in his bathroom. I asked if there were things going on other than a massage. Alessi stated that there were times towards the end of his employment that he would have to wash off a massager/vibrator and a long rubber penis, which were in the sink after the massage. Additionally, he stated the bed would almost always have to be made after the massage. Alessi was never privy to what went on during the

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massages.

He was asked if he remembered any names of the girls that massaged Epstein. He tried to remember and was unable to provide any exact names of any girls. Alessi was asked about any contact with anyone from the Epstein organization. Alessi said he did speak with Mr. Epstein shortly after my initial contact with him to find out what was going on. Alessi also stated that approximately on November 11, 2005, he was contacted by a private investigator from the Law Office of Roy Black. The investigator had called him to meet with him to ascertain what he was going to tell the police. Alessi stated they met at the Carrabba s Restaurant in Boynton Beach and discussed the same questions I was asking him. I informed Mr. Alessi and Mr. Morrell that as this is an ongoing investigation and anything we discuss should be confidential. They both acknowledged the fact that the information would be kept confidential. It should be noted that a court reporter was present during the interviews and would be providing a copy of the statements to me when they become available.

On November 21, 2005, I received a voice mail from Mr. Fronstin who advised he would not be making Mr. Epstein available for any statements. He did have some words that he wanted to relay on behalf of Mr. Epstein. I telephoned his office and left a message for him to return my call.

On November 29, 2005, I received a call back from Mr. Fronstin who left a voice mail after hours on November 28, 2005, advising he would return my call during normal business hours to speak with me reference the case on November 29, 2005.

********** N A R R A T I V E # 24 **********

NA Reported By: RECAREY, JOSEPH 11/29/05
Entered By.: ALTOMARO, NICKIE A. 12/01/05

On November 29, 2005, at approximately 2:30 p.m. I received a telephone call on the department issued cell phone. Mr. Fronstin stated he was calling to relay information that Mr. Epstein wished he could relay. Mr. Fronstin stated that he would not allow Mr. Epstein to speak with me at this time. He further stated that Mr. Epstein is very passionate about massages. He continued that Mr. Epstein had allegedly donated over $100,000 to the Ballet of Florida for massages. The massages are therapeutic and spiritually sound for him that is why he has had many massages. Mr. Fronstin stated he appreciated the way the investigation has not been leaked out into the media. I explained to Mr. Fronstin that it is as important to protect the innocent if the allegations are not substantiated. Mr. Fronstin was told of the allegations that the private investigators assigned to the case have been portraying themselves as police officers. Additionally, I explained that my cell phone had been called by the private investigators. Mr. Fronstin advised he was not aware of that and advised they were under the direction of Attorney Roy Black in

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Miami. Mr. Fronstin further stated Epstein had originally called Mr. Dershorwitz in Boston, who recommended Roy Black in Miami, who asked Mr. Fronstin to assist. I informed him that if and when any charges would be presented I would notify him. The call was then terminated.

Investigation continues.

********** N A R R A T I V E # 25 **********

NA Reported By: RECAREY, JOSEPH 12/15/05
Entered By.: ALTOMARO, NICKIE A. 12/16/05

A review of the telephone message books, which were obtained during the search warrant, was conducted in which various messages from different dates were made to Jeffrey Epstein. The telephone message books have a duplicate copy (Carbon Copy) which, once a phone message is written into the book, the top copy is then torn on the perforated edge and the carbon copy is left in the book. First names of girls, dates and telephone numbers were on the copy of the messages. I recognized various numbers and names of girls that had already been interviewed. The body of the messages was time of the day that they called for confirmation of "work." Other names and telephone numbers were located in which the body of the messages were, "I have girls for him" or "I have 2 girls for him." These messages were taken by [redacted] for Jeffrey Epstein. Based on the context of the body of the messages, I requested subpoenas for subscriber information on the telephone numbers and the time frame involved. Copies of the messages were made for evidentiary purposes.

I obtained [redacted] High School yearbooks for 2005, 2004 and 2003. I first reviewed the 2005 yearbook and located most of the girls I had spoken with. Additionally, I located [redacted] Based on the corrected name spelling, I was able to locate her to her residence in Loxahatchee. On December 8, 2005, Det. Caristo and I responded to [redacted] in Loxahatchee. I located [redacted] at her home. She advised she is attending [redacted] High and is participating in the early release program so she can maintain her part time job. As she is still a minor, I left my business card to have her mother return my call to request an interview with her daughter. We then left the area.

I also had previously researched the telephone number for "[redacted] and telephone number 561-[redacted] A subpoena had been issued for the information on 561-[redacted] The telephone number was registered to [redacted] of [redacted] A query of [redacted] revealed that she is the daughter of [redacted] and is currently residing at [redacted] in West Palm Beach. Det. Caristo and I attempted contact with [redacted] with negative results. I left my business card on her front door requesting she return my call. We then responded to [redacted] in West Palm Beach. I also attempted contact with Mr. [redacted] with negative results. I left my business card for him to return my call.

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On December 9, 2005, I received a telephone call from [redacted] mother, who was made aware of the on going investigation in Palm Beach. [redacted] advised she was told of everything that occurred at Epstein's house involving Epstein and his staff. She advised she would allow me to question her daughter about what occurred and would cooperate with the investigation. [redacted] provided me with [redacted] cellular telephone number to schedule an appointment for an official interview. I telephoned her cellular telephone and made a tentative appointment for Monday, December 12, 2005.

I then received a telephone call from [redacted] father of [redacted] who stated he found the business card on his door. I explained that I was conducting an investigation and needed to speak with [redacted] as she may have information that could assist in the investigation. Mr. [redacted] stated that his daughter no longer resides with him and has her own trailer in another trailer park. He advised he would tell her to call me.

On December 12, 2005, due to a conflict with schedules, arrangements were made to meet with [redacted] on Tuesday, December 13, 2005 at 5:00 pm. On December 13, 2005, Det. Dawson and I traveled to Loxahatchee and met with [redacted] During a sworn taped statement, [redacted] stated that when she was sixteen years old, she was taken to Epstein's house to provide a massage for money. [redacted] stated it was before Christmas last year when [redacted] approached her and asked if she needed to make money for Christmas; [redacted] stated she did and agreed to provide a massage for money. [redacted] made arrangements to take [redacted] to the house and drove [redacted] to the house to "work." [redacted] stated she could not remember the street name but would be able to drive to the street. They drove to the last house on the street and pulled in the last house on left side. They walked up the driveway and entered through a side gate which led to a kitchen door. They knocked on the door and were encountered by an employee who [redacted] described as a "Spanish looking lady." They informed her that they were expected. They were then encountered by a white female with long blond hair. [redacted] was unable to remember the name of the white female with blond hair but knew she was Epstein's assistant. She was led upstairs by the white female who explained that there would be lotions out already and Epstein would choose the lotion he wanted her to use. She was led through a spiral staircase which led to a master bedroom and bathroom. The massage table was already set up in the bathroom. [redacted] described the bathroom as a large spacious bathroom with a steam room and shower beside it with a sink to the right. [redacted] was introduced to Jeff who was on the phone when she entered. Jeff was wearing a white towel and lay on his stomach so that [redacted] may massage his feet and calves. [redacted] started the massage with the massage oil Jeff chose and rubbed his feet and calves. Jeff got off the phone and requested she massage his back as well. [redacted] began rubbing his back and got to the small of his back. During the rubbing of his back Jeff asked her to get comfortable. He

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requested she remove her pants and shirt. [redacted] removed her shirt and pulled her pants off. [redacted] stayed in her bra and thong panties. As she finished the small of the back, Jeff then turned onto his back. He instructed she rub his chest and pinch his nipples. As she began to rub his chest, Jeff asked her questions about herself. [redacted] remembered telling him she attended [redacted] High School. Jeff asked her if she was sexually active. Before [redacted] could answer, he also asked what sexual positions does she enjoy. [redacted] stated she was shy didn't like talking about those things. She continued rubbing his chest. Epstein reached up and unsnapped her bra from the front. [redacted] explained the bra she used had a front snapping device. Epstein rubbed her breasts and asked her if she like having her breasts rubbed. [redacted] said "no, I don't like that." Epstein then removed his towel and lay on the bed naked exposing his penis to [redacted] He began touching his penis and masturbated as he touched her breasts. [redacted] explained Jeff then touched her vagina area by rubbing her vagina with his fingers on the outside of her thong panties. [redacted] tensed up and stated Jeff was aware that she was uncomfortable.

[redacted] stated that Jeff told her , "Relax, I'm not going inside." She further explained Jeff commented to her how beautiful and sexy she was. Jeff then moved her thong panties to one side and now was stroking her clitoris. [redacted] said "Jeff commented how hard my clit was." He then inserted two fingers in her vagina and was stroking her within her vagina. She tried pulling back to pull out his fingers from within her vagina. Jeff removed his fingers from within her vagina and apologized for putting his fingers inside her. During this time he kept his hand on her vagina area rubbing her vagina. [redacted] stated he rubbed her real hard as he was masturbating. [redacted] said he climaxed onto the towel he had been previously wearing and got up from the table. Jeff told her there was $200.00 dollars for her on the dresser within the master bathroom. Jeff also told her that there was an additional $100.00 that was to be given to [redacted] for bringing her there to massage him. Jeff told her to leave her telephone number with his assistant as he wanted to see her again. Jeff stated his assistant would contact her to work again soon.

I asked her if she ever received any formal massage training to which [redacted] stated she did not. [redacted] stated it was the only time she ever went to work for Jeff and knew what happened to her was wrong. She stated she no longer speaks to [redacted] because she was upset that [redacted] took her there. She further stated that she had never been contacted for any additional work. The interview was terminated and we left the area.

Investigation Continues...

********** N A R R A T I V E # 26 **********

NA Reported By: DICKS, ALLEN C. 12/18/05
Entered By.: ALTOMARO, NICKIE A. 12/19/05

Case No. . . . : 1-05-000368 (Continued)

On 102005 at approx 0930hrs I assisted with the execution of a search warrant at 358 El Brillo Ave, Palm Beach.

Initially I was assigned to enter the residence and conduct a sweep of the premises for safety purposes. I then accompanied CSEU tech Pavlik while she photographed the exterior of the house. Once this was complete I was assigned to search certain areas of the house with Det. Dawson as part of the search warrant.

We began in the garage, searching three Mercedes Benz vehicles, a Harley Davidson motorcycle and adjacent closets in the garage. Nothing of evidentiary value was located.

We then searched two closets off the kitchen area on the east side. These can best be described as pantry or storage closets. Nothing of evidentiary value was obtained.

A small office with adjoining bath was then searched. In the bath area I located a phone message book with recent messages. This item was seized as evidence. Please note this bath and shower area are not used as designed but are storage areas containing a variety of items to include a gun safe in the shower and assorted household items.

We then searched a bath area and closet at the base of the main stairs in the foyer. Inside the closet two massage tables were located as well as partial nude female photographs. These items were later seized as evidence. Nothing of evidentiary value was noted in the bathroom.

We then searched two bedrooms upstairs on the east side of the residence. Located in the bath room of the south bedroom was penis shaped soap. Located in the bedroom of the northern bedroom was penis and vagina shaped soap as well as an adult sex toy. These items were seized as evidence.

We then searched the pool cabana located in the south west corner of the property. Several photographs of nude females were seized as evidence.

I was then assigned to stand by with a person I believe was Douglas Schoettle. Mr. Schoettle was in the residence at the beginning of the search warrant. He was present during the warrant service and subsequent search. I stood by with him until the search was completed and I departed the residence. I had no conversation with him regarding the reason for our presence.

Regarding seized evidence, all items were photographed in place and then collected by CSEU personnel.

This concludes my involvement in this case.

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********** N A R R A T I V E # 27 **********
NA Reported By: KRAUEL, CURTIS D. 12/21/05
Entered By.: ALTOMARO, NICKIE A. 12/21/05

On Thursday, October 20, 2005 at approximately 0936 hours, I assisted in the execution of a search warrant located at 358 El Brillo Way, Palm Beach, Florida, residence of Jeffrey Epstein. I was instructed by Case Agent Det. Joseph Recarey, to secure all computer and media related material from the residence.

Upon my arrival I was directed by Det. Recarey to a room designated as the Kitchen Staff Office. I observed a, Silver in color, CPU with the left side cover removed, exposing the CPU s hardware sitting on floor next to a glass type desk. The CPU had no discernable identifiers or features indicating a make or model. This CPU was powered off with the power cord not plugged in. The keyboard and mouse were atop the CPU. It should be noted that the CPU was not connected to a monitor, printer, or other media device. On the back Panel of the CPU, I observed an A/V card with RCA jacks attached. This type of hardware would allow audio and video to be downloaded onto the CPU s hard disk. The ends of the RCA jacks were unattached at the time of the search and no external camera was located within this room.

The CPU was located on the right side of a desk that held a flat panel LCD screen. The desk also held another keyboard and mouse, indicative of a second computer; however, no other computer was found. It appeared as though a second computer had been recently removed as the cables ends from the monitor, keyboard and mouse were in the same area. A further search of the room revealed no media storage devices, i.e. CD s, Floppy Disks, Zip Disks, etc. This type of media is commonly stored in an area where computers are placed, yet no media was found.

After completing a search of this room, I secured the CPU and turned all items over to the Evidence Custodian for future forensic analysis via a property receipt.

I was then directed by Det. Recarey to a room designated as the Garden Room, where I observed a wooden desk facing west. The desk held a flat screen LCD monitor, keyboard, mouse, media card reader and printer; however, no CPU was located. All of the cables were removed from an area where a computer had once been. A search of the desk area revealed no signs of any media devices.

Det. Recarey directed me to a third location designated as the Cabana room, which is detached from the residence and located just south of the pool. In the South East corner of the room, I observed an office type setting, with an L-shaped desk holding a flat screen LCD monitor, keyboard, mouse and printer; however, no CPU was located. All of the cables were removed from an area where a computer had once been. A search of the desk area revealed no signs of any media devices.

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Det. Recarey directed me to a second detached structure located on the South East corner of the property. This area of this structure was assigned with single letters to identify a particular part of the room. In the office area, designated as Room B, I observed a powered on Dell Dimension 2350, attached to an LCD flat panel monitor. The screen displayed an open Microsoft Internet Explorer browser with URL address of http://home.bellsouth.net/. I observed no other active windows in the Start panel window and photographed screen. The power cord was removed from the back of the Dell CPU and I disconnected the cable modem to prevent remote access. At that time, the Dell CPU, marked with Serial Number [redacted], was secured and turned over the evidence custodian for future forensic analysis via property receipt. I also located several media related items within Room B, which were recorded onto a property receipt and turned over the Evidence Custodians.

I then responded to a Bedroom designated as Room F, where I observed a white in color CPU marked Premio. The Premio CPU was in a computer desk which held a white CRT monitor, both of which were powered on. The CRT monitor displayed a message from Norton Antivirus software, warning of an expired subscription. I observed no other active windows in the Start panel window and photographed screen. I removed the power cable from the back of the Premio CPU and shutdown all other media. The Premio CPU, marked with Serial Number [redacted], was secured and turned over the evidence custodian for future forensic analysis via property receipt. I also located several media related items within Room F, which were recorded onto a property receipt and turned over the Evidence Custodians.

This concluded my participation in the search of the residence.

********** N A R R A T I V E # 28 **********
NA Reported By: RECAREY, JOSEPH 12/21/05
Entered By.: ALTOMARO, NICKIE A. 12/21/05

On December 20, 2005, I contacted ASA Daliah Weiss in an attempt to subpoena the Epstein former houseman, Alfredo Rodriguez. Rodriguez, who resides in Miami, had eluded the process servers previously and was not served the investigative subpoena. A telephone message was left as she is not available during the week of 12/19/2005. I made contact with State Attorney Inv Theresa Wyatt and requested the same via telephone message.

I then researched the victim's [redacted] cellular telephone subpoena data which had been received from a previous subpoena request. I analyzed the records which depict several calls from [redacted] [redacted] The telephone calls start on February 6, 2005 at 12:49 pm.; the same day which the victim and the victim's father stated the incident occurred at Epstein s house. The first incoming call was from [redacted] residence at 561 [redacted] The second incoming call from [redacted]

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cellular phone 561-[redacted] occurred at 1:02 pm. The call durations were one minute or less. The time frame was within thirteen minutes apart. It should be noted that [redacted] s residence was in close proximity to the victim's. The next call occurred at 5:50 pm when the victim telephoned [redacted] s residence. Several calls were made after the above mentioned calls both incoming and outgoing to [redacted] Further analysis showed no telephone calls to either [redacted] cellular telephone or [redacted] residence were registered prior to February 6, 2005.

Additionally, I also conducted an analysis on the telephone calls from 305-[redacted] The subscriber information confirmed that the number is registered to [redacted] A Lavery from Hialeah, Florida. The address was crossed referenced to the Office of Kiraly and Riley Private Investigators. I researched the web page www.rileykiraly.com which also showed various cases in which they assisted. I also located another web site under www.coralspringssparklandrotary.org in which Mr. Riley attended a Miami Rotary meeting and confirmed Atty. Roy Black is among his clientele.

The telephone calls revealed Lavery had telephone contact with [redacted] and [redacted] either just after I attempted to interview them, or just prior. A background was conducted on Lavery which revealed he holds a current Private Investigator License. A criminal arrest record revealed he had been previously arrested for possession of cocaine and solicitation of prostitution.

I also researched the girls using www.myspace.com. This web site is a new social networking service that allows members to create unique personal profiles online in order to find and communicate with old and new friends. The site allows one to establish your own myspace.com page and decorate the page any way one wishes. I found the following people have myspace sites: [redacted] and [redacted]

I received a Cingular Wireless packet which contained a CD which contained the results of the subpoena request for verbatim calls on [redacted]. An analysis will be conducted in the near future on the phone numbers called.

Investigation Continues.

********** N A R R A T I V E # 29 **********

NA Reported By: RECAREY, JOSEPH 12/27/05
Entered By.: ALTOMARO, NICKIE A. 12/29/05

Upon doing research on the message books recovered in the search warrant, I located the identity of "[redacted] The telephone number 561[redacted] was registered to [redacted] She currently is seventeen years old and is attending the Palm Beach Mall Academy. I

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responded to 1801 Palm Beach Lakes Boulevard, also known as the Palm Beach Mall. I located the Simon Youth Foundation. I located [redacted] inside the foundation and informed her that I was investigating a case against Jeffrey Epstein and knew she had been at the house. [redacted] started to cry and advised she had put that part of her life behind her. I explained that although she is seventeen years old I needed to inform her parents that she would be interviewed. She provided her home telephone number. I attempted contact and left voice mail messages at the house to speak with her parents.

Det. Caristo and I then located [redacted] at her residence located at [redacted] in West Palm Beach. I attempted to interview her about Jeffrey Epstein. She advised she is so in love with Jeff Epstein and would do anything for him. She further explained that she would not speak with us about him either negative or positive. She asked us to leave her property. I informed her that although she did not wish to speak with us, I had sufficient information at this point in the investigation to know she was at Epstein's house and provided girls to Epstein to work. I also explained that prior to our arrival at her residence I had telephone contact with her father, [redacted] who was told she would be interviewed. [redacted] is currently seventeen years old and as a juvenile, parental notification would be required. We then left the area and returned to the police station.

While at the police station, I left another telephone message for [redacted] parents. I began an analysis of [redacted] Cellular telephone. The telephone number [redacted] is assigned to [redacted] and the financially responsible party is Jeffrey Epstein of 457 Madison Ave. in New York City, New York. The time frame which was subpoenaed was September 2005, through October 2005. There were eighty seven pages of calls made either to the cell phone or from the cell phone. The local (561) numbers were analyzed. A spread sheet was prepared and placed into the attachment file of who was called.

The unknown numbers were researched using FoneFinder.com and subpoenas were requested to determine subscriber information. This was done to identify additional victims or witnesses. The analysis revealed that [redacted] had called the victim/witnesses frequently when Epstein was in the Town of Palm Beach to "work." This confirms what the girls interviewed had previously stated. [redacted] would notify them when Epstein was in town and their willingness to "work." The CD was placed into evidence.

Investigation Continues.

********** N A R R A T I V E # 30 **********

NA Reported By: RECAREY, JOSEPH 1/03/06
Entered By.: ALTOMARO, NICKIE A. 1/03/06

On December 29, 2005, I received a facsimile from National Compliance

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Center from Cingular Wireless for telephone number 561-[redacted] This was the telephone number for [redacted] during the time frame when the victim, [redacted] was brought to the Epstein house to "work." An analysis of the phone records, of all incoming and outgoing calls, showed that on February 6, 2005, the day the victim, [redacted] was brought to the house, [redacted] first called [redacted], Epstein's assistant, at [redacted] at 12:50 pm (EST). The next call was made to Epstein's house in Palm Beach, at 12:52 pm (EST). The following call was made to the victim, [redacted] at 1:01 pm (EST) and at 1:02 pm (EST). This confirms the information provided by the victim and victim's father. I photo copied the records and enlarged the page 8 of 10 to show the calls made by [redacted] on February 6, 2005.

To this date, I have not heard from [redacted] Langley's parents. I will attempt to establish contact with them during the evening hours. I received a package from Atty. Guy Fronstin, which was hand delivered at the police station. Within the package, was a letter from Alan Dershowitz, and two www.myspace.com profiles. The profiles were that of [redacted] and [redacted] MySpace.com is a social networking service that allows members to create unique personal profiles online in order to find and communicate with old and new friends. This package was in response to a previous meeting in which Mr. Dershowitz called to assist in the investigation in providing any additional witnesses such as house employees who have been reluctant to speak with law enforcement.

I reviewed the profiles Mr. Dershowitz enclosed. [redacted] who designed her blog to be "[redacted] Fucking [redacted] still attends [redacted] High School, sends and receives messages from friends which contain some profanity. Upon reviewing her friends' comments section from Myspace, most of her good friends sent messages to establish contact and invite her to go out.

I then reviewed [redacted] web blog which was provided by Mr. Dershowitz. Ms. [redacted] designed her blog to be "PimpJuice." Her blog states that her interests include music, theater and weed (Marijuana). I reviewed her packet in which [redacted] declares her love for her live-in boyfriend. She also describes using marijuana with her boyfriend [redacted]

The letter Mr. Dershowitz sent advised he was looking into the allegation that one of the private investigators used by the private attorneys of Epstein, attempted to impersonate or state that they were police officers from Palm Beach. Mr. Dershowitz advised that the investigators used to interview [redacted] had "quite a distinct speech impediment", did not claim to be nor did they impersonate themselves as a police officer. This package was sent to both ASA [redacted] and ASA [redacted] at the State Attorney's Office.

I made telephone contact with ASA [redacted] to confirm she received the package and request an interview with [redacted] and Janusz Banasiak. She advised she would assist in attempting to

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contact Mr. Dershowitz.

On January 3, 2006, I received a telephone call from ASA Weiss who informed me that she made telephone contact with Mr. Dershowitz. She had requested the employees be available the week of January 3, 2006. Mr. Dershowitz informed her that the assistants are out of the country and would require additional time to locate them and make them available.

Investigation Continues.

********** N A R R A T I V E # 31 **********

NA Reported By: MINOT, LORI S. 1/03/06
Entered By.: ALTOMARO, NICKIE A. 1/03/06

On Thursday, 03/31/05, I started conducting surveillance at 358 El Brillo. At this point I observed at 1155 hours, a Tan Altima bearing FL tag A303AN in Roadway, Black SL bearing FL tag V55RFW in drive, Tan Honda Civic bearing FL tag [redacted] in Roadway, Black Chevy Suburban in driveway and a Black Caddy Escalade in driveway. At 1325 Hours I observed Tan Honda Civic [redacted] in roadway, Black Chevy Suburban in driveway, Black Caddy Escalade in drive and a White Kia car bearing FL tag [redacted] At 1615 hours I observed a Tan Honda Civic, [redacted] in roadway, Black Chevy Suburban in drive, Black Caddy Escalade in driveway and a White Kia car [redacted] in roadway.

On Friday, 04/01/05, I continued surveillance at 358 El Brillo. At 1130 hours I observed a Tan Honda Civic bearing FL tag [redacted] in roadway, Black Caddy Escalade in driveway and a Tan unknown make/model bearing FL tag [redacted] in roadway. At 1227 hours, I observed a Tan Honda Civic [redacted] in roadway, Black Caddy Escalade in driveway and a Black Chevy SUV located behind the Escalade. At 1345 hours, I observed a Tan Honda Civic [redacted] in roadway and a Black Chevy SUV in driveway. At 1558 hours, I observed a Tan Honda Civic [redacted] in roadway, Black Chevy SUV in driveway, Black Caddy Escalade in driveway and a dark unknown model/make car parked in garage.

On Saturday, 04/02/05, I continued surveillance at 358 El Brillo. At 0713 hours, I observed a Red Explorer bearing FL tag [redacted] in roadway and a Black Caddy Escalade in driveway. At 0814 hours, I observed a Red Explorer [redacted] in roadway, Black Caddy Escalade in driveway and a Tan Honda Civic X98APM. At 0952 hours, I observed a Red Explorer [redacted] in roadway, Black Caddy Escalade in driveway, Tan Honda Civic [redacted] in roadway and also a Grey unknown make/model with a B.M in trunk retrieving landscaping tools.

At 1155 hours, I observed a Grey Camaro bearing FL tag [redacted] parking in the roadway in front of 358 El Brillo. A W/F, blond hair, teens to early 20's, thin and tall wearing a white tank top and short blue jean shorts, exited the vehicle and walked to the rear of the house. I also observed a Red Explorer [redacted] in roadway, Tan Honda Civic [redacted] in roadway and a Black Caddy Escalade in driveway. At 1310 hours, I

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observed a Red Explorer W/F driver leaving the area, Tan subcompact on roadway and a Red Neon bearing FL tag [redacted] Then observed 3 W/Fs, approximately 16 to 18 years of age jogging. All 3 females ran into the driveway. There were 2 with blond hair and one brown hair.

On Sunday, 04/03/05, I continued surveillance at 358 El Brillo. At 0719 hours I observed a Tan Honda Civic [redacted] in roadway and a Black Caddy Escalade. At 0934 hours, I observed a Tan Honda Civic [redacted] in roadway and a Black Caddy Escalade in driveway. At 1057 hours I observed only the Tan Honda Civic X98APM.

On Tuesday, 04/05/05, I continued surveillance at 358 El Brillo. At 1052 hours, I observed a Red Explorer [redacted] in roadway, a Green Explorer, bearing FL tag [redacted] in roadway, a Grey Altima bearing FL tag [redacted] in roadway, White Ford Truck [redacted] in roadway, Black Mercedes in driveway being washed by a B/M and an unknown dark car parked in the garage. At 1059 hours a Blue Chevy Suburban drove to the house of 358 El Brillo and parked in the driveway. At 1119 hours, I observed the White Fort Truck H58LRA leave the area and the drive was the pool man.

At 1126 hours, I observed a Grey unknown make/model car park in roadway. W/M got out of the car and walked to a house on the south side of El Brillo. At 1406 hours, I observed a Red Explorer parked on roadway and a large white box truck parked behind the surveillance suburban.

********** N A R R A T I V E # 32 **********

NA Reported By: BATES, MICHAEL J. 1/03/06
Entered By.: ALTOMARO, NICKIE A. 1/03/06

On 03/31/05, at approximately 1500 hours while conducting surveillance at 358 El Brillo, I observed a Black Cadillac Escalade, unknown tag, a Black Chevrolet Suburban, unknown tag, a Black Mercedes S600 FL tag U90BQL parked in the east driveway next to the 3-car garage. There was a Tan Honda Civic FL tag [redacted] parked on the street in front of the residence.

At approximately 1700 hours, I observed the Black Suburban, Black Escalade, Black Mercedes and Tan Honda Civic parked in the same place. At 1750 hours, there was no change in vehicles. At 1840 hours, I observed the Black Escalade, Black Suburban and Black Mercedes along with a Silver Hyundai Accent FL tag [redacted] all parked in the east driveway and a Red Ford Explorer FL tag [redacted] parked on the street in front of the residence.

At 2000 hours, I observed the Black Escalade, Black Suburban parked in the ease driveway and the Red Explorer and Tan Civic parked on the street.

On Friday, 04/01/05 at approximately 1700 hours, I observed the Black

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Escalade and Black Suburban parked in the east driveway and the Tan Honda Civic parked on the street in front of the residence. At 1820 hours, I observed the Suburban and Civic in the same place and a Gold Chevrolet Camaro FL tag [redacted] parked on the street in front of the residence. At 2250 there was no change. At 2330, I observed the Black Escalade parked in the driveway and the Red Explorer parked on the street in front of the residence.

On Saturday, 04/02/05 at approximately 1700 hours, I observed a Black Escalade, unknown tag, parked in the driveway and a Tan Honda Civic FL tag [redacted] parked in the street in front of the residence. At 1805 hours the Escalade and Civic were in the same position and the Black Mercedes FL tag [redacted] was also parked in the east driveway. At 1920 hours the Escalade and Civic were the only vehicles and both were in the same position. At 2030 hours and 2145 hours there were no vehicles observed.

At 2115 hours, I observed a Black Mercedes, 4-door parked in the east driveway FL tag [redacted] At 2300 hours, 2350 hours and 0045 hours, the Black Mercedes was the only vehicle observed.

********** N A R R A T I V E # 33 **********

NA Reported By: RECAREY, JOSEPH 1/05/06
Entered By.: ALTOMARO, NICKIE A. 1/05/06

I made contact with Mr. [redacted] father of [redacted] who was told that I wished to interview his daughter. Mr. [redacted] stated he was aware and had spoken with his daughter about the incident. He stated that his daughter had previously told him that she was hired to model lingerie at a Palm Beach mansion. Mr. [redacted] stated he knew nothing else about what she did when she went to "work." Mr. [redacted] advised he would cooperate with the investigation and make his daughter available for interviews. I asked if she was available for an interview, [redacted] stated she was not at home at the moment. I informed him I would make contact with her at a later time. Mr. [redacted] expressed his interest in the resolution in this matter as he stated this information has affected his daughter emotionally.

On January 4, 2005, I acquired the subpoenas from the State Attorney's Office for Cingular Wireless, Metro PCS, Verizon, Bell South Telecommunications and Sprint for the unknown telephone numbers from [redacted] cellular telephone. The subpoenas were sent to the respective telephone carriers for subscriber information.

I received a telephone call from State Attorney's Office, who informed me that the former houseman for Jeffrey Epstein, Alfredo Rodriguez, was present at the State Attorney's Office for an interview. Rodriguez was issued an investigative subpoena for an interview on the on-goings at Epstein's house during his employ. I responded to the State Attorney's Office and encountered Mr. Rodriguez waiting in the lobby. I brought Mr. Rodriguez to the interview room.

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During a sworn taped statement, Mr. Rodriguez stated he was employed by Jeffrey Epstein for approximately six months. He was referred by associates and his employment lasted the months of November 2004 through May 2005. His responsibilities as house manager included being the butler, chauffer, chef, houseman, run errands for Mr. Epstein and provide for Epstein's guests. Rodriguez advised he had very limited contact with Mr. Epstein. If Rodriguez needed to relay a message to Mr. Epstein, he would have to notify Epstein's secretary "Leslie" in New York City, who would then notify Epstein's personal assistant, [redacted], who would relay the message to Epstein. Rodriguez stated Epstein did not want to see or hear the staff when he was in residence.

I asked Rodriguez if Epstein received many guests during his stay in Palm Beach. Rodriguez advised he had many guests. I asked specifically about masseuses coming to the house. Rodriguez stated he would have two massages a day. Epstein would have one massage in the morning and one massage in the afternoon everyday he was in residence. Rodriguez stated he would be informed to expect someone and make them comfortable until either [redacted] or Epstein would meet with them.

Rodriguez stated once the masseuses would arrive, he would allow them entry into the kitchen area and offer them something to drink or eat. They would then be encountered by either [redacted] or Epstein. They would be taken upstairs to provide the massage. I asked Rodriguez if any of the masseuses appeared young in age. He advised he didn't ask their ages but felt they were very young. Rodriguez stated they ate like his own daughter who is in high school. Rodriguez stated they would eat tons of cereal and drink milk all the time. Rodriguez stated the girls that would come appeared to be too young to be masseuses. He stated one time under Epstein's direction, he delivered a dozen roses to [redacted] High School for one of the girls that came to provide a massage. He knew the girls were still in high school and were of high school age. I asked Rodriguez about the massages. He felt there was a lot more going on than just massages. He would clean Mr. Epstein's bedroom after the alleged massages and would discover massager/vibrators and sex toys scattered on the floor. He also said he would wipe down the vibrators and sex toys and put them away in an armoire. He described the armoire as a small wood armoire which was on the wall close to Epstein's bed.

Epstein ordered Rodriguez to go to the Dollar rent a car and rent a car for the same girl he brought the roses to, so that she could drive her self to Epstein's house without incident. Rodriguez said the girl always needed rides to and from the house. Rodriguez referred himself as a "human ATM machine" and was ordered by Epstein to maintain a minimum balance of $2,000 dollars on him at all times. When a girl would come by the house and Mr. Epstein was either not in residence or was not at home at the time, Rodriguez was to provide the girl (masseuse) several hundred dollars for their time and to notify Epstein the amount they were given. Epstein also ordered Rodriguez to

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purchase several gifts and provide them as tips to the girls. I asked what kind of gifts. Rodriguez stated he purchased IPODS, jewelry, anything the girls would want.

Rodriguez stated the amount of girls that came to the house was approximately fifteen. Each of the girls knew each other and all seemed to know at [redacted] High School who Mr. Epstein was. When asked to identify these girls, Rodriguez stated he could not at the moment but knew he wrote their names down on a journal he kept during his employ with Mr. Epstein. He kept a journal in the event he needed to explain either to Mr. Epstein or his assistants what was done at the house or who visited the house as he stated he was in-charge of Mr. Epstein's personal security while in Palm Beach. I informed him I would need to view this journal to which he stated he would research the book and contact me to provide the book. The interview was concluded and left the area. I returned back to the police station where the micro cassette was placed into evidence. At approximately 7:20 pm, I was notified Rodriguez located the journal and would call me on January 5, 2005 to provide the journal.

Investigation Continuesàà

********** N A R R A T I V E # 34 **********

NA Reported By: RECAREY, JOSEPH 1/09/06
Entered By.: ALTOMARO, NICKIE A. 1/10/06

On January 5, 2006, I attempted to meet with Alfredo Rodriguez to recover the folder or journal in which he kept the notes that were given to him during his employ with Mr. Jeffrey Epstein. He kept this folder to justify what he did during his employ should the need arise to justify what occurred with the monies he had to keep or any questions as to the petty cash he withdrew from the household account from the bank. At approximately 10:00 pm, I attempted contact with Mr. Rodriguez and discovered he was assisting his wife at her place of employment and would not be able to meet with me. Mr. Rodriguez stated he would meet with me on January 6, 2006, in Broward County, in the morning hours.

On January 6, 2006, at approximately 9:00 am, I received a telephone call from Mr. Rodriguez who advised he had the file in hand and would be traveling northbound to meet with me in Broward County. At 10:50 am, I met with Alfredo Rodriguez at the parking lot of Bank of America in Boca Raton on Yamato Road and Military Trail (known as the Polo Center). Rodriguez produced a green folder which contained documents, a note with Mr. Epstein's stationary with direction to deliver a bucket of roses to [redacted] High School after [redacted] ([redacted] high school drama performance. Also in that same note was direction to rent a car for [redacted] ([redacted] and direction to extend the rental contract. I returned to the Palm Beach Police Station and placed the folder into evidence.

I received a fax from Verizon from the subpoena request sent on

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01-04-06, for telephone number [redacted]. The phone number is registered to Dr Perry Bard, from West Palm Beach. Dr. Bard is a chiropractor and has an office located [redacted] in West Palm Beach. The cellular number is Dr Bard's personal cellular number.

On January 9, 2006, Det. Caristo and I traveled to [redacted] in Palm Beach Gardens in an attempt to locate [redacted] who had been previously seen on the property and identified through her Florida Drivers License and Florida license Plate. A business card was left for her to return my call. We then traveled to the Simon Youth Foundation and located [redacted] agreed to speak with us and in a private room within the school provided us a taped statement.

During the statement, [redacted] advised that when she was fifteen or sixteen years of age, she was taken to Jeffrey Epstein's house by her associate, [redacted] stated this occurred late May 2004 or early June 2004. She was told she could model lingerie for money for a wealthy Palm Beacher. She remembered they traveled by yellow cab from their residence in West Palm Beach to Epstein's house. She remembered encountering Epstein at the front door during the evening hours.

He introduced himself and brought them into the kitchen so that the chef could prepare something for them to eat. After having a meal, [redacted] and Epstein brought [redacted] upstairs to a master bedroom which had a large bathroom. She observed a large style shower, sauna and there was a large massage bed also in the bathroom. Epstein entered a room within the bathroom and came out wearing only a towel. [redacted] said they would provide a massage on his feet. [redacted] asked why they are doing this. [redacted] told her this was part of the routine and told her to rub his legs and calves. Epstein had told [redacted] to get comfortable. [redacted] continued rubbing Epstein's calves and feet. At Epstein's direction, [redacted] then left the room leaving [redacted] there by herself. Epstein told [redacted] to get comfortable. [redacted] removed her blouse and pants and stayed in her panties. [redacted] stated she was not wearing a bra. She believed she was wearing thong panties. Epstein turned over onto his back and began touching her. Epstein touched her breasts and began touching her in her vagina area. Epstein instructed her to rub his chest and rub his nipples. [redacted] stated the touching consisted over the panties on the first time; he stroked her vagina but stayed on top of the panties. During the first massage, she stated Epstein was stroking her and began masturbating himself at the same time. He put his hands under the towel and appeared as to masturbate himself however she never saw his penis. She continued rubbing his chest until he grabbed her and pulled her closer to him. He appeared to have climaxed because after he pulled her closer to him the massage was over. Epstein had told her that there was two hundred dollars for her on the dresser. He told her that she could not tell anyone what happened at the house or bad things could happen. [redacted] stated she went to Epstein's house three

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or four times total. [redacted] was very scared and felt very nervous. She knew because of Epstein's money he was powerful. After the massage, Epstein ordered his houseman at the time to drive the girls home. The employee was to drop off the girls at their house and watch them go inside their house.

[redacted] could not remember who the houseman was. She stated Epstein and his assistant [redacted] would call her at her father's house to arrange for her to come and "work." She advised each time she returned to the house, Epstein would do the same thing. [redacted] stated it was a routine with Epstein. She would rub his feet and calves. He would then turn over and begin to touch her on her vagina area. The only difference was that it was done without panties. Epstein's fingers would stroke her vagina area as he would masturbate and finally climax and the massage would be over. She was paid $200.00 each time she went. Each time she went she was reminded not to speak of what happened at the house and that she would be contacted again. She began to purposely miss the calls when either [redacted] or Epstein would call her. She once brought a friend, "[redacted] unknown last name, to work for Epstein. She was paid $200.00 for bringing [redacted] [redacted] stated she no longer retuned to work for Epstein. She also stated that she wanted to notify the police of what happened at the house. [redacted] stated she was scared of what could have happened to her or her family if she notified authorities.

On January 10, 2006, I received the results from the subpoena from BellSouth Telecommunications for telephone number 561-[redacted]-[redacted] The number is assigned to Mr. [redacted] [redacted]n, [redacted] [redacted]'s father in Palm Beach Gardens. I also received the results from Western Union which confirmed the money order sent to [redacted] [redacted] from Jeffrey Epstein in New York City. The "wire" was sent by Jeffrey Epstein of 457 Madison Ave in New York City on December 23, 2004 at 12:05 pm. The amount of $222.00 was charged to Epstein's credit card so that [redacted] could receive $200.00 in Royal Palm Beach. The twenty-two dollars was for processing and local fees to send the money via Western Union. A copy of the check presented to [redacted] was also attached to the receipt of the wire. This confirmed what [redacted] advised she received as a Christmas bonus from Epstein.

Investigation continues.

********** N A R R A T I V E # 35 **********

NA Reported By: RECAREY, JOSEPH 1/10/06
Entered By.: ALTOMARO, NICKIE A. 1/10/06

I received and reviewed the Cingular Wireless results from the subpoena requests for subscriber information for telephone numbers [redacted], [redacted] and [redacted]. The first number, [redacted], is assigned to Janusz Banasiak in care of Jeffrey Epstein of 457 Madison Ave in New York City. Banasiak is the current houseman/house manager for 358 El Brillo Way in Palm Beach, Fl 33480. The second number, [redacted], is assigned to [redacted] of

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1685 61st Drive in West Palm Beach. Research conducted on [redacted] revealed she is a licensed Massage therapist with a Florida conditional/active license number [redacted]. [redacted] had been previously arrested for battery / unwanted touching and DUI. Requests for copies of the reports involving the arrests were requested from the Palm Beach County Sheriff's Office. The last number [redacted] is assigned to [redacted] Rofrano of [redacted] A1A in Palm Beach Gardens. Research on Mr. Rofrano, revealed that he is a Florida Chiropractic Physician.

Vehicles that were previously documented on the property while surveillance was being conducted were researched. I determined a tan Chevrolet Camaro, bearing Florida license [redacted] was seen on the property in which a young white female was seen entering the Epstein property. Research was conducted which revealed that the vehicle is registered to [redacted] of Lake Worth. Mr. [redacted] has two daughters, [redacted] and [redacted] is currently residing in Connecticut and [redacted] is residing with her father in Lake Worth. Research on [redacted] revealed she was recently involved in a traffic stop in Lake Clarke Shores in [redacted], 2005. A request to discover any information from the stop was requested.

I spoke with ASA Daliah Weiss who informed me that Janusz Banasiak will be available for an interview tomorrow at the State Attorney's Office in West Palm Beach at 1:30 pm. I informed her that I would be at her office for the interview.

********** N A R R A T I V E # 36 **********

NA Reported By: RECAREY, JOSEPH 1/23/06
Entered By.: ALTOMARO, NICKIE A. 1/23/06

On January 19, 2006, Det. Caristo and I met with [redacted] at [redacted] in Palm Beach Gardens. [redacted] was identified as a licensed massage therapist who had previously been seen on Epstein's property when physical surveillance was done. [redacted] was told of the on going investigation and I felt she may have information pertaining to the case. During a sworn taped statement, [redacted] stated she met Epstein three years ago when Ghaline Maxwell approached her while she was attending Palm Beach Atlantic College to work around Epstein's house. Maxwell had told her that they needed some girls to work at the house to answer phones and run errands. [redacted] accepted the job and began working at Epstein's house on El Brillo in Palm Beach. [redacted] stated it was a part time job during the time she went to Palm Beach Atlantic College. She continued going to Epstein's house and would be notified when Epstein would travel to Palm Beach. [redacted] advised she would be notified by Maxwell, Epstein or [redacted], his assistant, when he would travel to Palm Beach. [redacted] stated she began providing massages to Epstein before she became a massage therapist. She continued giving massages not only to Epstein but to [redacted] and [redacted], his assistant. [redacted] was asked about what occurred during the massages. [redacted] stated as she was twenty

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three years old when she met Epstein, anything that happened was between two consenting adults. I explained to her that she was not in any trouble however as part of this investigation, I needed to ask certain questions. [redacted] stated that there were times that Epstein would ask her to perform during the massage. He would instruct her to rub his nipples as he masturbated himself. [redacted] stated she felt "grossed" about the behavior but as she was getting paid, she just continued. [redacted] also advised she would on occasion perform the massages naked. Epstein would on occasion, utilize the vibrator/massager on her vagina area when she performed the massages. [redacted] explained that Epstein never exposed himself to her as he maintained himself covered under the towel he would be wearing. When Epstein would masturbate he would be covered.

I asked if [redacted] ever received any gifts, or any gratuities from Epstein. [redacted] advised aside from being paid well, she advised Epstein took care of her tuition from Palm Beach Atlantic College. She received a rental car for a week when her scooter broke down.

Additionally she received other gifts from Epstein. Epstein also recommended her to another client who resides at Breakers Row in Palm Beach. The client she was referred to was "Glenn" unknown last name, and his wife, who she provided a massages to. The statement was concluded and placed into evidence upon our return to the Palm Beach Police Department.

While at the police station, I researched Florida tag [redacted] which was also previously seen on the property when there was physical surveillance being done at the property. The vehicle is registered to [redacted] of Lake Worth, Florida. Researching Mr. [redacted] and the vehicle revealed that his daughter, [redacted] had been driving the vehicle and was cited for unlawful speed in Lake Clark Shores. The vehicle is a tan, Chevrolet Camaro, 2-door. I researched [redacted] date of birth, [redacted], resides at [redacted] in Lake Worth. [redacted] has a my space page called [redacted]. In her web page, shows various photos of [redacted] photographed at a beach. An interview is forthcoming.

A review of the video disks which was extracted at the Palm Beach County Sheriff's Office Computer Crime Unit revealed that only one hidden camera was functional at the time. Several images of Epstein working at his office were seen. Additional footage of [redacted] and [redacted] was seen. There was other footage of females seen. The identity of the females is unknown at this time, until such time as I meet with certain females to show the video footage to confirm if, in fact, it is them on the video. At this time it appears that [redacted] and [redacted] are seen sitting with Epstein beside his desk in the evening hours. Due to poor lighting, a direct confirmation cannot be made at this time.

Inv. Continues.

Case No. . . . : 1-05-000368 (Continued)

********** N A R R A T I V E # 37 **********

NA Reported By: RECAREY, JOSEPH 1/30/06
Entered By.: ALTOMARO, NICKIE A. 1/30/06

On January 25, 2006, Det Caristo and I, responded to [redacted] in Lake Worth and met with [redacted] stated last year, when she was seventeen years of age, she met Jeffrey Epstein through her former room mate [redacted] was allegedly dating Epstein at the time. [redacted] and [redacted] had once cohabitated together when they modeled. [redacted] explained [redacted] called her on her telephone and advised her that she was in Palm Beach and requested to see her. [redacted] made arrangements to meet with her at Epstein's house. [redacted] arrived and met Epstein and [redacted] [redacted] and [redacted] went to the Palm Beach Mall together and went shopping. [redacted] advised that [redacted] and she had received money from Epstein to go to the mall. They visited Victoria's Secret and purchased undergarments from the store utilizing monies given by Epstein. [redacted] advised she purchased one item and [redacted] purchase various items. The money used to purchase the items was the money given by Epstein.

[redacted] and [redacted] continued shopping and having a day together. [redacted] stated [redacted] explained how she and Epstein have been dating each other and he has been paying all of her bills. [redacted] claimed [redacted] advised they met in New York and had been dating ever since. They later returned to Epstein's home and encountered Epstein. He had a brief conversation with [redacted] about her modeling career. He knew of her modeling career from [redacted] He requested to see her modeling portfolio and explained that he could help her with modeling jobs. [redacted] had her book with her to show [redacted] and showed the book to Epstein. He commented negatively about her photographs and portfolio. [redacted] felt uncomfortable with the comments made as she had been working with other professional modeling companies who had offered her work from her photographs. Epstein requested to see what was purchased at the mall. [redacted] took out the undergarments which were purchased. She immediately showed Epstein different sets purchased. Epstein then requested to view what [redacted] purchased. [redacted] was reluctant to show the outfit however since it was Epstein's money that purchased the item, she pulled it out of the bag. Epstein asked her to try it on. [redacted] looked at [redacted] who told her "yeah, try it on." Feeling compelled to try the undergarment outfit on; she went to another room and put on the bra and panty set. She walked out to the living room where they were sitting, and modeled the suit. She then went back into the other room and changed back into her clothes. [redacted] returned into the room and told [redacted] she would be going home. [redacted] scheduled another day for [redacted] to return for massages with her.

[redacted] stated within that same week, she returned to meet with [redacted] and have a massage. [redacted] had told her that she would be unable to stay with her as she would be going on a bike ride with Epstein. [redacted] explained she could stay at the house and take advantage of the massage.

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[redacted] stated she met with an unknown massage therapist and had the table already set up in a guest room. [redacted] removed her clothing, leaving her panties on, and wrapped herself with a towel for the massage. [redacted] remembered that the door to the guest room was closed but not locked. As the therapist was working her back, the door was opened by Epstein and entered into the room. [redacted] was trying to conceal herself as Epstein was talking to her about his chiropractic session. Epstein told [redacted] turn over onto her back. [redacted] eventually turned over exposing her breasts to Epstein as he applied pressure on her shoulder and her waist. [redacted] stated Epstein "popped" her back. [redacted] removed her self from the table, got dressed and left the house. [redacted] further stated [redacted] had attempted to call her on several occasions to invite her back to Epstein's house to which [redacted] replied "I'm busy." [redacted] advised she has not had contact with either [redacted] or Jeffrey Epstein. It should be noted that her mother, [redacted] was present during the interview. The interview was concluded and we thanked them her for their time.

********** N A R R A T I V E # 38 **********

NA Reported By: RECAREY, JOSEPH 1/31/06
Entered By.: ALTOMARO, NICKIE A. 1/31/06

On January 27, 2006, I made telephone contact with [redacted], at [redacted]. [redacted] is a licensed massage therapist who had frequented the home of Jeffrey Epstein. Ms. [redacted] has been unable to meet with me in Palm Beach County, and because she lives and works in Port St Lucie, a telephone interview was conducted. I explained to Ms. [redacted] that there was an on going investigation involving Jeffrey Epstein.

[redacted] stated she knows Epstein and has been employed by him for approximately three years. Epstein has paid [redacted] to perform Swedish Massages (Deep Tissue) on him and other guests. [redacted] explained that approximately three year ago she met Ghislaine Maxwell and Jeffrey Epstein through a mutual friend. Epstein and Maxwell were looking for a massage therapist. [redacted] stated since that time, she is notified when Epstein is coming to Palm Beach. [redacted] stated she comes to his house and provides the massage or massages. [redacted] explained she has also massaged his guests and assistants. [redacted] continued that she is paid $100.00 and hour for the massage.

I asked [redacted] if anything occurred during the massage that would have made her feel uncomfortable. [redacted] stated she only provided massages and that was it. She never was approached for anything else. I asked if Epstein ever asked her to rub his chest she stated she would not rub his chest as that is not part of her massage. [redacted] explained that she was not Epstein's type. The girls she would see at Epstein's house were very thin, beautiful and without tattoos. [redacted] explained she has several tattoos that are visible. Maxwell and Epstein have commented negatively about her tattoos previously when she has provided massages.

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[redacted] stated she only provided massages for Epstein and his associates and nothing happened during those massages. [redacted] stated as she does Swedish style massages, the patient is usually sore after the massages. I thanked her for her assistance and the interview was concluded at this time.

I received a facsimile from T-Mobile Cellular service on telephone number [redacted], which is assigned to David Rodgers, pilot for Mr. Epstein, who resides in Lake Worth. Rodgers' telephone number was dialed on several occasions by [redacted]. A background on Rodgers indicated he has a valid FAA pilot license First Class for the Southern FAA Region. Rodgers has another historical FAA license for Airline Transport Pilot.

Investigation Continues.

********** N A R R A T I V E # 39 **********
NA Reported By: RECAREY, JOSEPH 2/14/06
Entered By.: ALTOMARO, NICKIE A. 2/16/06

On Friday, February 3, 2006, I had made arrangements to meet with [redacted] at the Palm Beach Police Station. At approximately 1:00pm, [redacted] and her friend, [redacted] arrived at the police station. During an interview with [redacted] she stated she met Epstein when she turned eighteen years old and was brought to Epstein's house to provide a massage. She advised this occurred on May of 2005. She advised [redacted] had informed her if she wanted to provide a massage for $200.00. [redacted] agreed and was brought to Epstein's house to provide a massage. [redacted] stated she had been to the house on many occasions during the massage sessions. [redacted] also stated she would remove her clothing to provide the massage on Epstein. [redacted] advised Epstein would pay her $300.00 to rub his back, legs and chest. During the massages, Epstein would masturbate himself as she rubbed his chest. I asked her if Epstein ever touched her breasts during the massages. [redacted] replied. "Yes." I asked her if Epstein ever touched or massaged her vagina. [redacted] stated he had on several occasions. I asked her if he ever penetrated her with either his penis or any other objects. [redacted] stated that during a massage he inserted his fingers in her vagina as she massaged him. She stated this occurred one time only. [redacted] stated the massage would be over when Epstein would climax onto a towel. I asked [redacted] if she had any formal massage training to which she replied that she did not. [redacted] was then asked if she ever brought anyone to the house to "work." [redacted] stated she brought two people to the house. She advised she received money for bringing people to the house to "work." [redacted] stated she brought a girl named "[redacted] and her friend [redacted] was still waiting for [redacted] in the lobby of the police station. I thanked [redacted] for her time and her cooperation and escorted her to the lobby.

I asked Ms [redacted] if I could speak with her about this investigation. I

Case No. . . . : 1-05-000368 (Continued)

brought her to the interview room and explained to her that I was conducting an investigation on Jeffrey Epstein and felt she may have information pertaining to the investigation. Ms [redacted] identified herself as [redacted] and resides in Wellington, Florida. She advised approximately a year ago she was brought to Epstein's house to provide a massage for money. [redacted] stated she needed to make money and felt it was a quick way to make some money. [redacted] stated she was brought to the house by [redacted] and was introduced to Epstein and his assistant. She was brought to his main bathroom and provided a massage. I asked her if she provided the massage naked. [redacted] stated she did. She rubbed Epstein's legs, back and chest. I asked [redacted] if Epstein touched her during the massage. She advised he did not, however he did masturbate himself as she rubbed his chest. Once he climaxed the massage was over. She was paid her money and left the area. [redacted] advised it occurred one time and she never returned to Epstein's house. The interview was concluded and [redacted] was escorted to the lobby.

I located a telephone number for [redacted] and attempted to contact her on several occasions. I called 561-[redacted] and spoke with Ms. [redacted] who advised she would speak with me in Deerfield Beach where she resides. Due to a scheduling conflict, we were unable to meet. I informed her I would contact her to schedule another appointment to speak with her about this investigation. I have attempted to meet with her and make telephone contact with negative results.

On February 13, 2006, I met with David Rodgers at [redacted] in Lake Worth. Rodgers was identified as Epstein's pilot. I spoke with Rodgers who advised he has been employed with Epstein since 1991. He flies both planes for Epstein depending where he wants to fly to. Rodgers was asked about passengers in the plane he flies. Rodgers stated unless Epstein flew to his island off of St [redacted] there would be no way of knowing who the passengers were. I mentioned a recent flight to Ohio, where Rodgers flew to Ohio to pick up [redacted] Rodgers stated he recalled flying on several occasions and did remember [redacted] Rodgers stated once he is in the cockpit, he does not know who the passengers are. When he prepares the passenger manifests, he lists Epstein and his assistants he knows by name, [redacted] and [redacted]. Rodgers stated he would list either female or male passengers on the manifests only to keep a count on the passengers. Mrs. Rodgers came into the living room and recommended that her husband consult with an attorney. Mr. Rodgers agreed he would speak with the family attorney to inform him of this questioning. I explained to Mr. Rodgers that he was not the suspect in this investigation and ceased all questions. Based on the fact Rodgers could not advise who passengers were in the plane, I then left the area.

I attempted to locate [redacted] at [redacted] in Wellington. I left my business card for her to return my call. On February 14, 2006, at 12:06 pm, I received a call back from Ms. [redacted]

Case No. . . . : 1-05-000368 (Continued)

on my voice mail. Ms [redacted] left her telephone number for a return call 561[redacted]-[redacted] I left her a message to return call.

Investigation Continues..

********** N A R R A T I V E # 40 **********

NA Reported By: RECAREY, JOSEPH 2/21/06
Entered By.: ALTOMARO, NICKIE A. 2/22/06

On February 15, 2006, I made telephone contact with [redacted] who provided directions to where I could locate her. Det Caristo and I responded to [redacted] in Lake Park to meet with [redacted] Upon my arrival, I met with [redacted] in the parking lot directly behind MAACO Auto Painting. She was advised I was there to speak with her about an ongoing investigation that concerned Jeffrey Epstein in Palm Beach. [redacted] stated she knows Epstein very well and did not want to speak with me about Mr. Epstein. She was very fond of Epstein and did not want to speak with me about anything concerning Jeffrey Epstein. I explained to her that she was seen at the house and I would like to speak with her. She stated she knew there was an investigation and that I had spoken with other people and therefore I should know what happened at Epstein's house. [redacted] ended the conversation and walked back into her boyfriends business, [redacted] Automotive. Det Caristo and I left the area and returned to the police station.

Investigation continues.

********** N A R R A T I V E # 41 **********

NA Reported By: RECAREY, JOSEPH 4/10/06
Entered By.: ALTOMARO, NICKIE A. 4/10/06

A Grand Jury Session was requested during the month of February 2006, in which all the girls that had been interviewed would have been called to testify before the Grand Jury to seek an indictment against Jeffrey Epstein. Due to subsequent meetings with the State Attorney's Office and Defense Attorney Alan Dershowitz the Grand Jury was postponed until a later time. Dershowitz had provided a package of material on the main victims in this case in which they appear on myspace.com and speak about alcohol use and some marijuana use. The State Attorney's Office wanted time to review the material.

I requested additional subpoenas from the State Attorney's Office in which I requested information from Dollar Rent a Car and Jet Aviation. The information requested from Dollar Rent a Car was for the rented vehicle by Alfredo Rodriguez while under the employ of Epstein for one of the victims. The other subpoena requested was for Jet Aviation for dates and times when Epstein's planes were in Palm Beach County.

I continued to research other names that were acquired either from interviews or intelligence gathered during the investigation. I

Case No. . . . : 1-05-000368 (Continued)

located [redacted] in Royal Palm Beach. I responded to [redacted] in Royal Palm Beach. During the interview, [redacted] stated she knew I would be speaking with her. [redacted] stated she was first introduced to Epstein when she turned eighteen years old. [redacted] stated she was sure of her age as it was her senior year in [redacted] High School. She advised she was brought there to make money and was told she would have to provide a massage to this Palm Beach guy. She remembered she met Epstein and his assistant [redacted] in the kitchen area. She stated she was taken by one of her friends, [redacted] She stated she went upstairs with [redacted] while Epstein got ready for the massage. He exited his bathroom naked and [redacted] turned around. Epstein asked her if being naked offended her. [redacted] stated it made her uncomfortable. Epstein then put on a towel and lay on the table. [redacted] stated she rubbed his back and feet. She stated she had no massage training or experience. [redacted] stated during the massage, Epstein attempted to touch her buttocks. [redacted] pulled away as he touched her buttocks. She told him again she was uncomfortable with him touching her. Epstein then cut the massage short and became upset with her. Epstein paid her $200.00 for the massage and told her to leave the house. [redacted] never returned to the house. She did advise of one time she went with [redacted] however she waited in the car for [redacted] as she did not want to go into the house. At the conclusion of [redacted] visit with Epstein they left the area. [redacted] stated she had heard from other girls that have gone to the house that Epstein now required them to do the massage naked and allow him to touch them in their private areas for monies. The interview was concluded as [redacted] did not have any other information to provide.

I then learned from the original victim, [redacted] the defense attorney had learned of her identity. I spoke with the father of the victim, who stated there has been a private investigator on his house photographing his family and chasing visitors who come to the house. He provided a Florida License of [redacted]. This vehicle is registered to Ivan Robles of West Palm Beach. Robles is a private investigator intern who is licensed by the state. I informed the State Attorney's Office of the above information.

I received the Grand Jury subpoenas to be delivered to three victims for a Grand Jury session to be held on April 18, through April 20, 2006.

Investigation continues.

********** N A R R A T I V E # 42 **********

NA Reported By: RECAREY, JOSEPH 4/14/06
Entered By.: ALTOMARO, NICKIE A. 4/18/06

The Grand Jury Subpoenas were personally served to the individuals they were issued to. On April 5, 2006, at approximately 7:30 p.m., I personally served the parents of [redacted] who had informed me that the private investigators were still photographing the family. On April

Case No. . . . : 1-05-000368 (Continued)

10, 2006, at approximately 2:30 p.m., I served [redacted] at her residence in Royal Palm Beach. The subpoena was given to her mother, [redacted].

I learned through one of the victims ([redacted] that she was personally contacted through a source that has maintained contact with Epstein. The source assured [redacted] she would receive monetary compensation for her assistance in not cooperating with law enforcement. [redacted] also stated she was told, "Those who help him will be compensated and those who hurt him will be dealt with." I told [redacted] that tampering with a witness/victim is an arrestable offense and very serious. I asked her who approached her during this encounter. [redacted] originally was reluctant to provide the name of the person who approached her to offer her not to testify because she felt they were still friends.

On April 11, 2006, Det Dawson and I traveled to Tallahassee, Florida and met with the victim, [redacted] [redacted] identified [redacted] [redacted] W/F, [redacted] as the person who approached her in Royal Palm Beach while she was home during Spring Break in March 2006. [redacted] also stated she did not want to pursue the intimidation charges on [redacted] [redacted] was concerned that the defense attorney was given a copy of the report as certain things she had told me in confidence were repeated to her by [redacted] Prior to our departure, the victim was given a copy of her subpoena for the Grand Jury which was scheduled to commence April 18, 2006.

Upon our return from Tallahassee, I notified the State Attorney's Office of what was told to me. I also notified them that the subpoenas were delivered to the witnesses and they would be calling for arrangements for the date and time needed for the Grand Jury. I spoke with ASA Weiss and informed her of the possible intimidation by the defense.

On April 13, and April 14, 2006 I attempted contact on several occasions with ASA Weiss and ASA Belohlavic to ascertain when the victims needed to report for Grand Jury testimony. Messages were left on their voicemail. On April 17, 2006, during the hours of 9:00 am and 11:30 am, I again left messages for ASA Weiss and ASA Belohlavic for either of them to return my call as I had not heard from the State Attorney's Office as to the time and date of the Grand Jury.

At approximately 12:30 pm, I went to the State Attorney's Office and located ASA Weiss and ASA Belohlavic in their offices. I entered ASA Belohlavic's office who informed me that she was going to return my call. She explained that an offer was made to the defense, Atty Guy Fronstin and Atty Alan Dershowitz. The offer is 1 count of Agg Assault with intent to commit a felony, five years probation, with adjudication withheld. Epstein would have to submit to psychiatric/sexual evaluation and no unsupervised visits with minors. When asked about the all the other victims, ASA Belohlavic stated that was the only offer made as to one victim, [redacted] ASA Belohlavic cell phone rang and went to voice mail. She checked her voice mail and played the message on speaker. The caller identified himself as

Case No. . . . : 1-05-000368 (Continued)

Atty Guy Fronstin and acknowledged the deal made between them. Fronstin stated in the message, he spoke with his client, Jeffrey Epstein, and agreed to the deal. Fronstin asked to call off the grand jury as they would accept this deal. Belohlavic stated a probable cause would be needed to book Epstein in the county jail and would let me know as to when it would be needed. I explained my disapproval of the deal and not being consulted prior to the deal being offered. However I expressed that was only my opinion and the final approval would come from the Chief of Police. She explained to have Chief Reiter call Barry Krisher about the deal. I left the area and returned to the police station where I briefed the Chief about the deal offered.

I checked my voice mail messages and discovered a message from [redacted] stepmother for the victim [redacted] She was calling because the State Attorney's Office still had not returned any of her calls as to when they are needed for this case. I then called ASA Belohlavic's office and left messages for her to call the victims on this case and explained to them what the State Attorney's Office had done.

On April 17, 2006, at approximately 4:30 pm, State Attorney Investigator Tim Valentine called to officially notify me of the cancellation of the Grand Jury. He requested I contact the victims that had been served to appear, to notify them of the cancellation. I advised Valentine that as this Grand Jury session was called based on the State Attorney's Office decision to have the victims heard by the Grand Jury that I felt it was the States Attorney's Office responsibility to contact the victims and advise them of the reason they were no longer needed.

********** N A R R A T I V E # 43 **********

NA Reported By: RECAREY, JOSEPH 5/04/06
Entered By.: ALTOMARO, NICKIE A. 5/04/06

As I had not received any contact from anyone at the State Attorney's Office, on May 1, 2006, I prepared three arrest warrant requests and submitted them to the State Attorney's Office. The packages were delivered to the Crimes against Children Unit in care of ASA Lana Belohlavek. Jeffrey Epstein's arrest warrant was requested for 4 counts of Unlawful Sexual activity with certain minors and one count of Lewd and Lascivious Molestation. [redacted], Epstein's assistant's, arrest warrant request was for 4 counts of Principal in the 1st degree Unlawful Sexual activity with certain minors and one count of Principal in the 1st degree Lewd and Lascivious Molestation. [redacted] [redacted] arrest warrant request was for Lewd and Lascivious Acts on a victim under 16 years of age. The receipt of delivery was signed and brought back to the records division at the police department.

On May 3, 2006, at approximately 2:54 pm, I received a telephone call from ASA Daliah Weiss on my cellular telephone. ASA Weiss advised she

Case No. . . . : 1-05-000368 (Continued)

has been taken off the Jeffrey Epstein case because her husband is employed with Attorney Jack Goldberger. Attorney Goldberger is the attorney of record for Jeffrey Epstein. His previous attorney, Guy Fronstin, has been fired from representation. ASA Lana Belohlavek has been assigned the case. ASA Weiss stated she can no longer speak about the Epstein case with me. I thanked her for her telephone call. ASA Weiss further stated that ASA Belohlavek would be calling me.

********** N A R R A T I V E # 44 **********

NA Reported By: RECAREY, JOSEPH 5/15/06
Entered By.: ALTOMARO, NICKIE A. 5/15/06

On May 10, 2006, information was received that Epstein's associate, Leslie Wexner, The Limited Inc, CEO's, plane had arrived in West Palm Beach, PBIA. The plane, a Gulfstream 4 bearing a N900LS registration, was on the tarmac at Galaxy Aviation. As Epstein had recently acquired the services of a new attorney, and the fact that Epstein's house is currently under remodeling, it was believed that Epstein may be in Palm Beach. I conducted physical surveillance at the residence, 358 El Brillo Way. I observed a large construction crew conducting remodeling at the house. The contractor, David Norr, was observed driving a Ford Explorer, white in color. The vehicle has a Florida registration of [redacted]. Norr left Epstein's house and traveled north on County Road. Det Caristo and I conducted surveillance on Norr. Norr traveled to several construction sites and checked on certain jobs. Surveillance was discontinued on Norr and Det Caristo and I traveled to Galaxy Aviation. I observed the white plane with a blue stripe along the body and tail of the plane; the tail number was visible on the bottom of the tail, closer to the body of the plane. We maintained visual surveillance on the plane until 4:57 p.m., when a caravan of Cadillac Escalades drove onto the tarmac. We observed several people exit the vehicles and discovered that they were part of the executive team for Limited Inc. The executives were in Palm Beach County for an executive meeting for the day. They arrived in Palm Beach County on May 9, 2006 at 9:30 pm and were scheduled to leave on the 10th at 5:00 pm.

On May 12, 2006, I met with ASA Lana Belohlavek at the State Attorney's Office. She explained that her boss, Barry Krischer, was requesting this case be taken to the Grand Jury again. I explained to her I had requested arrest warrants for Jeffrey Epstein, [redacted], and [redacted] [redacted] I asked that she either issue the warrants or direct file, as so much time has elapsed since the original request to the Grand Jury. I explained that the Palm Beach Police Department had concluded the case in December of 2005 and has been waiting for the case to go forward. Belohlavek stated the original offer was again offered to the new defense attorney. She was waiting for their answer by Friday May 19, 2006. She stated she would advise me of the answer.

********** N A R R A T I V E # 45 **********

NA Reported By: RECAREY, JOSEPH 6/05/06

Case No. . . . : 1-05-000368 (Continued)
Entered By.: ALTOMARO, NICKIE A. 6/06/06

On May 22, 2006, I received several phone calls throughout the day from Mr. [redacted] who stated he had been followed aggressively by a private investigator. Mr. [redacted] stated that as he drove to and from work and running errands throughout the county, the same vehicle was behind him running other vehicles off the road in an attempt not to lose sight of Mr. [redacted] vehicle.

I explained to him as Mr. Epstein had retained new legal council it was possible it would be new private investigators following him to observe his daily activities. I also explained to him that there was a meeting scheduled with ASA Lana Belohlavek and Attorney Jack Goldberger at Mr. Krischer's office scheduled on June 1, 2006 at 9:00 am. I attempted to call ASA Lana Belohlavek to inform her of the private investigators following Mr. G however; she was on her vacation during the week of May 22 through May 30 2006.

On May 23, 2006, I received other phone calls from Mr. and Mrs. [redacted] who advised they were able to acquire the private investigators license plate information. The subject following them was again driving very aggressively and caused Mrs. [redacted] to run off the road. Mrs. [redacted] stated the vehicle is a green Chevy Monte Carlo bearing Florida tag [redacted]. The vehicle is registered to Zachary Bechard of Jupiter Florida. Bechard is employed with Candor Investigations from Jupiter, Florida. Bechard is a licensed Private Investigator in the State of Florida.

Since the discovery of the threat made against one of the victims in this case ([redacted], I requested subpoenas for all calls made to and received from [redacted] during the month of March 2006 for her cell phone and home phone. I had confirmed with Florida State University the exact dates of Spring Break for 2006. The Spring Break was from March 4, 2006 through March 12, 2006. I received a subpoena from Sprint/Nextel with all calls made during the month of March 2006. I reviewed the 989 calls made and received during the month of March 2006. I observed on March 7, 2006, [redacted] made and received thirty five calls during that day.

Date	Time	Seconds	In/Out	To/From
7-Mar-06	11:03 AM	492	Outbound	[redacted]
7-Mar-06	11:16 AM	6	Inbound	
7-Mar-06	11:22 AM	887.2	Inbound	
7-Mar-06	11:37 AM	48	Outbound	
7-Mar-06	11:39 AM	28.2	Inbound	
7-Mar-06	12:02 PM	727.2	Inbound	

The table reflects the date of the calls, time of day (EST), duration

Case No. . . . : 1-05-000368 (Continued)

of call in seconds, inbound or outbound calls and calls made to or from [redacted] phone. On March 7, 2006, at 11:03 am, [redacted] made a call to the victim [redacted] which lasted 492 seconds (8 minutes and 2 seconds). The victim then returned the call at 11:16 am which lasted 6 seconds. The victim then made contact with [redacted] at 11:22 am for 877.2 seconds (14 minutes and 6 seconds). These sequences of calls were consistent with what the victim had described to me on the date of the intimidation. Immediately after speaking with the victim, [redacted] makes a call to [redacted], Epstein's assistant, which lasts for forty-eight seconds. A call is then immediately received, a telephone number registered to a Corporation affiliated with Jeffrey Epstein located at 457 Madison Ave in New York. An extensive computer check revealed 457 Madison Ave is a business address in which Epstein has his corporations assigned to. Epstein had corporation attorney, Darren Indyke, register the businesses and register himself as an agent. I also observed Epstein has his El Zorro Ranch Corporation, New York Strategy Group, Ghislaine Corporation, J Epstein and Company and the Financial Strategy Group registered to this same address. Finally, a third call is received by [redacted] at 12:02 pm from the same corporate number which lasts 12 minutes and 1 second. It should be noted that there is no further contact with either the victim during the month of March or April of 2006. I also noted that there was no further contact with [redacted] or Jeffrey Epstein during the remainder of the month of March or April 2006.

On June 1, 2006, ASA Lana Belohlavek telephoned me to inform me of the meeting that occurred with Atty. Jack Goldberger and her reference this case. She advised she would make her determination on whether to file on this case or not by Monday June 5, 2006.

Inv Continues.

********** N A R R A T I V E # 46 **********

NA Reported By: RECAREY, JOSEPH 7/12/06
Entered By.: ALTOMARO, NICKIE A. 7/12/06

On June 29, 2006, I had spoken to ASA Lana Belohlavic who informed me that the case would be sent to the Grand Jury for charges. She informed me that the grand jury would convene on July 19, 2006 to hear the Epstein case. Belohlavic stated State Attorney Barry Krisher made the determination to go the Grand Jury to hear the case.

On July 12, 2006, I spoke with Mrs. [redacted] mother of the victim, [redacted] who inquired about the status of the case. I explained to her that I was told we would be going to the Grand Jury during the week of July 19, 2006. She stated she had not been contacted as of yet by the State Attorney's Office for any information. I provided her with the telephone numbers to the State Attorney's Office.

Investigation continues...

* * * * * * * * * * * * * * * * * END OF REPORT * * * * * * * * * * * * * * * * *

STATE INDICTMENT

EFTA00232129

A TRUE BILL

IN THE NAME OF AND BY THE AUTHORITY OF THE STATE OF FLORIDA

IN THE CIRCUIT COURT OF THE FIFTEENTH JUDICIAL CIRCUIT OF THE STATE OF FLORIDA

For Palm Beach County, at the Spring Term thereof, in the year of our Lord Two Thousand and Six, to-wit: The Grand Jurors of the State of Florida, inquiring in and for the body of said County of Palm Beach, upon their oaths do present that JEFFREY E. EPSTEIN in the County of Palm Beach aforesaid, in the Circuit and State aforesaid,

COUNT ONE
FELONY SOLICITATION OF PROSTITUTION

on or about or between the 1st day of August in the year of our Lord Two Thousand and Four and October 31, 2005, did solicit, induce, entice, or procure another to commit prostitution lewdness, or assignation, contrary to Florida Statute 796.07(1) on three or more occasions between August 01, 2004 and October 31, 2005, contrary to Florida Statute 796.07(2)(f) and (4)(c). (3 DEG FEL)(LEVEL 1)

against the form of the statute, to the evil example of all others, and against the peace and dignity of the State of Florida.

I hereby certify that I have advised the Grand Jury returning this indictment as authorized and required by law.

_____

Assistant State Attorney of the Fifteenth Judicial Circuit of the

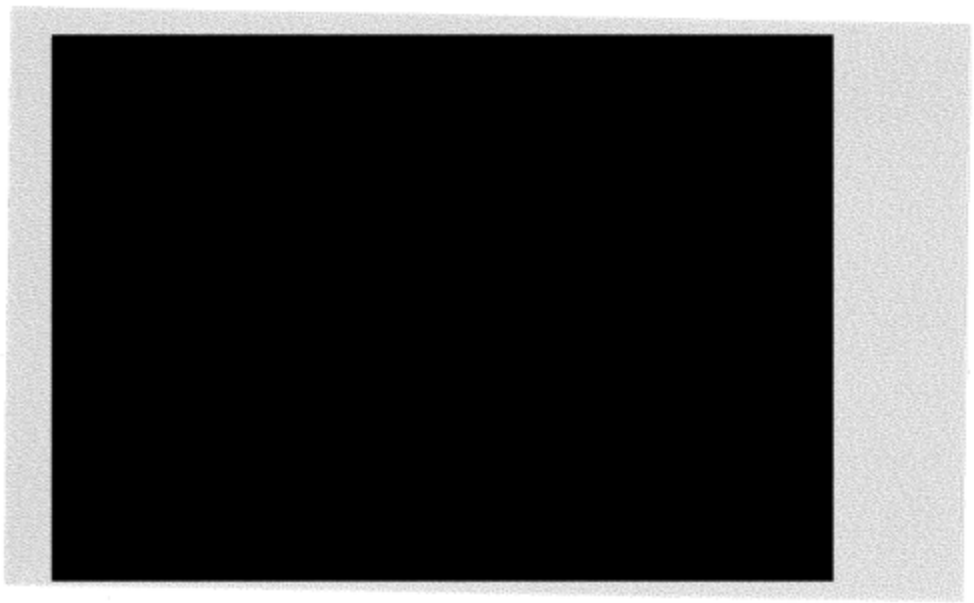
State

of Florida, prosecuting for the said State

GRAND JURY FOREPERSON

DATE

Jeffrey E. Epstein, Race: White, Sex: Male, DOB: [redacted]
Issue Warrant



FILED by D.C.
ELECTRONIC
July 18, 2008
STEVEN M. LARIMORE
CLERK U.S. DIST. CT.
S.D. OF FLA. - MIAMI

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

08-80804-Civ-MARRA/JOHNSON

CASE NO.: _____

JANE DOE,
a/k/a JANE DOE #1,

Plaintiff,

vs.

JEFFREY EPSTEIN, [redacted]
and [redacted],

Defendants.

_____/

NOTICE OF REMOVAL

In accordance with 28 U.S.C. §§ 1441, 1446, and 1332(a)(1), the defendants, Jeffrey Epstein, [redacted], and [redacted] hereby remove this action[1] from Palm Beach County Circuit Court to the United States District Court for the Southern District of Florida, and respectfully state as follows:

Introduction

Six months ago, this plaintiff filed virtually the identical lawsuit in this Court. *See Jane Doe #1 v. Epstein*, Case No. 08-cv-80069-KAM (S.D. Fla. filed

[1] *Doe v. Epstein et al.*, Case No. 50 2008 CA 006596 XXXX MB (Fla. 15th Cir. Ct. filed Mar. 6, 2008).

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Jan. 24, 2008) (the "First Federal Action"). The First Federal Action named Jeffrey Epstein as the sole tortfeasor, made the identical operative allegations as the instant Amended Complaint, and demanded damages of $50 million. (The amount of the demand against Epstein is evidently the product of recent reports in the press that Epstein is wealthy.)

The First Federal Action was quickly followed by a series of substantially identical "Jane Doe" lawsuits, all filed by the same attorney in a three-month span. *Compare Jane Doe #1 v. Epstein*, Case No. 08–cv-80069-KAM (S.D. Fla. filed Jan. 24, 2008), *with Jane Doe #2 v. Epstein,* No. 08-CV-80119-KAM (S.D. Fla. filed Feb. 6, 2008) (asserting identical causes of action based on the same operative allegations), *Jane Doe #3 v. Epstein,* No. 08-CV-80232-KAM (S.D. Fla. filed Mar. 5, 2008) (same), *Jane Doe #4 v. Epstein,* No. 08-CV-80380-KAM (S.D. Fla. filed Apr. 14, 2008) (same), *and Jane Doe #5 v. Epstein*, No. 08-80381-CV-KAM (S.D. Fla. filed Apr. 14. 2008) (same).

On February 20, amid these filings, Jane Doe #1 was deposed in *State of Florida v. Jeffrey Epstein,* 502006CF009454AXXXMB (Fla. 15th Cir. Ct., filed Jul. 19, 2006), a parallel state-court criminal action. During that deposition, she made numerous admissions that completely undermined the allegations against Epstein that she had pled in her complaint. A copy of her deposition, with names

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redacted, is attached hereto (Exhibit A). Two days later, counsel for Jane Doe #1 filed a notice of voluntary dismissal without prejudice in the First Federal Action. *See Doe #1 v. Epstein*, Case No. 08-CV-80069-KAM, DE 9.

Two weeks later (March 6, 2008), having changed lawyers, Jane Doe #1 refiled her complaint in Florida Circuit Court as the instant case, adding two nominal defendants: [redacted], Mr. Epstein's personal secretary, and [redacted] one of Jane Doe #1's contemporaries. These defendants have nothing to do with the plaintiff's case against Mr. Epstein, except that the presence of [redacted] as a defendant in this new case, because she is a citizen of Florida (Am. Compl. ¶ 4), would ostensibly prevent complete diversity.[2]

As discussed below, however, [redacted] was named in the refiled lawsuit only to destroy diversity jurisdiction, and to prevent any application of 18 U.S.C. § 3509(k), a mandatory stay provision applicable in federal court .[3] [redacted]

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[2] Defendant [redacted] is a citizen of New York (Am. Compl. ¶ 5), and is therefore a nonresident defendant for purposes of diversity jurisdiction and removal.

[3] Section 3509(k) of Title 18, United States Code, provides as follows:

> If, at any time that a cause of action for recovery of compensation for damage or injury to the person of a child exists, a criminal action is pending which arises out of the same occurrence and in which the child is the victim, ***the civil action shall be stayed until the end of all phases of the criminal action*** and any mention of the civil action during the criminal proceeding is prohibited. As used in this subsection, a criminal action is pending until its final adjudication in the trial court.

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[redacted] besides having nothing to do with the substantive allegations of the plaintiff's $50,000,000 case, is a community-college student with ***no assets whatever***.

Even if this case purports to identify a new (and strategically nondiverse) tortfeasor, the refiled lawsuit is still directed against only one defendant—Jeffrey Epstein. Then and now, the operative allegations are the same: Jane Doe alleges that Jeffrey Epstein assaulted her "in violation of Chapter 800 of the Florida Statutes."[4] (Am. Compl. ¶ 18.) To sharpen her lawsuit, the plaintiff says she is seeking damages in connection with a "conspiracy" (Am. Compl. ¶ 22), a "plan" (Am. Compl. ¶ 32), a "scheme" (Am. Compl. ¶ 32), and an "enterprise" (Am. Compl. ¶ 32). These theories of liability, however, cannot be supported by the allegations in the Amended Complaint. Even if everything in the Amended Complaint were true, recovery against [redacted] [redacted] under any formulation, is impossible under Florida law.

Focusing on the real parties to this controversy, the instant case could have (once again) been brought here in federal court—just like the four other "Jane

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18 U.S.C. § 3509(k) (emphasis added).

[4] Chapter 800, Florida Statutes, is entitled, "Lewdness; Indecent Exposure."

EFTA00232136

Doe" lawsuits presently pending against Epstein, filed by this plaintiff's former lawyer.

This case is properly removed to federal court, ***first***, because there is complete diversity among the real parties-in-interest, ***second***, because the amount in controversy exceeds $75,000, and ***third***, because this Notice complies with the requirements of 28 U.S.C. § 1446.

Discussion

A. This case is properly removable because it falls within the original jurisdiction of the United States District Court for the Southern District of Florida.

A state-court case is properly removable when "it could have been brought, originally, in a federal district court." *Lincoln Prop. Co. v. Roche*, 546 U.S. 81, 83 (2005) (*citing* 28 U.S.C. § 1441(a)). This case ***was*** originally filed in federal district court, and it is the same case today. Even though it was reconfigured to ***look like a state-court lawsuit***, this action falls squarely within the bounds of the diversity-jurisdiction statute. *See* 28 U.S.C. § 1332(a)(1) (establishing that federal district courts have original jurisdiction over cases where the amount in controversy [is more than $75,000] . . . and [when the controversy] is between citizens of different states").

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1. The amount in controversy in this action exceeds $75,000.

This case is a duplicate of the First Federal Lawsuit. In that case, Jane Doe pled "damages in excess of $50 million." *See Doe v. Epstein*, No. 08–80069-KAM (S.D. Fla. filed Jan. 24, 2008) (Compl. ¶ 6). That allegation is now deleted and the Amended Complaint substitutes a generic prayer for relief.[5] It is clear, however, that Jane Doe still seeks more than $75,000 in damages.

This case, precisely like the First Federal Action, seeks damages in connection with an alleged assault. (Am. Compl. ¶¶ 16–19.) The Amended Complaint alleges that Jane Doe "has suffered and will continue to suffer severe and permanent traumatic injuries, including mental, psychological, and emotional damages." (Am. Compl. ¶ 19.) These are the identical injuries Jane Doe asserted in the First Federal Action, and are no less serious simply because pled under a state-court caption. *Cf., e.g., Woods v. Southwest Airlines, Co.*, 523 F. Supp. 2d 812, 820 (N.D. Ill. 2007) (determining, in the context of diversity jurisdiction, that the $75,000 threshold had been satisfied, and "clearly [surpassed]," based on "the nature of the injuries alleged" in the complaint).

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[5] The Complaint seeks damages for "[more than] . . . $15,000." (Am. Compl. ¶ 6.) This boilerplate is routinely used in Florida pleading practice to trigger application of section 26.012, Florida Statutes, the statute that establishes the jurisdictional amount required for filing in Florida's Circuit Court (as opposed to County Court).

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To cement this point, the Eleventh Circuit Court of Appeals has said that "[w]hen [a] complaint does not claim a specific amount of damages, removal from state court is proper if it is facially apparent from the complaint that the amount in controversy exceeds the jurisdictional requirement." *Williams v. Best Buy Co., Inc.*, 269 F.3d 1316, 1319 (11th Cir. 2001). This case meets that standard, and satisfies the first prong of diversity jurisdiction.

2. There is complete diversity among the real parties to this controversy.

Diversity jurisdiction requires complete diversity. *Carden v. Arkoma Assocs.*, 494 U.S. 185, 187 (1990) ("Since its enactment, we have interpreted the diversity statute to require 'complete diversity' of citizenship." (*citing Strawbridge v. Curtiss*, 7 U.S. (3 Cranch) 267, 267–68 (1806))). *See also MacGinnitie v. Hobbs Group, LLC*, 420 F.3d 1234, 1239 (11th Cir. 2005) (stating that "[c]omplete diversity requires that no defendant in a diversity action be a citizen of the same state as any plaintiff"). As demonstrated below, this case satisfies the statutory requirement of complete diversity.

(a) Plaintiff Jane Doe is a citizen of Florida. (Am. Compl. ¶ 1.) [6]

[6] Jane Doe may, in fact, be a citizen of ***Georgia***, not Florida, as she pled in her Amended Complaint. *See New York Post*, Jul. 1, 2008 (reporting that "On his way into court [for his state-court guilty plea on June 30], Epstein was served with a copy of a lawsuit by Doe, ***who has since moved to another state***."); Jane Doe Depo. at 77, 112 (indicating that

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(b) Defendant Jeffrey Epstein is a citizen of the U.S. Virgin Islands.[7]

(c) Defendant [redacted] is a citizen of New York. (Am. Compl. ¶ 5.)

3. Defendant [redacted] [redacted] was fraudulently joined to defeat diversity.

"A non-diverse defendant who is fraudulently joined does not defeat diversity because his citizenship is excluded from the diversity calculus." *Shenkar v. Money Warehouse, Inc.*, No. 07-20634-CIV, 2007 WL 3023531, at *1 (S.D. Fla.

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her [redacted] sister lives with her mother in Georgia); Affidavit of [redacted] LaVogue [redacted] at ¶ 1(stating, "I am the mother and natural guardian for Jane Doe #1" with jurat executed in Georgia before a Georgia notary), DE 4-2, *Jane Doe No. 1 v. Epstein,* Case No. 08-80069-Civ-Marra (1/29/08); Intervenor's Complaint, at ¶ 2 (filed by "Jane Doe's Mother" and stating that "***Jane Doe's Mother is a citizen and resident of the State of Georgia***."), DE 5-2, *Jane Doe No. 1 v. Epstein,* Case No. 08-80069-Civ-Marra (1/29/08); Petition for Removal of Disability of Non-Age, at ¶¶ 1, 2, 7 (filed "on behalf of S.D.G.," alleging that "The mother is Da[w]n Lavogue [redacted] and her address is .... ***Ga.***," and stating that "S.D.G. is also the unnamed party in a lawsuit filed by her father on her behalf in the U.S. District Court for the Southern District of Florida, Case No. 08-80069, which was filed without the consent of the mother"), *In re* [redacted] *v.* [redacted] Case No. 50 2008 DR 001141 (Palm Beach Co. Family Ct.) (1/31/08). If this turns out to be the case, there is complete diversity, regardless of [redacted] citizenship. Although the Eleventh Circuit has recently indicated that a district court may not conduct jurisdictional discovery under such circumstances, another division of this Court has since allowed it. *Compare Lowery v. Ala. Power Co.*, 483 F.3d 1184, 1215-16, 1221 (11th Cir. 2007) (holding that jurisdictional discovery to determine citizenship upon removal is inappropriate), *with Calixto v. BASF Constr. Chemicals, LLC*, slip op., Case No. 07-60077-CIV-ZLOCH, 2008 WL 1840717, *1 (S.D. Fla. Apr. 22, 2008) (ordering that parties "shall engage in jurisdictional discovery for the Court to determine the citizenship of BASF and whether it has subject-matter jurisdiction over this action").

[7] The Amended Complaint erroneously states that Jeffrey Epstein is a citizen of New York.

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Oct. 15, 2007) (Moreno, J.) (*citing Riley v. Merrill Lynch, Pierce, Fenner & Smith, Inc.*, 292 F.3d 1334, 1337 (11th Cir. 2002)); *accord, e.g.*, *Tedder v. F.M.C. Corp.*, 590 F.2d 115, 117 (5th Cir. 1979) (denying motion to remand where two resident defendants were joined for the fraudulent purpose of defeating federal jurisdiction). In this case, the plaintiff relies on her original allegations to support three causes of action against [redacted] civil conspiracy (Am. Compl. ¶¶ 20–23); Intentional Infliction of Emotional Distress (Am. Compl. ¶¶ 23–28); and civil RICO (Am. Compl. ¶¶ 29–34). These allegations, however, do not support these claims, or any other theory of liability that would allow recovery against [redacted] *Cf. Parks v. The New York Times Co.*, 308 F.2d 474, 477 (5th Cir. 1962) (observing that "determination of fraudulent joinder is to be based on whether there was a ***real intention on colorable grounds*** to procure a joint judgment") (emphasis added).[8]

(a) Nonresident defendants have a right of removal.

The removal statute was enacted specifically "to protect defendants." *Legg v. Wyeth*, 428 F.3d 1317, 1325 (11th Cir. 2005). *Cf., e.g.*, *Picquet v. Amoco Prod. Co.*, 513 F. Supp. 938, 941 (M.D. La. 1981) (explaining that courts developed the fraudulent-joinder doctrine to protect "the right [of removal] granted to

[8] In *Bonner v. City of Prichard*, 661 F.2d 1206, 1207 (11th Cir. 1981) (en banc), the Eleventh Circuit Court of Appeals adopted as binding precedent all decisions of the former Fifth Circuit rendered prior to October 1, 1981.

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[defendants] by . . . Congress"). In this case, by reconstituting her original federal lawsuit and refiling it in state Court, the plaintiff has clearly sought to avoid the strictures of the mandatory stay of this case that federal law requires under 18 U.S.C. § 3509(k).[9]

In federal court, pursuant to 18 U.S.C. § 3509(k), this action must be automatically stayed pending final disposition of an ongoing parallel criminal action against Mr. Epstein. *See* 18 U.S.C. § 3509(k) (providing that a parallel civil

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[9] By filing in state court, the plaintiff's attorney has also evidently sought to avoid the clear command of our local rules forbidding public comment about the merits of a pending lawsuit. *Compare* S.D. Fla. Local Rule 77.2(7) ("A lawyer or law firm associated with a civil action shall not during its investigation or litigation make or participate in making an extrajudicial statement, other than a quotation from or reference to public records, which a reasonable person would expect to be disseminated by means of public communication if there is a reasonable likelihood that such dissemination will interfere with a fair trial and which relates to (a) Evidence regarding the occurrence or transaction involved. (b) The character . . . of a party . . . . (d) The lawyer's opinion as to the merits of the claims . . . ."), *with* Ricci~Leopold Home Page, http://www.riccilaw.com (click on "Breaking News," then access the hyperlink entitled, *03/13/08 - Consumer Justice Attorney Ted Leopold Files Case to aid Jane Doe in seeking justice against sexual predator Jeffrey Epstein and his associates.*) (describing character of party defendant Epstein as a "sexual predator" (a term defined by Florida criminal statutes) and quoting the plaintiff's attorney "Ted Leopold, managing partner" as characterizing Epstein as "an extremely powerful and wealthy man," with "vast resources," who acted "in the vilest way" at his "lavish mansion" with "lurid fantasies" and inflicting "untold damage," and opining that he should "be held accountable;" also quoting the plaintiff's attorney as opining that "[t]his case is both about justice and making sure that a wealthy and powerful man knows that he is not above the law;" also quoting the plaintiff's attorney's view of the evidence that plaintiff "continues to endure emotional trauma daily") (Web site last visited July 17, 2008).

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action arising from an alleged sexual assault of a minor "***shall be stayed*** until the end of all phases of [any] criminal action") (emphasis added). In this case, there is a parallel federal criminal grand jury action pending in the Southern District of Florida, *In re Grand Jury*, No. [redacted] (WPB) (S.D. Fla.), which arises out of the same allegations pled here. Thus, in resorting to fraudulent joinder, the plaintiff has sought to avoid any application of this otherwise controlling statute. *Cf. Doe v. Francis*, No. 5:03 CV 260 MCR/WCS, 2005 WL 517847, at *1–2 (N.D. Fla. Feb. 10, 2005) (staying civil diversity action over plaintiffs' objections on grounds that "the language of 18 U.S.C. § 3509(k) is clear that ***a stay is required*** in a case . . . where a parallel criminal action is pending which arises from the same occurrence involving minor victims") (emphasis added).

Even outside the context of a mandatory federal statute, "the Supreme Court [has] admonished [that] 'the Federal courts should not sanction devices intended to prevent a removal to a Federal court where one has that right, and should be equally vigilant to protect the right to proceed in the Federal court.'" *Legg*, 428 F.3d at 1325 (*citing Wecker v. Nat'l Enameling & Stamping Co.*, 204 U.S. 176, 186 (1907)). *See also id.* (observing that "Congress 'did not extend [to defendants a right of removal] with one hand, and with the other give plaintiffs a bag of tricks

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to overcome it'" (*quoting McKinney v. Bd. of Trustees of Maryland Cmty. Coll.*, 955 F.2d 924, 928 (4th Cir. 1992))).

To protect a nonresident defendant's right of removal, a federal court will "determine the matter of jurisdiction" by examining "***the true situation*** both as to parties and causes of action." *Bernblum v. Travelers' Inc. Co.*, 9 F. Supp. 34, 35 (W.D. Mo. 1934) (emphasis added). *See also id.* (observing that "[t]he federal courts will . . . strike out the fiction injected into a case by a party to prevent removal"). In accordance with these principles, a plaintiff cannot destroy diversity jurisdiction simply by conjuring up a nondiverse defendant; there must be at least some "possibility that the state law might impose liability on [the nondiverse] defendant under the circumstances alleged in the complaint." *Florence v. Crescent Res., LLC*, 484 F.3d 1293, 1299 (11th Cir. 2007) (citations omitted). *See also, Holloway v. Morrow*, No. 07-0839-WS-M, 2008 WL 401305, at *5 (S.D. Ala. Feb. 11, 2008) (emphasizing that "'[t]he potential for legal liability ***must be reasonable, not merely theoretical***'" (*quoting Legg v. Wyeth*, 428 F.3d 1317, 1325 n.5 (11th Cir. 2005))) (emphasis added).

In this case, the plaintiffs have tried to whip Jane Doe's original, one-defendant complaint into a froth that looks non-federal. *Cf. Owens v. Swan*, 962 F. Supp. 1436, 1439 (D. Utah 1997) (noting that "although plaintiffs' amended

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complaint contains four claims for relief, the first and second claims state ***only one cause of action***") (emphasis added). Using her original allegations ***and adding nothing***, Jane Doe has tried to add claims against [redacted] [redacted] for civil conspiracy (Am. Compl. ¶¶ 20–23), Intentional Infliction of Emotional Distress (Am. Compl. ¶¶ 24–28), and civil RICO (Compl. ¶¶ 29–34) in order to append a nondiverse defendant to her Complaint. These claims, however, are untenable under Jane Doe's own allegations, and therefore cannot be used to destroy diversity jurisdiction.

(b) There is no possibility that the plaintiff can establish a cause of action against [redacted] [redacted] under Florida law.

(i) The conspiracy claim against [redacted] must fail.

As a general rule, "[a]n actionable conspiracy [under Florida law] requires an ***actionable underlying tort or wrong***." *Wright v. Yurko*, 446 So. 2d 1162, 1165 (Fla. 5th DCA 1984) (citations omitted) (emphasis added).[10]

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[10] This case is governed by the general rule. *Cf. Churruca v. Miami Jai-Alai, Inc.*, 353 So. 2d 547, 550 (Fla. 1977) (noting that while there is "ordinarily . . . no independent tort for conspiracy," there is a narrow exception to this rule when "the plaintiff can show some ***peculiar power of coercion*** possessed by the conspirators by virtue of their combination") (emphasis added). *See generally Liappas v. Augoustis,* 47 So. 2d 582, 583 (Fla. 1950) (observing that "'instances of conspiracy which is in itself an independent tort ***are rare and should be added to with caution***'" (*quoting Fleming v. Dane,* 22 N.E.2d 609, 611, (Mass. 1939))) (emphasis added). Plainly, this case involves the general rule, not the narrow exception, because ***only one person*** could have caused Jane Doe's injuries. *Cf. Martin v. Marlin*, 529 So. 2d 1174, 1179 (Fla. 3d DCA 1988) (upholding

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Here, Jane Doe cannot assert a cause of action for "violation of Chapter 800, Florida Statutes" (Am. Compl. ¶ 18) because there is ***no private right of action*** under that Chapter. *See generally Am. Home Assurance Co. v. Plaza Materials Corp.*, 908 So. 2d 360, 374 (Fla. 2005) (observing that "not every statutory violation carries a civil remedy" (*citing Villazon v. Prudential Health Care Plan, Inc.*, 843 So. 2d 842, 852 (Fla. 2003))). *See also, e.g., Miami Herald Publ'g Co. v. Ferre*, 636 F. Supp. 970 (S.D. Fla. 1985) (King, C.J.) (holding that violation of Florida's criminal extortion statute does not give rise to a civil cause of action for damages); *Mantooth v. Richards*, 557 So. 2d 646, 646 (Fla. 4th DCA 1990) (per curiam) (affirming dismissal of plaintiff's claim for parental kidnapping where "the mentioned statutes concern only criminal violations ***and do not afford a civil remedy***") (citation omitted) (emphasis added); *Wright v. Yurko*, 446 So. 2d 1162, 1165 (Fla. 5th DCA 1984) (holding that "[a]n act which does not constitute a basis for a cause of action against one person cannot be made the basis for a civil action for conspiracy").

In this case, Jane Doe's claim under Count II (civil conspiracy) fails because it derives ***exclusively*** from Count I (violation of Chapter 800, Florida Statutes). *Cf.*

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grant of summary judgment against claim for independent conspiracy, noting that "[w]hen the concerted acts of the defendants do not create a greater harm than if the acts were committed by one person alone, then there can be no recovery").

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Buchanan v. Miami Herald Publ'g Co., 230 So. 2d 9, 12 (Fla. 1969) (holding that where Count I of the complaint had failed to state a cause of action for malicious prosecution, there could be no civil-conspiracy claim in Count II "based on the allegations of Count I"). Because the statute she expressly pleads as the basis for Count I, Chapter 800, Florida Statutes, provides no civil remedy, Jane Doe cannot prevail on Count I. Therefore, she cannot prevail on her claim for conspiracy (Count II) to violate Chapter 800, Florida Statutes (Count I).

(ii) The plaintiff cannot prevail against nondiverse defendant [redacted] on her claim for Intentional Infliction of Emotional Distress (IIED).

Even if the plaintiff, for the sake of argument, can assert an IIED claim against Jeffrey Epstein, the plaintiff still does not have a cause of action for IIED against [redacted] ***First***, the plaintiff cannot recover damages in connection with her own illegal conduct; and ***second***, the plaintiff's purported IIED claim fails as a matter of law.

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1. The plaintiff seeks damages in connection with her own illegal conduct.

The plaintiff concedes that she went to Jeffrey Epstein's house "to give Epstein a massage for monetary compensation." (Am. Compl. ¶ 13.) The plaintiff also concedes, in the guise of an allegation, that [redacted] [redacted] "brought Jane Doe to Epstein's mansion in Palm Beach" to help the plaintiff execute her own plan. (Am. Compl. ¶ 13.) Yet, the plaintiff's plan was illegal: under Florida law, ***it is a crime*** "to practice massage" without a license. § 480.047, Fla. Stat. (1997). To say it another way, the plaintiff admits that she went to Mr. Epstein's house to ***commit a crime***.

Based on these allegations, it is clear that the plaintiff seeks damages in connection with ***her own illegal conduct***; this is enough to support a finding of fraudulent joinder. *See Florence v. Crescent Resources, LLC*, 484 F.3d 1293, 1298 n.3 (11th Cir. 2007) (acknowledging that "under some circumstances, application of an affirmative defense can support a finding of fraudulent joinder). This conclusion is supported by well-established principles.

Under Florida law, a plaintiff cannot recover damages flowing from her own illegal conduct. *See* [redacted] *v.* [redacted] 93 Fla. 709, 112 So. 622, 628 (1927) (referring to "***the universal rule*** of our law that one in a court of justice cannot complain . . . of another's wrong whereof he was a partaker") (internal quotation marks and citation

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omitted) (emphasis added); *Turner v. Anderson*, 704 So. 2d 748, (Fla. 4th DCA 1998) ("[N]o public policy should allow appellant to recover damages as a result of engaging in criminal conduct such as occurred in this case."). *Cf. Ewell v. Daggs*, 108 U.S. 143, 149 (1883) (stating that "'[n]o court will lend its aid to a [plaintiff] who founds [a] cause of action upon an immoral or an illegal act'") (*quoting Holman v. Johnson*, 98 Eng. Rep. 1120 (K.B. 1775)); *see also id.* (explaining that this policy is "'not for the sake of the defendant, but because [***the courts***] ***will not lend their aid to such a plaintiff***'" (*quoting Holman*, 98 Eng. Rep. 1120)) (emphasis added); *Balas v. Ruzzo*, 703 So. 2d 1076, 1082 (Fla. 5th DCA 1997) (Harris, J., concurring) (remarking in the context of an action brought against an alleged prostitution house that "the court should continue its tradition of not interceding in civil conflicts involving transactions that are either illegal or are against public policy").

Based on the foregoing, the plaintiff cannot blame someone else ([redacted] for the consequences of her own criminal conduct. *Cf. Feld & Sons, Inc. v. Pechner, Dorfman, Wolffe, Rounick and Cabot*, 458 A.2d 545, 552 (Pa. Super. Ct. 1983) (holding that law-firm clients could not recover damages flowing from their own criminal acts, even though clients' lawyers had suggested the unlawful conduct to begin with). *See also Turner v. Anderson*, 704 So. 2d 748, 751 (Fla. 4th

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DCA 1998) (approving reasoning in *Feld & Sons,* holding that "no public policy should allow [a plaintiff] to recover damages as a result of engaging in criminal conduct" where the plaintiff had provided false testimony at an arbitration proceeding).

2. The plaintiff's IIED claim fails as a matter of law.

To state a cause of action for IIED, a complaint must allege four elements: (1) deliberate or reckless infliction of mental suffering; (2) outrageous conduct; (3) the conduct caused the emotional distress; and (4) the distress was severe. *Metro. Life Ins. Co. v. McCarson,* 467 So. 2d 277, 278 (Fla. 1985). Whether conduct is outrageous enough to support a claim of intentional infliction of emotional distress is a question of law, not a question of fact. *Liberty Mut. Ins. Co. v. Steadman*, 968 So. 2d 592, 595 (Fla. 2d DCA 2007) (citations omitted).

In this case, without reaching the question of "outrage," the plaintiff has failed to show that [redacted] [redacted] conduct - - allegedly arranging an illegal sexual massage that the plaintiff herself agreed to perform - - itself caused the plaintiff to suffer any emotional distress. Even if the alleged agreement was fraudulently induced, the plaintiff's IIED claim flows from Epstein's alleged conduct, not the joint conduct of [redacted] and Doe in planning the massage.

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(iii) The plaintiff cannot prevail on her claim for civil remedies for criminal practices or racketeering ("civil RICO") pled in Count IV.

A cause of action under section 772.104, Florida Statutes ("Civil Remedies for Criminal Practices") requires a showing of ***direct injury***. Even assuming for the sake of argument that Jane Doe can establish that the defendants engaged in a "pattern of criminal activity," she cannot establish that she was directly injured by those activities.

Section 772.104 allows someone to bring a civil RICO claim only if "he or she has been injured ***by reason of***" any RICO violation. § 772.104, Fla. Stat. (2007). Here, the allegations in Count IV, even if they are true, do not add up to a civil RICO claim because there is no proximate cause between the purported "pattern of criminal activity" and Jane Doe's alleged injuries.

In a doomed attempt to satisfy the extremely high burden of pleading civil RICO under Florida law, the Amended Complaint lists a series of violations rooted in Florida's prostitution statutes. (Am. Compl. ¶ 31.) According to the Amended Complaint, the defendants participated in a criminal enterprise . . . or conspir[acy]" (Am. Compl. ¶ 30) over an unspecified length of time "to repeatedly find and bring [Jeffrey Epstein] underage girls . . . in order for Epstein to solicit, coerce, entice, compel, or force such girls in acts of prostitution and/or lewdness" (Am.

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Compl. ¶ 32). The alleged "pattern of criminal activity" comprises violations of Chapter 796, Florida Statutes—the chapter that proscribes various crimes of prostitution.[13]

These allegations do not tie directly into Jane Doe's alleged psychic injuries. In contrast to a cognizable RICO claim, this action concerns only an isolated occurrence. More important, the alleged injuries in this case are pled to have resulted from an alleged sexual assault, an assault "in violation of Chapter 800 of the Florida Statutes" (Am. Compl. ¶ 18)—***not*** anything having to do with the facilitation of prostitution, or more succinctly, the violation of Florida's prostitution law.

Civil RICO claims are extraordinarily difficult to plead successfully. There are examples in the case law of RICO claims stemming from a prostitution enterprise, but they are vastly different from what plaintiff pleads here. They involve, for example, prostitutes who sued a ***house of prostitution*** (as an "enterprise") for inflicting systematic and repetitive abuse ***on them, over time***. *See Balas v. Ruzzo*, 703 So. 2d 1076, 1077 (Fla. 5th DCA 1997) (offering an example of a civil RICO claim against the operators of an alleged "house of prostitution,"

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[13] The Amended Complaint alleges a "pattern of criminal activity" comprising the following criminal violations: §§ 796.03, 796.07(2)(f), 796.07(2)(h), 796.045, and 796.04, Fla. Stat. (Am. Compl. ¶ 31.)

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where petitioners alleged that they had "suffered emotional pain, anguish, humiliation, insult, indignity, loss of self-esteem, inconvenience, hurt and emotional distress" as a result of being forced repeatedly, over time, to "perform sexual acts to retain their employment"). Here, even if the Amended Complaint can be read to plead that the defendants schemed to solicit other massages from other people (*see, e.g.*, Am. Compl. ¶¶ 9, 11, 12, 32), those activities are not alleged in any way to have impacted ***Jane Doe***. *Cf., e.g., Palmas Y Bambu, S.A. v. E.I. Dupont De Nemours & Co., Inc.*, 881 So. 2d 565, 570 (Fla. 3d DCA 2004) (holding that "'indirect injuries, that is injuries sustained not as a direct result of predicate acts . . . ***will not allow recovery under Florida RICO.***'" (*quoting O'Malley v. St.* [redacted] *Univ., Inc.*, 599 So. 2d 999, 1000 (Fla. 3d DCA 1992))) (emphasis added).

Because the Amended Complaint does not satisfy the direct-injury requirement under Florida's RICO law, Jane Doe has failed to allege a cause of action against [redacted] [redacted] for violation of section 772.103, Florida Statutes.

B. This Notice satisfies the procedural requirements of 28 U.S.C. § 1446.

1. This notice of removal is timely.

In accordance with 28 U.S.C. § 1446, this notice of removal is timely. Only defendant Epstein has been served with process. Defendants [redacted] and [redacted]

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have not yet been served. In a multi-defendant lawsuit, removal is timely when effected within 30 days after the last defendant is served. *See Hill Dermaceuticals, Inc. v. RX Solutions, United Health Group, Inc.*, No. 6:08-cv-330-Orl-31KRS, 2008 WL 1744794, at *3 (M.D. Fla. Apr. 11, 2008) (concluding that removal petition was timely where it was filed within 30 days after the last defendant was served).

2. Notice has been given, and state-court papers have been filed.

In accordance with 28 U.S.C. § 1446(d), defendants have served this Notice of Removal on July 18, 2008. All papers filed in State Court are attached to this Removal Petition.

3. There is unanimity among the defendants.

In accordance with 28 U.S.C. § 1446(b) the undersigned are authorized to represent that all of the defendants join this Petition and consent to removal.

Conclusion

Because this is a civil action between citizens of different states, excluding any fraudulently joined parties, and the amount in controversy exceeds $75,000, exclusive of interests and costs, this Court has original jurisdiction over this action pursuant to 28 U.S.C. § 1332(a)(1).

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WHEREFORE, the Defendants, Jeffrey Epstein, [redacted], and [redacted] remove this case from Palm Beach Circuit Court to the United States District Court for the Southern District of Florida.

Respectfully submitted,

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Fla. Bar No [redacted]

Attorneys for Defendant Jeffrey Epstein

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that the foregoing document is being served this day, July 18, 2008, on counsel of record identified on the service list by U.S. Mail.



Michael R. Tein

Lewis Tein PL.
3059 Grand Avenue, Suite 340, Coconut Grove, Florida 33133

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EXHIBIT A

EFTA00232158

IN THE CIRCUIT COURT OF THE FIFTEENTH JUDICIAL CIRCUIT
IN AND FOR PALM BEACH COUNTY, FLORIDA
CASE NO. 2006 CF09454AXX

STATE OF FLORIDA,

-vs-

JEFFREY EPSTEIN,
Defendant.
_____/

DEPOSITION OF [redacted]

Wednesday, February 20, 2008

2:00 p.m. - 4:30 p.m.
Palm Beach County Courthouse
205 North Dixie Highway
West Palm Beach, Florida 33401

COPY

Reported By:
Judith F. Consor, FPR
Notary Public, State of Florida
Consor & Associates Reporting and Transcription
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[redacted]

ALSO PRESENT:
ON BEHALF OF THE WITNESS: THEODORE J. LEOPOLD, ESQ.
KEITH J. BRETT, DIRECTOR OF MULTIMEDIA DIVISION, LEGAL-EZE

- - -

I N D E X

WITNESS:	PAGE:
[redacted]	
DIRECT EXAMINATION	4
BY MR. TEIN:	

- - -

NO E X H I B I T S M A R K E D

- - -

.....CERTIFIED QUESTIONS.....

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Deposition taken before Judith F. Consor, Court Reporter and Notary Public in and for the State of Florida at Large, in the above cause.

- - -

Thereupon,

[redacted]

having been first duly sworn or affirmed, was examined and testified as follows:

THE WITNESS: I do.

DIRECT EXAMINATION

BY MR. TEIN:

Q. Good afternoon. Please tell me your full name.

A. [redacted]

Q. And can you please spell it.

A. [redacted]

Q. Thank you.

May I call you [redacted]

A. Uh-huh.

Q. [redacted] I'm going to ask you a few questions, several questions today. If at any time you want to take a break, you just let me know. Okay?

A. Okay.

Q. If you at any time don't understand one of

my questions, will you just please let me know?

A. Yes.

Q. And if at any time you're not feeling well or something like that, you'll tell us, right?

A. Yes.

Q. Do you feel okay today?

A. Yes.

Q. Not taking any alcohol or drugs or anything like that, right?

A. No.

Q. So you feel ready to have your deposition taken?

A. Yes.

Q. [redacted] what is your address?

A. I'm currently living at my aunt's house and I don't know it off the top of my head.

Q. Where is it?

A. In Jupiter.

Q. Who is your aunt?

A. [redacted]

Q. Who else is living there?

A. [redacted] my uncle.

Q. Anyone else living there?

A. No.

Q. The contempt motion that your mother filed

against your father regarding your fifty million-dollar lawsuit against Jeffrey Epstein says that you live with your aunt and uncle and have been living there; is that correct?

A. Yes.

Q. How long have you been living with your aunt and uncle?

A. Since my father kicked me out.

Q. That was Thanksgiving of this past year?

A. Yes, sir.

Q. Okay. Didn't your firefighter boyfriend [redacted] get an apartment for the two of you?

A. No, sir. He has an apartment, but by himself.

Q. Did he get an apartment for the two of you to live in?

A. No, sir.

Q. Are you planning to move in with him?

A. Maybe one day in the future.

Q. Do you have a plan to move in with him presently?

A. No.

Q. Have you been to the apartment that you and [redacted] have discussed moving in together?

A. I have been to the apartment.

Q. Where is that?
A. Palm Beach Lakes.
Q. Have you spent the night over there?
A. No, sir.
Q. Do you know the address there?
A. I do not.
Q. Isn't your sister [redacted] planning on living with you and [redacted]?
A. No.
Q. [redacted] you know that this court case is a criminal prosecution, correct?
A. Correct.
Q. And you know that it's a criminal prosecution against a man who has no criminal background. Do you know that?
A. I do now.
Q. You agree that court is a very serious matter?
A. Yes.
Q. And you're here with your lawyer Mr. Leopold, right?
A. Yes.
Q. And you know that Mr. Leopold recently filed a lawsuit in federal court against Jeffrey Epstein, seeking fifty million dollars.

MR. LEOPOLD: Let me just object. [redacted] let me instruct you. Anything that you have learned through conversations between you and me are protected. So if you know any of that information outside of those discussions, you may answer. But if the only way you know it is through our discussions, do not answer that question.

BY MR. TEIN:

Q. [redacted] you know that Mr. Leopold recently filed a lawsuit in federal court on your behalf against Jeffrey Epstein seeking fifty million dollars?

MR. LEOPOLD: Same objection.

If you know the answer to that outside of our discussions, you may answer. If it is the only way that you know the answer is through our discussions, do not answer that question.

THE WITNESS: Okay.

MR. LEOPOLD: Attorney/client privilege.

BY MR. TEIN:

Q. You can answer the question unless --

MR. LEOPOLD: Same objection.

MR. TEIN: Let me finish.

MR. LEOPOLD: Excuse me. We're --

MR. TEIN: No. Let me finish.

MR. LEOPOLD: Lewis, we're not going to do that.

MR. TEIN: My name is not Lewis.

I'm going to finish my question. Okay?

MR. LEOPOLD: Do not answer until you hear from me.

BY MR. TEIN:

Q. Other than conversations that you have had with Mr. Leopold -- I'm not asking about that -- are you aware that Mr. Leopold has filed a lawsuit in federal court seeking fifty million dollars from Jeffrey Epstein on your behalf?

MR. LEOPOLD: Same objection.

Anything that you learn through conversations between you and me, do not answer. Those are protected. If you know through any other realm of knowledge, you may answer.

THE WITNESS: No.

BY MR. TEIN:

Q. You have no idea that Mr. Leopold filed a fifty million-dollar lawsuit on your behalf against Jeffrey Epstein?

MR. LEOPOLD: Same objection.

Do not answer that question if it's through discussions that you and I had. Outside of that,

you may answer. So do not answer that question if that is the only basis by which you understand that answer.

THE WITNESS: No.

BY MR. TEIN:

Q. You didn't know that?

MR. LEOPOLD: Don't answer that question. Again, it's attorney/client privilege. Any information you've learned through conversations between you and I are protected. If you know it through any other realm, you may answer.

MR. TEIN: Are you going to say that for every question in the deposition, Mr. Leopold?

MR. LEOPOLD: When you ask improper questions like that without the proper --

MR. TEIN: You're going to stop your speaking objections right now. Okay?

MR. LEOPOLD: Without the proper --

MR. TEIN: You need to stop your speaking objections.

Let's continue.

MR. LEOPOLD: Counsel, you just asked me a question and I'm going to state it on the record --

MR. TEIN: You need to stop your speaking

objections. Check your rules.

MR. LEOPOLD: Excuse me. For the record, Counsel asked me a question. I'll state the answer on the record. He asked me the question am I going to be answering that way throughout the deposition. So long as there's improper foundation and predicate asked by the attorney, I will protect my client and I make the record where appropriate. If counsel wishes to ask an appropriate worded question with the proper foundation and predicate, I will certainly allow the client to answer the question.

MR. GOLDBERGER: Why don't you just state attorney/client privilege and just be done with it?

MR. LEOPOLD: I want the record to be clear.

MR. TEIN: You want to waste time is what you want to do.

You were supposed to be here this morning and you totally broke the deal, the agreement that you had with us if your hearing got cancelled.

But let's move on and maybe you'll stop obstructing this deposition.

MR. LEOPOLD: I think the record is very

clear where we stand thus far.

Is there a recording taken of this deposition?

THE COURT REPORTER: Yes.

MR. LEOPOLD: Just make sure that's preserved.

BY MR. TEIN:

Q. Go to Exhibit 20-01 -- well, before you do that, [redacted] are you aware that a lawyer named Jeffrey Herman filed a lawsuit on your behalf, yes or no?

MR. LEOPOLD: Objection.

Any conversations that you and I have had regarding that, if that is the only way by which you understand how to answer that question, do not answer. It's attorney/client privilege, as well as any conversations you may have had with the attorney from Miami. That is also attorney/client privilege. And I'm assuming --

MR. TEIN: You're actually wrong about the attorney/client privilege.

MR. LEOPOLD: I'm assuming Counsel is not asking you to divulge attorney/client --

MR. TEIN: Of course not.

BY MR. TEIN:

Q. [redacted] are you aware that Jeffrey Herman,

an attorney, filed a fifty-million-dollar lawsuit on your behalf against Jeffrey Epstein, yes or no?

MR. LEOPOLD: Same objection.

MR. TEIN: We've heard the objection 10 times already.

MR. LEOPOLD: Counsel, excuse me.

MR. TEIN: Just say attorney/client privilege. Stop interrupting my questions.

MR. LEOPOLD: I'm entitled to make an objection for the record, which I'm doing, and I'll make the same objection. And if it calls for attorney/client privilege, any conversations you and I have had, do not answer the question.

And I think that it might be appropriate, for the record, to ask questions via [redacted] as opposed to [redacted] I think that would be more appropriate for this deposition.

BY MR. TEIN:

Q. Go ahead. Please answer yes or no.

A. Yes.

Q. Thank you.

In fact, you know that Mr. Herman held a press conference after he filed the fifty-million-dollar lawsuit on your behalf, don't you?

A. After it happened.

Q. You know that he had a press conference, don't you, yes or no?
A. Yes.
Q. In fact, let's go to Exhibit 20-01.
MR. GOLDBERGER: Look behind you. You'll see it.
BY MR. TEIN:
Q. Have you ever seen that picture before?
A. Yes.
Q. Is that a picture of your father, your stepmother and Mr. Herman at the press conference regarding your lawsuit?
A. Yes.
Q. Now you know that this is a very serious matter, don't you?
MR. LEOPOLD: Asked and answered. Objection.
MR. GOLDBERGER: All right. You can object. You're representing a witness here, Mr. Leopold. You can object on privilege grounds. You cannot make legal objections. You have no standing to do so.
MR. LEOPOLD: I'm going to make them and then --
MR. GOLDBERGER: We're --

MR. LEOPOLD: We're going to leave or we're going to take a break, because his demeanor is not appropriate. There's no reason to have this kind of demeanor. If you want to have this kind of demeanor with me --

MR. TEIN: You are obstructing this deposition.

MR. GOLDBERGER: Why don't you guys go outside and just talk about --

MR. LEOPOLD: She -- her job is very difficult and she's not going to be able to take us both talking at the same time.

MR. GOLDBERGER: Off the record.

MR. LEOPOLD: We're not going off the record, Jack. We're not, Jack. Her job is very difficult. I'm going to make the record.

I don't think it is appropriate, especially in the small confines of this room, to be very aggressive with this young lady.

MR. TEIN: That's not happening. Stop, stop actually --

MR. LEOPOLD: If you're going to interrupt me, we're going to cancel this deposition --

MR. TEIN: Stop misrepresenting.

THE COURT REPORTER: I need one at a time,

no matter who it is.

MR. LEOPOLD: I think we're going to take a break. Perhaps you might want to talk to your co-counsel --

MR. TEIN: I don't need to talk to him.

MR. LEOPOLD: But we're going to take a break.

MR. TEIN: We're not taking a break unless the witness needs a break.

You're obstructing this deposition, Ted.

MR. LEOPOLD: Come on, [redacted]

You all want to continue in this demeanor --

MR. TEIN: You're obstructing the deposition. Stop making speeches. We're not discussing this with you. The questions are to your client. Go take your five-minute break.

MR. LEOPOLD: Fine. We need to make sure the record's clear and clean.

And I want to make sure, as I've already asked you -- I know that you're one of the best in town -- that this audio -- this needs to be preserved. Okay?

MR. TEIN: Go take your five-minute break, Mr. Leopold, now.

You were supposed to be here at nine a.m.; it's now after two. Take your break and come back.

MR. LEOPOLD: Okay. If the demeanor keeps up, we will not be here beyond those five minutes.

MR. TEIN: Take your break and come back.

MR. LEOPOLD: Okay. So I suggest that you relax.

MR. TEIN: I suggest that you take your break.

MR. GOLDBERGER: Let them take that five-minute break.

MR. LEOPOLD: But I would suggest that you take deep breaths.

MR. TEIN: Suggest whatever you want. Go take a break.

(Thereupon, a recess was taken.)

BY MR. TEIN:

Q. [redacted] you agree that giving testimony today at your deposition is something very serious, don't you?

A. Yes.

Q. And you respect the court, don't you?

A. Yes.

Q. Let me show you Exhibit 31-001. Can you

read that out loud, please.

A. Okay. What do you want?

Q. Will you read that out loud, please.

A. Oh.

Q. Thank you.

A. Lol hah my baddd...lol yah i got some stupid court shit on the 20th...bullshit...and damn you still have court shit with him? Like after so long wow im sorry... well yah well we will definitely havta make plans for sure..because i miss u tons times a million and no no no i love you...o and p.s. i love ur default pic niggaa. Muah xo.

Q. Did you send that message last week to a friend of yours on MySpace?

A. I wouldn't know. There's no dates and I've deleted that MySpace, so --

Q. We're going to talk about that in a second.

A. Okay.

Q. Did you send that message last week --

A. Right.

Q. Let me finish my question.

Did you send that message last week to a friend of yours on MySpace?

A. I wouldn't know the date, but obviously, it's to a friend.

Q. Did you send that message to a friend of yours on MySpace?
A. Sure, yes.
Q. Were you referring to this deposition?
A. Yes.
Q. Do you find the term n-i-g-g-e-r offensive?
A. That's not anywhere in there.
Q. What word did you use in there?
MR. LEOPOLD: Where are you referring to, Counsel? There's 20 plus words in there.
MR. TEIN: Don't make a speaking objection.
THE WITNESS: Are you referring to anything --
MR. LEOPOLD: No, [redacted] Don't -- don't -- let him ask you the question.
BY MR. TEIN:
Q. What question were you asking, [redacted]?
MR. LEOPOLD: She doesn't ask questions. You ask the questions. What is the question pending?
BY MR. TEIN:
Q. [redacted] what is the last word on there in the text of your message before the closing?
A. Niggaa.
Q. Don't you find that term offensive?

A. No.

MR. LEOPOLD: Can you spell it for the record, please.

THE WITNESS: N-i-g-g --

MR. TEIN: No, no, no. You are not going to be asking questions.

MR. LEOPOLD: I'm not asking questions. I'm asking for the record the word to be spelled, because we don't have a video here today.

MR. TEIN: These exhibits are part of the record. You --

MR. LEOPOLD: Well, it's not marked as an exhibit.

MR. TEIN: Stop interrupting me, Mr. Leopold. I have marked and identified as an exhibit and you will get it.

MR. LEOPOLD: There has been no identification of this document in the record.

MR. TEIN: Mr. Leopold, stop interrupting this deposition.

MR. LEOPOLD: What is the exhibit number marked for identification?

MR. TEIN: 31-001.

MR. LEOPOLD: Do we have copies? Is it on the record anywhere?

BY MR. TEIN:

Q. Let me ask you, [redacted] did you in fact write your friend this message about this deposition?

A. Yes.

Q. So you wrote your friend that this deposition is stupid court s-h-i-t, correct?

A. Yes.

Q. Because you think this deposition is stupid court s-h-i-t, don't you?

A. No.

Q. You wrote that to your friend, didn't you?

A. Yes.

Q. You think that court is stupid, don't you?

A. In some cases.

Q. And you think that court is bull s-h-i-t, don't you?

A. No.

Q. And you think this deposition is bull s-h-i-t, don't you?

A. No.

Q. You wrote that to your friend, didn't you?

MR. LEOPOLD: Objection. Asked and answered.

MR. TEIN: That's not an objection.

BY MR. TEIN:

Q. You wrote that to your friend, didn't you?

MR. LEOPOLD: Objection. Asked and answered, for the fourth time.

MR. TEIN: You are improperly objecting, Mr. Leopold. You have no grounds to object. And that's not an objection.

MR. LEOPOLD: It is an objection.

MR. TEIN: Then terminate the deposition if you think it's been asked and answered.

MR. LEOPOLD: Counsel, I am not precluded from just making an objection to the form of the question. As the courts well know, and if you practice here in West Palm Beach, many of the judges require you to set the objection with specificity. And I will do that. And if you don't want me to, you can make the record. But I will do that.

MR. TEIN: Here's what we'll do, Ted. You can -- I will allow you to reserve an objection to form for every single one of my questions. Otherwise, all you're doing is obstructing.

MR. LEOPOLD: I won't do that.

MR. TEIN: Of course; because you want to obstruct.

MR. LEOPOLD: All right.

BY MR. TEIN:

Q. [redacted] you think that giving testimony today, under oath, is bull s-h-i-t, don't you?

A. No.

Q. And you wrote that to your friend on MySpace last week, didn't you?

MR. LEOPOLD: Objection. Asked and answered.

THE WITNESS: No, I did not.

BY MR. TEIN:

Q. You didn't write this exhibit?

A. I wrote that, but I didn't write what you said.

Q. You wrote in this exhibit, "I got some stupid court s-h-i-t on the 20th. Bull s-h-i-t." Didn't you write that?

A. Yes.

Q. Referring to this deposition, didn't you?

A. Referring to the court. I was later informed that it was a deposition.

Q. I'm going to ask you some questions now about what happened when you went to Jeff Epstein's house three years ago. Okay?

A. Uh-huh.

Q. When the police interviewed you one month

after you went to Epstein's house, you swore on your mother's grave that you and Epstein did not engage in sex of any kind?

A. Yes.

Q. Didn't you tell that to the police?

A. Yes. And I will continue. I have never had sex with him.

Q. Did what happened upstairs at Jeff Epstein's house take you completely by surprise, [redacted]?

A. Yes.

Q. Now the civil complaint that you filed against Mr. Epstein for fifty million dollars alleged that you were totally shocked by what happened when you got there.

A. Yes.

Q. Were you totally shocked by what happened when you got to Epstein's house?

A. Yes.

Q. You didn't expect it at all, did you?

A. No.

Q. You had absolutely no idea why your friend [redacted] was taking you to Epstein's house, right?

A. I was informed it was a massage.

Q. All you thought that it was going to be was a massage, correct?

A. Yes.

Q. Before you got to Epstein's house [redacted] never said anything to you on the telephone about sexual activity with Epstein, did she?

A. No.

Q. And before you got to Epstein's house [redacted] never sent you a message over the Internet about sexual activity with Epstein, did she?

A. No.

Q. Did [redacted] ever try to convince you to engage in any sexual activity with Epstein?

A. No.

Q. Did [redacted] every try to convince you to engage in any sexual activity with Epstein?

A. I don't know who [redacted] is.

Q. Do you have a friend [redacted]?

A. No.

Q. Okay. Before you went so Epstein's house did anyone call or e-mail you to induce you to engage in sexual activity with Epstein?

A. No.

Q. So you're sure that before you got to Epstein's house no one tried to persuade you to engage in sexual activity with Jeffrey Epstein?

A. No.

Q. You're sure that -- let me ask the question again.

You're sure that before you got to Epstein's house no one tried to persuade you to engage in sexual activity with Epstein for money. Are you?

MR. LEOPOLD: Objection. Asked and answered.

THE WITNESS: No. And I've already answered that a bazillion times.

BY MR. TEIN:

Q. He's coaching you now. So I'm going to ask the question --

MR. LEOPOLD: Counsel, I've made an objection for the record.

MR. TEIN: Stop speaking.

MR. LEOPOLD: I'm not going to stop speaking. You can't interrupt me when I'm making the record.

MR. TEIN: You're coaching the witness.

MR. LEOPOLD: Counsel --

MR. TEIN: Stop coaching the witness.

BY MR. TEIN:

Q. [redacted] let me ask you --

MR. LEOPOLD: If you continue to --

MR. TEIN: Stop interrupting my questions.

MR. LEOPOLD: If you do it one more time, we're leaving.

BY MR. TEIN:

Q. [redacted]

MR. LEOPOLD: I'm going to make the record. You cannot interrupt me when I'm making the record. Out of professional conduct, you cannot do that. I'm entitled to make the record. I made an objection, asked and answered. Your demeanor is inappropriate. You're willing and you are able and you're responsible to ask a question in a professional manner, and ask the question and once you get the answer, to either follow up on it or move on, but not continuously browbeat and ask the same question over and over because you don't like the answer.

MR. TEIN: Calm down, sir.

MR. LEOPOLD: Trust me, I'm very calm here. When I'm not calm, you'll know it. I'm very calm.

So please continue on. But I will not allow you to continue to harass her in the demeanor that you're doing. Ask her a question and move on.

MR. TEIN: Are you done?

MR. LEOPOLD: Thank you. I am.

MR. TEIN: Stop misrepresenting the record and calm down. I'm going to ask my question. Stop it.

BY MR. TEIN:

Q. [redacted] --

MR. LEOPOLD: I think the record is very clear.

MR. GOLDBERGER: Let me just clarify something. When you object to the form of a question, you're not instructing the witness not to answer the question, are you?

MR. LEOPOLD: No. And I'm not making that objection; only on attorney/client privilege.

MR. TEIN: Will you stop speaking now so I can ask my question? Are you done?

Okay. I'm going to ask my question.

BY MR. TEIN:

Q. Listen, [redacted] --

MR. LEOPOLD: Hold on. Stop.

I've been doing this for 20 plus years and have met a lot of attorneys, but I've never had an experience like this where I've --

MR. TEIN: Stop your speeches.

MR. LEOPOLD: If you continue to do this, whether it's with me or with my client, I will not

put up with it and I don't need to put up with it and it's not appropriate. And I'm sure Mr. Goldberger knows all this, because I know that he wouldn't do this. So I will not put up with it. And I think it's highly inappropriate to do this with this child sitting here, the way you're acting, primarily towards me, and I will not put up with it.

MR. TEIN: Will you please stop your speech so I can ask questions?

MR. LEOPOLD: So long as you act professionally, I will do so. But if you continue to do it this way, I will leave.

MR. TEIN: Suit yourself.

BY MR. TEIN:

Q. [redacted] are you sure that before you got to Epstein's house no one tried to persuade you to engage in sexual activity with Epstein for money?

MR. LEOPOLD: Asked and answered. Objection.

MR. TEIN: Did you get her answer?

THE COURT REPORTER: No, I did not.

THE WITNESS: I'm sure.

BY MR. TEIN:

Q. Let me ask you a few questions about your

contact with Jeffrey Epstein. Okay?

A. (Witness nods head up and down.)

Q. Jeff never e-mailed you, did he?

A. No.

Q. Jeff never text messaged you, did he?

A. No.

Q. Jeff never chatted in a chat room with you, did he?

A. No.

Q. Before you got to Epstein's house you had never spoken to Jeff, had you?

A. No.

Q. And before you got to Epstein's house you had never met Jeff?

A. Correct.

Q. Before you got to Epstein's house you had never told Jeff that you were under 18, right?

A. No.

Q. Before you got to Epstein's house had you ever told Jeffrey that you were under 18?

A. No. I never spoke to the man before that.

Q. And you only went to Jeff Epstein's house that one time three years ago, correct?

A. Yes.

Q. You never went there again, correct?

A. No.

Q. All right. Let me ask you two final areas of questioning about this and we'll move onto something else. Okay?

A. Uh-huh. Yes. I'm sorry.

Q. Before you got to Epstein's did anyone associated with Epstein ever call you on the phone and try to persuade, induce, entice or coerce you to engage in any sexual activity?

A. No.

Q. Before you got to Epstein's did anybody associated with Epstein ever contact you on the Internet and try to persuade, induce, entice or coerce you to engage in any sexual activity?

A. No.

Q. [redacted] who told you that when you got to Jeff Epstein's house you should lie to Jeff about your age?

A. [redacted].

Q. Was it [redacted] or was it the other girl in the car who you rode over with to Epstein's house?

A. [redacted]

Q. Who was the other girl in the car with you that day?

A. I honestly don't know.

Q. Had you ever seen her before?
A. No, sir.
Q. You told the police that when you rode over to Epstein's you had no idea who she was, right?
A. Correct.
Q. You told the police that you didn't know her name, but she was like really dark, kind of like a Spanish girl?
A. Yes.
Q. Those were your words, right?
A. Yes.
Q. Do you now know who she is?
A. No, sir.
Q. So it was [redacted] who told you to lie about your age to Jeff Epstein?
A. Yes, sir.
Q. And [redacted] told you that if you weren't 18, Epstein wouldn't let you into his house, right?
A. That's -- yes, yes.
Q. All right. Let's talk for a minute about when you first met Jeff. Okay?
A. Sure.
Q. When you first met Jeff he tried to find out how old you were, right?
A. Excuse me?

Q. When you first met Jeff he tried to find out how old you were, right?

A. Not when we first introduced each other; when we get upstairs, then, yes.

Q. During the massage Jeff asked you how old you were, correct?

A. Yes, yes.

Q. Now hadn't you already told Jeff's assistant, the one who walked you upstairs, that you went to college and had just moved down here from Ohio?

A. I never spoke to the lady.

Q. Do you want to rethink that answer?

MR. LEOPOLD: Is that a question?

BY MR. TEIN:

Q. Do you want to rethink that answer?

A. No. I didn't really speak with her that much.

Q. Do you want to try to refresh your memory on that?

MR. LEOPOLD: Do you have something to refresh her memory with?

MR. TEIN: Do you want to stop making speaking objections?

MR. LEOPOLD: No. But to refresh someone's memory, you show them a document.

MR. TEIN: I know how to do this.

MR. LEOPOLD: Then show her a document.

MR. TEIN: Stop speaking.

MR. LEOPOLD: I'm not going to stop speaking. I'm going to continue to make the record.

MR. TEIN: You're obstructing. Please stop.

MR. LEOPOLD: I'm not obstructing. But if you want to refresh her recollection, you need to show her something.

That's not a proper question. I object to the foundation and the predicate of that question.

MR. TEIN: Are you done?

MR. LEOPOLD: I am now. Thank you.

BY MR. TEIN:

Q. Do you want to try to refresh your memory as to whether you had any conversation with the woman who walked you upstairs in Epstein's house in which you told her that you went to college and had just moved down from Ohio?

MR. LEOPOLD: Objection. Object to the form of the question. Lack of foundation and predicate.

BY MR. TEIN:

Q. You can answer the question.
A. Sure.
Q. Is there anything that would refresh your memory that in fact you told Mr. Epstein's assistant, the one who walked you upstairs, that you went to college and you had just moved down here from Ohio?
A. I don't remember saying that, but if you -- I don't remember saying that myself, so --
Q. That would be a lie, right?
A. No. I really don't remember.
Q. So you told Jeff that you were 18 years old, correct?
A. Yes.
Q. Do you remember Detective [redacted] Pagan of the Police Department, Palm Beach Police Department?
A. Yes.
Q. Do you remember you spoke to her?
A. Yes.
Q. Do you remember that you told Detective Pagan that when you lied about your age to Jeff you said it really fast because you didn't want to make it sound like you were lying?
A. I don't remember the words exactly, but I do remember telling her I told him I was 18.
Q. And do you remember telling Detective Pagan

that when you lied to Epstein about your age that you said it really fast so Epstein wouldn't realize you were lying?

A. No, I don't remember saying those words exactly to her. I remember telling her that I told Epstein I was 18.

Q. Does it sound right to you that you told Detective Pagan that you said your age really fast to Epstein --

MS. BELOHLAVEK: Objection. Asked and answered.

BY MR. TEIN:

Q. -- so he wouldn't think that you were lying?

MR. LEOPOLD: Objection. Asked and answered, lack of foundation, mischaracterization of her earlier testimony. She's already answered that question.

BY MR. TEIN:

Q. You can answer it.

MR. LEOPOLD: Same objection. It's been asked and answered.

You can answer. I've made the objection.

THE WITNESS: I forget the question, now.

BY MR. TEIN:

Q. Let me put it again.

Does it sound right to you that you told Detective Pagan that when you lied about your age to Jeffrey Epstein, you said it really fast because you didn't want to make it sound like you were lying?

MR. LEOPOLD: Objection. Lack of foundation, asked and answered.

THE WITNESS: I could have possibly said that, yes.

BY MR. TEIN:

Q. You didn't want Mr. Epstein to know that you were lying about your age, right?

A. Correct.

Q. You didn't want Mr. Epstein to know that you were not 18 yet, right?

A. Correct.

Q. You wanted Mr. Epstein to believe that you really were 18, right?

A. Correct.

Q. Do you remember when Mr. Epstein asked where you went to school?

A. Yes.

Q. And you told Mr. Epstein you went to Wellington, right?

A. Yes.
Q. Was that the truth?
A. No.
Q. In fact, you went to [redacted], right?
A. Yes.
Q. So you lied to Mr. Epstein again, correct?
A. Yes.
Q. Is Wellington the college that you told Jeff's assistant that you were attending?
A. I don't remember having that conversation with her, so I wouldn't know if that's what I said.
Q. That was a lie, though, wasn't it?
MR. LEOPOLD: Objection to the form of the question, lack of foundation. You're making an assumption. She just answered you she can't tell you that.
MR. TEIN: Speaking objection. And you well know that, Mr. Leopold.
MR. LEOPOLD: She can't answer that question. The way you phrased that question, you're purposely making her not be honest in her testimony. She can't answer a question like that. She doesn't remember. So then you say, "So you were lying." That's improper and you know that. That's not a proper question. And any attorney

that would do that to a witnesses or to a person that's sitting in this chair is not acting professionally. You can't ask a question like that. You can do it, but it's not proper. And I'm sure you weren't trained that way, certainly not ethically.

MR. TEIN: Will you stop?

MR. LEOPOLD: I'm not going to stop, because the way you're asking that question is improper and you know it.

MR. TEIN: You're losing your cool.

BY MR. TEIN:

Q. Ms. [redacted] --

MR. LEOPOLD: Trust me. I'm very calm. When I lose my cool, you'll know it.

MR. TEIN: I do know it.

BY MR. TEIN:

Q. Ms. [redacted] Mr. Epstein never asked you to do anything other than massage him, correct?

A. Incorrect; because he asked me to take off my bra, so that would be two things he's asked me to do.

Q. Other than asking you to take your bra off, Mr. Epstein never asked you to do anything with him other than massage, correct?

MR. LEOPOLD: Objection. Foundation,

predicate.

THE WITNESS: Correct.

BY MR. TEIN:

Q. You told the police, in your words, that you did not whack him off, right?

A. Correct.

Q. What does that mean?

A. Whack, like whacking off?

Q. Your term, what does that mean?

A. Masturbating.

Q. Mr. Epstein never tried at any time to grab your hand, did he?

A. No.

Q. Mr. Epstein never tried to put your hand anywhere, did he?

A. No.

Q. At no time did you touch Mr. Epstein's penis, did you?

A. No.

Q. And he did not touch you, correct?

A. Incorrect.

Q. Well, you told the police, "At no time did he touch me." Were you lying to the police then?

A. No. Well, I wasn't being fully truthful, but I wasn't lying.

Q. You told the police twice when you spoke to [redacted] Pagan that "at no time did he touch me." Didn't you say that to the police?

A. Yeah.

Q. And you're saying that that was not fully truthful. Is that what you're saying now?

A. Correct.

Q. And you're saying if you're not fully truthful, that's not a lie. Correct?

A. You took that out of context like really bad. I didn't mean like that. Touching my legs and -- he never kept his hands to himself the entire time. That's what I'm trying to say.

Q. You told the police, "At no times did he touch me." You agree with that, correct?

A. No, I don't agree with that, because he did touch me.

Q. Did you tell the police that he did not touch you, yes or no?

A. It's a possibility, but I do not remember.

Q. Okay. And you did not have any type of sex with Jeff, correct?

A. No.

Q. And you did not have any type of oral sex with Jeff, correct?

A. No.
Q. No type of intercourse with Jeff, correct?
A. Correct.
Q. All right. Let's talk about what happened after the massage was over.
A. Okay.
Q. After the massage, you told Epstein that you wanted to bring your [redacted] sister back so she could make some money, correct?
A. Incorrect.
Q. Your [redacted] sister is [redacted] right?
A. Correct.
Q. And you love [redacted] very much, don't you?
A. Yes.
Q. And when you left the house you were joking with the other girls, weren't you?
A. Incorrect.
Q. Well, when [redacted] and the other girl in the car that day made their statements to the police they told the police that you were joking afterwards. Are you saying that they were lying to the police about that?
A. No. But a question or -- questions from [redacted] -- like she asked me questions, but it wasn't joking. She was kind of like in a happy way, like, "Oh, what did you do? What did you do?" Like those kind of

things, but it wasn't joking about it at all.

Q. You joked about it, didn't you?

A. No.

Q. You said to [redacted] that if you did this every weekend you'd be rich, didn't you?

A. No. That's what [redacted] told me.

Q. You didn't tell that to [redacted]

MR. LEOPOLD: Objection. Asked and answered.

THE WITNESS: No.

BY MR. TEIN:

Q. After you left Epstein's house you took the money and you went shopping with [redacted] and the other girl in the car, correct?

A. Incorrect. I didn't spend any of the money.

Q. You went to Marshall's, didn't you?

A. I went along, yes, but I didn't --

Q. You went shopping with them at Marshall's, didn't you?

MR. LEOPOLD: Objection.

THE WITNESS: I guess you could say that.

MR. LEOPOLD: Objection. Lack of predicate and foundation. Mischaracterization of earlier testimony.

BY MR. TEIN:

Q. And [redacted] bought a purse, right?

A. Yes.

Q. And you were with her the whole time at Marshall's, correct?

A. Yes.

Q. Now tell me about when the federal prosecutors told you about getting reimbursed.

A. I have no idea what you're talking about.

Q. Tell me about when the federal prosecutors spoke to you about getting money you feel you're entitled to from Mr. Epstein.

A. I don't know what you're talking about.

Q. Do you know who [redacted] is?

A. No, sir.

Q. Did you ever meet with any federal prosecutors?

A. I think -- yeah. I think they were -- I think they were like FBI.

Q. Uh-huh. Did you meet with federal prosecutors?

A. They came to my house one time, yes.

Q. When did they come to your house?

A. Very long ago.

Q. Was it this year, 2008?

A. It was not this year, no.
Q. Was it 2007?
A. I'd have to say at least two years ago or a year ago, yeah. So it would be 2007, 2006; but it was a while ago.
Q. How many federal prosecutors or FBI agents came to your house?
A. I'm trying to remember. I want to say four people came.
Q. Did they give you their business cards?
A. If they did, I don't remember, and they weren't toward me. Maybe my parents have them. I don't know.
Q. Did they give you their cell phone numbers?
A. No.
Q. Did you ever speak to them on their cell phones?
A. No, sir.
Q. Did they speak to your parents?
A. That's something you'd have to ask my parents.
Q. Do you know whether they spoke to your parent's?
A. No, sir.
Q. You have no idea?

A. No, sir.

MR. LEOPOLD: Objection. Asked and answered.

BY MR. TEIN:

Q. So if I say the name to you [redacted], you don't know who that is?

A. No, sir.

Q. How many women and how many men came to your house?

A. I want to say two ladies and two guys.

Q. Did someone named [redacted] come to your house?

A. I don't know names, sir.

Q. Do you know who [redacted] is?

A. No, sir.

Q. Do you know who Jeffrey Herman is?

A. Yes.

Q. That's the lawyer who first sued Epstein on your behalf, right?

A. Yes.

Q. Has Mr. Herman advanced your family any money?

MR. LEOPOLD: Any conversations that you've had with Mr. Herman regarding that issue, you are not to disclose. If you've learned in some other

fashion, you may answer.

THE WITNESS: Okay.

I wouldn't know.

BY MR. TEIN:

Q. You don't know?

A. No.

MR. LEOPOLD: Objection. Foundation. Attorney/client privilege.

BY MR. TEIN:

Q. And you say you don't know who [redacted] is?

A. No, sir.

Q. Does it refresh your recollection that he's the number two prosecutor at the U.S. Attorney's Office?

A. No.

Q. That he's [redacted] [redacted] boss?

A. No.

Q. Does it refresh your memory that he's the ex-partner of Jeff Herman, the first lawyer who sued you -- sued Mr. Epstein on your behalf for fifty million dollars?

A. No, sir. I don't know who he is.

Q. Without telling me any conversations that you've had with your lawyers, how is it that you selected Mr. Herman as your lawyer from the 81,000 members of the

Florida Bar?

A. I did not select him.

Q. Who did?

A. My father.

Q. Did you ever meet Mr. Herman?

A. Once.

Q. Don't -- don't tell me what you discussed with him. Where did you meet him?

A. I was shopping in my -- he showed up at my friend's house.

Q. Whose house?

A. My friend [redacted].

Q. Is that [redacted] from the Quarterdeck Tavern?

A. Yes.

Q. And did you have a meeting with him at [redacted] house?

A. Yes. I guess you could say that.

Q. And who else was there?

A. My Aunt [redacted].

Q. And what was that meeting about?

MR. LEOPOLD: Objection. That calls for attorney/client privilege.

BY MR. TEIN:

Q. What discussions did you have with

Mr. Herman in the presence of [redacted]?

A. None.

Q. What discussions did you have in the presence of her aunt?

A. Of my aunt?

MR. GOLDBERGER: It's the witness's aunt.

BY MR. TEIN:

Q. Oh, of your aunt.

A. The only one that we've ever discussed or ever had.

Q. And so you were in a conversation with Mr. Herman and your aunt?

A. Yes, sir.

Q. And you discussed privileged matters during that conversation?

MR. LEOPOLD: Object to the form. I think you might have to educate her on that question.

BY MR. TEIN:

Q. You discussed the lawsuit?

A. Yes.

Q. Did [redacted] tell you about any conversations that she had with Mr. Herman?

A. As far as I'm concerned, she's never spoken or she's never had a conversation. She only opened the door and then left. She's the one who answered the door.

Q. Why did the meeting take place at [redacted] house?
A. I spent the night that night at her house.
Q. And when was this?
A. A while ago.
Q. How long ago?
A. A month and a half ago. I'm guessing.
Q. A month and a half ago?
A. Uh-huh.
Q. So was it before of after Mr. Herman filed the fifty-million-dollar lawsuit against Epstein?
A. After.
Q. Did you meet with an FBI agent named [redacted], a woman?
A. I don't know.
Q. Did Ms. [redacted] speak to you about getting reimbursed from Mr. Epstein?
A. I've never had a discussion with anyone about getting reimbursed from Mr. Epstein.
Q. Have you met with an agent named [redacted]?
A. Not to my knowledge.
Q. How about an agent named [redacted]?
A. No, sir.
Q. How about an agent named [redacted]?

A. No.

Q. And we've learned that many of the girls, some of whom are as old as 23, were told by the government that they would get money at the end of the criminal prosecution. Does that sound familiar to you?

A. No, sir.

Q. Other than Mr. Leopold here -- I'm not asking about Mr. Herman either --

A. Uh-huh.

Q. -- did anyone ever discuss with you that you could get reimbursement for your damages?

A. No, sir.

Q. Did you or any member --

MR. LEOPOLD: Are you referring to a criminal matter or a civil matter?

BY MR. TEIN:

Q. Did you or any member --

MR. LEOPOLD: Excuse me. Let me object to the form of the question.

BY MR. TEIN:

Q. Did you or any member of your family ever get a victim notification letter from anyone?

A. I no longer live at that residence and I wouldn't know.

Q. So your testimony is that you have never

received a victim notification letter, correct?

rect.

Q. And your testimony is that you don't know if your parents have ever received a victim notification letter, correct?

A. Correct.

Q. Have you given any evidence to prosecutors or law enforcement in this case?

A. What do you mean by evidence?

Q. Well. Anything that you can touch or feel.

A. No.

MR. LEOPOLD: Objection to the form of the question.

BY MR. TEIN:

Q. So you haven't given anything physical --

A. No.

Q. -- any item to any prosecutor, police officer or law enforcement agent, correct?

A. My cell phone four years ago or three years ago, but that's it.

Q. You gave your cell phone to whom?

A. [redacted] Pagan.

Q. Did she keep it?

A. Ask her.

Q. You gave it to her and then you didn't get

Ph. [redacted] - Fax. [redacted]
1655 Palm Beach Lakes Blvd., Suite 500 - West Palm Beach, FL 33401

it back at the end of the meeting?

A. No. They -- yeah. No. They have it. I'm guessing. I don't have it.

Q. How much money are you hoping to get out of Mr. Epstein?

MR. LEOPOLD: Objection to the form of the question. Attorney/client privilege.

BY MR. TEIN:

Q. How much money are you hoping to get, you, yourself, hoping to get out of Epstein?

MR. LEOPOLD: Same. Same objection, attorney/client privilege.

Don't answer the question.

BY MR. TEIN:

Q. I'm not asking about what your lawyer told you.

MR. LEOPOLD: I'm instructing her not to answer the question, because any of those conversations involve her counsel.

MR. TEIN: Certify that.

MR. LEOPOLD: Please.

.....CERTIFIED QUESTION.....

BY MR. TEIN:

Q. Now, [redacted], you lied to get out of this deposition, didn't you?

A. No, sir.

Q. You didn't want to come to court today and tell the story that you had told to the police under oath, did you?

MR. LEOPOLD: Object to the form of the question. Lack of foundation, predicate.

THE WITNESS: No. I have no problem coming here and talking to you.

BY MR. TEIN:

Q. And to avoid getting served with a lawful subpoena, you lied about your name, didn't you?

A. No.

Q. And in fact, just lying yourself wasn't enough, was it?

MR. LEOPOLD: Objection to the form of the question.

Don't answer it. It's not a question.

Object to the form of the question. Lack of foundation.

MR. TEIN: Are you instructing her not to answer?

MR. LEOPOLD: I am.

MR. TEIN: Certify it.

MR. LEOPOLD: Please.

.....CERTIFIED QUESTION.....

BY MR. TEIN:

Q. You asked your co-workers --

MR. LEOPOLD: It's vague and ambiguous.

BY MR. TEIN:

Q. You asked your co-workers at the Quarterdeck Tavern to lie for you, didn't you?

A. No. I informed my boss about what was going on and he told me that he would help in any way that he can.

Q. Okay. You got your friend [redacted] to lie by switching name tags with you, correct?

A. Incorrect. It was a coincidence that same night she was not wearing her name tag; she was wearing mine. But I was also not wearing -- I was wearing my name tag. Everyone switches name tags. It just so happens it was a coincidence that same night the people came with the papers.

MR. TEIN: Will you put up Exhibit 18-001?

MR. GOLDBERGER: And mark 18-001 for identification purposes to this deposition.

MR. LEOPOLD: None of them have been marked yet. Can we mark them and put them as attachment to the depositions? Because I think you've shown three photos now. And this is the only one that

has been marked for identification yet.

BY MR. TEIN:

Q. [redacted] --

MR. LEOPOLD: Hold on just a second. Just so the record is clear --

MR. TEIN: I'm not speaking to you.

MR. LEOPOLD: Okay. Then don't speak to me then. But I'll speak to Mr. Goldberger, perhaps.

But at least for the record, can we put on the record what the previous two photographs were marked for identification?

MR. GOLDBERGER: We will make sure that the record is clear at the end of the deposition so that there's no ambiguity.

MR. LEOPOLD: Thank you.

BY MR. TEIN:

Q. [redacted] I've put a photograph marked 18-001 up on the screen. Do you see that?

A. Yup.

Q. Who is that in the photo?

A. [redacted] on the left and me on the right.

Q. [redacted], right?

A. Yes.

Q. [redacted] your friend at the Quarterdeck Tavern, right?

A. Yes.

Q. [redacted] your friend, who you say the day that the process servers went to serve you with a subpoena for this deposition, just happened -- just by coincidence, was wearing your name tag?

A. Yes, sir.

Q. And just by coincidence, you were wearing her name tag, correct?

A. Yes.

Q. Your testimony under oath is that's just a coincidence, right?

A. Total honesty.

Q. It just happens to be the day that you were going to be served with a subpoena, correct?

A. That wasn't the first day that --

MR. LEOPOLD: [redacted] just answer the question. It calls for a yes or no.

THE WITNESS: Yes.

BY MR. TEIN:

Q. You said that wasn't the first day you were going to be -- you thought you were being served with a subpoena, correct?

A. Correct.

Q. You knew before the day that you switched name tags with [redacted] that the process servers were

looking for you, didn't you?

A. No. I knew --

MR. LEOPOLD: Just answer it. It calls for a yes or no.

THE WITNESS: Okay. No.

BY MR. TEIN:

Q. Now you can explain the answer that your counsel stopped you from explaining.

A. Okay. I work at Quarterdeck and people were telling me that people were looking for me. So yes, I was aware that people were searching for me. But I had no idea who they were or what their intentions were. But I thought they were just people I didn't want to talk to. So I just didn't want to talk to them. And every time they'd come to work I wasn't there. And so happens the night that they came in me and my friend switched name tags. No big deal.

Q. That's a lie, isn't it?

MR. LEOPOLD: Objection. Don't answer that question. That's harassment and I will not allow it. He could ask the questions and we'll allow a jury to make that determination, but not counsel.

I will not allow her to answer that question.

MR. TEIN: Certify it.

MR. LEOPOLD: I'll certify it.

.....CERTIFIED QUESTION.....

She's answered that question. She's explained it five times already. The fact that Counsel doesn't like the answer, that's a different query.

MR. TEIN: Stop making speaking objections.

MR. LEOPOLD: I'm not. I'm not going to put up with it, because it's in appropriate, Jack, and you know it. I will not allow Counsel to berate a witness, whether it's in a criminal case or a civil case, whether my client or --

MR. TEIN: Calm down.

MR. LEOPOLD: Excuse me.

No, I'm not going to allow it. That is not proper.

MR. GOLDBERGER: Okay.

MR. LEOPOLD: If he wants to say that she's lying after asking it five times and her explaining in great detail, he can do that. But I'm not going to allow her to answer, nor be harassed by him. It's improper.

MR. GOLDBERGER: Okay. But your response that Counsel doesn't like the question -- or doesn't like the answer -- just let me finish.

MR. LEOPOLD: Absolutely. I wasn't going

to interrupt you.

MR. GOLDBERGER: Just requires us to say we like the answer to that question. And it's not you and I or you and Mr. Tein who are testifying here. It's the witness.

MR. LEOPOLD: Fine. But after the sixth time of asking the same question and then coming back and pointing a finger at her and saying, "You're a liar" --

MR. TEIN: That didn't happen.

MR. LEOPOLD: That's fine. But I'm not going to allow her to answer that question, because she's answered that same question and has explained it.

Now Counsel might be sitting there rubbing his head with a migraine. That's his problem. But if he can't ask a question appropriately in a professional manner, we will leave. I will not allow her to be berated like that.

MR. GOLDBERGER: Actually, we're very happy with the answer.

MR. LEOPOLD: That's great.

MR. GOLDBERGER: Do you want us to get into that?

MR. TEIN: Ted --

MR. LEOPOLD: This is really big stuff that you're going through. But that's fine; just ask your question and move on. But do it one time. If you don't understand it, I'll let you follow up, but I'm not going to allow you to ask the same question time and again and then call her a liar. Just ask the question, get the answer and move to the next subject matter.

MR. TEIN: Ted, I'm sitting right across the table from you.

MR. LEOPOLD: Yes, sir.

MR. TEIN: Please be quiet. Don't yell.

MR. LEOPOLD: I will not be quiet.

MR. TEIN: Stop yelling.

MR. LEOPOLD: Lewis, when I'm yelling you'll know it. I will not --

MR. TEIN: My name is not Lewis.

MR. LEOPOLD: I thought your first name was Lewis, Mr. Tein.

MR. TEIN: You watched me for three days at the evidentiary hearing where you sat in the back of the courtroom. You should know who I am.

MR. LEOPOLD: Well, that's the impression you must have made in the courtroom.

I will not be quiet.

MR. TEIN: That's obnoxious. Stop being obnoxious. It's stupid. Let's go ahead with the questions.

MR. LEOPOLD: I will make the record.

MR. TEIN: Let's get on with the questions.

MR. LEOPOLD: Do you need a break?

(Thereupon, a recess was taken.)

BY MR. TEIN:

Q. Okay. [redacted] after you told your manager at the Quarterdeck Tavern everything that was going on and he told you he would help you any way he could, he hid you in the kitchen from the process servers, correct?

A. Incorrect.

Q. Isn't it true that lying to avoid service is a meaningless lie to you, [redacted]

A. Incorrect.

Q. What is your manager's name?

A. I have three. Would you like to know all --

Q. Who's the one who lied for you?

A. [redacted]

Q. And what did [redacted] do to lie for you?

A. Said I wasn't there.

Q. And who did he tell wasn't there?

A. Ask him.

Q. Where were you when [redacted] told this someone that you were not at the Quarterdeck Tavern?

A. Eating nachos.

Q. At the Quarterdeck Tavern?

A. Yes.

Q. What did you do so that [redacted] would lie to the process servers for you?

A. Nothing.

Q. You just got him to lie for you, didn't you?

A. No. I had no influence on him saying I wasn't there.

Q. He took that upon himself?

Isn't it true that Mr. Epstein's process servers had to ask the police to get you out of the restaurant so that they could serve you?

MR. LEOPOLD: Objection. Lack of foundation, predicate.

BY MR. TEIN:

Q. You can answer the question.

MR. LEOPOLD: If you know. Don't guess.

THE WITNESS: No. Can you repeat the question?

MR. TEIN: Don't coach.

MR. LEOPOLD: Don't guess.

MR. TEIN: That's a coaching.

MR. LEOPOLD: No. That's an instruction to the client.

MR. TEIN: No. You don't do that.

THE WITNESS: Can you repeat the question?

MR. LEOPOLD: Let me just state for the record --

BY MR. TEIN:

Q. Once the police -- isn't it true that Mr. Epstein's process servers had to ask the police to get you out of the restaurant so that they could serve you?

A. Incorrect. My boss called the police.

Q. And once the police showed up, to stop you from lying to avoid service, you made up another lie that the process servers had harassed you. Isn't that correct?

A. Incorrect.

Q. You lie all the time, don't you?

MR. LEOPOLD: Objection.

THE WITNESS: Incorrect.

BY MR. TEIN:

Q. You have a MySpace page, don't you?

A. No longer do I have a MySpace page. I deleted it.

Q. When did you delete your MySpace page?
A. A couple days ago.
Q. Who told you to take your MySpace page down a couple of days ago?
A. Nobody. I'm sick and tired of MySpace.
Q. You all of a sudden got sick and tired of MySpace and just a few days before this deposition you decided to delete your MySpace page, correct?
A. Correct.
Q. Is that your testimony under oath?
A. Yes.
Q. Did you take your MySpace page down because you thought the government might subpoena it?
A. Incorrect.
Q. Hadn't your MySpace page been up for over three months before you took it down?
A. Correct. But I also had made tons of MySpaces over the last years. I just get tired of them and delete them because -- drama -- and make new ones.
Q. We're going to talk about that.
So you deleted your MySpace page after you were already under subpoena for this deposition, correct?
A. Correct.
Q. What about the MySpace page didn't you want us to see, [redacted]

A. Nothing.
Q. Well, we're going to come back to MySpace in a second.
A. You do that.
Q. [redacted] I'm going to ask you some questions about why you lie about your age so often, okay?
MR. LEOPOLD: Objection to the form. Argumentative.
BY MR. TEIN:
Q. You lie about your age all the time, don't you?
MR. LEOPOLD: Objection, argumentative.
THE WITNESS: Incorrect.
BY MR. TEIN:
Q. You lie about your age to get body piercings, don't you?
A. Incorrect.
Q. You have body piercings, don't you?
A. Yes.
Q. You have four body piercings; isn't that right?
A. Five.
Q. Other than the piercings on your ears -- I'm not talking about that --
A. Oh, then no; just one.

Q. And where is the one body piercing?
A. Belly.
Q. When did you get that?
A. For my birthday, with my stepmother and my father.
Q. And when was that?
A. When I was 14.
Q. Okay. So you had that body piercing when you met Epstein, correct?
A. It might have been, or maybe that -- yeah, either my 14th birthday or my 15th. I honestly don't remember.
Q. Now you've lied about your age to get into bars by using driver's licenses that aren't yours, correct?
A. Incorrect.
Q. Are you swearing under oath that you've never done that?
A. Yes, I swear under oath.
Q. And you've lied about your age to buy beer, correct?
A. Incorrect.
Q. You're swearing under oath that you've never lied to stores about your age?
A. I've never lied to a store about my age or

anything.

Q. You try to look much older than you are, don't you?

A. Incorrect.

Q. And you've lied about your age on your MySpace pages, don't you?

A. Incorrect.

Q. All right. Let's look at Exhibit 26-01 one.

MS. BELOHLAVEK: 26-001?

MR. TEIN: Yes.

BY MR. TEIN:

Q. On this page you lied to everyone that you were 18, didn't you?

A. Correct.

Q. Let's go to Exhibit 33.

MS. BELOHLAVEK: That's 33-001?

TEIN: Correct.

BY MR. TEIN:

Q. On this page you lied to everyone that you were 19, didn't you?

A. Incorrect.

MR. LEOPOLD: Just answer the question.

THE WITNESS: Oh, incorrect.

BY MR. TEIN:

Q. Now you can explain your answer.
A. I know that I have seen all of these and I know that this one is mine.
Can you go down?
MR. LEOPOLD: Just for the record, you're pointing to the photo.
THE WITNESS: I'm pointing to --
BY MR. TEIN:
Q. You're pointing to the one where it says your age is 18?
A. Correct.
Q. That's yours, right?
A. Correct. That's mine from a couple years ago that I have not been on, because I don't use that. Please keep going down, please. And I think that's it, because there's no one -- just that one is mine.
Q. So the one you pointed to where it says your age is 18, that's yours, correct?
A. Correct.
Q. And when you wrote 18 as your age on your MySpace page, that was a lie, wasn't it?
A. Correct.
Q. Did you lie about your MySpace page back then because you couldn't post on MySpace unless you were 18?

A. Correct. There was a rule many years ago that you had to be 18 to have a MySpace.

Q. So you lied about your age so you could post on MySpace, right?

A. Yes.

Q. Let's go back to the top one on this page, 33-01.

Are you testifying now under oath that this MySpace page where the headline says, "[redacted]s do have more fun," and the location is given as Lox, abbreviation for Loxahatchee, and the age is 19, and it says [redacted] is it your testimony that you did not post that?

A. Correct.

Q. Now let's go back to the one that you were pointing to before on this page, where it says your age is 18 and you lied about your age to post MySpace, okay?

A. Uh-huh, yes.

Q. All right. Why did you finally put your true age on your MySpace profile four days before you were scheduled to testify before the Grand Jury?

A. I don't know what you're talking about.

MR. LEOPOLD: If you don't understand, ask him to ask the question again.

MR. TEIN: Don't coach.

THE WITNESS: I don't know which MySpace you're talking about.

BY MR. TEIN:

Q. The MySpace page that you're just pointing to, where it says you were 18.

A. Yes.

Q. And you were lying about your age, right?

A. Uh-huh.

Q. Why did you finally post your true age on your MySpace profile --

A. Uh --

Q. -- four days before you were scheduled to testify before the Grand Jury?

A. I honestly don't know which MySpace, because I've had like a bazillion MySpaces, and in that year, I had two, that one and another one, and that one's been deleted. So I don't know which one you're referring to.

Q. You remember that you changed your age on your MySpace page from 18 to your true age just four days before you went and testified in the Grand Jury?

A. No.

Q. You don't remember that.

A. No.

Q. Do you remember Detective Recarey? Did you

ever meet a Detective Recarey?

A. I don't know the names.

Q. How many different detectives have you met with on this case from Palm Beach?

A. Probably a good six or seven, maybe.

Q. Did one of the detectives tell you before you testified in the Grand Jury that you should take your MySpace age and put your true age?

A. No.

Q. Didn't Detective Recarey have to come to your house to pick you up to get you to testify in front of the Grand Jury?

A. Possibly; maybe because I didn't have a ride; I was only 14 or 15 at the time.

Q. Your mom didn't drive you?

A. No.

Q. Stepmom didn't drive you?

A. I think my dad. Oh, my dad; my dad drove me.

Q. Your dad drove you?

A. Yes, sir.

Q. So your testimony is Detective Recarey did not drive you, correct?

MR. LEOPOLD: Objection. /asked and answered.

THE WITNESS: No. I'm pretty sure my dad drove me, because he was there with me.

BY MR. TEIN:

Q. Did any detective tell you to change your age on your MySpace page, to put your true age?

A. No, sir.

Q. Now you also lied on your MySpace page about your income, didn't you?

A. Yes.

Q. And you lied, saying that you made a quarter million dollars a year and higher, correct?

A. As a joke, yes.

Q. That was a lie, wasn't it?

A. Yes.

Q. And you also lied on your MySpace page, saying that you were married, didn't you?

A. Possibly. And that might have been an error on my part.

Q. Now you also lie to the police, don't you?

A. No.

Q. Well, you lied to the police in your tape-recorded statement that you gave to Detective [redacted] Pagan three years ago, didn't you?

A. To my knowledge, no, I did not.

Q. Well, you lied to the police when you

accused Mr. Epstein of attempting to murder your father, didn't you?

A. No. I never heard a statement saying that Mr. Epstein tried to murder my father.

Q. You made that statement, didn't you?

MR. LEOPOLD: Do you have a statement to show her? That's been asked and answered.

MR. TEIN: I'm sorry. I didn't hear the witness' answer, Mr. Leopold.

BY MR. TEIN:

Q. [redacted] you told the police, didn't you, that Mr. Epstein almost killed your father, didn't you?

A. No.

Q. Three years ago, before Mr. Epstein even knew about this investigation, you told the police that Epstein had "already come to my dad's house and did something to my dad's tires and my dad almost died. I didn't want my dad to get hurt, because Jeff already almost killed him."

Didn't you say that?

A. Not to my knowledge or recollection. I have never said anything like that.

Q. That would have been a complete lie, wouldn't it have been?

A. Yeah.

EPSTEIN'S MOTN TO SEAL NON-PROS AGRMT

ATTERBURY, GOLDBERGER & WEISS, P.A.
ATTORNEY [redacted] LAW
SUITE 1400
250 AUSTRALIAN AVENUE SOUTH
WEST PALM BEACH, FLORIDA 33401-5086
TELEPHONE [redacted]

FAX [redacted]

FAX COVER SHEET

Date: 6/26/09

To: R. Alexander Acosta, Esq. USAO
Barbara Burns, Esq. ASAO
Bradley J. Edwards, Esq.
William J. Berger, Esq.
Robert D. Critton, Esq.
Spencer T. Kuvin, Esq.

[redacted]

[redacted]

Subject: State of Florida v. Epstein

Pages: 3, including this cover sheet.

See attached letter.

ORIGINAL WILL BE SENT: _____ YES __X___ NO

IF THERE ARE ANY PROBLEMS WITH
THE TRANSMISSION, PLEASE CONTACT
[redacted] AS SOON AS POSSIBLE.

The information contained in this facsimile message is attorney privileged and confidential information intended only for the use of the individual or entity named above. If the reader of this message is not the intended recipient, you are hereby notified that any dissemination, distribution or copy of this communication is strictly prohibited. If you have received this communication in error, please immediately notify us by telephone. Thank you.

ATTERBURY GOLDBERGER WEISS

JOSEPH R. ATTERBURY
JACK A. GOLDBERGER
JASON S. WEISS
Board Certified Criminal Trial Attorney
Member of New Jersey & Florida Bars

June 26, 2009

TELECOPIED THIS DATE

The Honorable Jeffrey Colbath
Palm Beach County Courthouse
205 N. Dixie Highway
Room 11F
West Palm Beach, FL 33401

Re; State of Florida v. Jeffrey Epstein

Dear Judge Colbath:

On behalf of Mr. Epstein, we strongly object to the proposed order submitted by Deanna Shullman on behalf of the Palm Beach Post. The court has already entered an order dated June 25, 2009 on:

a) Non-party, [redacted]'s Motion to Vacate Order Sealing Records and Unseal Records

b) Palm Beach Post's Motions to Intervene and petition for Access

c) [redacted] Motions to Intervene and for an order to Unseal Records

d) Jeffrey Epstein's Motion to Make Court Records Confidential.

The only matter before the court today was Defendant Epstein's Motion for a Stay which the court denied. Contrary to the assertions in the proposed order submitted to you by the Palm Beach Post, the court made a specific finding that the Defendant Epstein has met his burden of irreparable harm. Additionally, all of the other matters contained in the proposed order were addressed in the court's Order of June 25, 2009.

It is the position of Defendant Epstein that the order on today's Motion to Stay should simply state that the Defendant's Motion to Stay is denied. In this way, the court's order of June 25, 2009 on the merits of the issue and the order of the court

denying the stay motion can properly be reviewed by the Fourth District Court of Appeal.

Very truly yours,

JACK A. GOLDBERGER

JAG:cg
cc: U.S. Attorney's Office (via facsimile)
State Attorney's Office(via facsimile)
Deanna K. Shullman, Esquire (via facsimile)
Bradley J. Edwards, Esquire (via facsimile)
Spencer t. Kuvin, Esquire (via facsimile)

IN THE CIRCUIT COURT OF THE FIFTEENTH JUDICIAL CIRCUIT, IN AND FOR PALM BEACH COUNTY, FLORIDA
CRIMINAL DIVISION "W"

CASE NO. 502008CF009381AXXMB
502006CF009454AXXMB

STATE OF FLORIDA,

vs.
JEFFREY EPSTEIN,
Defendant
_____/

ORDER DENYING MOTION TO STAY DISCLOSURE AGREEMENT

THIS MATTER came before the Court at a hearing on June 26, 2009, on Jeffrey Epstein's Motion to Stay the Disclosure of the Non-Prosecution Agreement and the Addendum thereto. The Court notes the parties were present and represented by counsel. Based upon argument, it is

ORDERED AND ADJUDGED that

1. The Motion to Stay is denied.

2. The Clerk of Court shall make the documents available for disclosure at noon on Thursday, July 2, 2009. It is the intent of the Court to give the Defendant, Mr. Epstein, and his attorney an opportunity to have this Court's orders reviewed by the 4th DCA. If the Clerk gets no direction from the Appellate Court, she shall disclose the documents on the date referred to above.

DONE AND ORDERED in West Palm Beach, Palm Beach County, Florida this ____ day of June, 2009.

SIGNED AND DATED
JUN 26 2009
JEFFREY J. COLBATH

JEFFREY J. COLBATH
Circuit Court Judge

Copies furnished:

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Deanna K. Shullman, Esq.
P. O. Box 2602
Tampa, FL 33602



Judge Jeffrey J. Colbath
205 North Dixie Highway
West Palm Beach, FL 33401

WEST PALM BEACH, FLORIDA 33401



[redacted] - R. ALEXANDER ACOSTA, ESQ
U.S. Attorney's Office Southern District
500 S. Australian Avenue
Suite 400
West Palm Beach, FL 33401

33401+6235

EFTA00232239

Mr [redacted]

You were not at the hearing today, so we are sending this to you by mail.

BCLC

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

CASE NO. 2008CF009381A
DIVISION W

STATE OF FLORIDA

v.

JEFFREY EPSTEIN,

Defendant.
_____/

EPSTEIN'S MOTION TO STAY DISCLOSURE OF THE NON-PROSECUTION AGREEMENT AND ADDENDUM PENDING REVIEW

Defendant, JEFFREY EPSTEIN ("EPSTEIN"), by and through his undersigned counsel and pursuant to Rule 9.310, Florida Rules of Appellate Procedure, moves to stay disclosure of the Non-Prosecution Agreement and Addendum (collectively, the "NPA") pending review, and states:

1. In the event the Court grants Nonparty [redacted]'s Motion to Vacate Order Sealing Records and Unseal Records, grants Palm Beach Post's Motion to Intervene and Petition for Access and/or denies EPSTEIN's Motion to Make Court Records Confidential, EPSTEIN moves to stay the disclosure of the NPA pending review by the Fourth District Court of Appeals.

2. Rule 9.310(a), Florida Rules of Appellate Procedure, provides in pertinent part, "...a party seeking to stay a final or non-final order pending review shall file a motion in the lower tribunal, which shall have continuing jurisdiction, in its discretion , to grant, modify or deny such relief."

3. A stay pending review is warranted under the circumstances because of the irreparable harm that would be caused by disclosure of the NPA including, but not limited to, substantial injury to a party by disclosing matters protected by common law and privacy rights, substantial injury to a compelling government interest, substantial injury to innocent third parties and a serious imminent threat to the fair, impartial and orderly administration of justice as set forth in the hearing record date June 25, 2009.

4. In Mariner Health Care of Nashville, Inc. v. Baker, 739 So. 2d 608, 609 (Fla. 1st DCA 1999), defendant Mariner filed a petition for writ of certiorari after the trial court compelled it to produce certain incident reports. Mariner also moved for a stay pending review pursuant to Fla. R. App. Pro. 9.310. The trial court advised the parties that Mariner would be required to submit the incident reports to the court under seal as a prerequisite to a stay. Mariner refused to produce the documents under seal and the trial court denied the motion for stay and imposed daily fines until the documents were produced. Id. The First District Court of Appeals affirmed the trial court's order and noted

> Mariner has failed to explain how the production of the reports under seal would result in any prejudice. To the contrary, the records will be protected from disclosure during the entire course of the certiorari proceeding before this court. No harm can be done if this court ultimately determines that the reports are protected by the work product privilege.

Id. at 610.

5. In the instant case the NPA is already filed under seal. Should the Court grant Nonparty [redacted]'s Motion to Vacate Order Sealing Records and Unseal Records, grant Palm Beach Post's Motion to Intervene and Petition for Access and/or deny

EFTA00232242

EPSTEIN's Motion to Make Court Records Confidential, EPSTEIN requests the Court exercise its discretion under Fla. R. App. Pro. 9.310(a) and enter a stay pending review by the 4th DCA.

6. No harm will be done if the NPA remains under seal pending appellate review. To the contrary, EPSTEIN will suffer irreparable harm if a stay is not entered and the NPA is disclosed to the public.

WHEREFORE, Defendant, JEFFREY EPSTEIN, respectfully requests that if the Court grants Nonparty [redacted]'s Motion to Vacate Order Sealing Records and Unseal Records, grants Palm Beach Post's Motion to Intervene and Petition for Access and/or denies EPSTEIN's Motion to Make Court Records Confidential, the Court enter a stay pending review and grant any additional relief the Court deems just and proper.

Certificate of Service

WE HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished by Hand Delivery to [redacted] ESQ., United States Attorney's Office – Southern District, 500 S. Australian Avenue, Suite 400, West Palm Beach, FL 33401, JUDITH STEVENSON AREO, ESQ., State Attorney's Office – West Palm Beach, 401 North Dixie Highway, West Palm Beach, FL 33401, WILLIAM J. BERGER, ESQ., and BRADLEY J. EDWARDS, Rothstein Rosenfeldt Adler, 401 East Las Olas Boulevard, Suite 1650, Fort Lauderdale, FL 33394, JACK A. GOLDBERGER, ESQ., Atterbury, Goldberger & Weiss, P.A., 250 Australian Avenue South, Suite 1400, West Palm Beach, FL 33401, SPENCER T. KUVIN, ESQ., Leopold-Kuvin, P.A., 2925 PGA Blvd., Suite 200, Palm Beach Gardens, FL 33410, and DEANNA K. SHULLMAN,

EFTA00232243

400 North [redacted] Drive, Suite 1100, P.O. Box 2602 (33601) Tampa, FL 33602, this 25th day of June, 2009.

BURMAN, CRITTON, LUTTIER & COLEMAN, LLP
515 N. Flagler Drive, Suite 400
West Palm Beach, FL 33401
[redacted]
[redacted] Fax

By: _____
Robert D. Critton, Jr.
Florida Bar #[redacted]
Michael J. Pike
Florida Bar #[redacted]
Counsel for Defendant Jeffrey Epstein)

and

Jack Alan Goldberger, Esq.
Atterbury Goldberger & Weiss, P.A.
250 Australian Avenue South
Suite 1400
West Palm Beach, FL 33401-5012
Fax:[redacted]
Counsel for Defendant Jeffrey Epstein

EFTA00232244

BURMAN, CRITTON, LUTTIER
& COLEMAN LLP
L · A · W · Y · E · R · S

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[redacted]
U.S. Attorney's Office Southern District
500 S. Australian Avenue
Suite 400
West Palm Beach, FL 33401

33401$6235 C023

IN THE DISTRICT COURT OF APPEAL OF THE STATE OF FLORIDA, FOURTH DISTRICT

JEFFREY EPSTEIN,

Petitioner,

v.

STATE OF FLORIDA,

Respondent.
_____/

CASE NO. _____
PALM BEACH COUNTY
L.T. CASE NO. 2008 CF 009381A

MOTION TO FILE UNDER SEAL

Petitioner/defendant, JEFFREY EPSTEIN, moves this Court for an order allowing him to file the September 24, 2007 Non-Prosecution Agreement ("Agreement") and October 29, 2007 Addendum to the Non-Prosecution Agreement ("Addendum"), which are the subject of his contemporaneously filed emergency petition for certiorari and emergency motion to review denial of stay, under seal.

1. The Agreement and Addendum were executed by petitioner/defendant and the United States Attorney's Office in September 2007. They are attached in the sealed envelope.

2. The Agreement contains a confidentiality clause, precluding it from

EFTA00232246

being disclosed to third parties or made part of any public record. Federal District Judge Marra has twice ordered the documents not disclosed to third parties.

3. Fifteenth Judicial Circuit Judge Deborah Pucillo ordered Mr. Epstein's attorney to file the documents under seal during his plea conference on June 30, 2008.

4. On June 25, 2009, Judge Colbath granted non-parties' motions to vacate the order sealing records and ordered them disclosed.

5. On June 26, 2009, Judge Colbath denied petitioner's motion for stay, and ordered the Clerk of Court to make the documents available for disclosure at noon on Thursday, July 2, 2009, unless this Court granted a stay.

6. It is necessary that this Court review the Agreement and Addendum in conjunction with these proceedings. To protect the purpose of the petition for writ of certiorari pending before this Court, petitioner asks to file the documents under seal.

Accordingly, petitioner requests that this Court grant this motion and allow

EFTA00232247

him to file the Agreement and Addendum, which are separate from the appendix to his emergency petition and motion for review, under seal.

I HEREBY CERTIFY that a copy of the foregoing has been sent by email and Federal Express this 30th day of June, 2009, to:

[redacted]
U.S. Attorney's Office-Southern District
500 South Australian Avenue, Suite 400
West Palm Beach, FL 33401

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State Attorney's Office-West Palm Beach
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Counsel for [redacted].

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Counsel for The Palm Beach Post

SPENCER T. KUVIN
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Palm Beach Gardens, FL 33410
Counsel for [redacted].

HONORABLE JEFFREY COLBATH
Palm Beach County Courthouse
205 North Dixie Highway
Room 11F
West Palm Beach, FL 33401

ROBERT D. CRITTON of
BURMAN, CRITTON, LUTTIER & COLEMAN
515 North Flagler Drive, Suite 400
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and
JACK A. GOLDBERGER of
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and

EFTA00232248

JANE KREUSLER-WALSH and
BARBARA J. COMPIANI of
KREUSLER-WALSH, COMPIANI & VARGAS, P.A.
501 South Flagler Drive, Suite 503
West Palm Beach, FL 33401-5913
[redacted]
Counsel for Petitioner

By: _____
JANE KREUSLER-WALSH
Florida Bar No. [redacted]

EFTA00232249

IN THE DISTRICT COURT OF APPEAL OF THE STATE OF FLORIDA, FOURTH DISTRICT

JEFFREY EPSTEIN,

Petitioner,

v.

STATE OF FLORIDA,

Respondent.
_____/

CASE NO. _____
PALM BEACH COUNTY
L.T. CASE NO. 2008 CF 009381A

MOTION TO USE ONE APPENDIX TO SUPPORT EMERGENCY PETITION FOR WRIT OF CERTIORARI AND EMERGENCY MOTION TO REVIEW DENIAL OF STAY

Petitioner, JEFFREY EPSTEIN, moves to file one appendix in support of his contemporaneously filed emergency petition for writ of certiorari and emergency motion to review denial of stay. The documents in the appendix support both the petition and motion to review denial of stay. In order to expedite review, avoid duplication of paper and unnecessary expense, Mr. Epstein requests that this Court allow him to use the appendix in support of both the petition and motion to review denial of stay.

I HEREBY CERTIFY that a copy of the foregoing has been sent by E-Mail and

EFTA00232250

Federal Express this 30th day of June, 2009, to:

JEFFREY H. SLOMAN
U.S. Attorney's Office-Southern District
500 South Australian Avenue, Suite 400
West Palm Beach, FL 33401

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401 North Dixie Highway
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Counsel for [redacted].

HONORABLE JEFFREY COLBATH
Palm Beach County Courthouse
205 North Dixie Highway
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and

EFTA00232251

JANE KREUSLER-WALSH and
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KREUSLER-WALSH, COMPIANI & VARGAS, P.A.
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West Palm Beach, FL 33401-5913
[redacted]
Counsel for Petitioner

By: _____
JANE KREUSLER-WALSH
Florida Bar No. [redacted]

EFTA00232252

IN THE DISTRICT COURT OF APPEAL OF THE STATE OF FLORIDA, FOURTH DISTRICT

JEFFREY EPSTEIN,

Petitioner,

v.

STATE OF FLORIDA,

Respondent.
_____/

CASE NO. _____
PALM BEACH
LT. CASE NO. 2008 CF 009381A

PETITIONER'S EMERGENCY MOTION TO REVIEW ORDER DENYING STAY OF DISCLOSURE OF FEDERAL NON-PROSECUTION AGREEMENT AND ADDENDUM

Petitioner, JEFFREY EPSTEIN, pursuant to Florida Rule of Appellate Procedure 9.310(f), requests this Court review the order denying his Motion to Stay Disclosure of Federal Non-Prosecution Agreement and Addendum pending his contemporaneously filed petition for certiorari and grant the stay.[1] Mr. Epstein seeks review of the stay denial on emergency basis. The court stayed disclosure until noon on Thursday, July 2, 2009 so Mr. Epstein could seek review in this Court. Absent a stay by this Court, the documents will be disclosed and there will be no adequate remedy.

[1] Petitioner, Jeffrey Epstein is referred to by proper name. Non-party interveners, [redacted]., [redacted]. and The Post are referred to as [redacted]., [redacted]. and The Post. All emphasis is supplied unless indicated otherwise. The following symbol is used: A – Petitioner's appendix.

EFTA00232253

FACTUAL BACKGROUND

In 2006, a Florida state grand jury indicted Jeffrey Epstein for felony solicitation of prostitution. He was also charged by information with procuring persons under 18 for prostitution. The United States Attorney's Office for the Southern District of Florida began a federal grand jury investigation into allegations arising out of the same conduct.

In September 2007, the United States Attorney's Office and Mr. Epstein negotiated and signed a non-prosecution agreement (A-7:38).[2] The non-prosecution agreement contains an express confidentiality provision and makes specific reference to a grand jury investigation of Mr. Epstein (A-7:38). The United States Attorney's Office agreed to defer the federal criminal action on the condition that Mr. Epstein comply with many obligations, beginning with his pleading guilty to certain state charges in the Florida criminal action (A-7:38). A breach of any condition violates the non-prosecution agreement and criminal charges will resume (A-7:39-40).

On June 30, 2008, Mr. Epstein pled guilty to felony solicitation of prostitution and procuring a minor under 18 for prostitution in the Florida criminal action (A-7; A-

[2] The non-prosecution agreement and addendum are separately filed with a motion to seal.

EFTA00232254

8). Judge Deborah Dale Pucillo, sitting for the Fifteenth Judicial Circuit, accepted the plea (A-7).

During the plea conference, Judge Pucillo asked Mr. Epstein whether any promises had been made to him besides the terms of the state plea (A-7:37-38). Mr. Epstein's attorney advised the court of the "confidential [non-prosecution agreement with the United States Attorney's Office] that the parties have agreed to." (A-7:38). He informed the court that Mr. Epstein's failure to comply with the terms of the state plea would violate the non-prosecution agreement (A-7:39-40).

Judge Pucillo then instructed Mr. Epstein's attorney that she wanted "a sealed copy of that filed in this case." (A-7:40). When Mr. Epstein's attorney tried to comply and file the non-prosecution agreement with the court, the clerk advised him an order was necessary. On July 2, 2008, the court entered an "Agreed Order Sealing Document in Court File" (A-9). An addendum to the non-prosecution agreement was filed under seal on August 25, 2008.

On July 7, 2008, Jane Doe 1 and Jane Doe 2 filed an independent action in the federal court to compel production of the non-prosecution agreement (A-1). Mr. Epstein was not a party to the proceeding, but the United States Attorney's Office

EFTA00232255

opposed disclosure (A-2). On August 16, 2008, Judge Marra of the Southern District ordered the United States Attorney's Office to produce the non-prosecution agreement to the Does' attorneys and to any other victims and their counsel, provided they not disclose the terms to anyone else (A-2). As a result of this order, all victims, including those with civil suits against Mr. Epstein, have access to the non-prosecution agreement and addendum. They just cannot share it with others.

In September 2008, Jane Doe 1 and Jane Doe 2 filed motions in the federal action to unseal the non-prosecution agreement and addendum (A-3). The United States Attorney's Office opposed disclosure noting its confidentiality provision, the movant's right to access the agreement, and Judge Marra's protective order to which the movants voiced no objection (A-4). On February 12, 2009,[3] Judge Marra denied the motion, stating in pertinent part:

> Petitioners' mere desire to discuss the Agreement with third parties is insufficient, in and of itself, to warrant the granting of such relief. If and when Petitioners have a specific tangible need to be relieved of the restrictions, they should file an appropriate motion. If a specific tangible need arises in a civil case Petitioners or other alleged victims are pursuing against Epstein, relief should be sought in that case, with notice to the United States, the other party to the Agreement.

(A-6).

[3] The order is mistakenly dated February 12, 2008 (A-6).

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Rather than seeking relief from Judge Marra in federal court, non-party [redacted]., a victim of Mr. Epstein, filed a motion in the state criminal action on May 12, 2009, seeking to intervene and unseal the non-prosecution agreement and addendum pursuant to Florida Rule of Judicial Administration 2.420(d)(5) (A-10). [redacted]. alleged that the proper procedures had not been followed in sealing the documents (A-10). [redacted]. claimed these documents are relevant to her civil action against Mr. Epstein; that she, as a member of the public, has a right to have them unsealed; and that continued sealing violates public policy (A-10).

On June 1, 2009, Palm Beach Newspapers d/b/a The Palm Beach Post ("The Post") moved in the state criminal action to intervene and access the non-prosecution agreement and addendum (A-11). The Post alleged that the procedures for sealing had not been followed and that "good cause exists for unsealing the documents because of their public significance." (A-11:3).

Fifteenth Judicial Circuit Judge Jeffrey Colbath heard [redacted]'s and The Post's motions in the state criminal action on June 10, 2009 (A-13). The court granted both motions to intervene, but deferred ruling on the motions to unseal pending a later hearing (A-13).

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The next day, June 11, 2009, Mr. Epstein filed a Motion to Make Court Records Confidential (A-13). Mr. Epstein alleged that the documents should remain confidential to prevent a serious imminent threat to the fair, impartial, and orderly administration of justice; to protect a compelling government interest; to avoid substantial injury to innocent third parties; and to avoid substantial injury to a party by disclosure of matters protected by a common law and privacy right, not generally inherent in the specific type of proceeding sought to be closed (A-13).

Also on June 11, non-party [redacted]. filed motions to intervene and for an order unsealing the records, alleging grounds similar to non-parties [redacted]. and The Palm Beach Post (A-12).

Judge Colbath heard [redacted]'s, The Post's, and [redacted]'s motions to unseal and Mr. Epstein's motion for confidentiality on June 25, 2009 (A-16). The court granted [redacted]'s, The Post's, and [redacted]'s motions and denied Mr. Eptsein's (A-16:2). The court concluded:

> At the time the State court took these matters under seal, the proper procedure for sealing such documents had not been followed. Neither the State of Florida nor the U.S. Government nor Mr. Epstein have [sic] presented sufficient evidence to warrant the sealing of documents currently held by the Court.

(A-16:2; A-18:43). The court ruled that "[t]his Order is in no way to be interpreted as

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permission to not comply with U.S. District Court Kenneth Marra's previous Orders." (A-16:3). Subsequent to this oral ruling, Mr. Epstein provided the court with a Motion to Stay (A-14). The court stayed disclosure until it could hear Mr. Epstein's motion to stay, scheduled for the next day (A-16:3).

The court heard Mr. Epstein's stay motion on June 26, 2009 (A-19). Mr. Epstein alleged that he will be irreparably harmed by disclosure of the non-prosecution agreement and addendum (A-14). No harm will be done if the documents remain under seal pending review by this Court (A-14). The court denied the motion, but stayed disclosure until noon on Thursday, July 2, so Mr. Epstein could seek emergency review of the denial in this Court (A-17).

ARGUMENT

Whether to grant a stay is discretionary with the trial court. See Pabian v. Pabian, 469 So. 2d 189, 191 (Fla. 4th DCA 1985). Factors courts consider in deciding whether to grant a stay pending appellate proceedings include the likelihood of success on the merits, the likelihood of harm if not stay is granted, and the remedial quality of any such harm. See Perez v. Perez, 769 So. 2d 389, 391 n.4 (Fla. 3d DCA 1999); see also State ex rel. Price v. McCord, 380 So. 2d 1037, 1038 n.3 (Fla. 1980). The trial court agreed that Mr. Epstein had established irreparable harm (A-17:16), denied a

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stay.

The trial court abused its discretion by denying a stay. As set forth in the contemporaneously filed petition for certiorari, Mr. Epstein will likely succeed on the merits. The trial court departed from the essential requirements of law in granting the motions to unseal the confidential federal non-prosecution agreement and addendum between the United States Attorney's Office and Mr. Epstein.

These documents are subject to confidentiality provisions, which the federal court recognized and enforced when it permitted disclosure to the attorneys for Jane Doe 1 and Jane Doe 2 and to any other victims and their counsel, provided they not disclose the terms to anyone else. Disclosure violates a condition of the agreement, thereby vitiating the agreement between Mr. Epstein and the United States Attorney. Disclosure also violates Judge Marra's two orders in the federal district court, denying disclosure to the parties. Judge Colbath paid lip service to this principle in stating that his "Order is in no way to be interpreted as permission to not comply with U.S. District Court Kenneth Marra's previous Orders." (A-16:3). But there is no way disclosure does not inherently violate Judge Marra's orders.

The principle of supremacy required that the state court defer to the federal court

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on this issue. U.S. Const. Art. I § 8. These documents reference federal grand jury proceedings, which are protected under Federal Rule of Criminal Procedure 6(e)(2)--an attorney for the government "must not disclose a matter occurring before the grand jury." As a consequence of the confidentiality provisions of the non-prosecution agreement, information that disclosed the existence and the subject matter of a federal grand jury proceeding which itself is protected by Federal Rule of Criminal Procedure 6(e) remains non-public, thus effectuating the privacy concerns addressed by the United States Supreme Court in Douglas and other cases. See e.g. Douglas Oil Co. v. Petrol Stops Northwest, 441 U.S. 211, 228-30 (1979). Under Rule 6(e), only a federal court can, absent findings, order the unsealing of federal grand jury proceedings. See Fed. R. Crim. P. 6(e)(3)(F), (G). Judge Colbath did not address this principle. Nor did Judge Colbath address the principle of comity, which required that the state court defer to the federal court, which has twice denied disclosure to third parties, on this issue.

The court erred in concluding that the non-prosecution and agreement were not properly sealed. The non-parties filed their motions to unseal pursuant to Florida Rule of Judicial Administration 2.420(d) (A-10, A-11, A-12). They alleged that Judge Pucillo failed to properly seal the documents under the procedure set forth in that rule (Id.). By its terms, however, the procedures for sealing in Rule 2.420(d) (titled, "Request to Make Circuit and County Court Records in **Non-Criminal Cases**

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Confidential") do **not** apply to criminal cases. See Fla. R. Jud. Admin. 2.420, 2007 Court Commentary ("New subdivision (d) applies to motions that seek to make court records in non-criminal cases confidential in accordance with subdivision (c)(9)."); see also In re Amendments to Fla. R. Jud. Admin. 2.420--Sealing of Court Records & Dockets, 954 So. 2d 16, 17 & 23 (Fla. 2007) (declining to adopt specific procedure regarding the sealing of court records in criminal cases and referring the matter to rules committees for further study). Under the version of rule 2.420 in effect when the documents were sealed, there is no procedure for criminal proceedings.

Even under the prior version of rule 2.420, Judge Pucillo was not required to give prior notice of her intent to seal documents during the plea hearing. Committee Notes on the 1995 amendments discussing a prior version of Rule 2.420(c)(9)(D), make clear that advance notice is not always required:

> Unlike the closure of court proceedings, which has been held to require notice and hearing prior to closure, *see Miami Herald Publishing Co. v. Lewis*, 426 So. 2d 1 (Fla. 1982), **the closure of court records has not required prior notice. Requiring prior notice of closure of a court record may be impractical and burdensome in emergency circumstances or when closure of a court record requiring confidentiality is requested during a judicial proceeding.**

The local administrative rule the non-parties cite, 15th Judicial Circuit

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Administrative Order 2.303, is not applicable either. This Administrative Order addresses the procedures for sealing criminal and non-criminal court records, but was not adopted until September 29, 2008--months after Judge Pucillo sua sponte ordered the non-prosecution agreement and its addendum filed and sealed. The Administrative Order in effect when Judge Pucillo sealed these documents was 2.032-10/06. As explained above, the procedures designated therein would not apply since Judge Pucillo filed and sealed the documents sua sponte, not by motion. To the extent that the Administrative Order conflicts with the version of rule 2.420 then in effect, the rule prevails. Judge Pucillo was not required to follow Administrative Order 2.032 when she sealed the documents in June 2008.

Assuming compliance with procedures for confidentiality was required, Mr. Epstein met them. At all times, the rules of judicial administration provided that court records "[redacted] **be confidential**" if a court has determined that confidentiality is required. Fla. R. Jud. Admin. 2.420(c)(9). Rule 2.420(c)(9) provides:

> **(c) Exemptions. The following records of the judicial branch [redacted] be confidential:**
>
> . . . .
>
> (9) Any court record determined to be confidential in case decision or court rule on the grounds that
>
> (A) confidentiality is required to
>
> (i) prevent a serious and imminent threat to the fair, impartial, and orderly administration of justice;
>
> (ii) protect trade secrets;

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(iii) protect a compelling governmental interest;

(iv) obtain evidence to determine legal issues in a case;

(v) avoid substantial injury to innocent third parties;

(vi) avoid substantial injury to a party by disclosure of matters protected by a common law or privacy right not generally inherent in the specific type of proceeding sought to be closed;

(vii) comply with established public policy set forth in the Florida or United States Constitution or statutes or Florida rules or case law;

(B) the degree, duration, and manner of confidentiality ordered by the court shall be no broader than necessary to protect the interests set forth in subdivision (A); and

(C) no less restrictive measures are available to protect the interests set forth in subdivision (A).

Fla. R. Jud. Admin. 2.420(c)(9). Thus, courts are required to seal court records upon a finding that closure is need to "**prevent a serious and imminent threat to the fair, impartial, and orderly administration of justice,**" to "avoid substantial injury to innocent third parties" or to "avoid substantial injury to a party by disclosure of matters protected by a common law or privacy right not generally inherent in the specific type of proceeding sought to be closed." Fla. R. Jud. Admin. 2.420(c)(9)(i), (v), (vi).

Mr. Epstein's Motion to Make Court Records Confidential satisfied these requirements; thus, the court erred in denying it. Mr. Epstein alleged three separate grounds for confidentiality. He first argued that confidentiality is necessary to protect

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a compelling government interest. He satisfied this prong since the United States Attorney's Office has a compelling interest in having the confidentiality provision of its contract with Mr. Epstein honored. Judge Marra already balanced that interest against arguments for disclosure and struck a balance by requiring disclosure to plaintiffs and their lawyers, but not to third parties. Secondly, Mr. Epstein contended that maintaining confidentiality will avoid injury to innocent third parties, i.e., the other persons the United States Attorney's Office agreed not to prosecute who will be harmed if the documents are unsealed. Thirdly, Mr. Epstein demonstrated that confidentiality is necessary to avoid substantial injury to a party by disclosure of matters protected by a common law or privacy right not generally inherent in the specific type of proceeding sought to be closed. Disclosure of these documents is not generally inherent in a state court plea hearing and will violate Mr. Epstein's common law right to confidentiality.

Granting a stay would vindicate the values and purposes of grand jury secrecy which will be implicated, if a stay is denied, by the public disclosure of a confidential agreement that references matters related to a federal grand jury investigation. There is no prejudice to non-parties/interveners [redacted]., [redacted]. and The Post, if disclosure is stayed pending the outcome of Mr. Epstein's emergency petition for certiorari. Mr. Epstein, on the other hand, will suffer irreparable harm once the documents are produced--a fact

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the trial court recognized (A-19:16).

CONCLUSION

This Court should grant review and order the trial court to stay the order unsealing the non-prosecution agreement and addendum pending certiorari review.

CERTIFICATION OF EXISTENCE OF EMERGENCY

Undersigned counsel certifies that the subject of this motion constitutes an emergency. The trial court's order at **noon on July 2, 2009**, provides that the confidential federal non-prosecution agreement and addendum will be disclosed. Once these documents are disclosed, irreparable harm will result.

I HEREBY CERTIFY that a copy of the foregoing has been sent by E-Mail and Federal Express this 30th day of June, 2009, to:

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By: Jane Kreusler-Walsh
JANE KREUSLER-WALSH
Florida Bar No. [redacted]

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IN THE DISTRICT COURT OF APPEAL OF THE STATE OF FLORIDA, FOURTH DISTRICT

JEFFREY EPSTEIN,

Petitioner,

v.

STATE OF FLORIDA,

Respondent.
_____/

CASE NO. _____
PALM BEACH
LT. CASE NO. 2008 CF 009381A

EMERGENCY PETITION FOR WRIT OF CERTIORARI

Petitioner, JEFFREY EPSTEIN, seeks a writ of certiorari pursuant to Florida Rule of Appellate Procedure 9.100(c)(1), to review an order compelling disclosure of a confidential federal non-prosecution agreement and addendum, pursuant to motions to unseal, filed by non-parties, [redacted]., [redacted]. and Palm Beach Newspapers d/b/a The Palm Beach Post ("the Post").[1] The confidential federal non-prosecution agreement and addendum between the United States Attorney's Office and Mr. Epstein were filed under seal in state court at the express directive of the judge who heard Mr. Epstein's guilty plea--"I want a sealed copy of that filed in this case"--and not by

[1] Petitioner, Jeffrey Epstein is referred to by proper name. Non-party interveners, [redacted]., [redacted]. and The Post are referred to as [redacted]., [redacted]. and The Post. All emphasis is supplied unless indicated otherwise. The following symbol is used: A – Petitioner's appendix.

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motion of any party (A-7:40). Federal Court Judge Marra has twice denied public access to these documents.

Mr. Epstein seeks certiorari review on an emergency basis.[2] The court stayed disclosure until noon on Thursday, July 2, 2009. Once the documents are produced, there will be no adequate remedy.

I. JURISDICTION

Mr. Epstein seeks to invoke the certiorari jurisdiction of this Court pursuant to Florida Rules of Appellate Procedure 9.030(b)(2)(A) and 9.100. Certiorari review is appropriate where, as here, an order unsealing a court record departs from the essential requirements of law and causes material injury that cannot be remedied on appeal after final judgment. See Allstate Ins. Co. v. Langston, 655 So. 2d 91, 94 (Fla. 1995).

This Court should exercise its certiorari jurisdiction to quash the order unsealing the non-prosecution agreement and addendum. Production of these documents will cause irreparable harm ("cat out of the bag") to Mr. Epstein. The order departs from the essential requirements of law because

[2] Mr. Epstein has contemporaneously filed an emergency motion to review denial of stay.

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the court failed to recognize principles of supremacy and comity and failed to apply the correct law as to sealing these records.

Alternatively, Mr. Epstein appeals the order under Florida Rule of Appellate Procedure 9.140(b)(1)(D) as an order entered after a finding of guilt in a criminal case. See Fla. R. App. P. 9.040(c) ("If a party seeks an improper remedy, the cause shall be treated as if the proper remedy had been sought . . . .").

II. STATEMENT OF FACTS

In 2006, a Florida state grand jury indicted Jeffrey Epstein for felony solicitation of prostitution. He was also charged by information with procuring persons under 18 for prostitution. The United States Attorney's Office for the Southern District of Florida began a federal grand jury investigation into allegations arising out of the same conduct.

In September 2007, the United States Attorney's Office and Mr. Epstein executed a non-prosecution agreement (A-7:38).[3] The non-prosecution agreement contains an express confidentiality provision (A-

[3] The non-prosecution agreement and addendum are separately filed with a motion to seal.

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7:38). The United States Attorney's Office agreed to defer the federal criminal action on the condition that Mr. Epstein comply with many obligations, beginning with his pleading guilty to certain state charges in the Florida criminal action (A-7:38). A breach of any condition violates the non-prosecution agreement and criminal charges will resume (A-7:39-40).

On June 30, 2008, Mr. Epstein pled guilty to felony solicitation of prostitution and procuring a minor under 18 for prostitution in the Florida criminal action (A-7; A-8). Judge Deborah Dale Pucillo, sitting for the Fifteenth Judicial Circuit, accepted the plea (A-7).

During the plea conference, Judge Pucillo asked Mr. Epstein whether any promises had been made to him besides the terms of the state plea (A-7:37-38). Mr. Epstein's attorney advised the court of the "confidential [non-prosecution agreement with the United States Attorney's Office] that the parties have agreed to." (A-7:38). He informed the court that Mr. Epstein's failure to comply with the terms of the state plea would violate the non-prosecution agreement (A-7:39-40).

Judge Pucillo then instructed Mr. Epstein's attorney that she wanted

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"a sealed copy of that filed in this case." (A-7:40). When Mr. Epstein's attorney tried to comply, and file the non-prosecution agreement with the court, the clerk advised him an order was necessary. On July 2, 2008, the court entered an "Agreed Order Sealing Document in Court File" (A-9). An addendum to the non-prosecution agreement was filed under seal on August 25, 2008.

On July 7, 2008, Jane Doe 1 and Jane Doe 2 filed an independent action in federal court to compel production of the non-prosecution agreement (A-1). Mr. Epstein was not a party to the proceeding, but the United States Attorney's Office opposed disclosure (A-2). On August 16, 2008, Judge Marra of the Southern District ordered the United States Attorney's Office to produce the non-prosecution agreement to the Does' attorneys and to any other victims and their counsel, provided they not disclose the terms to anyone else (A-2). As a result of this order, all victims, including those with civil suits against Mr. Epstein, have access to the non-prosecution agreement and addendum. They just cannot share it with others.

In September 2008, Jane Doe 1 and Jane Doe 2 filed motions in the federal criminal action to unseal the non-prosecution agreement (A-3). The

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United States Attorney's Office opposed disclosure noting its confidentiality provision, the movant's right to access the agreement, and Judge Marra's protective order to which the movants voiced no objection (A-4). On February 12, 2009,[4] Judge Marra denied the motion, finding in pertinent part:

> Petitioners' mere desire to discuss the Agreement with third parties is insufficient, in and of itself, to warrant the granting of such relief. If and when Petitioners have a specific tangible need to be relieved of the restrictions, they should file an appropriate motion. If a specific tangible need arises in a civil case Petitioners or other alleged victims are pursuing against Epstein, relief should be sought in that case, with notice to the United States, the other party to the Agreement.

(A-6).

Rather than seeking relief from Judge Marra in federal court, non-party [redacted]., a victim of Mr. Epstein, filed a motion in the state criminal action on May 12, 2009, seeking to intervene and unseal the non-prosecution agreement and addendum pursuant to Florida Rule of Judicial Administration 2.420(d)(5) (A-10). [redacted]. alleged that the proper procedures had not been followed in sealing the documents (A-10). [redacted]. claimed these documents are relevant to her civil action against Mr. Epstein and that she,

[4] The order is mistakenly dated February 12, 2008 (A-6).

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as a member of the public, has a right to have them unsealed; and that continued sealing violates public policy (A-10).

On June 1, 2009, Palm Beach Newspapers d/b/a The Palm Beach Post ("The Post") also moved in the state criminal action to intervene and access the agreement and addendum (A-11). The Post alleged the procedures for sealing had not been followed and that "good cause exists for unsealing the documents because of their public significance." (A-11:3).

Fifteenth Judicial Circuit Judge Jeffrey Colbath heard [redacted]'s and The Post's motions in the state criminal action on June 10, 2009 (A-13). The court granted both motions to intervene, but deferred ruling on the motions to unseal pending a later hearing (A-13).

The next day, Mr. Epstein filed a Motion to Make Court Records Confidential (A-13). Mr. Epstein alleged that the documents should remain confidential to prevent a serious imminent threat to the fair, impartial, and orderly administration of justice; to protect a compelling government interest; to avoid substantial injury to innocent third parties; and to avoid substantial injury to a party by disclosure of matters protected by a common

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law and privacy right, not generally inherent in the specific type of proceeding sought to be closed (A-13).

Also on June 11, non-party [redacted]. filed motions to intervene and for an order unsealing the records, alleging grounds similar to non-parties [redacted]. and The Palm Beach Post (A-12).

Judge Colbath heard [redacted]'s, The Post's, and [redacted]'s motions to unseal, and Mr. Epstein's motion for confidentiality, on June 25, 2009 (A-16). The court granted [redacted]'s, The Post's, and [redacted]'s motions and denied Mr. Eptsein's (A-16:2). The court concluded:

> At the time the state court took these matters under seal, the proper procedure for sealing such documents had not been followed . . . [and that] [n]either the State of Florida nor the U.S. Government nor Mr. Epstein have [sic] presented sufficient evidence to warrant the sealing of documents currently held by the court.

(A-16:2; A-18:43). The court ruled that "[t]his Order is in no way to be interpreted as permission to not comply with U.S. District Court Kenneth Marra's previous Orders." (A-16:3). Subsequent to this oral ruling, Mr. Epstein provided the court with a Motion for Stay (A-14). The court stayed disclosure until it could hear Mr. Epstein's motion to stay, scheduled for the

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next day (A-16:3).

The court heard Mr. Epstein's stay motion on June 26, 2009 (A-19). Mr. Epstein alleged that he will be irreparably harmed by disclosure of the non-prosecution agreement and addendum (A-14). No harm will be done if the documents remain under seal pending review by this Court (A-14). The court denied the motion, but stayed disclosure until noon on Thursday, July 2, 2009, so Mr. Epstein could seek review of the denial in this Court (A-17). Mr. Epstein has filed an emergency motion to review denial of stay in this Court, contemporaneously with this motion.

III. NATURE OF RELIEF SOUGHT

Mr. Epstein seeks to quash the June 25, 2009 order granting non-parties' motions to unseal the confidential non-prosecution agreement and addendum between Mr. Epstein and the United States Attorney's Office.

IV. ARGUMENT

The trial court departed from the essential requirements of law in granting the motions to unseal the confidential federal non-prosecution agreement and addendum between the United States Attorney's Office and

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Mr. Epstein. These documents are subject to confidentiality provisions, which the federal court recognized and enforced when it permitted disclosure to the attorneys for Jane Doe 1 and Jane Doe 2, and to any other victims and their counsel, provided they not disclose the terms to anyone else. Disclosure violates a condition of the agreement, thereby vitiating the agreement between Mr. Epstein and the United States Attorney. Disclosure also violates Judge Marra's two orders in the federal district court, denying disclosure to the parties. Judge Colbath paid lip service to this principle in stating that his "Order is in no way to be interpreted as permission to not comply with U.S. District Court Kenneth Marra's previous Orders." (A-16:3). But there is no way disclosure does not inherently violate Judge Marra's orders.

The principle of supremacy required that the state court defer to the federal court on this issue. U.S. Const. Art. I § 8. These documents reference federal grand jury proceedings, which are protected under Federal Rule of Criminal Procedure 6(e)(2)--an attorney for the government "must not disclose a matter occurring before the grand jury." As a consequence of the confidentiality provisions of the non-prosecution agreement, information that disclosed the existence and the subject matter of a federal grand jury

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proceeding which itself is protected by Federal Rule of Criminal Procedure 6(e) remains non-public, thus effectuating the privacy concerns addressed by the United States Supreme Court in Douglas and other cases. See e.g. Douglas Oil Co. v. Petrol Stops Northwest, 441 U.S. 211, 228-30 (1979). Under Rule 6(e), only a federal court can, absent findings, order the unsealing of federal grand jury proceedings. See Fed. R. Crim. P. 6(e)(3)(F), (G). Judge Colbath did not address this principle. Nor did Judge Colbath address the principle of comity, which required that the state court defer to the federal court, which has twice denied disclosure to third parties, on this issue.

The court erred in concluding that the non-prosecution and agreement were not properly sealed. The non-parties filed their motions to unseal pursuant to Florida Rule of Judicial Administration 2.420(d) (A-10, A-11, A-12). They alleged that Judge Pucillo failed to properly seal the documents under the procedure set forth in that rule (Id.). By its terms, however, the procedures for sealing in Rule 2.420(d) (titled, "Request to Make Circuit and County Court Records in **Non-Criminal Cases** Confidential") do **not** apply to criminal cases. See Fla. R. Jud. Admin. 2.420, 2007 Court Commentary ("New subdivision (d) applies to motions that seek to make court records in

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non-criminal cases confidential in accordance with subdivision (c)(9)."); see also In re Amendments to Fla. R. Jud. Admin. 2.420--Sealing of Court Records & Dockets, 954 So. 2d 16, 17 & 23 (Fla. 2007) (declining to adopt specific procedure regarding the sealing of court records in criminal cases and referring the matter to rules committees for further study). Under the version of rule 2.420 in effect when the documents were sealed, there is no procedure for criminal proceedings.

Even under the prior version of rule 2.420, Judge Pucillo was not required to give prior notice of her intent to seal documents during the plea hearing. Committee Notes on the 1995 amendments discussing a prior version of Rule 2.420(c)(9)(D), make clear that advance notice is not always required:

> Unlike the closure of court proceedings, which has been held to require notice and hearing prior to closure, *see Miami Herald Publishing Co. v. Lewis*, 426 So. 2d 1 (Fla. 1982), **the closure of court records has not required prior notice. Requiring prior notice of closure of a court record may be impractical and burdensome in emergency circumstances or when closure of a court record requiring confidentiality is requested during a judicial proceeding.**

The local administrative rule the non-parties cite, 15th Judicial Circuit

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Administrative Order 2.303, is not applicable either. This Administrative Order addresses the procedures for sealing criminal and non-criminal court records, but was not adopted until September 29, 2008--months after Judge Pucillo sua sponte ordered the non-prosecution agreement and its addendum filed and sealed. The Administrative Order in effect when Judge Pucillo sealed these documents was 2.032-10/06. As explained above, the procedures designated therein would not apply since Judge Pucillo filed and sealed the documents sua sponte, not by motion. To the extent that the Administrative Order conflicts with the version of rule 2.420 then in effect, the rule prevails. Judge Pucillo was not required to follow Administrative Order 2.032 when she sealed the documents in June 2008.

Assuming compliance with procedures for confidentiality was required, Mr. Epstein met them. At all times, the rules of judicial administration provided that court records "**shall be confidential**" if a court has determined that confidentiality is required. Fla. R. Jud. Admin. 2.420(c)(9). Rule 2.420(c)(9) provides:

> **(c) Exemptions. The following records of the judicial branch shall be confidential:**
>
> . . . .
>
> (9) Any court record determined to be confidential in case decision or court rule on the grounds that

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> (A) confidentiality is required to
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> (i) prevent a serious and imminent threat to the fair, impartial, and orderly administration of justice;
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> (ii) protect trade secrets;
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> (iii) protect a compelling governmental interest;
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> (v) avoid substantial injury to innocent third parties;
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>
> (vii) comply with established public policy set forth in the Florida or United States Constitution or statutes or Florida rules or case law;
>
> (B) the degree, duration, and manner of confidentiality ordered by the court shall be no broader than necessary to protect the interests set forth in subdivision (A); and
>
> (C) no less restrictive measures are available to protect the interests set forth in subdivision (A).

Fla. R. Jud. Admin. 2.420(c)(9). Thus, courts are required to seal court records upon a finding that closure is need to "**prevent a serious and imminent threat to the fair, impartial, and orderly administration of justice,**" ~~to "avoid substantial injury to innocent third parties" or to "avoid~~ substantial injury to a party by disclosure of matters protected by a common law or privacy right not generally inherent in the specific type of proceeding

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sought to be closed." Fla. R. Jud. Admin. 2.420(c)(9)(i), (v), (vi).

Mr. Epstein's Motion to Make Court Records Confidential satisfied these requirements; thus, the court erred in denying it. Mr. Epstein alleged three separate grounds for confidentiality. He first argued that confidentiality is necessary to protect a compelling government interest. He satisfied this prong since the United States Attorney's Office has a compelling interest in having the confidentiality provision of its contract with Mr. Epstein honored. Judge Marra already balanced that interest against arguments for disclosure and struck a balance by requiring disclosure to plaintiffs and their lawyers, but not to third parties. Secondly, Mr. Epstein contended that maintaining confidentiality will avoid injury to innocent third parties, i.e., the other persons the United States Attorney's Office agreed not to prosecute who will be harmed if the documents are unsealed. Thirdly, Mr. Epstein demonstrated that confidentiality is necessary to avoid substantial injury to a party by disclosure of matters protected by a common law or privacy right not generally inherent in the specific type of proceeding sought to be closed. Disclosure of these documents is not generally inherent in a state court plea hearing and will violate Mr. Epstein's common law right to confidentiality.

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There is no prejudice to non-parties/interveners [redacted]., [redacted]. and The Post, if disclosure is stayed pending the outcome of Mr. Epstein's emergency petition for certiorari. Mr. Epstein, on the other hand, will suffer irreparable harm once the documents are produced--a fact the trial court recognized (A-19:16).

CONCLUSION

This Court should grant certiorari and quash the June 25, 2009 order granting non-parties' motions to unseal the confidential non-prosecution agreement and addendum between Mr. Epstein and the United States Attorney's Office.

CERTIFICATION OF EXISTENCE OF EMERGENCY

Undersigned counsel certifies that the subject of this petition constitutes an emergency. The trial court's order at **noon on July 2, 2009**, provides that the confidential federal non-prosecution agreement and addendum will be disclosed. Once these documents are disclosed, irreparable harm will result.

EFTA00232283

I HEREBY CERTIFY that a copy of the foregoing has been sent by

E-Mail and Federal Express this 30th day of June, 2009, to:

JEFFREY H. SLOMAN
U.S. Attorney's Office-Southern District
500 South Australian Avenue, Suite 400
West Palm Beach, FL 33401

JUDITH STEVENSON ARCO
State Attorney's Office-West Palm Beach
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Counsel for The Palm Beach Post

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Counsel for [redacted].

HONORABLE JEFFREY COLBATH
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205 North Dixie Highway
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ROBERT D. CRITTON
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250 Australian Avenue South, Suite 1400
West Palm Beach, FL 33401
[redacted]
and

EFTA00232284

JANE KREUSLER-WALSH and
BARBARA J. COMPIANI of
KREUSLER-WALSH, COMPIANI & VARGAS, P.A.
501 South Flagler Drive, Suite 503
West Palm Beach, FL 33401-5913
[redacted]
Counsel for Petitioner

By: _____
JANE KREUSLER-WALSH
Florida Bar No. [redacted]

EFTA00232285

THOMAS | LOCICERO
& | BRALOW

400 N. [redacted] Drive•Suite 1100•Tampa, FL 33602
[redacted] (Phone)• [redacted] (Fax)
Toll Free: [redacted]

facsimile transmittal

To:	**Marilyn, Judicial Assistant to Judge Colbath**	FAX	[redacted]
	R. Alexander Acosta, Esq., USAO		[redacted]
	Barbara Burns, Esq., ASAO		[redacted]
	Jack Alan Goldberger, Esq.		[redacted]
	Bradley J. Edwards, Esq. **William J. Berger, Esq.**		[redacted]
	Robert D. Critton, Esq.		[redacted]
	Spencer T. Kuvin, Esq.		[redacted]
From:	**Deanna K. Shullman, Esq.**	Date:	**06/04/2009**
Re:	**State v. J. Epstein**	Pages:	**5**

Urgent ☐	For review ☐	Please comment ☐	Please reply ☐	Please recycle ☐

Please see attached proposed Order.

CONFIDENTIALITY STATEMENT
This electronic message transmission contains information from the law firm of [redacted] LoCicero & Bralow PL and is confidential or privileged. The information is intended to be for the use of the individual or entity named above. If you are not the intended recipient, be aware that any disclosure, copying, distribution or use of the contents of this information is prohibited. If you have received this electronic transmission in error, please notify us by telephone [redacted] immediately. Thank you for your cooperation.

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Deanna K. Shullman
Direct Dial: [redacted]

Reply To Tampa

June 26, 2009

VIA FASCIMILE

The Honorable Jeffrey Colbath
Fifteenth Judicial Circuit-Palm Beach
Palm Beach County Courthouse
Main Judicial Complex
205 N. Dixie Highway, Room 11F
West Palm Beach, FL 33401

Re: State of Florida v. Jeffrey Epstein

Dear Judge Colbath:

This law firm represents the Palm Beach Post in the above matter. I have prepared a proposed Order, which I believe accurately reflects your ruling at the hearing on June 26, 2009 on Defendant Jeffrey Epstein's Motion to Stay Disclosure of the Non-Prosecution Agreement and Addendum Pending Review.

By copy of this letter, I am providing all counsel of record a copy of the proposed Order. If the attached Order meets with Your Honor's approval, please enter the same. If you would like to have an electronic copy of this proposed order, please have your Judicial Assistant call my office to make arrangements for us to send you the order via email.

Sincerely,

[redacted] LOCICERO & BRALOW PL

Deanna K Shullman

Deanna K. Shullman

DKS/kb
Enclosures

cc: U.S. Attorney's Office (via facsimile)
State Attorney's Office (via facsimile)
Jack Alan Goldberger, Esq. (via facsimile)
Bradley J. Edwards, Esq. (via facsimile)
Deanna K. Shullman, Esq. (via facsimile)
Spencer T. Kuvin, Esq. (via facsimile)

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

STATE OF FLORIDA

vs. Case Nos.: 2006-CF9454-AXX &
2008-9381CF-AXX

JEFFREY EPSTEIN
_____/

ORDER

This matter came before the Court on Defendant Jeffrey Epstein's Motion to Stay Disclosure of the Non-Prosecution Agreement and Addendum Pending Review and upon further consideration of this Court's June 26, 2009 Order unsealing certain records in this case. A hearing was conducted on these matters on June 26, 2009.

On June 26, 2009, this Court entered an order unsealing the non-prosecution agreement and an addendum on file in this case. Having inspected the documents, this Court finds that they do not name any victims and do not contain any material subject to confidentiality pursuant to Federal Rule of Criminal Procedure 6. Thus, the Court declines to make any redactions to the records before releasing them to the public.

The Court further finds that Defendant has not demonstrated that a stay pending appeal is warranted. Defendant has not shown any irreparable harm or likelihood of success on the merits on appeal. These documents were not properly closed in the first instance, no present basis for closure exists, and good cause supports disclosure given the public interest in these proceedings and the lack of compelling interest in closure.

Accordingly, it is ordered and adjudged as follows:

1. Effective at noon on July 2, 2009, the non-prosecution agreement (docketed July 2, 2008) and addendum (docketed August 25, 2008) are unsealed;

2. Defendant's Motion for Stay pending appellate review is DENIED;

3. The Clerk of Court is directed to release the documents to the public at noon on Thursday, July 2, 2009.

Done and ordered this _____ day of June, 2009 in Palm Beach County, West Palm Beach, Florida.

Hon. Jeffrey Colbath
CIRCUIT JUDGE

cc: U.S. Attorney's Office
State Attorney's Office
Jack Alan Goldberger, Esq.
Bradley J. Edwards, Esq.
Deanna K. Shullman, Esq.
Spencer T. Kuvin, Esq.

EFTA00232290

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BOARD CERTIFIED APPELLATE LAWYERS

TELEPHONE [redacted]
FACSIMILE [redacted]

June 30, 2009

By Hand Delivery

Honorable Jeffrey Colbath
Palm Beach County Courthouse
Fifteenth Judicial Circuit
205 North Dixie Highway, Room 11F
West Palm Beach, FL 33401

Re: Epstein v. State of Florida
15th Circuit Court Case No. 2008CF009381A

Dear Judge Colbath:

Enclosed is a copy of Epstein's Emergency Petition for Writ of Certiorari, Emergency Motion to Review Denial of Stay, Motion to Use One Appendix and Motion to Seal, as filed with the Fourth District Court of Appeal. Due to the volume of the appendix, we have only enclosed the table of contents. Please let us know if you wish to receive a copy of the appendix. Thank you.

Very truly yours,

JANE KREUSLER-WALSH

JKW/bl
Enclosure
cc/enc. Robert D. Critton
Jack A. Goldberger
Jeffrey H. Sloman
Judith Stevenson Arco
William J. Berger
Deanna K. Shullman
Spencer T. Kuvin

IN THE DISTRICT COURT OF APPEAL OF THE STATE OF FLORIDA, FOURTH DISTRICT

JEFFREY EPSTEIN,

Petitioner,

v.

STATE OF FLORIDA,

Respondent.
_____/

CASE NO. _____
PALM BEACH COUNTY
L.T. CASE NO. 2008 CF 009381A

APPENDIX TO
EMERGENCY PETITION FOR WRIT OF CERTIORARI AND EMERGENCY MOTION TO REVIEW DENIAL OF STAY

ROBERT D. CRITTON
BURMAN, CRITTON, LUTTIER & COLEMAN
515 North Flagler Drive, Suite 400
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and
JANE KREUSLER-WALSH and
BARBARA J. COMPIANI of
KREUSLER-WALSH, COMPIANI & VARGAS, P.A.
501 South Flagler Drive, Suite 503
West Palm Beach, FL 33401-5913
[redacted]
Counsel for Petitioner

APPENDIX

TO REORDER CALL [redacted]

RECYCLED PAPER

Document	Tab
Proceedings in Southern District Court	
Victim's (Doe) Petition for Enforcement of Crime Victim's Right Act, 18 U.S.C. Section 3771	A-1
Judge Marra's Order to Compel Production and Protective Order (8/21/08)	A-2
Victims' (Doe #1 and Doe #2) Motion to Unseal Non-Prosecution Agreement (9/25/08)	A-3
Respondent's (U.S. Attorney's Office) Opposition to Victims' Motion to Unseal Non-Prosecution Agreement (10/8/08)	A-4
Victims' (Doe #1 and Doe #2) Reply to Respondent's Opposition to Victims' Motion to Unseal Non-Prosecution Agreement (10/16/08)	A-5
Judge Marra's Order Denying Petitioners' (Doe #1 and Doe #2). Motion to Unseal Non-Prosecution Agreement (2/12/08 [sic should be 2/12/09])	A-6
Proceedings in 15th Judicial Circuit	
Transcript of Epstein's Plea Conference (6/30/08)	A-7
Epstein's Plea (6/30/08)	A-8
Agreed Order Sealing Document in Court File (7/2/08)	A-9
NonParty [redacted]'s Motion to Vacate Order Sealing Records And Unseal Records (5/12/09)	A-10
Palm Beach Post's Motion to Intervene and Petition for Access (6/1/09)	A-11
Applicant, [redacted]'s Motion to Intervene and Supporting Memorandum of Law (6/11/09)	A-12

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Epstein's Motion to Make Court Records Confidential (6/11/09)	A-13
Epstein's Motion to Stay Disclosure of the Non-Prosecution Agreement and Addendum Pending Review (6/25/09)	A-14
Intervener's [[redacted].] Response to Motion to Stay and Supporting Memorandum of Law (6/26/09)	A-15
Order of Judge Jeffrey J. Colbath granting motions to unseal (6/25/09)	A-16
Order of Judge Jeffrey J. Colbath denying motion to stay (6/26/09)	A-17
Transcript on non-parties' motions to unseal and Epstein's motion for confidentiality (6/25/09)	A-18
Transcript on Epstein's motion to stay (6/26/09)	A-19

LEGAL
OFFICE PRODUCTS & SUPPLIES
RECYCLED PAPER
TO REORDER CALL [redacted]

EFTA00232296

FILED by D.C.
ELECTRONIC
JULY 7, 2008
STEVEN M. LARIMORE
CLERK U.S. DIST. CT.
S.D. OF FLA. - MIAMI

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

08-80736-Civ-MARRA/JOHNSON
CASE NO.:

IN RE: JANE DOE,

Petitioner.

Emergency **VICTIM'S PETITION FOR ENFORCEMENT OF CRIME VICTIM'S RIGHTS ACT, 18 U.S.C. SECTION 3771**

COMES NOW the Petitioner, JANE DOE (hereinafter "Petitioner"), by and through her undersigned attorneys, pursuant to the Crime Victim's Rights Act, 18 U.S.C. Section 3771 ("CVRA"), and files this Petition for Enforcement in the above styled action as follows:

1. Petitioner, an adult, as a minor child was a victim of federal crimes committed by JEFFREY EPSTEIN (hereinafter "Defendant"). These crimes included sex trafficking of children by fraud, in violation of 18 U.S.C. § 1591, use of a means of interstate commerce to entice a minor to commit prostitution, in violation of 18 U.S.C. § 2422, as well as wire fraud, in violation of 18 U.S.C. § 1343. The Defendant committed these crimes within the jurisdiction of the Southern District of Florida in Palm Beach County, Florida.

2. Upon information and belief, the Defendant is the subject of a federal criminal investigation conducted by the United States of America in the Southern District of Florida. The Defendant has recently been prosecuted and pleaded guilty, on June 30, 2008, in the Circuit Court for Palm Beach County to various similar state offenses including solicitation of minors for prostitution.

3. Upon information and belief, the Defendant is engaged in plea negotiations with the Office of the United States Attorney for the Southern District of Florida concerning federal

EFTA00232297

crimes which he is alleged to have committed against minor children, including the Petitioner. Such negotiations may likely result in a disposition of the charges in the next several days.

4. Under the CVRA, before any charges are filed against the Defendant, the Petitioner has the rights (among others) to notice of her rights under the CVRA, to confer with the prosecutors, and to be treated with fairness. As soon as charges are filed, the Petitioner has the rights (among others) to timely notice of court proceedings, the right not to be excluded from such proceedings, the right to be heard at such public proceedings regarding conditions of release, any plea, and any sentence, the right to confer with the attorney for the government, the right to restitution, and the right to be treated with fairness and with respect for her dignity and privacy.

5. The Petitioner has been denied her rights in that she has received no consultation with the attorney for the government regarding the possible disposition of the charges, no notice of any public court proceedings, no information regarding her right to restitution, and no notice of rights under the CVRA, as required under law.

6. The Petitioner is in jeopardy of losing her rights, as described above, if the government is able to negotiate a plea or agreement with the Defendant without her participation and knowledge.

WHEREFORE, for the reasons outlined above, the Petitioner respectfully requests this Court to grant her Petition, and to order the United States Attorney to comply with the provisions of the CVRA prior to and including any plea or other agreement with the Defendant and any attendant proceedings.

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MEMORANDUM

I. THE CRIME VICTIMS' RIGHTS ACT MAKES CRIME VICTIMS INDEPENDENT PARTICIPANTS THROUGHOUT THE CRIMINAL JUSTICE PROCESS.

In October 2004, Congress passed and the President signed into law the Crime Victims' Rights Act, Pub. L. No. 108-405, 118 Stat. 2251 (codified at 18 U.S.C. § 3771). Because this appears to be the first case involving the Act to come before this Court, a bit of background may be in order.

A. The CVRA Gives Crime Victims Rights to Participate in the Criminal Justice Process.

Congress passed the CVRA "to give crime victims enforceable rights to participate in federal criminal proceedings." Opinion at 14. Congress was concerned that in the federal system crime victims were "treated as non-participants in a critical event in their lives. They were kept in the dark by prosecutors too busy to care enough ... and by a court system that simply did not have a place for them." 150 CONG. REC. S4262 (Apr. 22, 2004) (statement of Sen. Feinstein). To remedy this problem, Congress gave victims "the simple right to know what is going on, to participate in the process where the information that victims and their families can provide may be material and relevant ... ." *Id.*

The CVRA gives victims of federal crimes a series of rights, including the right to notice of court proceedings, to be heard at plea and sentencing hearings, and to reasonably "confer with the attorney for the Government in the case." 18 U.S.C. § 3771(a). Victims also have a "right of access to the terms of a plea agreement ... ." *In re Interested Party 1*, 530 F.Supp. 2d 136, 2008 WL 134233 at *7 (D.D.C. 2008). The CVRA also assures victims broadly that they will "be treated with fairness." 18 U.S.C. § 3771(a)(8).

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Of course, these rights would be of little use to most crime victims unless they were told about them. To ensure that victims are notified of their rights, the CVRA directs employees of the Justice Department "and other departments and agencies of the United States engaged in the detection, investigation, or prosecution of crime" to use their "best efforts to see that crime victims are notified of ... the rights described [in the CVRA]." 18 U.S.C. § 3771(c)(1) (emphasis added).1

B. The CVRA Gives Victims Rights During the Investigation of a Crime.

The CVRA gives victims rights during the investigation of a crime. The Fifth Circuit recently reached this conclusion, holding:

> The district court acknowledged that "[t]here are clearly rights under the CVRA that apply before any prosecution is underway." BP Prods., 2008 WL 501321 at *11, 2008 U.S. Dist. LEXIS 12893, at *36. Logically, this includes the CVRA's establishment of victims' "reasonable right to confer with the attorney for the Government." 18 U.S.C. § 3771(a)(5). At least in the posture of this case (and we do not speculate on the applicability to other situations), the government should have fashioned a reasonable way to inform the victims of the likelihood of criminal charges and to ascertain the victims' views on the possible details of a plea bargain.

In re Dean, 527 F.3d 391, 394 (5th Cir. 2008).

The position that CVRA rights apply before charges have been filed is consistent with the Justice Department regulations under the CVRA, which explain that government officials "must advise a victim [about their rights under the CVRA] ... at the earliest opportunity at which it may be done without interfering with an investigation." A.G. GUIDELINES FOR VICTIM AND WITNESS

1 Further supporting this requirement is another statute, 42 U.S.C. § 10607(c)(3), which directs government officials to provide victims with "the earliest possible notice of," among other things, "the filing of charges against a suspected offender."

EFTA00232300

ASSISTANCE 23 (May 2005). And the plain language of the CVRA undergirds this conclusion, as it applies not simply to prosecutors but to government agencies "engaged in the detection [and] investigation ... of crime ... ." 18 U.S.C. § 3771(c)(1). Indeed, if there were any doubt, the plain language of the CVRA extends victims' right to situations "in which no prosecution is underway." 18 U.S.C. § 3771(d)(3).

II. PETITIONER IS A "VICTIM PROTECTED BY THE CVRA.

Under the CVRA the crime victim is defined as "a person directly and proximately harmed as a result of the commission of a Federal offense ... ." 18 U.S.C. Section 3771(e). In particular, Defendant called Petitioner when she was a minor over a telephone (a means of interstate communication) requesting that she perform a massage in exchange for payment. As Defendant well knew, that request was fraudulent, as he not only intended to receive a massage, but also intended to have her perform sexual acts in exchange for a cash payment to Petitioner. Only when Petitioner arrived at a Defendant's mansion as directed by Defendant, did Defendant reveal his true purpose of obtaining sexual favors in exchange for payment. This conduct violated 18 U.S.C. § 2422, which forbids using a means of interstate commerce to knowingly "induce" or "entice" a minor "to engage in prostitution." In addition, this conduct was both a use of "fraud" to obtain a commercial sex act, in violation of 18 U.S.C § 1591, and use of wire communications to perpetrate a "scheme and artifice to defraud," in violation of 18 U.S.C. § 1343.

It appears obvious that Petitioner was "directly and proximately" harmed by these crimes, thereby making her a victim under the CVRA. It should be emphasized that the CVRA "was designed to be a 'broad and encompassing' statutory victims' bill of rights." *United States v.*

EFTA00232301

Degenhardt, 405 F.Supp.2d 1341, 1342 (D. Utah 2005) (quoting 150 Cong. Rec. S4261 (daily ed. Apr. 22, 2004) (statement of Sen. Feinstein)). Congress intended the CVRA to dramatically rework the federal criminal justice system. In the course of construing the CVRA generously, the Ninth Circuit observed: "The criminal justice system has long functioned on the assumption that crime victims should behave like good Victorian children -- seen but not heard. The Crime Victims' Rights Act sought to change this by making victims independent participants in the criminal justice process." *Kenna v. U.S. Dist. Court for C.D. Cal.*, 435 F.3d 1011, 1013 (9th Cir. 2006). Accordingly, because the CVRA is remedial legislation, courts should interpret it "liberally to facilitate and accomplish its purposes and intent." *Elliott Industries Ltd. Partnership v. BP America Production Co.*, 407 F.3d 1091, 1118 (10th Cir. 2005) (noting remedial legislation should be "interpreted liberally to facilitate and accomplish its purposes and intent"). The CVRA itself suggests this conclusion by requiring that courts must treat crime victims with "fairness." *United States v. Patkar*, 2008 WL 233062 at *3 (D. Haw. 2008) (citing *United States v. Turner*, 367 F.Supp.2d 319, 335 (E.D.N.Y. 2005)).

Not only must the CVRA as a whole be interpreted liberally, but its definition of "crime victim" requires a generous construction. After reciting the direct-and-proximate-harm language at issue here, one of the Act's two co-sponsors -- Senator Kyl -- explained that "[t]his is an intentionally broad definition because all victims of crime deserve to have their rights protected ... ." 150 Cong. Rec. S10912 (Oct. 9, 2004) (emphasis added). The description of the victim definition as "intentionally broad" was in the course of floor colloquy with the other primary sponsor of the CVRA and therefore deserves significant weight. *See Kenna*, 435 F.3d at 1015-16 (discussing significance of CVRA sponsors= floor statements).

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The definition of "crime victims" must thus be construed broadly in favor of Petitioner. She obviously qualifies as a "victim" under the CVRA.

III. PETITIONER IS ENTITLED TO NOTICE OF HER RIGHTS, AN OPPORTUNITY TO CONFER WITH THE PROSECUTORS AND TO BE TREATED WITH FAIRNESS.

Because Petitioner is a "victim" under the CVRA, she has certain protected rights under the Act. Most important, the Act promises that she will have an opportunity to "confer with the attorney for the Government in the case." To date, Petitioner has not been given that right. This raises that very real possibility that the Government may negotiate and conclude a plea agreement with the Defendant without giving Petitioner her protected rights.2

Petitioner is entitled to have this conference with prosecutors before any final plea agreement is reached. The Fifth Circuit reached exactly this conclusion in a very recent case. In *In re Dean*, 527 F.3d 391 (5th Cir. 2008), the Government negotiated a plea agreement with the well-heeled corporate defendant without conferring with the victims. When the Government's failure was challenged in the Fifth Circuit, the Fifth Circuit concluded that the Government had indeed violated the CVRA. The Fifth Circuit observed: "In passing the [CVRA], Congress made the policy decision-which we are bound to enforce-that the victims have a right to inform the plea negotiation process by conferring with prosecutors before a plea agreement is reached." *Id.* at 394.

This Court is obligated to protect the rights of Petitioner. The CVRA directs that "[i]n any court proceeding involving an offense against a crime victim, the court shall ensure that the

2 On information and belief, roughly the same crimes were committed against several other young females. These victims, too, are in danger of losing their right to confer under the CVRA.

EFTA00232303

crime victim is afforded the rights described in [the CVRA]." 18 U.S.C. § 3771(b)(1). The CVRA also confers on crime victims the right to "assert the rights described in [the CVRA]." 18 U.S.C. § 3771(d)(1). Therefore, this Court has its own independent obligation to intercede and ensure that the Government respects the rights of Petitioner under the CVRA.

CONCLUSION

The Petitioner requests the intervention of this Court to ensure that her rights are respected and accorded, as promised in the Crime Victims' Rights Act.

DATED this 7th day of July, 2008.

Respectfully Submitted,

THE LAW OFFICE OF BRAD EDWARDS & ASSOCIATES, LLC



Brad Edwards, Esquire
Attorney for Petitioner
Florida Bar #[redacted]
2028 Harrison Street
Suite 202
Hollywood, Florida 33020
Telephone:
Facsimile:

EFTA00232304

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the above and foregoing has been provided by United States mail and via facsimile to: [redacted], AUSA, United States Attorney's Office, 500 South Australian Avenue, Suite 400, West Palm Beach, Florida 33401, this 7th day of July, 2008.

Brad Edwards, Esquire
Attorney for Petitioner
Florida Bar No[redacted]

EFTA00232305

08-80736-Civ-MARRA/JOHNSON

Case 9:08-cv-80736-KAM Document 1 Entered on FLSD Docket 07/07/2008 Page 1 of 10

FILED by D.C.
ELECTRONIC
JULY 7, 2008
STEVEN M. LARIMORE
CLERK U.S. DIST. CT.
S.D. OF FLA. - MIAMI

JS 44 (Rev. 2/08)

CIVIL COVER SHEET

The JS 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON THE REVERSE OF THE FORM.) **NOTICE: Attorneys MUST Indicate All Re-filed Cases Below.**

I. (a) PLAINTIFFS
In re: Jane Doe

DEFENDANTS
United States of

(b) County of Residence of First Listed Plaintiff Palm Bch.
(EXCEPT IN U.S. PLAINTIFF CASES)

County of Residence of First Listed Defendant _____
(IN U.S. PLAINTIFF CASES ONLY)

NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF THE TRACT OF LAND INVOLVED.

(c) Attorney's (Firm Name, Address, and Telephone Number)
Law office of Brad Edwards & Associates
2028 Harrison Street
Suite 202.
Hollywood, FL 33020

[redacted] U.S. attys office

(d) Check County Where Action Arose: ☐ MIAMI-DADE ☐ MONROE ☐ BROW[redacted] ☒ PALM BEACH ☐ MARTIN ☐ ST. LUCIE ☐ INDIAN RIVER ☐ OKEECHOBEE ☐ HIGHLANDS

II. BASIS OF JURISDICTION (Place an "X" in One Box Only)

- ☐ 1 U.S. Government Plaintiff
- ☐ 3 Federal Question (U.S. Government Not a Party)
- ☒ 2 U.S. Government Defendant
- ☐ 4 Diversity (Indicate Citizenship of Parties in Item III)

08CV80736 MARRA/JOHNSON

III. CITIZENSHIP OF PRINCIPAL PARTIES (Place an "X" in One Box for Plaintiff and One Box for Defendant)
(For Diversity Cases Only)

	PTF	DEF		PTF	DEF
Citizen of This State	☐ 1	☐ 1	Incorporated or Principal Place of Business In This State	☐ 4	☐ 4
Citizen of Another State	☐ 2	☐ 2	Incorporated and Principal Place of Business In Another State	☐ 5	☐ 5
Citizen or Subject of a Foreign Country	☐ 3	☐ 3	Foreign Nation	☐ 6	☐ 6

IV. NATURE OF SUIT (Place an "X" in One Box Only)

CONTRACT	TORTS		FORFEITURE/PENALTY	BANKRUPTCY	OTHER STATUTES
☐ 110 Insurance	PERSONAL INJURY	PERSONAL INJURY	☐ 610 Agriculture	☐ 422 Appeal 28 USC 158	☐ 400 State Reapportionment
☐ 120 Marine	☐ 310 Airplane	☐ 362 Personal Injury - Med. Malpractice	☐ 620 Other Food & Drug	☐ 423 Withdrawal 28 USC 157	☐ 410 Antitrust
☐ 130 Miller Act	☐ 315 Airplane Product Liability	☐ 365 Personal Injury - Product Liability	☐ 625 Drug Related Seizure of Property 21 USC 881	PROPERTY RIGHTS	☐ 430 Banks and Banking
☐ 140 Negotiable Instrument	☐ 320 Assault, Libel & Slander	☐ 368 Asbestos Personal Injury Product Liability	☐ 630 Liquor Laws	☐ 820 Copyrights	☐ 450 Commerce
☐ 150 Recovery of Overpayment & Enforcement of Judgment	☐ 330 Federal Employers' Liability	PERSONAL PROPERTY	☐ 640 R.R. & Truck	☐ 830 Patent	☐ 460 Deportation
☐ 151 Medicare Act	☐ 340 Marine	☐ 370 Other Fraud	☐ 650 Airline Regs.	☐ 840 Trademark	☐ 470 Racketeer Influenced and Corrupt Organizations
☐ 152 Recovery of Defaulted Student Loans (Excl. Veterans)	☐ 345 Marine Product Liability	☐ 371 Truth in Lending	☐ 660 Occupational Safety/Health		☐ 480 Consumer Credit
☐ 153 Recovery of Overpayment of Veteran's Benefits	☐ 350 Motor Vehicle	☐ 380 Other Personal Property Damage	☐ 690 Other		☐ 490 Cable/Sat TV
☐ 160 Stockholders' Suits	☐ 355 Motor Vehicle Product Liability	☐ 385 Property Damage Product Liability	LABOR	SOCIAL SECURITY	☐ 810 Selective Service
☐ 190 Other Contract	☐ 360 Other Personal Injury		☐ 710 Fair Labor Standards Act	☐ 861 HIA (1395ff)	☐ 850 Securities/Commodities Exchange
☐ 195 Contract Product Liability			☐ 720 Labor/Mgmt. Relations	☐ 862 Black Lung (923)	☐ 875 Customer Challenge 12 USC 3410
☐ 196 Franchise			☐ 730 Labor/Mgmt.Reporting & Disclosure Act	☐ 863 DIWC/DIWW (405(g))	☐ 890 Other Statutory Actions
REAL PROPERTY	CIVIL RIGHTS	PRISONER PETITIONS	☐ 740 Railway Labor Act	☐ 864 SSID Title XVI	☐ 891 Agricultural Acts
☐ 210 Land Condemnation	☐ 441 Voting	☐ 510 Motions to Vacate Sentence Habeas Corpus:	☐ 790 Other Labor Litigation	☐ 865 RSI (405(g))	☐ 892 Economic Stabilization Act
☐ 220 Foreclosure	☐ 442 Employment	☐ 530 General	☐ 791 Empl. Ret. Inc. Security Act	FEDERAL TAX SUITS	☐ 893 Environmental Matters
☐ 230 Rent Lease & Ejectment	☐ 443 Housing/ Accommodations	☐ 535 Death Penalty	IMMIGRATION	☐ 870 Taxes (U.S. Plaintiff or Defendant)	☐ 894 Energy Allocation Act
☐ 240 Torts to Land	☐ 444 Welfare	☐ 540 Mandamus & Other	☐ 462 Naturalization Application	☐ 871 IRS - Third Party 26 USC 7609	☐ 895 Freedom of Information Act
☐ 245 Tort Product Liability	☐ 445 Amer. w/Disabilities - Employment	☐ 550 Civil Rights	☐ 463 Habeas Corpus-Alien Detainee		☐ 900 Appeal of Fee Determination Under Equal Access to Justice
☐ 290 All Other Real Property	☐ 446 Amer. w/Disabilities - Other	☐ 555 Prison Condition	☐ 465 Other Immigration Actions		☐ 950 Constitutionality of State Statutes
	☒ 440 Other Civil Rights				

V. ORIGIN (Place an "X" in One Box Only)

☒ 1 Original Proceeding ☐ 2 Removed from State Court ☐ 3 Re-filed- (see VI below) ☐ 4 Reinstated or Reopened ☐ 5 Transferred from another district (specify) ☐ 6 Multidistrict Litigation ☐ 7 Appeal to District Judge from Magistrate Judgment

VI. RELATED/RE-FILED CASE(S). (See instructions second page)
a) Re-filed Case ☐ YES ☐ NO b) Related Cases ☐ YES ☐ NO
JUDGE _____ DOCKET NUMBER _____

VII. CAUSE OF ACTION
Cite the U.S. Civil Statute under which you are filing and Write a Brief Statement of Cause (Do not cite jurisdictional statutes unless diversity): Crime Victim's Rights Act 18 USC § 3771
Petition on behalf of victim of sex offenses to be accorded her rights under the CVRA
LENGTH OF TRIAL via 1 days estimated (for both sides to try entire case)

VIII. REQUESTED IN COMPLAINT:
☐ CHECK IF THIS IS A CLASS ACTION UNDER F.R.C.P. 23
DEMAND $
CHECK YES only if demanded in complaint:
JURY DEMAND: ☐ Yes ☐ No

ABOVE INFORMATION IS TRUE & CORRECT TO THE BEST OF MY KNOWLEDGE
SIGNATURE OF ATTORNEY OF RECORD
DATE 7-7-08

FOR OFFICE USE ONLY
AMOUNT 350.00 RECEIPT # 124403 IFP _____

10 of 10

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LEGAL OFFICE PRODUCTS & SUPPLIES an ALL-STATE LEGAL company SINCE 1977

RECYCLED PAPER

TO REORDER CALL 9[redacted]

EFTA00232307

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

NO. 08-80736-CIV-MARRA/JOHNSON

IN RE: JANE DOES 1 AND 2,

Petitioners.
_____/

ORDER TO COMPEL PRODUCTION AND PROTECTIVE ORDER

THIS CAUSE comes before the Court on the Petitioners' *ore tenus* motion seeking the production of the Non-Prosecution Agreement between the United States Attorney's Office for the Southern District of Florida ("USAO") and Jeffrey Epstein ("Epstein"). After consideration of the Motion, the arguments of the parties, and the record, it is **ORDERED AND ADJUDGED** that the Petitioners' Motion is **GRANTED**. The USAO shall produce the Non-Prosecution Agreement, including any modifications and addenda thereto, in accordance with the following procedures:

(a) The USAO shall produce a copy of the Non-Prosecution Agreement, including any modifications and addenda thereto (collectively referred to as the "Agreement"), to the attorneys for Petitioners.

(b) Petitioners and their attorneys shall not disclose the Agreement or its terms to any third party absent further court order, following notice to and an opportunity for Epstein's counsel to be heard.

(c) Before counsel for petitioners show the Agreement to their clients or discuss the specific terms with them, they must provide a copy of this Order to petitioners, who must review and acknowledge their receipt of, and agreement to abide by, the terms of the Order. Counsel for petitioners must promptly provide a copy of that acknowledgment to the USAO.

(d) If any individuals who have been identified by the USAO as victims of

Epstein and/or any attorney(s) for those individuals request the opportunity to review the Agreement, then the USAO shall produce the Agreement to those individuals, so long as those individuals also agree that they shall not disclose the Agreement or its terms to any third party absent further court order, following notice to and an opportunity for Epstein's counsel to be heard

(e) Prior to producing the documents to any other individuals who have been identified by the USAO as victims of Epstein and/or any attorney(s) for those individuals, a copy of this Order must be provided to said individuals, who must review and acknowledge their receipt of, and agreement to abide by, the terms of this Order. Counsel for petitioners must promptly provide a copy of that acknowledgment to the USAO.

DONE and ORDERED in Chambers, in West Palm Beach, Palm Beach County, Florida, this 21st day of August, 2008.

KENNETH A. MARRA
UNITED STATES DISTRICT JUDGE

Copies furnished to: all counsel of record

By signing below, I certify that I have reviewed and agree to be bound by the terms of this Order.

Dated: _____ Signed by: _____
Printed Name:

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RECYCLED PAPER

TO REORDER CALL 954-846-9399

EFTA00232310

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

CASE NO.: 08-80736-CIV-MARRA/JOHNSON

JANE DOE #1 AND JANE DOE #2,

Petitioners,

v.

UNITED STATES OF AMERICA,

Respondent.

VICTIM'S MOTION TO UNSEAL NON-PROSECUTION AGREEMENT

COMES NOW the Petitioners, Jane Doe #1 and Jane Doe #2, by and through their undersigned attorneys, pursuant to the Crime Victim's Rights Act, 18 U.S.C. Section 3771 ("CVRA"), and file this motion to unseal the non-prosecution agreement that has been provided to their attorneys under seal in this case. The agreement should be unsealed because no good cause exists for sealing it. Moreover, the Government has inaccurately described the agreement in its publicly-filed pleadings, creating a false impression that the agreement protects the victims. Finally, the agreement should be unsealed to facilitate consultation by victims' counsel with others involved who have information related to the case.

BACKGROUND

As the court is aware, this action was brought by two crime victims (hereinafter referred to as "the victims") seeking protection of their rights under the Crime Victim's Rights Act, 18 U.S.C. § 3771. At the center of this action is an agreement between the United States and Jeffrey Epstein that (as described in earlier court pleadings publicly filed by the Government) involved

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Epstein's entry of guilty pleas to various state charges and an 18-month jail sentence, in exchange for which the U.S. Government apparently agreed to defer all federal prosecution – including any federal prosecution for the federal crimes committed against the victims.

At a hearing held on August 14, 2008, the court ordered the Government to produce to counsel for the victims the non-prosecution agreement. That production, however, was to be done under protective order in the first instance. The agreement has now been produced. At the earlier hearing, the court recognized that the victims' counsel might at a later date seek to have the sealing lifted. That date has now arrived.

ARGUMENT

As the court envisioned might well happen, counsel for the victims now believe that sealing of the agreement is no longer appropriate. The non-prosecution agreement should now be unsealed for three reasons.

1. No Good Cause Has Been Shown for Sealing the Agreement.

Having now reviewed the agreement, counsel for the victims can find no legitimate basis for the document to be sealed. Because it stands at the center of this litigation (as well as several related civil suits), the burden should fall on those who would keep the document sealed to show cause for doing so. No good cause has yet been shown. *Cf. United States v. Ochoa-Vasque*, 428 F.3d 1015 (11th Cir. 2005) (to justify sealing of court records "a court must articulate the overriding interest along with findings specific enough that a reviewing court can determine whether the closure order was properly entered").

2. The Government Has Inaccurately Described the Agreement.

In its publicly-filed pleadings in this case, the Government has inaccurately

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described the non-prosecution agreement, creating the false impression that it is more favorable to the victims than it actually is. Accordingly, the non-prosecution agreement should be unsealed so that the true state of affairs is reflected in the court's file.

In its response to the victims' petition, the Government states that the non-prosecution agreement contains the following provision:

> Any person, who while a minor, was a victim of a violation of an offense enumerated in Title 18, United states Code, Section 2255; will have the same rights to proceed under Section 2255 as she would have had, if Mr. Epstein had been tried federally and convicted of an enumerate offense. For purposes of implementing this paragraph, the United States shall provide Mr. Epstein's attorneys with a list of individuals whom it was prepared to name in an Indictment as victims of an enumerated offense by Mr. Epstein. Any judicial authority interpreting this provision, including any authority determining which evidentiary burdens if any a plaintiff must meet, shall consider that it is the intent of the parties to place these identified victims in the same position as they would have been had Mr. Epstein been convicted at trial. No more; no less.

Govt's Resp. to Victim's Emergency Petition for Enforcement of Crime Victim's Right at 4. The sworn declaration of the Assistant U.S. Attorney handling this matter also recounts the same language. *See* Declaration of [redacted] in Support of United States' Response to Victims' Emergency Petition at 3-4. The sworn declaration also states that victims were told about this language in October 2007. *See* Declaration of [redacted] at 4 ("In October 2007, shortly after the agreement was signed, four victims were contacted and these provisions were discussed"). On July 9, 2008, the victims received notice from the Government that the above-described provision was negotiated on behalf of the victims for their protection and was

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thus contained in the non-prosecution agreement.1

Having now reviewed the non-prosecution agreement, the Government's response to the victims' motion and the accompanying sworn declaration are simply untrue. The above-quoted provision simply *does not appear in the agreement anywhere*. It is true that the non-prosecution agreement contains a provision bearing on the same subject. However, this provision has a number of qualifying provisos that make it far less favorable to the victims than the above-described provision. (To avoid filing a separate, sealed pleading laying out the differences, counsel for the victims have simply described the differences in general terms. We trust that the Government, in its response, will agree that it has erroneously described the agreement to the court and the victims.)

The Government should be required to correct its previously-filed pleadings to accurately recount the non-prosecution agreement that it reached with Epstein. Moreover, the Government should also be required to state forthrightly whether through the last nine months, it gave the victims (like the court) inaccurate information about what the non-prosecution agreement entailed. But most important, because the current sealing of the non-prosecution agreement creates a false and deceptive appearance about the agreement that the Government has actually reached with Epstein, the agreement should be unsealed.

Indeed, it should be noted that sealing of materials in this case appears to operate in a rather peculiar fashion. The Government apparently feels free to disclose to the victims one provision in the non-prosecution agreement that it believes it is to its advantage to disclose, but not others. The Government should not be permitted to pick and choose, particularly where it

1 The Government has recently provided a new notice to the victims, containing different language.

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has inaccurately described the provision that it has chosen to disclose.

3. The Non-Prosecution Agreement Should be Unsealed To Facilitate Effective Representation of the Victims in this Action and Related Civil Actions.

The sealing order bars the victims' counsel from "disclos[ing] the Agreement or its terms to any third party absent further court order, following notice to and an opportunity for Epstein's counsel to be heard." Order to Compel Production and Protective Order at 1. Victims' counsel have scrupulously abided by that restriction. Victims' counsel would, however, now like to discuss the terms of the non-prosecution agreement with third parties in making a determination about how best to proceed in this action, including what remedies to seek for the violations of victims' rights that have occurred. Counsel, therefore, respectfully seek the "further court order" that the sealing order envisions.

In particular, victims' counsel would like to discuss the agreement with other victims of Epstein and their attorneys to determine whether they were likewise provided with inaccurate information about the nature of the plea agreement. Victims' counsel would also like to discuss possible legal responses to the Government with other victims' rights attorneys, including in particular the National Alliance of Victims' Rights Attorneys for possible legal approaches. *See* http://www.ncvli.org/navra.html. The sealing order would apparently block these forms of consultation, or perhaps require such burdensome non-disclosure obligations as to make the consultation difficult or impractical. Finally, victims' counsel would like to refer to the non-prosecution agreement in a parallel civil suit that is pending before this court. *See Jane Doe v. Jeffrey Epstein, United States District Court, Southern District of Florida, Case No.: 08-CIV-80893-MARRA-JOHNSON.* To facilitate all these discussions, the non-prosecution agreement

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should be unsealed.

NOTICE TO EPSTEIN

It is possible that Jeffrey Epstein will object to the unsealing of the agreement. Accordingly, the court should provide notice of this motion to Jeffrey Epstein, through counsel. Jeffrey Epstein's counsel has entered an appearance in several related civil suits, including *Jane Doe v. Jeffrey Epstein, United States District Court, Southern District of Florida, Case No.: 08-CIV-80893-MARRA-JOHNSON.* Although Epstein's counsel has not entered an appearance in this matter, as a courtesy to them, counsel for the victims' will provide a copy of this pleading at the address indicated in the related civil suit.

CONCLUSION

The non-prosecution agreement should be unsealed.

DATED this 25th day of September, 2008.

Respectfully Submitted,

THE LAW OFFICE OF BRAD EDWARDS & ASSOCIATES, LLC

By: s/ Brad Edwards

Brad Edwards, Esquire
Attorney for Petitioners
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EFTA00232316

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Jay C. Howell, Esquire
Attorney for Petitioners
Pro Hac Vice
644 Cesery Boulevard
Suite 250
Jacksonville, Florida 32211
Telephone: [redacted]
Facsimile:
E-Mail: [redacted]

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on September 25, 2008, I electronically filed the foregoing document with the Clerk of the Court using CM/ECF.

SERVICE LIST

Jane Doe 1 and Jane Doe 2
Case No.: 08-80736-CIV-MARRA/JOHNSON
United States District Court, Southern District of Florida

[redacted]
Assistant U.S. Attorney
99 N.E. 4th Street
Miami, Florida 33132
Telephone: [redacted]
Facsimile:

EFTA00232317

[redacted] AUSA
United States Attorney's Office
500 South Australian Avenue
Suite 400
West Palm Beach, Florida 33401

s/ Brad Edwards
Brad Edwards, Esquire
Attorney for Petitioner
Florida Bar No. [redacted]

I HEREBY FURTHER CERTIFY that on September 25, 2008, a true and correct copy of the above and foregoing document is being provided by United States mail to:

Jack Alan Goldberger, Esquire
Atterburty, Goldberger & Weiss, P.A.
250 Australian Avenue South
Suite 1400
West Palm Beach, Florida 33401
[redacted]

Michael R. Tein, Esquire
Lewis Tein, P.L.
3059 Grand Avenue
Suite 340
Coconut Grove, Florida 33133
[redacted]

Robert D. Critton, Jr., Esquire
Michael J. Pike, Esquire
Burman, Critton, Luttier & Coleman, LLP
515 North Flagler Drive
Suite 400
West Palm Beach, Florida 33401
[redacted]

s/ Brad Edwards
Brad Edwards, Esquire
Attorney for Petitioner
Florida Bar No. [redacted]

EFTA00232318

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

CASE NO.: 08-80736-CIV-MARRA/JOHNSON

JANE DOE #1 AND JANE DOE #2,

Petitioners,

v.

UNITED STATES OF AMERICA,

Respondent.

ORDER TO UNSEAL NON-PROSECUTION AGREEMENT

THIS CAUSE comes before the Court on the Petitioners' Motion to Unseal Non-Prosecution Agreement between the United States Attorney's Office for the Southern District of Florida and Jeffrey Epstein. After consideration of the Motion and the record, it is

ORDERED AND ADJUDGED that the Petitioners' Motion is **GRANTED** and the Non-Prosecution Agreement between the United States Attorney's Office for the Southern District of Florida and Jeffrey Epstein is hereby ordered to be unsealed.

DONE AND ORDERED in Chambers, in West Palm Beach, Palm Beach County, Florida, this ____ day of _____, 2008.

KENNETH A. MARRA
UNITED STATES DISTRICT COURT

Copies furnished to: all counsel of record

RECYCLED PAPER

TO REORDER CALL [redacted]

EFTA00232320

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

Case No. 08-80736-Civ-Marra/Johnson

JANE DOES #1 and #2

Petitioners,

v.

UNITED STATES OF AMERICA,

Respondent.
_____/

RESPONDENT'S OPPOSITION TO VICTIMS' MOTION TO UNSEAL NON-PROSECUTION AGREEMENT

Respondent, by and through its undersigned counsel, files its Opposition to Victims' Motion to Unseal Non-Prosecution Agreement, and states:

I. THE MOTION TO UNSEAL SHOULD BE DENIED BECAUSE THE NON-PROSECUTION AGREEMENT HAS NEVER BEEN FILED UNDER SEAL IN THIS COURT.

Petitioners have filed their motion to unseal the non-prosecution agreement, claiming that no good cause exists for sealing it. As an initial matter, the motion should be denied because the non-prosecution agreement entered into between the United States Attorney's Office and Jeffrey Epstein was never filed in the instant case by the United States, either under seal or otherwise. On August 14, 2008, this Court held a telephonic hearing to discuss petitioners' request for a copy of the non-prosecution agreement. The United States advised the Court that the Agreement had a confidentiality provision,

which the United States was obligated to honor. The United States requested that, if the Agreement was to be produced to petitioners, it should be done pursuant to a protective order, to ensure that further dissemination of the Agreement would not occur. At that time, petitioners had no objection to such a procedure.

On August 21, 2008, this Court entered its Order to Compel Production and Protective Order (DE 26). Subpart (b) of the Order provides that, "Petitioners and their attorneys shall not disclose the Agreement or its terms to any third party absent further court order, following notice to and an opportunity for Epstein's counsel to be heard." (DE 26 at 1.) Presumably, petitioners' motion to unseal is an effort to modify the terms of the Protective Order, to enable them to disclose the Agreement to third parties.

Since the Agreement has not been filed under seal with this Court, the legal authority cited by petitioners regarding sealing of documents, United States v. Ochoa-Vasque, 428 F.3d 1015 (11th Cir. 2005), is inapposite. The parties who negotiated the Agreement, the United States Attorney's Office and Jeffrey Epstein, determined that the Agreement should remain confidential. They were free to do so, and violated no law in making such an agreement. Since the Agreement has become relevant to the instant lawsuit, petitioners have been given access to it, upon the condition that it not be disclosed further.[1] Petitioners have no legal right to disclose the Agreement to third parties, or standing to challenge the confidentiality provision.

[1]It is unclear whether the Petitioners themselves (as opposed to their attorneys) have actually reviewed the Non-Prosecution Agreement. The Court's Order to Compel Production required petitioners' counsel to review and agree to the Protective Order and to do the same with

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In order to have standing, petitioners must show: (1) an injury in fact, meaning an injury that is concrete and particularized, and actual or imminent; (2) a causal connection between the injury and the causal conduct; and (3) a likelihood that the injury will be redressed by a favorable decision. Granite State Outdoor Advertising, Inc. v. City of Clearwater, Fla., 351 F.3d 1112, 1116 (11th Cir. 2003). Petitioners already have obtained access to the agreement, so they cannot claim a denial of access as an injury in fact. Their motion to unseal refers to their stated desire to confer with other victims of Epstein and their attorneys "to determine whether they were likewise provided with inaccurate information about the nature of the plea agreement." (DE 28 at 5.)

This asserted reason for needing to unseal the Agreement is baseless given that the Protective Order, at the Court's direction, specifically provides for a very simple procedure to allow other victims and their lawyers to see the Agreement. (See DE 26 at 1-2, subpart (d).) All that is required is for any victims and/or their attorneys to review and agree to the terms of the Protective Order, and to provide the signed acknowledgment of that agreement to the United States.

Petitioners' claim that they wish to discuss with others the "possible legal responses" to the Government, including the National Alliance of Victims' Rights Attorneys, also provides no basis for vacatur of the Protective Order. Petitioners contend that the "sealing order would apparently block these forms of consultation . . ." (DE 28 at

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their clients. Copies of those signed acknowledgements to abide by the Protective Order were then to be provided "promptly" to the United States. To date, only Attorney Brad Edwards has provided a signed acknowledgement.

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5.) First, there is no sealing order. Second, the Protective Order does not prevent petitioners from consulting with anyone; it only prevents them from disclosing the Agreement. Petitioners fail to mention why it is necessary for the National Alliance of Victims' Rights Attorneys to have the Agreement in hand, in order to meaningfully consult with them.

Petitioners also assert that they would like to be able to reference the Agreement "in a parallel civil suit that is pending before this Court." (DE 28 at 5.) Given that the suit names Jeffrey Epstein as a defendant and is pending before the same district judge, it seems that litigation regarding the production and use of the Agreement should occur in that case, where the true party in interest, Jeffrey Epstein, is present and represented by counsel, rather than in a suit that was originally filed in July as an "Emergency Petition" under the various victims' rights laws.

II. THE GOVERNMENT ACCURATELY DESCRIBED THE PROVISIONS OF THE AGREEMENT, [redacted] THE TIME THE RESPONSES WERE FILED WITH THE COURT.

Petitioners castigate the Government for inaccurately describing the non-prosecution agreement. (DE 28 at 2-5.) They contend a particular provision cited by the Government does not appear in the copy of the Agreement produced to them.

During the telephonic hearing on August 14, 2008, Government counsel advised the Court and petitioners' counsel that there was an ongoing dispute between the Government and Epstein's attorneys over what constituted the Agreement. Government counsel advised that, in its opinion, the Agreement had three parts. The first part was

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executed in September 2007, the second part, an addendum, was executed in October 2007, and the third part was a December 2007 letter from the United States Attorney to Epstein's attorneys, suggesting a further modification of the Agreement. The Government advised the Court that it believed that all three parts comprised the Agreement, while it appeared that Epstein's attorneys were contending the Agreement was comprised only of parts one and two.

At the commencement of the instant litigation, in July 2008, the Government believed the Agreement was comprised of all three parts mentioned above. This belief was expressed in victim notification letters, including one sent to Jane Doe #1,[2] the Government's July 9, 2008 response to the Emergency Petition for Enforcement of Victims Rights Act, as well as the Declaration of A. [redacted] Villafaña, Assistant U.S. Attorney, which accompanied the Government's response. This belief continued until August 2008, when the Government advised Epstein's attorneys that the victims had

[2]The victim notification letter was provided to Epstein's attorneys prior to being sent, who approved the language of which the petitioners now complain. Thus, petitioners' repeated assertions that the Government made these errors intentionally and/or negligently are meritless. (See, e.g., DE 28 at 4-5 ("The Government apparently feels free to disclose to the victims one provision in the non-prosecution agreement that it believes it is to its advantage to disclose, but not others. The Government should not be permitted to pick and choose, particularly where it has inaccurately described the provision that it has chosen to disclose.") The Government seeks no "advantage" in this suit brought by the two victims. Furthermore, the petitioners' original emergency petition focused on their concern about the amount of jail time that Epstein would serve. The provision that they complain of now has no relation to jail time. Furthermore, petitioners aver that the October 2007 disclosure to Jane Doe #1 contained inaccurate information, but that disclosure was made before the December 2007 letter and, therefore, did not include anything related to the U.S. Attorney's now-defunct proposed amendment to the Agreement.

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demanded disclosure of the Agreement to them, and discussions ensued about what constituted the Agreement. Epstein's attorneys then told the Government that Epstein believed the Agreement consisted only of the first and second parts. These were the parts disclosed to petitioners pursuant to the Protective Order in compliance with the Court's order to compel production. The fact that an erroneous disclosure was inadvertently made to one petitioner after Epstein had already entered his guilty plea, was sentenced, and surrendered to begin serving his sentence does not create an injury where one did not exist before.

CONCLUSION

For the foregoing reasons, the United States respectfully requests that the Court deny Petitioners' Motion to Unseal the Non-Prosecution Agreement.

Respectfully submitted,

R. ALEXANDER ACOSTA
UNITED STATES ATTORNEY

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Attorney for Respondent

EFTA00232326

RECYCLED PAPER TO REORDER CALL 954-846-9399

EFTA00232327

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

CASE NO.: 08-80736-CIV-MARRA/JOHNSON

JANE DOE #1 AND JANE DOE #2,

Petitioners,

v.

UNITED STATES OF AMERICA,

Respondent.

VICTIMS' REPLY TO RESPONDENT'S OPPOSITION TO VICTIMS' MOTION TO UNSEAL NON-PROSECUTION AGREEMENT

COME NOW the Petitioners, Jane Doe #1 and Jane Doe #2 ("the victims"), by and through undersigned counsel, and reply to the Government's Opposition to Victims' Motion to Unseal Non-Prosecution Agreement.

The victims have moved for a lifting of the protective order barring them from publicly disclosing or discussing the terms of the non-prosecution agreement between Jeffrey Epstein and the United States Government. Jeffrey Epstein has made no response to this motion. The Government, however, contends that the victims' motion should be denied because the victims cannot show any injury from the protective order. The Government's position is wrong for three reasons. First, the Government bears the burden of showing some good cause for a protective order. It has utterly failed to even offer any such cause – much less show that it is good cause. Second, the Government – with the apparent contrivance of Jeffrey Epstein's attorneys – has made inaccurate representations about the nature of the non-prosecution agreement in its notices to the victims and in its filing before the Court. To set the record straight, therefore, the victims

should be allowed to publicly discuss the agreement. Finally, the victims are burdened by provisions in the protective order. For all these reasons, the protective order should be lifted.

1. No Good Cause Has been Shown for Sealing the Agreement.

In their motion to unseal the agreement, the victims argued that there was no good reason for the protective order requiring them not to further disseminate the agreement. Curiously, the Government's response does not offer any substantive reason for the agreement to remain under seal or under a protective order.[1] Instead, the Government contends that victims have "no legal right to disclose the Agreement to third parties, or standing to challenge the confidentiality provision." Gov't Response at 2. But this argument has things backwards. It is not the victims' task to show some reason for *not* entering a protective order; rather, it is the Government's task to show some affirmative reason for entering the order in the first place. *See* Fed. R. Civ. P. 26(c) (allowing for entry of a protective order upon motion for a party "for good cause shown"); *see also In re Alexander Grant & Co. Litigation*, 820 F.2d 352, 356 (11th Cir. 1987) ("good cause" for a protective order "generally signifies a sound basis or legitimate need to take judicial action"). Having been given the opportunity to explain why the document has to remain confidential, the Government chose not to do so. And Jeffrey Epstein was served with the victims' motion, but chose not to respond. Presumably this was because Jeffrey Epstein had no real interest at stake in the confidentiality of the agreement. Therefore, the protective order should be lifted because it lacks any articulated justification – much less any justification that constitutes good cause.

[1] The Government prefers to view the issues in this case as involving not the sealing of a document but rather the entry of a protective order preventing the disclosure of a document. To simplify the dispute in this case, we will proceed on the Government's view of the situation.

2. The Government, With the Apparent Aid of Epstein, Has Provided Inaccurate Information to the Victims (and to the Court).

The victims also asked that the protective order be lifted to help clarify the record in this case. The Government has made public representations in its pleadings in this case about the civil remedy provision in the non-prosecution agreement. It also specifically sent notices to Jane Doe #1 and other victims of Jeffrey Epstein's crimes describing this provision in the agreement. Those representations were inaccurate – as the Government now seemingly admits. *See* Gov't Response at 6 (referring to "erroneous disclosure" that was "inadvertently made" to Jane Doe #1). Indeed, the Government now takes the position that the responsibility for those inaccurate representations to the victim – as well as to the Court – lies with Jeffrey Epstein's attorneys'. *See* Gov't Response at 5 ("the [inaccurate] victim notification letter was provided to Epstein's attorneys prior to being sent, who approved the language of which the petitioners now complain.").

The apparent approval by Jeffrey Epstein's attorneys of inaccurate information being sent to crime victims (and possibly their approval of inaccurate information being provided, as a result, to the Court) raises very significant issues under the Crime Victim's Rights Act. The victims have, therefore, sent a letter to the U.S. Attorney's Office requesting clarification of exactly how Jeffrey Epstein's attorneys participated in misleading the victims. *See* Attachment 1 (Oct. 9, 2008, Letter from Brad Edwards, Esq. to AUSA [redacted]). Indeed, it appears that the Government may have provided an inaccurate description of another feature of the non-prosecution agreement to the victims. *See* Attachment 2 (Oct. 15, 2008 Letter from Brad Edwards, Esq. to AUSA [redacted] (noting Government's representation to victims of a right to recover at least $150,000 in damages from Jeffrey Epstein while Jeffrey Epstein's lawyers take the position that the agreement allows automatic recovery of only $50,000). In light of all these

apparent misrepresentations about precisely what the non-prosecution agreement entails, the victims should not be bound by a protective order barring their public disclosure of the agreement.

3. The Protective Order Unfairly Burdens the Victims.

In their motion, the victims also explained how the protective order burdened their efforts to confer with other victims' rights attorneys regarding how best to proceed in light of the non-prosecution agreement. The Government does not seriously contest the victims' representations about the burdens imposed by the protective order. Instead, it takes the truly remarkable position that "the Protective Order does not prevent [the victims] from consulting with anyone; it only prevents them from disclosing the Agreement." Gov't Response at 4. But the whole point of the victims' motion was that the protective order places burdens on the victims in consulting with other attorneys *about the agreement*. Obviously, it is of no help to the victims to be able to consult with other attorneys on that issue if the agreement itself cannot be disclosed.

CONCLUSION

The provision in the protective order barring the victims and their attorneys from publicly disclosing the non-prosecution agreement should be lifted.

DATED this 16th day of October, 2008.

Respectfully Submitted,

THE LAW OFFICE OF BRAD EDWARDS & ASSOCIATES, LLC

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on October 16, 2008, I electronically filed the foregoing document with the Clerk of the Court using CM/ECF.

SERVICE LIST

Jane Doe 1 and Jane Doe 2
Case No.: 08-80736-CIV-MARRA/JOHNSON
United States District Court, Southern District of Florida

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s/ Brad Edwards
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I HEREBY FURTHER CERTIFY that on October 16, 2008, a true and correct copy of the above and foregoing document is being provided by United States mail to:

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EFTA00232334

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

NO. 08-80736-CIV-MARRA/JOHNSON

JANE DOES #1 AND #2,

Petitioners,

v.

UNITED STATES OF AMERICA,

Respondent.

_____/

ORDER

THIS CAUSE comes before the Court on the Petitioners' Motion to Unseal Non-Prosecution Agreement (DE 28), filed September 25, 2008. Respondent filed its response (DE 29), on October 8, 2008, and Petitioners filed their reply (DE 30) on October 16, 2008. The Court has carefully considered the motion and the record and is otherwise fully advised in the premises.

Petitioners motion seeks the Court to enter an order unsealing the Non-prosecution Agreement, including any modifications and addenda thereto (collectively referred to as the "Agreement"), between the United States Attorney's Office for the Southern District of Florida ("USAO") and Jeffrey Epstein ("Epstein"). At a hearing held on August 14, 2008, the Court ordered the USAO to produce the Agreement to counsel for the Petitioners and to any other victims identified by the USAO and their counsel, pursuant to the terms of the Court's Order. (See DE 26, August 21, 2008). Petitioners argue that the Agreement "should now be unsealed."

First, as Respondent points out, the Agreement was not filed in this case, under seal or otherwise. Petitioners also assert that the Agreement should be "unsealed" because the victims

and/or their attorneys believe the Government has mischaracterized some of its provisions. If and when such alleged mischaracterizations become relevant to an issue to be decided by the Court, the parties will be given the opportunity to advance their positions and the Court will resolve the issue. If disclosure of the Agreement will be required for the Court to resolve the issue, appropriate disclosure will be ordered.

Furthermore, to the extent Petitioners are seeking modification of the restrictions placed upon their use of the Agreement by the Court's August 21, 2008 order, Petitioners have not met their burden to justify a modification. Petitioners' mere desire to discuss the Agreement with third parties is insufficient, in and of itself, to warrant the granting of such relief. If and when Petitioners have a specific tangible need to be relieved of the restrictions, they should file an appropriate motion. If a specific tangible need arises in a civil case Petitioners or other alleged victims are pursuing against Epstein, relief should be sought in that case, with notice to the United States, the other party to the Agreement. Accordingly, it is

ORDERED AND ADJUDGED that Petitioners' Motion to Unseal Non-Prosecution Agreement (DE 28) is **DENIED.**

DONE and ORDERED in Chambers, in West Palm Beach, Palm Beach County, Florida, this 12th day of February, 2008.

KENNETH A. MARRA
UNITED STATES DISTRICT JUDGE

Copies furnished to:
all counsel of record

EFTA00232336

RECYCLED PAPER

TO REORDER CALL [redacted]

EFTA00232337

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

STATE OF FLORIDA	
vs	CASE NO. 06 CF9454AMB
	08 9381CFAMB
JEFFREY EPSTEIN	
Defendant.	

PLEA CONFERENCE

PRESIDING: HONORABLE DEBORAH DALE PUCILLO

APPEARANCES:

ON BEHALF OF THE STATE:
BARRY E. KRISCHER, ESQUIRE
State Attorney
401 North Dixie Highway
West Palm Beach, Florida 33401
By: LANNA BELOHLAVEK, ESQUIRE
Assistant State Attorney

ON BEHALF OF THE DEFENDANT:
ATTERBURY, GOLDBERGER & WEISS,P.A.
250 Australian Avenue South
Suite 1400
West Palm Beach, Florida 33401
By: JACK GOLDBERGER, ESQUIRE

CERTIFIED COPY

June 30, 2008
Palm Beach County Courthouse
West Palm Beach, Florida 33401
Beginning at 8:40 o'clock, a.m.

PHYLLIS A. DAMES, OFFICIAL COURT REPORTER

BE IT REMEMBERED that the following proceedings were had in the above-entitled cause before the HONORABLE DEBORAH DALE PUCILLO, one of the judges of the aforesaid court, at the Palm Beach County Courthouse, located in the City of West Palm Beach, State of Florida on June 20, 2008 beginning at 8:40 o'clock, a.m. with appearances as hereinbefore noted, to wit:

THEREUPON:

MR. GOLDBERGER: Good morning, Judge, Jack Goldberger on behalf of Jeffrey Epstein.

THE COURT: Good morning.

MR. GOLDBERGER: Your Honor, we are here for a plea conference.

THE COURT: Raise your right hand.

THEREUPON:

JEFFREY EPSTEIN,

after being called as a witness by the Defense and after being first duly sworn by the Court, was examined and testified as follows:

THE DEFENDANT: Yes, ma'am.

THE COURT: Is this one case or two?

MS. BELOHLAVEK: Two.

THE COURT: May I see the PC

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affidavit in both cases, please?

MS. BELOHLAVEK: There are no PC affidavits. There was originally an Indictment, the second charge was filed arising out of the booking. It was all testimony presented to the grand jury.

THE COURT: Let me see the Indictment then?

I have one Indictment, one Information?

MS. BELOHLAVEK: Correct.

THE COURT: So one case is charged by Indictment, one is charged by Information?

MS. BELOHLAVEK: Correct.

THE COURT: In case 2006036744 you are charged with procuring a person under 18 for prostitution, a second degree felony, maximum penalty of fifteen years Department of Corrections; minimum, some period of probation. No mandatory minimum apply, is that correct, State?

MS. BELOHLAVEK: Correct.

THE COURT: And in case number 06 9454CF, you are charged with felony solicitation to prostitution, a third

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degree felony, punishable by a maximum penalty of five years in the Department of Corrections, and a minimum, probation. No mandatory minimums, correct?

MS. BELOHLAVEK: Correct.

THE COURT: The defendant has no prior criminal record?

MS. BELOHLAVEK: Correct.

MR. GOLDBERGER: Yes, Your Honor.

THE COURT: You checked the NCIC as well as State records?

MS. BELOHLAVEK: Yes.

THE COURT: And the guideline score sheet I have before me shows 21.5 months in the Department of Corrections as the lowest permissible prison sentence in months. Both sides agree to the preparation of the guideline score sheet?

MR. GOLDBERGER: We so agree, Your Honor.

MS. BELOHLAVEK: Yes.

THE COURT: What is proposed -- it goes on for pages.

MR. GOLDBERGER: Your Honor, much of the documentation is acknowledgement by my

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client to community control, sex offender status.

THE COURT: I understand.

Okay. What is proposed -- those are the maximums and minimums, Mr. Epstein. What is proposed is that you will be pleading guilty to felony solicitation to prostitution and procuring a person under 18 for prosecution. A PSI would be waived, you would be adjudicated guilty of both felonies, is that correct?

MS. BELOHLAVEK: Correct.

THE COURT: And on 06 9454, the defendant to be sentenced to 12-months in the Palm Beach County -- detention facility? He's going to do time in the jail?

MS. BELOHLAVEK: Yes.

THE COURT: With credit for one day served. And on 08 9381, he is to be sentenced to six months in the Palm Beach County jail detention facility, with credit for one day served. And the six month sentence is to be served consecutive to the 12 month sentence?

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MS. BELOHLAVEK: Correct..

THE COURT: Following the six months sentence, the defendant will be placed on 12-months of community control one. The conditions of the community control are attached hereto and incorporated herein.

As a special condition of community control, he's to have no unsupervised contact with minors and the supervising adult must be approved -- and I would say, pre-approved, approved ahead of time, not after the fact by the Department of Corrections. And you would mean by that his community control officer?

MS. BELOHLAVEK: Correct.

THE COURT: The defendant is designated as a sexual offender pursuant to Florida Statute 943.0435 and must abide by all the corresponding requirements of the statute, a copy of which is attached hereto and incorporated herein. The defendant must provide a DNA sample in court at the time of this plea. Is this the -- and the attachments are the terms and conditions of community control. There are some

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squiggles on the bottom of the page, what would those squiggles be?

MR. GOLDBERGER: Thank you, Your Honor, those are my client's signature acknowledging that we have gone over all the conditions.

THE COURT: One page after the plea sheet that really spells out the terms and conditions of community control, Florida Statute 948.101, Mr. Epstein, is that squiggle at the bottom your squiggle?

THE DEFENDANT: Yes, ma'am.

THE COURT: Would those be your initials?

THE DEFENDANT: Yes, ma'am.

THE COURT: Did you read all of that page?

THE DEFENDANT: Yes, ma'am.

THE COURT: Can you read?

THE DEFENDANT: Yes, ma'am.

THE COURT: How far did you go in school?

THE DEFENDANT: High school.

THE COURT: That's your highest degree?

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THE DEFENDANT: Yes.

THE COURT: And is this your signature on the plea sheet that recites the terms of the plea I just read?

THE DEFENDANT: Yes, ma'am.

THE COURT: Did you read that document as well?

THE DEFENDANT: Yes, ma'am.

THE COURT: You understand once you do your 12 months followed by your six months all in the Palm Beach County jail you will then be put on community control which involves having an electronic monitor attached to you and --

MR. GOLDBERGER: Actually Your Honor, the agreement of the parties is to, it's community control one which is not monitor.

THE COURT: Oh, community control one, is that spelled out in here?

MS. BELOHLAVEK: Yes.

MR. GOLDBERGER: Yes, it is, Your Honor.

MS. BELOHLAVEK: He does not fall under the Jessica Lunsford Act which requires the bracelet.

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THE COURT: Community control two.

MS. BELOHLAVEK: Correct.

THE COURT: Community control one -- that would be no electronic monitor?

MR. GOLDBERGER: That is correct.

THE COURT: Now which of the terms and conditions of community control one are you incorporating?

MR. GOLDBERGER: I can go through them with Your Honor.

THE COURT: None of the them appear to be articulated in the plea sheet which is why I'm asking.

MR. GOLDBERGER: These are the standard conditions of community control by statute would apply to anyone that goes on community control and out of an abundance of caution, we simply memorialized those standard conditions in the plea sheet agreement.

THE COURT: The Court shall require intensive supervision and surveillance for an offender placed on community control which may include but is not limited to specified contact with the parole and

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probation officer, specified by who?

PROBATION OFFICER: Specified by you, Your Honor.

THE COURT: I don't see that in the plea sheet. That's why I'm asking the questions. No one has specified how often, how frequently he is to have contact with his parole and probation officer. Confinement to an agreed upon residence during the hours away from employment and public service activity, has that been articulated?

MS. BELOHLAVEK: I believe Judge McSorley has a standard order somewhere on the bench up there regarding this, I'm told by the prosecutor.

MS. LENHARDT: Judge, usually this is the probation sheet she hands out to folks.

THE COURT: I have seen those sheets -- I have seen them incorporated in plea agreements which is why I'm asking.

MR. GOLDBERGER: I see.

THE COURT: Is there some reason you didn't use this particular document in this case?

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MS. BELOHLAVEK: I didn't realize until Ms. Lenhardt just told me that Judge McSorley has that.

MR. GOLDBERGER: We'd be happy to execute that document, Your Honor. We were -- we overreacted by just having him sign off on all conditions of community control.

THE COURT: Well, this is --

MR. GOLDBERGER: Perhaps the better practice would be --

THE COURT: This is, the reason Judge McSorley does this which makes ultimate sense is we're going to be here half the morning if we're going to decide among ourselves now what the --

MR. GOLDBERGER: That makes sense.

THE COURT: I'm not going to leave this just unspecified.

MS. BELOHLAVEK: We can take care of that right now if you could give us a few minutes.

THE COURT: All right.

These are the standard conditions that Judge McSorley normally uses. If you like them, you need to circle the ones that

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apply and everyone must initial them. We will go over it. If you wish to change -- you understand there is quite a bit of latitude given the court in putting somebody on community control. If you agree to some change, let me know, but understand at the outset that I'm a big fan of specificity. I want to know what he will be doing for employment. I want to know exactly where he is going to be living and I want it on the record now. It can change but it can only change with preapproval by DOC. I want it crystal clear. I don't want the community control officer who gets this case the day he walks out the Palm Beach County to have any doubt or confusion as to exactly what this defendant is supposed to do, where he is supposed to be when, exactly what I am requesting that officer to supervise.

MS. BELOHLAVEK: Absolutely.

THE COURT: Okay.

MR. GOLDBERGER: We will work on it. Thank you, Your Honor.

THE COURT: We will recall that case.

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(Brief recess.)

MR. GOLDBERGER: Your Honor, we are back on Jeffrey Epstein, actually it worked, we had an opportunity to go through Judge McSorley's conditions of community control and we asked the Department of Corrections representative to assist us to make sure we did everything properly. They were very helpful and we executed the document.

MS. BELOHLAVEK: Yes, and Your Honor, this defendant doesn't fall under the sex offender probation but we have included special sex offender conditions as part of the community control and they are all circled there.

THE COURT: The plea agreement stated the defendant is designated as a sexual offender pursuant to Florida Statute 942.035.

MS. BELOHLAVEK: Correct. But the sex offender probation, the statute is different and only applies to certain offenses and this one was not enumerated.

THE COURT: Okay. I want to make

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sure both I and the defendant are clear. The sexual offender statute you are referring to in the plea sheet is the one that requires registration?

MS. BELOHLAVEK: Correct.

MR. GOLDBERGER: Correct.

THE COURT: And we will talk about that.

MR. GOLDBERGER: Okay.

THE COURT: But it is not the one that requires the special conditions of sex offender probation?

MS. BELOHLAVEK: Correct.

THE COURT: Now, rather than 948, do you want me to disregard 948? He's read it?

MS. BELOHLAVEK: He's read it.

THE COURT: We will leave it in there. But these conditions we are going to go over right now are going to be viewed in my mind, yes, and they have been signed by the defendant and we will go over that in a second as a part of the whole plea.

MS. BELOHLAVEK: Correct.

THE COURT: So circled are

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conditions, A, you will remain confined to your residence except one half hour before and after your approved employment, community service work or any other activity approved by your probation officer.

B, you will maintain an hourly accounting of all your activities on a daily log which you will submit to your supervising officer upon request.

My understanding about the daily log, maybe I'm just confused from other cases I've heard, is the daily log is a weekly log, I guess it is submitted ahead of time, is that correct?

PROBATION OFFICER: That is correct, Your Honor.

THE COURT: So part A, where he has to stay in his residence except for one hour before and after the approved employment, community service work and other activity. All that's information that will be recorded in writing and the defendant will have a copy and he will know exactly where he is supposed to be when.

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PROBATION OFFICER: That is correct, Your Honor.

THE COURT: As will his supervising probation officer. And then to document that he's supposedly done all that he himself will be keeping a daily log?

PROBATION OFFICER: That is correct, Your Honor.

THE COURT: And the log form will be provided by the department and he will be turning that in every time he meets with the probation officer?

PROBATION OFFICER: That is correct, Your Honor.

THE COURT: Okay. So that applies and F applies. Does E apply? No.

MS. BELOHLAVEK: Did I circle E?

THE COURT: No. F -- made one up, the defendant will be residing at 358 El Brillo Way, Palm Beach, Florida, 33480. He knows now that that's where he will be living when he is released after his 12 months and six months.

MR. GOLDBERGER: That is correct, Your Honor.

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THE COURT: That's a private residence?

MR. GOLDBERGER: That is his home.

THE COURT: Does he own the residence?

MR. GOLDBERGER: He does, Your Honor.

THE COURT: Is there any possibility that he no longer owns the residence?

MR. GOLDBERGER: Not anticipated, Your Honor.

THE COURT: Okay. Should he not be for whatever reason -- 18-months is a long time, should he not be owning that residence or able to reside there, he will have the obligation of notifying his probation officer prior, and I emphasize this, prior to his release from custody. I assume that the department will be notified prior to, to his release?

PROBATION OFFICER: That is correct, Your Honor.

THE COURT: And then you would need to send someone to meet with him before he walks out of the Palm Beach County jail and verify his address and employment

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information?

PROBATION OFFICER: That is correct.

THE COURT: All address -- I assume all of this to and from work and any other approved activities restricts him to Palm Beach County, is that correct?

PROBATION OFFICER: That is correct, Your Honor.

THE COURT: So let's be clear, everything, from the day he walks out occurs in Palm Beach County, is that clear?

MR. GOLDBERGER: We understand, Your Honor. That's correct.

THE COURT: Then the additional condition of his probation, they are not sex offender standard conditions, they are just conditions that are being imposed especially in this case?

MS. BELOHLAVEK: Correct.

THE COURT: They are as follows, you shall submit to a mandatory curfew from 10 p.m. to 6:00 a.m. regardless of any other restrictions regarding work or approved activity, there will be no exceptions to being at home in house from 10 p.m. to 6

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a.m., is that correct?

MS. BELOHLAVEK: Yes.

THE COURT: If the victim was under age of 18 years which I gather is the case because it's circled, you shall not live within 1000 feet of a school, day care center, park, playground or other place where children regularly congregate.

Has someone verified that 358 El Brillo is such a place?

MS. BELOHLAVEK: No, but that will be done prior to his release.

THE COURT: So 358 El Brillo will not be approved if it should happen to be one thousand feet from a school, day care center, park, playground or other place -- this is rather open.

MR. GOLDBERGER: Where children gather.

THE COURT: Where children regularly congregate.

MS. BELOHLAVEK: Right.

THE COURT: The Court knows 358 El Brillo Way is a residential neighborhood, are there areas there where children

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regularly congregate?

MS. BELOHLAVEK: I personally do not know.

THE COURT: Neither do I, which is why I'm asking. Has that been investigated?

MR. GOLDBERGER: We have done our due diligence, for what it's worth, there is a residential street. There are not children congregating on that street. We think the address applies, if it doesn't, we fully recognize that he can't live there.

THE COURT: Okay. D is, you shall not have any contact with the victim, are there more than one victim?

MS. BELOHLAVEK: There's several.

THE COURT: Several, all of the victims. So this should be plural. I'm making that plural. You are not to have any contact direct or indirect, and in this day and age I find it necessary to go over exactly what we mean by indirect. By indirect, we mean no text messages, no e-mail, no Face Book, no My Space, no telephone calls, no voice mails, no

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messages through carrier pigeon, no messages through third parties, no hey would you tell so and so for me, no having a friend, acquaintance or stranger approach any of these victims with a message of any sort from you, is that clear?

THE DEFENDANT: Yes, ma'am

THE COURT: And then it states, unless approved by the victim, the therapist and the sentencing court. Okay.

THE DEFENDANT: I understand.

THE COURT: And the sentencing court. So, if there is a desire which, I would think would be a bit strange to have contact with any of the victims the court must approve it.

MS. BELOHLAVEK: Correct.

THE COURT: If the victim was under the age of 18, which was the case, you shall not until you have successfully attended and completed the sex offender program. So, is this sex offender program becoming a condition of probation?

MS. BELOHLAVEK: That is not. I don't believe I circled that one.

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THE COURT: You did.

MR. GOLDBERGER: That's a mistake on our part. Actually the statute that he is pleading guilty to does not require the --

THE COURT: I understand that, but you circled it.

MS. BELOHLAVEK: I apologize, that one is not. He has already been in treatment with a private psychiatrist.

THE COURT: Which you find to be an adequate substitute for sex offender program?

MS. BELOHLAVEK: I -- it is not required and based upon the evaluation and my contact with that doctor, I don't believe it's necessary at this point.

THE COURT: Has that been -- I assume you have a law degree and do not have a Ph.D in a psychology or [redacted] in psychiatry?

MS. BELOHLAVEK: That is correct, I don't.

THE COURT: So it is just your judgement --

MS. BELOHLAVEK: Correct.

THE COURT: -- that his treatment

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with some fancy private psychiatrist or psychologist in his case is okay?

MS. BELOHLAVEK: That is correct.

THE COURT: So you are not imposing E?

MS. BELOHLAVEK: Correct.

THE COURT: F, if the victim was under the age of 18, you shall not work or play or as a volunteer in any school, day care center, park, play ground or other place where children regularly congregate, is that understood?

THE DEFENDANT: Yes, ma'am.

THE COURT: Children will be defined as anyone under the age of 18. There are a lot of places where children regularly congregate. What kind of work do you do?

THE DEFENDANT: Banking.

THE COURT: Here in Palm Beach County?

THE DEFENDANT: Virgin Islands, ma'am.

THE COURT: You understand you will not travel from Palm Beach County for the duration of this?

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THE DEFENDANT: Yes, ma'am.

MR. GOLDBERGER: Your Honor, I'm sorry to interrupt, we do cover the employment later in the agreement as to what he is going to be doing during the one year that he is on community control.

THE COURT: Okay. And let me -- condition G, which is circled, unless otherwise indicated in the treatment plan provided by sexual offender treatment program.

MR. GOLDBERGER: That's not in there.

THE COURT: Is that what you want?

MS. BELOHLAVEK: No.

THE COURT: But you do want the, you will not view, own or possess any obscene pornographic --

MS. BELOHLAVEK: Correct.

THE COURT: Okay. But are you saying that this therapist can okay him to own certain pornographic material?

MS. BELOHLAVEK: No, not at all.

MR. GOLDBERGER: No, Your Honor.

THE COURT: Would be really helpful if people read these things before they

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signed them thoroughly.

Unless otherwise indicated in the treatment plan. I'm just going to strike out, provided by the sexual offender treatment program. Is that what you intend, that his therapist can --

MS. BELOHLAVEK: No.

THE COURT: No?

MS. BELOHLAVEK: No.

THE COURT: Unless otherwise indicated.

MR. GOLDBERGER: The parties have agreed that during the period that he is -- cannot be --

THE COURT: Condition G will now read, you shall not view, own, possess any obscene, pornographic or sexually stimulating visual or auditory material including telephonic, electronic media, computer program or computer services that are relevant to your deviant behavior pattern. And who is going to enforce that?

MS. BELOHLAVEK: The community control officer.

THE COURT: How?

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MS. BELOHLAVEK: They have the obligation and included in there for warrantless search to check at any time his home, his computer, anything he has contact with.

THE COURT: And do they regularly do that?

PROBATION OFFICER: Yes, ma'am.

THE COURT: Since we have the pleasure of having someone from the Department of Corrections here.

Okay. H, you shall submit two specimens of blood to the Florida Department of Law Enforcement to be registered in the DNA data bank.

J, you shall submit to a warrantless search by your probation officer or community control officer of your person, residence or vehicle.

G -- where is the G?

MS. BELOHLAVEK: That was under the original part, not under the sex offender one.

THE COURT: Okay. Defendant to have contact with the community control officer

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at a minimum one time a week.

Defendant to work at Florida Science Foundation, 250 Australian Avenue, West Palm Beach, Florida. Is that volunteer work or work for pay?

MR. GOLDBERGER: It is a 501C corporation that he has formed, Your Honor, that will be doing charitable work.

THE COURT: That he has formed?

MR. GOLDBERGER: Yes.

THE COURT: What exactly is Florida Science Foundation?

MR. GOLDBERGER: Do you want to explain?

THE DEFENDANT: It funds science programs around the state and the country.

THE COURT: How long has it been in existence?

THE DEFENDANT: Fifteen years.

THE COURT: How many programs has it funded?

THE DEFENDANT: Numerous, more than 50.

THE COURT: What is your position with the organization?

EFTA00232364

THE DEFENDANT: President.

THE COURT: Is there a board of directors?

THE DEFENDANT: Yes, ma'am.

THE COURT: Who's on the board of directors?

THE DEFENDANT: Two attorneys.

THE COURT: What exactly do you do?

THE DEFENDANT: I'm an investment banker but my --

THE COURT: No, no, I mean with the science foundation.

THE DEFENDANT: We fund science programs --

THE COURT: I don't want to know what we do, I want to know what you do. How often are you there?

THE DEFENDANT: I'm there every day, I research, I take in people who want to make presentations about why they need money for funding medical research, advanced science research. My background is in physics. I go through all the programs in detail, review the science work potentials, I follow through on a daily

EFTA00232365

basis with what they have been given money to do.

THE COURT: Who are some recent grantees?

THE DEFENDANT: Harvard University. There is a full program of Evolutionary Dynamics, Neuro Science Institute of California, the Physics Institute, MIT.

THE COURT: Do you ever have occasion to deal with anyone under the age of eighteen?

THE DEFENDANT: Not very often. It is, if someone is in college -- sorry.

THE COURT: Right, that's why I'm asking the question.

THE DEFENDANT: Most of the people I fund are all usually professors.

THE COURT: Thank you. You understand that you can't have contact with anyone if -- this organization, do they ever have any involvement with high schools?

THE DEFENDANT: No, ma'am.

THE COURT: Students or teachers?

THE DEFENDANT: No, ma'am.

EFTA00232366

THE COURT: Okay.

MS. BELOHLAVEK: Those are duplicates, you will see those are the same as the ones on the previous page, however, it was reproduced.

THE COURT: The next condition, you shall maintain a driving log. You shall not drive a motor vehicle while alone without prior approval of your supervising officer.

If there was sexual contact, you shall submit to at probationer's or community controllee's expense an HIV test with results to be released to the victims, victim's parent or guardian -- will be victims, plural. Has that been done?

MR. GOLDBERGER: Not yet.

THE COURT: Do we have a time frame on that? I would think ASAP might be good on something like that.

MS. BELOHLAVEK: I believe they can actually do that at the jail.

THE COURT: At his expense?

MS. BELOHLAVEK: Yes.

THE COURT: I would request that that

EFTA00232367

be done within 48 hours?

You shall not obtain or use a post office box without prior approval of the supervising officer.

Okay. Are all those conditions you two have agreed to?

MS. BELOHLAVEK: Yes, Your Honor.

MR. GOLDBERGER: With the court's amendments, yes.

THE COURT: Mr. Epstein, do you understand?

THE DEFENDANT: Yes, ma'am.

THE COURT: I need the defendant to sign number D where I had an s added to victim, and G, we struck out the otherwise indicated language. Otherwise, it is as you agreed.

Mr. Epstein, do you understand this is a somewhat complicated terms of the plea that you've agreed to?

THE DEFENDANT: Yes, ma'am

THE COURT: Do you have any questions about the terms of the plea?

THE DEFENDANT: No.

THE COURT: Can I ask the State why

EFTA00232368

you choose -- or defense and the State together, why twelve months in the Palm Beach County jail followed by six months? Why not just send him to DOC?

MR. GOLDBERGER: It was the agreement of the parties, Your Honor. We just decided that was the best way to accomplish what needed to be done here and the parties agreed that that sentence satisfied everyone's requirements.

THE COURT: The taxpayers of Palm Beach County is going to pay 18 months to house this guy instead of DOC?

MS. BELOHLAVEK: Right.

THE COURT: You understand we're losing positions left and right in county government because we haven't got enough money but you want -- okay.

His requirement to register there is many, many -- there is nine pages outlining the sexual offender's requirement to register with the department and penalty, have you read all those, Mr. Epstein?

THE DEFENDANT: Yes, ma'am.

EFTA00232369

THE COURT: Do you understand you will be required to register and this will be an ongoing life long obligation?

THE DEFENDANT: Yes, ma'am.

THE COURT: And this registration occurs when?

MS. BELOHLAVEK: Within 48-hours of release.

THE COURT: So when he gets out of the Palm Beach County jail, he needs to register? Okay. And the department -- who is going to provide him with the form?

MR. GOLDBERGER: He actually registers out at the Sheriff's Office, Your Honor, we can do it out there.

THE COURT: Okay. It has been brought to my attention that FDLE is the one who is statutorily required to handle these registrations but some of our municipal jurisdictions have taken it upon themselves to impose additional requirements, y'all understand that?

MS. BELOHLAVEK: Correct.

MR. GOLDBERGER: Right.

THE COURT: What you are telling him

EFTA00232370

he has to do is the official State of Florida registration?

MS. BELOHLAVEK: Correct.

THE COURT: Mr. Epstein, I need to make sure you understand that that's what's required by this plea. Anyone on probation, community control is required to live and abide by the laws. So if a jurisdiction you choose to reside in should have some additional municipal requirements you will be required in order to comply with the law of living there, just like you can't get a parking ticket or speeding ticket, to comply with those regulations but I want to make sure you understand because I have seen some defendants who have been confused about this. If you don't, for example, if the Town of Palm Beach has you register that does not take care of your requirement. Your requirement to register with FDLE through the Sheriff's office is separate, distinct and must be done on their form according to their schedule.

THE DEFENDANT: Yes, ma'am.

EFTA00232371

THE COURT: And if my experience the last few months is of any value, they are very serious about enforcing this. They will be tracking you for the rest of your life. Do not move. Do not go -- I don't care when you are done with community control, they need to know exactly where you are and if you go anywhere without registering, they will find and you will be locked up.

THE DEFENDANT: Yes, ma'am.

THE COURT: Okay. Any questions about that?

THE DEFENDANT: No, ma'am.

THE COURT: Did you read the plea in the circuit court form that describes all the rights you are giving up by entering this plea?

THE DEFENDANT: Yes, ma'am.

THE COURT: I think I asked you before, can you read?

THE DEFENDANT: Yes.

THE COURT: Are you under the influence of alcohol, drugs or medication today?

EFTA00232372

THE DEFENDANT: No, ma'am.

THE COURT: Normally taking any prescribed medication?

THE DEFENDANT: Only for cholesterol.

THE COURT: Does that interfere with your mental ability?

THE DEFENDANT: No.

THE COURT: Do you understand you have an attorney, you have a right to trial by jury, there is not going to be a jury trial. There won't be witnesses called. That your attorney and you would have a right to confront and cross examine, do you understand you have a right to call witnesses of your own and the court would issue subpoenas to compel their attendance just like any other witness called by the State, that you have the right -- absolute right to remain silent and that you would not have to say or do anything at the trial if there were a trial, do you understand those rights?

THE DEFENDANT: Yes, ma'am.

THE COURT: Do you understand if you are not a United States citizen your plea

EFTA00232373

could subject you to deportation pursuant to the laws and regulations governing the United States Immigration and Naturalization Service and this court has no jurisdiction or authority in such matters, do you understand that?

THE DEFENDANT: Yes.

THE COURT: Has anybody threatened you, coerced you or promised you anything other than the terms of this plea to get you to enter this plea?

THE DEFENDANT: No.

THE COURT: Do you understand this is a plea in criminal court?

THE DEFENDANT: Yes, ma'am.

THE COURT: This has -- in criminal court in Palm Beach County, State of Florida. I have absolutely nothing to do with any civil matters or matters in any other jurisdiction, do you understand that?

THE DEFENDANT: Yes, ma'am.

THE COURT: Is this plea in any way tied to any promises or representations by any civil attorneys or other jurisdictions?

MR. GOLDBERGER: May we come sidebar

EFTA00232374

on that, Your Honor?

THE COURT: It is going to be recorded.

MR. GOLDBERGER: That's fine.

THE COURT: Defendant needs to approach as well.

(Whereupon, there was a conference at the bench.)

MR. GOLDBERGER: The reason why I asked to come sidebar, there is a nonprosecution agreement with the United States Attorney's office that triggers as a result of this plea agreement. In other words, they have signed off and said they will not prosecute Mr. Epstein in the Southern District of Florida for any offense upon his successful taking of this plea today. That is a confidential document that the parties have agreed to. Just in an abundance of caution, I wanted to tell the court.

THE COURT: I understand, that would also be invalidated should he violate his community control?

MR. GOLDBERGER: Absolutely. That

EFTA00232375

nonprosecution agreement --

MS. BELOHLAVEK: They spell all that out.

THE COURT: Mr. Epstein needs to come closer.

Mr. Epstein, your attorney has told me that in addition to everything, we talked about another Inducement, shall we say, to your taking this plea is that the U.S. Attorney for the Southern District of the State of Florida, federal prosecutor, has agreed to a nonprosecution agreement with you, meaning that if you successfully complete probation and do everything you're supposed to, they have, have agreed not to prosecute you federally, did you understand that?

THE DEFENDANT: Yes, ma'am.

THE COURT: And I would view that as a significant inducement in accepting this plea.

MS. BELOHLAVEK: They are actually in court here today, also.

THE COURT: Okay.

MR. GOLDBERGER: And the plea

EFTA00232376

agreement very carefully spelled out if there was a breach that would violate this agreement, so we are well aware of it.

THE COURT: Okay. I would request that a sealed copy of that -- Mr. Epstein has signed that document?

MR. GOLDBERGER: Yes, I would like to seal the copy.

THE COURT: I want a sealed copy of that filed in this case. That is the only other condition of the agreement that is influencing this defendant to make this decision?

MR. GOLDBERGER: Absolutely. I think that's the right idea.

(Return to open court.)

THE COURT: Mr. Epstein, is there anything else?

THE DEFENDANT: No, ma'am.

THE COURT: Because I don't take these pleas unless they are freely and voluntarily made.

THE DEFENDANT: I understand that.

THE COURT: I also don't want somebody or anybody coming back a year,

EFTA00232377

two years from now saying, oh no, no, they beat me over the head or if there is anything else that is influencing you to make this decision, then I need to know about it.

THE DEFENDANT: I understand that.

MR. GOLDBERGER: Thank you.

THE DEFENDANT: Thank you very much, Your Honor.

(Return to open court.)

THE COURT: All right, Mr. Epstein, any questions about the rights you are giving up by entering this plea?

THE DEFENDANT: No ma'am.

THE COURT: State, please give me a factual basis.

MS. BELOHLAVEK: In 069454 CF AMB, between August 1, 2004 and October 31, 2005, the defendant in Palm Beach County did solicit or procure someone to commit prosecution on three or more occasions.

And in 08 CF 9381 CF AMB between August 1, 2004 and October 9, 2005, the defendant did procure a minor under the age of 18 to commit prostitution in Palm Beach

EFTA00232378

County also.

THE COURT: I find a sufficient factual basis to support the pleas.

Are all of the victims in both of these cases in agreement with the terms of this plea?

MS. BELOHLAVEK: I have spoken to several myself and I have spoken to counsel, through counsel as to the other victim, and I believe, yes.

THE COURT: And with regard to the victims under age eighteen, is that victim's parents or guardian in agreement with the plea?

MS. BELOHLAVEK: That victim is not under age 18 any more and that's why we spoke with her counsel.

THE COURT: And she is in agreement with the plea?

MS. BELOHLAVEK: Yes.

THE COURT: And community control will be given information concerning how to contact these victims?

MS. BELOHLAVEK: Yes.

THE COURT: Confidentially. That

EFTA00232379

information will not be related to the defendant but will be used exclusively for purposes of verifying compliance with this agreement?

MS. BELOHLAVEK: Yes.

THE COURT: Is there anything else from anybody else before I accept this plea?

MR. GOLDBERGER: No, Your Honor.

THE COURT: Mr. Goldberger, if it is your desire, you may enter your client's plea.

MR. GOLDBERGER: Thank you, Your Honor, at this time we would withdraw our previously entered pleas of not guilty, enter pleas of guilty pursuant to negotiations with the State.

THE COURT: Mr. Epstein, I am going to accept those pleas on your behalf. I find you are intelligent, alert, you understand what is going on here and the consequence of entering this plea, you are doing it freely and voluntarily.

Pursuant to the plea, I am waiving a PSI, I will sentence you at this time

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pursuant to it. I will adjudicate you guilty of felony solicitation of prostitution, a third degree felony, case number 06 CF 00945A -- 454 AMB, and procuring a person under 18 for prostitution, a second degree felony 08 CF 009381AMB.

With respect to the solicitation of prosecution, I will sentence you to twelve months in the Palm Beach County detention facility with credit for the one day served.

With respect to 08 CF 009381, I will sentence you to six months in the Palm Beach County detention facility, with credit for the one day served. That six month sentence is to be served consecutive to the twelve month sentence.

Following the six month sentence you will be placed on 12 months of community control. That will be on both cases, I assume, to run concurrently, correct?

MS. BELOHLAVEK: Only on the 08 case.

THE COURT: Only on the second degree

EFTA00232381

felony?

MS. BELOHLAVEK: Correct, the one that designates him a sexual offender.

THE COURT: Okay. So only on case number 08 CF 009381AMB will you be on one year community control which would then invoke a potential penalty of fifteen years were you to violate.

The special conditions are that you are to have no unsupervised contact with minors and the supervising adult must be approved by the Department of Corrections. You are to be designated a sexual offender pursuant to Florida Statute 943.0435 and you must abide by all requirements of that statute which I have read and we have discussed.

You will remain confined to your residence except one half hour before and after your approved employment, community service work or other activities approved by your probation officer. You will maintain an hourly accounting of all your activity on a daily log which you submit to the supervising officer upon request.

EFTA00232382

You will be residing at 358 El Brillo Way, Palm Beach, Florida 33480. Should you desire to move or go to a different location upon release from custody, you will get preapproval of that location from the Department of Corrections. You will have to contact your community control officer a minimum of once a week, it can be more often at their discretion and you are to work at the Florida Science Foundation at 250 Australian Avenue in West Palm Beach, Florida. You will submit to a mandatory curfew of 10 p.m. to 6 a.m.

You shall not live within a thousand feet of a school, day care center, park, playground or other place where children congregate. You shall not have any contact with the victims, directly or indirectly including through a third person unless approved by victim's therapist and the sentencing court.

You shall not work for pay or as a volunteer at any school, day care center park, play ground, other place where

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children may congregate. You shall not view, own or possess any obscene pornographic or sexually stimulating or visual, auditory material including telephone, electronic media, computer programs, computer services that are relevant to deviant behavior.

You shall submit two specimens of blood to Florida Department of Law Enforcement to be registered with the DNA data bank. You shall submit to a warrantless search by the probation officer or community control officer of your person, residence or vehicle.

You shall maintain a driving log. You shall not drive a motor vehicle while alone without prior approval of the supervising officer.

You shall submit to, at probationer or community control expense a HIV test, the result of which is to be released to the victims or victim's parent or guardian. That has to be done within 48 hours.

You shall not obtain or a use post

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office box without the prior approval of the supervising officer.

MS. BELOHLAVEK: You forgot one that you may not possess, own or view sexually stimulating -- I don't believe you read that outloud just now.

THE COURT: Yes, I did.

MS. BELOHLAVEK: I'm sorry, I didn't hear it. I just wanted to make sure.

THE COURT: And the warrantless search by the community control officer of the person, residence or vehicle -- understand the person, residence or vehicle includes anything you might possess like computer, a cell phone and whatever other elaborate devices there are to communicate electronically these days, okay. Good luck.

MR. GOLDBERGER: Thank you.

MS. BELOHLAVEK: Thank you.

THE COURT: Is there a judgment?

MR. GOLDBERGER: Yes, there should be judgments.

THE COURT: Was there a condition of community control that he pay or is he

EFTA00232385

paying it?

MR. GOLDBERGER: Actually there is a cash bond posted, court cost can be deducted from the cash bond.

THE COURT: $574 is the total?

MS. BELOHLAVEK: Correct.

THE COURT: Is that to cover both cases?

MR. GOLDBERGER: Yes.

THE COURT: Thank you.

MR. GOLDBERGER: Thank you, Your Honor.

(Whereupon, at 9:48 o'clock a.m. the proceedings before the Court concluded.)

EFTA00232386

CERTIFICATE

THE STATE OF FLORIDA,

COUNTY OF PALM BEACH.

I, PHYLLIS A. DAMES, Official Court Reporter for the Fifteenth Judicial Circuit, Criminal Division, in and for Palm Beach County, Florida; do hereby certify that I was authorized to and did report the foregoing proceedings before the Court at the time and place aforesaid; and that the preceding pages numbered from 1 through 49, inclusive, represent a true and accurate transcription of my stenonotes taken at said proceedings.

IN WITNESS WHEREOF, I have hereunto affixed my official signature this 19th day of July, 2008.

Phyllis A. Dames

PHYLLIS A. DAMES

LEGAL OFFICE PRODUCTS & SUPPLIES SINCE 1977 an ALL-STATE LEGAL company RECYCLED PAPER TO REORDER CALL [redacted]

PLEA IN THE CIRCUIT COURT
THE FOLLOWING IS TO REFLECT ALL TERMS OF THE NEGOTIATED SETTLEMENT

Name: Jeffrey E. Epstein

Plea: Guilty X

Case No.	Charge	Count	Lesser	Degree
06CF009454AMB	Felony Solicitation of Prostitution	1	No	3 FEL
08CF009381AMB	Procuring Person Under 18 for Prostitution	1	No	2 FEL

PSI: Waived/Not Required X Required/Requested ____

ADJUDICATION: Adjudicate [x]

SENTENCE:

On 06CF009454AMB, the Defendant is sentenced to 12 months in the Palm Beach County Detention Facility, with credit for 1 (one) day time served.

On 08CF009381AMB, the Defendant is sentenced to 18 months Community Control 1 (one). As a special condition of this Community Control, the Defendant must serve the first 6 months in the Palm Beach County Detention Facility, with credit for 1 (one) day time served. This sentence is to be served consecutive to the 12 month sentence in 06CF009454AMB. The conditions of community control are attached hereto and incorporated herein.

OTHER COMMENTS OR CONDITIONS:

Court Costs: $474.00 Cost of Prosecution: $50.00 Drug Trust Fund: $50.00

As a special condition of his community control, the Defendant is to have no unsupervised contact with minors, and the supervising adult must be approved by the Department of Corrections.

The Defendant is designated as a Sexual Offender pursuant to Florida Statute 943.0435 and must abide by all the corresponding requirements of the statute, a copy of which is attached hereto and incorporated herein.

The Defendant must provide a DNA sample in court at the time of this plea.

_____ _____
Assistant State Attorney Attorney for the Defendant

_____ _____
Date of Plea Defendant

PLEA IN THE CIRCUIT COURT
THE FOLLOWING IS TO REFLECT ALL TERMS OF THE NEGOTIATED SETTLEMENT

Name: Jeffrey E. Epstein

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06CF009454AMB	Felony Solicitation of Prostitution	1	No	3 FEL
08CF009381AMB	Procuring Person Under 18 for Prostitution	1	No	2 FEL

PSI: Waived/Not Required X Required/Requested ____

ADJUDICATION: Adjudicate [x]

SENTENCE:

On 06CF009454AMB, the Defendant is sentenced to 12 months in the Palm Beach County Detention Facility, with credit for 1 (one) day time served. jail sentence

On 08CF009381AMB, the Defendant is sentenced to 6 months in the Palm Beach County Detention Facility, with credit for 1 (one) day time served. This 6 month sentence is to be served consecutive to the 12 month sentence in 06CF009454AMB. Following this 6 month sentence, the Defendant will be placed on 12 months Community Control 1 (one). The conditions of community control are attached hereto and incorporated herein.

OTHER COMMENTS OR CONDITIONS:

As a special condition of his community control, the Defendant is to have no unsupervised contact with minors, and the supervising adult must be approved by the Department of Corrections.

The Defendant is designated as a Sexual Offender pursuant to Florida Statute 943.0435 and must abide by all the corresponding requirements of the statute, a copy of which is attached hereto and incorporated herein.

The Defendant must provide a DNA sample in court at the time of this plea.

[redacted]
Assistant State Attorney

6/30/08
Date of Plea

[redacted]
Attorney for the Defendant

[redacted]
Defendant

948.101 Terms and conditions of community control and criminal quarantine community control.--

(1) The court shall determine the terms and conditions of community control. Conditions specified in this subsection do not require oral pronouncement at the time of sentencing and may be considered standard conditions of community control.

(a) The court shall require intensive supervision and surveillance for an offender placed into community control, which may include but is not limited to:

1. Specified contact with the parole and probation officer.

2. Confinement to an agreed-upon residence during hours away from employment and public service activities.

3. Mandatory public service.

4. Supervision by the Department of Corrections by means of an electronic monitoring device or system.

5. The standard conditions of probation set forth in s. 948.03.

(b) For an offender placed on criminal quarantine community control, the court shall require:

1. Electronic monitoring 24 hours per day.

2. Confinement to a designated residence during designated hours.

(2) The enumeration of specific kinds of terms and conditions does not prevent the court from adding thereto any other terms or conditions that the court considers proper. However, the sentencing court may only impose a condition of supervision allowing an offender convicted of s. 794.011, s. 800.04, s. 827.071, or s. 847.0145 to reside in another state if the order stipulates that it is contingent upon the approval of the receiving state interstate compact authority. The court may rescind or modify at any time the terms and conditions theretofore imposed by it upon the offender in community control. However, if the court withholds adjudication of guilt or imposes a period of incarceration as a condition of community control, the period may not exceed 364 days, and incarceration shall be restricted to a county facility, a probation and restitution center under the jurisdiction of the Department of Corrections, a probation program drug punishment phase I secure residential treatment institution, or a community residential facility owned or operated by any entity providing such services.

(3) The court may place a defendant who is being sentenced for criminal transmission of HIV in violation of s. 775.0877 on criminal quarantine community control. The Department of Corrections shall develop and administer a criminal quarantine community control program emphasizing intensive supervision with 24-hour-per-day electronic monitoring. Criminal quarantine community control status must include surveillance and may include other measures normally associated with community control, except that specific conditions necessary to monitor this population may be ordered.

[redacted]

[1]943.0435 Sexual offenders required to register with the department; penalty.--

(1) As used in this section, the term:

(a)1. "Sexual offender" means a person who meets the criteria in sub-subparagraph a., sub-subparagraph b., sub-subparagraph c., or sub-subparagraph d., as follows:

a.(I) Has been convicted of committing, or attempting, soliciting, or conspiring to commit, any of the criminal offenses proscribed in the following statutes in this state or similar offenses in another jurisdiction: s. 787.01, s. 787.02, or s. 787.025(2)(c), where the victim is a minor and the defendant is not the victim's parent or guardian; s. 794.011, excluding s. 794.011(10); s. 794.05; s. 796.03; s. 796.035; s. 800.04; s. 825.1025; s. 827.071; s. 847.0133; s. 847.0135, excluding s. 847.0135(4); s. 847.0137; s. 847.0138; s. 847.0145; or s. 985.701(1); or any similar offense committed in this state which has been redesignated from a former statute number to one of those listed in this sub-sub-subparagraph; and

(II) Has been released on or after October 1, 1997, from the sanction imposed for any conviction of an offense described in sub-sub-subparagraph (I). For purposes of sub-sub-subparagraph (I), a sanction imposed in this state or in any other jurisdiction includes, but is not limited to, a fine, probation, community control, parole, conditional release, control release, or incarceration in a state prison, federal prison, private correctional facility, or local detention facility;

b. Establishes or maintains a residence in this state and who has not been designated as a sexual predator by a court of this state but who has been designated as a sexual predator, as a sexually violent predator, or by another sexual offender designation in another state or jurisdiction and was, as a result of such designation, subjected to registration or community or public notification, or both, or would be if the person were a resident of that state or jurisdiction, without regard to whether the person otherwise meets the criteria for registration as a sexual offender;

c. Establishes or maintains a residence in this state who is in the custody or control of, or under the supervision of, any other state or jurisdiction as a result of a conviction for committing, or attempting, soliciting, or conspiring to commit, any of the criminal offenses proscribed in the following statutes or similar offense in another jurisdiction: s. 787.01, s. 787.02, or s. 787.025(2)(c), where the victim is a minor and the defendant is not the victim's parent or guardian; s. 794.011, excluding s. 794.011(10); s. 794.05; s. 796.03; s. 796.035; s. 800.04; s. 825.1025; s. 827.071; s. 847.0133; s. 847.0135, excluding s. 847.0135(4); s. 847.0137; s. 847.0138; s. 847.0145; or s. 985.701(1); or any similar offense committed in this state which has been redesignated from a former statute number to one of those listed in this sub-subparagraph; or

d. On or after July 1, 2007, has been adjudicated delinquent for committing, or attempting, soliciting, or conspiring to commit, any of the criminal offenses proscribed in the following statutes in this state or similar offenses in another jurisdiction when the juvenile was 14 years of age or older at the time of the offense:

(I) Section 794.011, excluding s. 794.011(10);

(II) Section 800.04(4)(b) where the victim is under 12 years of age or where the court finds sexual activity by the use of force or coercion;

(III) Section 800.04(5)(c)1. where the court finds molestation involving unclothed genitals; or

(IV) Section 800.04(5)(d) where the court finds the use of force or coercion and unclothed genitals.

2. For all qualifying offenses listed in sub-subparagraph (1)(a)1.d., the court shall make a written finding of the age of the offender at the time of the offense.

For each violation of a qualifying offense listed in this subsection, the court shall make a written finding of the age of the victim at the time of the offense. For a violation of s. 800.04(4), the court shall additionally make a written finding indicating that the offense did or did not involve sexual activity and indicating that the offense did or did not involve force or coercion. For a violation of s. 800.04(5), the court shall additionally make a written finding that the offense did or did not involve unclothed genitals or genital area and that the offense did or did not involve the use of force or coercion.

(b) "Convicted" means that there has been a determination of guilt as a result of a trial or the entry of a plea of guilty or nolo contendere, regardless of whether adjudication is withheld, and includes an adjudication of delinquency of a juvenile as specified in this section. Conviction of a similar offense includes, but is not limited to, a conviction by a federal or military tribunal, including courts-martial conducted by the Armed Forces of the United States, and includes a conviction or entry of a plea of guilty or nolo contendere resulting in a sanction in any state of the United States or other jurisdiction. A sanction includes, but is not limited to, a fine, probation, community control, parole, conditional release, control release, or incarceration in a state prison, federal prison, private correctional facility, or local detention facility.

(c) "Permanent residence" and "temporary residence" have the same meaning ascribed in s. 775.21.

(d) "Institution of higher education" means a career center, community college, college, state university, or independent postsecondary institution.

(e) "Change in enrollment or employment status" means the commencement or termination of enrollment or employment or a change in location of enrollment or employment.

(f) "Electronic mail address" has the same meaning as provided in s. 668.602.

(g) "Instant message name" means an identifier that allows a person to communicate in real time with another person using the Internet.

(2) A sexual offender shall:

(a) Report in person at the sheriff's office:

1. In the county in which the offender establishes or maintains a permanent or temporary residence within 48 hours after:

a. Establishing permanent or temporary residence in this state; or

b. Being released from the custody, control, or supervision of the Department of Corrections or from the custody of a private correctional facility; or

2. In the county where he or she was convicted within 48 hours after being convicted for a qualifying offense for registration under this section if the offender is not in the custody or

control of, or under the supervision of, the Department of Corrections, or is not in the custody of a private correctional facility.

Any change in the sexual offender's permanent or temporary residence, name, any electronic mail address and any instant message name required to be provided pursuant to paragraph (4)(d), after the sexual offender reports in person at the sheriff's office, shall be accomplished in the manner provided in subsections (4), (7), and (8).

(b) Provide his or her name, date of birth, social security number, race, sex, height, weight, hair and eye color, tattoos or other identifying marks, occupation and place of employment, address of permanent or legal residence or address of any current temporary residence, within the state and out of state, including a rural route address and a post office box, any electronic mail address and any instant message name required to be provided pursuant to paragraph (4)(d), date and place of each conviction, and a brief description of the crime or crimes committed by the offender. A post office box shall not be provided in lieu of a physical residential address.

1. If the sexual offender's place of residence is a motor vehicle, trailer, mobile home, or manufactured home, as defined in chapter 320, the sexual offender shall also provide to the department through the sheriff's office written notice of the vehicle identification number; the license tag number; the registration number; and a description, including color scheme, of the motor vehicle, trailer, mobile home, or manufactured home. If the sexual offender's place of residence is a vessel, live-aboard vessel, or houseboat, as defined in chapter 327, the sexual offender shall also provide to the department written notice of the hull identification number; the manufacturer's serial number; the name of the vessel, live-aboard vessel, or houseboat; the registration number; and a description, including color scheme, of the vessel, live-aboard vessel, or houseboat.

2. If the sexual offender is enrolled, employed, or carrying on a vocation at an institution of higher education in this state, the sexual offender shall also provide to the department through the sheriff's office the name, address, and county of each institution, including each campus attended, and the sexual offender's enrollment or employment status. Each change in enrollment or employment status shall be reported in person at the sheriff's office, within 48 hours after any change in status. The sheriff shall promptly notify each institution of the sexual offender's presence and any change in the sexual offender's enrollment or employment status.

When a sexual offender reports at the sheriff's office, the sheriff shall take a photograph and a set of fingerprints of the offender and forward the photographs and fingerprints to the department, along with the information provided by the sexual offender. The sheriff shall promptly provide to the department the information received from the sexual offender.

(3) Within 48 hours after the report required under subsection (2), a sexual offender shall report in person at a driver's license office of the Department of Highway Safety and Motor Vehicles, unless a driver's license or identification card that complies with the requirements of s. 322.141(3) was previously secured or updated under s. 944.607. At the driver's license office the sexual offender shall:

(a) If otherwise qualified, secure a Florida driver's license, renew a Florida driver's license, or [redacted]re an identification card. The sexual offender shall identify himself or herself as a sexual offender who is required to comply with this section and shall provide proof that the sexual offender reported as required in subsection (2). The sexual offender shall provide any of the information specified in subsection (2), if requested. The sexual offender shall submit to the taking of a photograph for use in issuing a driver's license, renewed license, or identification card, and for use by the department in maintaining current records of sexual offenders.

[redacted]

(b) Pay the costs assessed by the Department of Highway Safety and Motor Vehicles for issuing or renewing a driver's license or identification card as required by this section. The driver's license or identification card issued must be in compliance with s. 322.141(3).

([redacted]) Provide, upon request, any additional information necessary to confirm the identity of the sexual offender, including a set of fingerprints.

(4)(a) Each time a sexual offender's driver's license or identification card is subject to renewal, and, without regard to the status of the offender's driver's license or identification card, within 48 hours after any change in the offender's permanent or temporary residence or change in the offender's name by reason of marriage or other legal process, the offender shall report in person to a driver's license office, and shall be subject to the requirements specified in subsection (3). The Department of Highway Safety and Motor Vehicles shall forward to the department all photographs and information provided by sexual offenders. Notwithstanding the restrictions set forth in s. 322.142, the Department of Highway Safety and Motor Vehicles is authorized to release a reproduction of a color-photograph or digital-image license to the Department of Law Enforcement for purposes of public notification of sexual offenders as provided in this section and ss. 943.043 and 944.606.

(b) A sexual offender who vacates a permanent residence and fails to establish or maintain another permanent or temporary residence shall, within 48 hours after vacating the permanent residence, report in person to the sheriff's office of the county in which he or she is located. The sexual offender shall specify the date upon which he or she intends to or did vacate such residence. The sexual offender must provide or update all of the registration information required under paragraph (2)(b). The sexual offender must provide an address for the residence or other location that he or she is or will be occupying during the time in which he or she fails to establish or maintain a permanent or temporary residence.

(c) A sexual offender who remains at a permanent residence after reporting his or her intent to vacate such residence shall, within 48 hours after the date upon which the offender indicated he or she would or did vacate such residence, report in person to the agency to which he or she reported pursuant to paragraph (b) for the purpose of reporting his or her address at such residence. When the sheriff receives the report, the sheriff shall promptly convey the information to the department. An offender who makes a report as required under paragraph (b) but fails to make a report as required under this paragraph commits a felony of the second degree, punishable as provided in s. 775.082, s. 775.083, or s. 775.084.

(d) A sexual offender must register any electronic mail address or instant message name with the department prior to using such electronic mail address or instant message name on or after October 1, 2007. The department shall establish an online system through which sexual offenders may securely access and update all electronic mail address and instant message name information.

(5) This section does not apply to a sexual offender who is also a sexual predator, as defined in s. 775.21. A sexual predator must register as required under s. 775.21.

(6) County and local law enforcement agencies, in conjunction with the department, shall verify the addresses of sexual offenders who are not under the care, custody, control, or supervision of the Department of Corrections in a manner that is consistent with the provisions of the federal Adam Walsh Child Protection and Safety Act of 2006 and any other federal standards applicable to such verification or required to be met as a condition for the receipt of federal funds by the state. Local law enforcement agencies shall report to the department any failure by a sexual offender to comply with registration requirements.

[redacted]

(7) A sexual offender who intends to establish residence in another state or jurisdiction other than the State of Florida shall report in person to the sheriff of the county of current residence within 48 hours before the date he or she intends to leave this state to establish residence in another state or jurisdiction. The notification must include the address, municipality, county, and state of intended residence. The sheriff shall promptly provide to the department the information received from the sexual offender. The department shall notify the statewide law enforcement agency, or a comparable agency, in the intended state or jurisdiction of residence of the sexual offender's intended residence. The failure of a sexual offender to provide his or her intended place of residence is punishable as provided in subsection (9).

(8) A sexual offender who indicates his or her intent to reside in another state or jurisdiction other than the State of Florida and later decides to remain in this state shall, within 48 hours after the date upon which the sexual offender indicated he or she would leave this state, report in person to the sheriff to which the sexual offender reported the intended change of residence, and report his or her intent to remain in this state. The sheriff shall promptly report this information to the department. A sexual offender who reports his or her intent to reside in another state or jurisdiction but who remains in this state without reporting to the sheriff in the manner required by this subsection commits a felony of the second degree, punishable as provided in s. 775.082, s. 775.083, or s. 775.084.

(9)(a) A sexual offender who does not comply with the requirements of this section commits a felony of the third degree, punishable as provided in s. 775.082, s. 775.083, or s. 775.084.

(b) A sexual offender who commits any act or omission in violation of this section may be prosecuted for the act or omission in the county in which the act or omission was committed, the county of the last registered address of the sexual offender, or the county in which the conviction occurred for the offense or offenses that meet the criteria for designating a person as a sexual offender.

(c) An arrest on charges of failure to register when the offender has been provided and advised of his or her statutory obligations to register under subsection (2), the service of an information or a complaint for a violation of this section, or an arraignment on charges for a violation of this section constitutes actual notice of the duty to register. A sexual offender's failure to immediately register as required by this section following such arrest, service, or arraignment constitutes grounds for a subsequent charge of failure to register. A sexual offender charged with the crime of failure to register who asserts, or intends to assert, a lack of notice of the duty to register as a defense to a charge of failure to register shall immediately register as required by this section. A sexual offender who is charged with a subsequent failure to register may not assert the defense of a lack of notice of the duty to register.

(d) Registration following such arrest, service, or arraignment is not a defense and does not relieve the sexual offender of criminal liability for the failure to register.

(10) The department, the Department of Highway Safety and Motor Vehicles, the Department of Corrections, the Department of Juvenile Justice, any law enforcement agency in this state, and the personnel of those departments; an elected or appointed official, public employee, or school administrator; or an employee, agency, or any individual or entity acting at the request or upon the direction of any law enforcement agency is immune from civil liability for damages for good faith compliance with the requirements of this section or for the release of information under this section, and shall be presumed to have acted in good faith in compiling, recording, reporting, or releasing the information. The presumption of good faith is not overcome if a technical or clerical error is made by the department, the Department of Highway Safety and Motor Vehicles, the Department of Corrections, the Department of Juvenile

[redacted]

Justice, the personnel of those departments, or any individual or entity acting at the request or upon the direction of any of those departments in compiling or providing information, or if information is incomplete or incorrect because a sexual offender fails to report or falsely reports his or her current place of permanent or temporary residence.

(11) Except as provided in s. 943.04354, a sexual offender must maintain registration with the department for the duration of his or her life, unless the sexual offender has received a full pardon or has had a conviction set aside in a postconviction proceeding for any offense that meets the criteria for classifying the person as a sexual offender for purposes of registration. However, a sexual offender:

(a)1. Who has been lawfully released from confinement, supervision, or sanction, whichever is later, for at least 25 years and has not been arrested for any felony or misdemeanor offense since release, provided that the sexual offender's requirement to register was not based upon an adult conviction:

a. For a violation of s. 787.01 or s. 787.02;

b. For a violation of s. 794.011, excluding s. 794.011(10);

c. For a violation of s. 800.04(4)(b) where the court finds the offense involved a victim under 12 years of age or sexual activity by the use of force or coercion;

d. For a violation of s. 800.04(5)(b);

e. For a violation of s. 800.04(5)c.2. where the court finds the offense involved unclothed genitals or genital area;

f. For any attempt or conspiracy to commit any such offense; or

g. For a violation of similar law of another jurisdiction,

may petition the criminal division of the circuit court of the circuit in which the sexual offender resides for the purpose of removing the requirement for registration as a sexual offender.

2. The court may grant or deny relief if the offender demonstrates to the court that he or she has not been arrested for any crime since release; the requested relief complies with the provisions of the federal Adam Walsh Child Protection and Safety Act of 2006 and any other federal standards applicable to the removal of registration requirements for a sexual offender or required to be met as a condition for the receipt of federal funds by the state; and the court is otherwise satisfied that the offender is not a current or potential threat to public safety. The state attorney in the circuit in which the petition is filed must be given notice of the petition at least 3 weeks before the hearing on the matter. The state attorney may present evidence in opposition to the requested relief or may otherwise demonstrate the reasons why the petition should be denied. If the court denies the petition, the court may set a future date at which the sexual offender may again petition the court for relief, subject to the standards for relief provided in this subsection.

3. The department shall remove an offender from classification as a sexual offender for purposes of registration if the offender provides to the department a certified copy of the court's written findings or order that indicates that the offender is no longer required to comply with the requirements for registration as a sexual offender.

[redacted]

(b) As defined in sub-subparagraph (1)(a)1.b. must maintain registration with the department for the duration of his or her life until the person provides the department with an order issued by the court that designated the person as a sexual predator, as a sexually violent predator, or by another sexual offender designation in the state or jurisdiction in which the order was issued which states that such designation has been removed or demonstrates to the department that such designation, if not imposed by a court, has been removed by operation of law or court order in the state or jurisdiction in which the designation was made, and provided such person no longer meets the criteria for registration as a sexual offender under the laws of this state.

(12) The Legislature finds that sexual offenders, especially those who have committed offenses against minors, often pose a high risk of engaging in sexual offenses even after being released from incarceration or commitment and that protection of the public from sexual offenders is a paramount government interest. Sexual offenders have a reduced expectation of privacy because of the public's interest in public safety and in the effective operation of government. Releasing information concerning sexual offenders to law enforcement agencies and to persons who request such information, and the release of such information to the public by a law enforcement agency or public agency, will further the governmental interests of public safety. The designation of a person as a sexual offender is not a sentence or a punishment but is simply the status of the offender which is the result of a conviction for having committed certain crimes.

(13) Any person who has reason to believe that a sexual offender is not complying, or has not complied, with the requirements of this section and who, with the intent to assist the sexual offender in eluding a law enforcement agency that is seeking to find the sexual offender to question the sexual offender about, or to arrest the sexual offender for, his or her noncompliance with the requirements of this section:

(a) Withholds information from, or does not notify, the law enforcement agency about the sexual offender's noncompliance with the requirements of this section, and, if known, the whereabouts of the sexual offender;

(b) Harbors, or attempts to harbor, or assists another person in harboring or attempting to harbor, the sexual offender; or

(c) Conceals or attempts to conceal, or assists another person in concealing or attempting to conceal, the sexual offender; or

(d) Provides information to the law enforcement agency regarding the sexual offender that the person knows to be false information,

commits a felony of the third degree, punishable as provided in s. 775.082, s. 775.083, or s. 775.084.

(14)(a) A sexual offender must report in person each year during the month of the sexual offender's birthday and during the sixth month following the sexual offender's birth month to the sheriff's office in the county in which he or she resides or is otherwise located to reregister.

(b) However, a sexual offender who is required to register as a result of a conviction for:

1. Section 787.01 or s. 787.02 where the victim is a minor and the offender is not the victim's parent or guardian;

[redacted]

2. Section 794.011, excluding s. 794.011(10);

3. Section 800.04(4)(b) where the court finds the offense involved a victim under 12 years of age or sexual activity by the use of force or coercion;

4. Section 800.04(5)(b);

5. Section 800.04(5)(c)1. where the court finds molestation involving unclothed genitals or genital area;

6. Section 800.04(5)c.2. where the court finds molestation involving unclothed genitals or genital area;

7. Section 800.04(5)(d) where the court finds the use of force or coercion and unclothed genitals or genital area;

8. Any attempt or conspiracy to commit such offense; or

9. A violation of a similar law of another jurisdiction,

must reregister each year during the month of the sexual offender's birthday and every third month thereafter.

(c) The sheriff's office may determine the appropriate times and days for reporting by the sexual offender, which shall be consistent with the reporting requirements of this subsection. Reregistration shall include any changes to the following information:

1. Name; social security number; age; race; sex; date of birth; height; weight; hair and eye color; address of any permanent residence and address of any current temporary residence, within the state or out of state, including a rural route address and a post office box; any electronic mail address and any instant message name required to be provided pursuant to paragraph (4)(d); date and place of any employment; vehicle make, model, color, and license tag number; fingerprints; and photograph. A post office box shall not be provided in lieu of a physical residential address.

2. If the sexual offender is enrolled, employed, or carrying on a vocation at an institution of higher education in this state, the sexual offender shall also provide to the department the name, address, and county of each institution, including each campus attended, and the sexual offender's enrollment or employment status.

3. If the sexual offender's place of residence is a motor vehicle, trailer, mobile home, or manufactured home, as defined in chapter 320, the sexual offender shall also provide the vehicle identification number; the license tag number; the registration number; and a description, including color scheme, of the motor vehicle, trailer, mobile home, or manufactured home. If the sexual offender's place of residence is a vessel, live-aboard vessel, or houseboat, as defined in chapter 327, the sexual offender shall also provide the hull identification number; the manufacturer's serial number; the name of the vessel, live-aboard vessel, or houseboat; the registration number; and a description, including color scheme, of the vessel, live-aboard vessel or houseboat.

4. Any sexual offender who fails to report in person as required at the sheriff's office, or who fails to respond to any address verification correspondence from the department within 3 weeks of the date of the correspondence or who fails to report electronic mail addresses or

[redacted]

instant message names, commits a felony of the third degree, punishable as provided in s. 775.082, s. 775.083, or s. 775.084.

(d) The sheriff's office shall, within 2 working days, electronically submit and update all information provided by the sexual offender to the department in a manner prescribed by the department.

[redacted]

STATE OF FLORIDA
Plaintiff

-VS-

JEFFREY E. EPSTEIN
Defendant

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

CASE NUMBER 502008CF009381AXXXMB
DIVISION MCSORLEY "W"
DC NUMBER W35755
CIRCUIT NUMBER: 15-4/JAIL SPLIT

ORDER OF COMMUNITY CONTROL I

This cause coming before the Court to be heard, and you, the defendant, being now present before the court, and you having

☒ entered a plea of guilty to ☐ been found guilty by jury verdict of
☐ entered a plea of nolo contendere to ☐ been found guilty by the court trying the case without a jury of

Count 1. PROCURE PERSON UNDER AGE OF 18 FOR PROSTITUTION

SECTION 1: JUDGMENT OF GUILT

☒ The court hereby adjudges you to be guilty of the above offense(s).

Now, therefore, it is ordered and adjudged that the imposition of sentence is hereby withheld and that you be placed on Probation I for a period of_____ under the supervision of the Department of Corrections, subject to Florida law.

SECTION 2: ORDER WITHHOLDING ADJUDICATION

☐ Now, therefore, it is ordered and adjudged that the adjudication of guilt is hereby withheld and that you be placed on Probation for a period of___ under the supervision of the Department of Corrections, subject to Florida law.

SECTION 3: INCARCERATION DURING PORTION OF SUPERVISION SENTENCE

It is hereby ordered and adjudged that you be:

☐ committed to the Department of Corrections
or
☐ confined in the County Jail
for a term of_____ with credit for_____ jail time. After you have served _____ of the term, you shall be placed on Probation for a period of _____ under the supervision of the Department of Corrections, subject to Florida law.
or
☒ confined in the County Jail
for a term of SIX (6) MONTHS AS TO COUNT 1 FOLLOWED BY TWELVE (12) MONTHS COMMUNITY CONTROL I CONSECUTIVE TO THE (12) MONTH SENTENCE IN CASE# 2008CF009454AMB with credit for ONE (1) DAY jail time, as a special condition of supervision.

SHARON R. BOCK, CLERK
PALM BEACH COUNTY, FL
CIRCUIT CRIMINAL

2008 JUL 21 PM 4:55

FILED

EFTA00232401

JEFFREY EPSTEIN
CASE#502008CF009381AXXXMB

IT IS FURTHER ORDERED that you shall comply with the following standard conditions of supervision as provided by Florida law:

(1) You will report to the probation office as directed. Not later than the fifth day of each month, unless otherwise directed, you will make a full and truthful report to your officer on the form provided for that purpose.

(2) You will pay the State of Florida the amount of $50.00 per month, as well as 4% surcharge, toward the cost of your supervision in accordance with s. 948.09, F.S., unless otherwise exempted in compliance with Florida Statutes.

(3) You will remain in a specified place. You will not change your residence or employment or leave the county of your residence without first procuring the consent of your officer.

(4) You will not possess, carry or own any firearm or weapon, unless authorized by the court.

(5) You will live without violating the law. A conviction in a court of law shall not be necessary for such a violation to constitute a violation of your probation/community control.

(6) You will not associate with any person engaged in any criminal activity.

(7) You will not use intoxicants to excess or possess any drugs or narcotics unless prescribed by a physician. Nor will you visit places where intoxicants, drugs or other dangerous substances are unlawfully sold, dispensed or used.

(8) You will work diligently at a lawful occupation, advise your employer of your probation status, and support any dependents to the best of your ability, as directed by your officer.

(9) You will promptly and truthfully answer all inquiries directed to you by the court or the officer, and allow your officer to visit in your home, at your employment site or elsewhere, and you will comply with all instructions your officer may give you.

(10) You will pay restitution, court costs, and/or fees in accordance with special conditions imposed or in accordance with the attached orders.

(11) You will submit to random testing as directed by your officer or the professional staff of the treatment center where he/she is receiving treatment to determine the presence of alcohol or illegal drugs. You will be required to pay for the tests unless exempt by the court.

(12) You will submit two biological specimens, as directed by your officer, for DNA analysis as prescribed in ss. 943.325 and 948.014, F.S.

(13) You will report in person within 72 hours of your release from incarceration to the probation office in PALM BEACH County, Florida, unless otherwise instructed by the court or department. (This condition applies only if section 3 on the previous page is checked.) Otherwise, you must report immediately to the probation office located at 3444 SOUTH CONGRESS AVENUE, LAKE WORTH, FL 33461.

EFTA00232402

JEFFREY EPSTEIN
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SPECIAL CONDITIONS

☐ 1. You must undergo a Drug and Alcohol evaluation and, if treatment is deemed necessary, you must successfully complete the treatment, and be responsible for the payment of any costs incurred while receiving said evaluation and treatment, unless waived by the court.
Additional instructions ordered: _____

☐ 2. You will make restitution to the following victim(s), as directed by the court, until the obligation is paid in full:
NAME: _____
TOTAL AMOUNT; $_____
Additional instructions ordered, including specific monthly amount, begin date, due date, or joint & several: _____

NAME: _____
TOTAL AMOUNT: $_____
Additional instructions ordered, including specific monthly amount, begin date, due date, or joint & several: _____

SPECIAL CONDITIONS – CONTINUED

☐ 3. You will enter the Department of Corrections Non-Secure Drug Treatment Program or other residential treatment program/Probation and Restitution Center for a period of successful completion as approved by your officer. You are to remain until you successfully complete said Program and Aftercare. You are to comply with all Rules and Regulations of the Program. You shall be confined in the county jail until placement in said program, and if you are confined in the jail, the Sheriff will transport you to said program.

☐ 4. You will abstain entirely from the use of alcohol and/or illegal drugs, and you will not associate with anyone who is illegally using drugs or consuming alcohol.

☐ 5. You will submit to urinalysis testing on a monthly basis to determine the presence of alcohol or illegal drugs. You will be required to pay for the tests unless exempt by the court.

☐ 6. You will not visit any establishment where the primary business is the sale and dispensing of alcoholic beverages.

☐ 7. You will successfully complete ___ hours of community service at a rate of _____, at a work site approved by your officer.
Additional instructions ordered: _____

☐ 8. You will remain at your residence between 10 p.m. and 6 a.m. due to a curfew imposed, unless otherwise directed by the court.

☐ 9. You will submit to electronic monitoring, follow the rules of electronic monitoring, and pay $_____ per month for the cost of the monitoring service, unless otherwise directed by the court.

☐ 10. You will not associate with _____ during the period of supervision.

☐ 11. You will have no contact (direct or indirect) with the victim or the victim's family during the period of supervision.

☐ 12. You will have no contact (direct or indirect) with _____ during the period of supervision.

☐ 13. You will maintain full time employment or attend school/vocational school full time or a combination of school/work during the term of your supervision.

☐ 14. You will make a good faith effort toward completing basic or functional literacy skills or a high school equivalency diploma.

☐ 15. You will successfully complete the Probation & Restitution Program, abiding by all rules and regulations.

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JEFFREY EPSTEIN
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☐ 16. You will attend Alcoholics Anonymous or Narcotics Anonymous meetings at least monthly, unless otherwise directed by the court.

☐ 17. You must successfully complete Anger Management, and be responsible for the payment of any costs incurred while receiving said treatment, unless waived. If convicted of a Domestic Violence offense, as defined in s. 741.28, F.S., you must attend and successfully complete a batterer's intervention program, unless otherwise directed by the court.
Additional instructions ordered: ____

☐ 18. You will attend an HIV/AIDS Awareness Program consisting of a class of not less than two (2) hours or more than four (4) hours in length, the cost for which will be paid by you.

☐ 19. You shall submit your person, property, place of residence, vehicle or personal effects to a warrantless search at any time, by any probation or community control officer or any law enforcement officer.

☒ 20. DEFENDANT MUST REGISTER AS A SEXUAL OFFENDER WITHIN 48 HOURS OF RELEASE

☒ 21. AS A SPECIAL CONDITION OF HIS COMMUNITY CONTROL, THE DEFENDANT IS TO HAVE NO UNSUPERVISED CONTACT WITH MINORS, AND THE SUPERVISING ADULT MUST BE APPROVED BY THE DEPARTMENT OF CORRECTIONS

☒ 22. THE DEFENDANT IS DESIGNATED AS A SEXUAL OFFENDER PURSUANT TO FLORIDA STATUTE 943.05 AND MUST ABIDE BY ALL THE CORRESPONDING REQUIREMENTS OF THE STATUTE, A COPY OF WHICH IS ATTACHED HERETO AND INCORPORATED HEREIN

☒ 23. DEFENDANT MUST PROVIDE A DNA SAMPLE IN COURT [redacted] THE TIME OF THIS PLEA.

☒ 24. SPECIFIED CONTACT WITH THE PAROLE AND PROBATION OFFICER

☒ 25. CONFINEMENT TO AN AGREED-UPON RESIDENCE DURING HOURS AWAY FROM EMPLOYMENT AND PUBLIC SERVICE ACTIVITIES

☒ 25. MANDATORY PUBLIC SERVICE

☒ 26. SUPERVISION BY THE DEPARTMENT OF CORRECTIONS BY MEANS OF AN ELECTRONIC MONITORING DEVICE OR SYSTEM

☒ 27. ELECTRONIC MONITORING 24 HOURS PER DAY

☒ 28. CONFINEMENT TO A DESIGNATED RESIDENCE DURING DESIGNATED HOURS

AND, IF PLACED ON DRUG OFFENDER PROBATION, YOU WILL COMPLY WITH THE FOLLOWING CONDITION OF SUPERVISION IN ADDITION TO THE STANDARD CONDITIONS LISTED ABOVE AND ANY OTHER SPECIAL CONDITIONS ORDERED BY THE COURT:

(14) You will participate in a specialized drug treatment program, either as an in-patient or out patient, as recommended by the treatment provider. You will attend all counseling sessions, submit to random urinalysis and, if an in-patient, you will comply with all operating rules, regulations and procedures of the treatment facility. You will pay for all costs associated with treatment and testing unless otherwise directed.
Additional instructions ordered: ____

☐ (15) You will remain at your residence between ____ p.m. and ____ a.m. due to a curfew imposed, unless otherwise directed by the court.

AND, IF PLACED ON COMMUNITY CONTROL, YOU WILL COMPLY WITH THE FOLLOWING CONDITIONS, IN ADDITION TO THE STANDARD CONDITIONS LISTED ABOVE AND ANY OTHER SPECIAL CONDITIONS ORDERED BY THE COURT:

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(14) You will report to your officer as directed, at least one time a week, unless you have written consent otherwise.

(15) You will remain confined to your approved residence except for one half hour before and after your approved employment, public service work, or any other special activities approved by your officer.

(16) You will maintain an hourly accounting of all your activities on a daily log, which you will submit to your officer on request.

(17) You will successfully complete ___ hours of community service at a rate of _____, at a Work site approved by your officer. Additional instructions ordered: _____

☐ (18) You will submit to electronic monitoring, follow the rules of electronic monitoring, and pay $_____ per month for the cost of the monitoring service, unless otherwise directed by the court.

AND, IF PLACED ON PROBATION OR COMMUNITY CONTROL FOR A SEX OFFENSE PROVIDED IN CHAPTER 794, s. 800.04, s. 827.071, or s. 847.0145, COMMITTED ON OR AFTER OCTOBER 1, 1995 YOU WILL COMPLY WITH THE FOLLOWING STANDARD SEX OFFENDER CONDITIONS, IN ADDITION TO THE STANDARD CONDITIONS LISTED ABOVE AND ANY OTHER SPECIAL CONDITIONS ORDERED BY THE COURT:

(14) A mandatory curfew from 10 p.m. to 6 a.m. The court may designate another 8-hour period if the offender's employment precludes the above specified time, and the alternative is recommended by the Department of Corrections. If the court determines that imposing a curfew would endanger the victim, the court may consider alternative sanctions.

(15) If the victim was under the age of 18, a prohibition on living within 1,000 feet of a school, day care center, park, playground, or other place where children regularly congregate, as prescribed by the court. The 1,000-foot distance shall be measured in a straight line from the offender's place of residence to the nearest boundary line of the school, day care center, park, playground, or other place where children congregate. The distance may not be measured by a pedestrian route or automobile route.

(16) Active participation in and successful completion of a sex offender treatment program with qualified practitioners specifically trained to treat sex offenders, at the offender's own expense. If a qualified practitioner is not available within a 50-mile radius of the offender's residence, the offender shall participate in other appropriate therapy.

(17) A prohibition on any contact with the victim, directly or indirectly, including through a third person, unless approved by the victim, the offender's therapist, and the sentencing court.

(18) If the victim was under the age of 18, a prohibition on contact with a child under the age of 18 except as provided in this paragraph. The court may approve supervised contact with a child under the age of 18 if the approval is based upon a recommendation for contact issued by a qualified practitioner who is basing the recommendation on a risk assessment. Further, the sex offender must be currently enrolled in or have successfully completed a sex offender therapy program. The court may not grant supervised contact with a child if the contact is not recommended by a qualified practitioner and may deny supervised contact with a child at any time.

(19) If the victim was under age 18, a prohibition on working for pay or as a volunteer at any place where children regularly congregate, including, but not limited to any school, day care center, park, playground, pet store, library, zoo, theme park, or mall.

(20) Unless otherwise indicated in the treatment plan provided by the sexual offender treatment program, a prohibition on viewing, accessing, owning, or possessing any obscene, pornographic, or sexually stimulating visual or auditory material, including telephone, electronic media, computer programs, or computer services that are relevant to the offender's deviant behavior pattern.

(21) A requirement that the offender submit two specimens of blood or other approved biological specimens to the Florida Department of Law Enforcement to be registered with the DNA data bank.

(22) A requirement that the offender make restitution to the victim, as ordered by the court under s. 775.089, for all necessary medical and related professional services relating to physical, psychiatric, and psychological care.

(23) Submission to a warrantless search by the community control or probation officer of the offender's person, residence, or vehicle.

EFTA00232405

JEFFREY EPSTEIN
CASE#502008CP009381AXXXMB

EFFECTIVE FOR PROBATIONER OR COMMUNITY CONTROLLEE WHOSE CRIME WAS COMMITTED ON OR AFTER OCTOBER 1, 1997, AND WHO IS PLACED ON COMMUNITY CONTROL OR SEX OFFENDER PROBATION FOR A VIOLATION OF CHAPTER 794, s. 800.04, s. 827.071, or s. 847.0145, IN ADDITION TO ANY OTHER PROVISION OF THIS SECTION, YOU MUST COMPLY WITH THE FOLLOWING CONDITIONS OF SUPERVISION:

(24) As part of a treatment program, participation at least annually in polygraph examinations to obtain information necessary for risk management and treatment and to reduce the sex offender's denial mechanisms. A polygraph examination must be conducted by a polygrapher trained specifically in the use of the polygraph for the monitoring of sex offenders, where available, and shall be paid by the sex offender.

(25) Maintenance of a driving log and a prohibition against driving a motor vehicle alone without the prior approval of the supervising officer.

(26) A prohibition against obtaining or using a post office box without the prior approval of the supervising officer.

(27) If there was sexual contact, a submission to, at the offender's expense, an HIV test with the results to be released to the victim and/or the victim's parent or guardian.

(28) Electronic monitoring when deemed necessary by the probation officer and supervisor, and ordered by the court at the recommendation of the Department of Corrections.

(29) **Effective for an offender whose crime was committed on or after July 1, 2005, and who are placed on supervision for violation of chapter 794, s. 800.04, s. 827.071, or s. 847.0145,** a prohibition on accessing the Internet or other computer services until the offender's sex offender treatment program, after a risk assessment is completed, approves and implements a safety plan for the offender's accessing or using the Internet or other computer services.

(30) **Effective for offenders whose crime was committed on or after September 1, 2005,** there is hereby imposed, in addition to any other provision in this section, mandatory electronic monitoring as a condition of supervision for those who:

- Are placed on supervision for a violation of chapter 794, s. 800.04(4), (5), or (6), s. 827.071, or s. 847.0145 and the unlawful sexual activity involved a victim 15 years of age or younger and the offender is 18 years of age or older; or
- Are designated as a sexual predator pursuant to s. 775.21; or
- Has previously been convicted of a violation of chapter 794, s. 800.04(4), (5), or (6), s. 827.071, or s. 847.0145 and the unlawful sexual activity involved a victim 15 years of age or younger and the offender is 18 years of age or older.

You are hereby placed on notice that should you violate your probation or community control, and the conditions set forth in s. 948.063(1) or (2) are satisfied, whether your probation or community control is revoked or not revoked, you shall be placed on electronic monitoring in accordance with F.S. 948.063.

YOU ARE HEREBY PLACED ON NOTICE that the court may at any time rescind or modify any of the conditions of your probation, or may extend the period of probation as authorized by law, or may discharge you from further supervision. If you violate any of the conditions of your probation, you may be arrested and the court may revoke your probation, adjudicate you guilty if adjudication of guilt was withheld, and impose any sentence that it might have imposed before placing you on probation or require you to serve the balance of the sentence.

EFTA00232406

JEFFREY EPSTEIN
CASE#502008CF009381AXXXMB

IT IS FURTHER ORDERED that when you have been instructed as to the conditions of probation, you shall be released from custody if you are in custody, and if you are at liberty on bond, the sureties thereon shall stand discharged from liability. (This paragraph applies only if section 1 or section 2 is checked.)

IT IS FURTHER ORDERED that the clerk of this court file this order in the clerk's office and provide certified copies of same to the officer for use in compliance with the requirements of law.

DONE AND ORDERED, on July 15, 2008

NUNC PRO TUNC 06-30-2008

Sandra K. McSorley, Circuit Judge

I acknowledge receipt of a copy of this order and that the conditions have been explained to me and I agree to abide by them.

Date: _____ _____
Defendant

Instructed by: _____
Supervising Officer

sp/07-02-08

EFTA00232407

JEFFREY EPSTEIN
CASE#502008CF009381AXXXMB

COURT ORDERED PAYMENTS

CHECK ALL THAT ARE ORDERED:

FINES

☐ $____ Total of fines assessed in sentence, pursuant to s. 775.083 (1)(a) through (g) or Chapter 316, F.S.
☐ $____ Statutorily mandated 5% surcharge/cost if fine assessed (on first line) pursuant to s. 938.04, F.S.
☐ $ 20.00 Crime Stoppers [redacted] Fund pursuant to s. 938.06(1), F.S. Statutorily mandated if a fine is imposed.

MANDATORY COSTS IN ALL CASES

☒ $200.00 Additional court cost for felony offense, pursuant to s. 938.05(1)(a), F.S.
☐ $ 50.00 Additional court cost for misdemeanor or criminal traffic offense, pursuant to s. 938.05(1)(b) or (c), F.S.
☒ $ 50.00 Crimes Compensation Trust Fund pursuant to s. 938.03(1), F.S.
☒ $ 50.00 County Crime Prevention Fund pursuant to s. 775.083(2), F.S.
☒ $ 3.00 Additional Court Costs Clearing Trust Fund pursuant to s. 938.01(1), F.S.
☐ $ 3.00 Per month for each month of supervision for Training Trust Fund Surcharge, pursuant to s. 948.09, F.S.

MANDATORY COSTS IN SPECIFIC TYPES OF CASES

☐ $151.00 Rape Crisis Program Trust Fund, pursuant to s. 938.085, F.S. for any violations of ss. 784.011, 784.021, 784.03, 784.041, 784.045, 784.048, 784.07, 784.08, 784.081, 784.082, 784.083, 784.085, or 794.011, F.S.
☐ $201.00 Domestic Violence Trust Fund, pursuant to s. 938.08, F.S. for any violations of ss. 784.011, 784.021, 784.03, 784.041, 784.045, 784.048, 784.07, 784.08, 784.081, 784.082, 784.083, 784.085, 794.011, or any offense of Domestic Violence described in s. 741.28, F.S.
☐ $101.00 Certain Crimes Against Minors, pursuant to s. 938.10(1), F.S. for any violations of s. 784.085, chapter 787, chapter 794, s. 796.03, s. 800.04, chapter 827, s. 847.0145, or s. 985.701, F.S.
☐ $135.00 DUI Court Costs, pursuant to s. 938.07, F.S. for any violations of ss. 316.193 or 327.35, F.S.
☐ $ 3.00 State Agency Law Enforcement Radio System Trust Fund, pursuant to s. 318.18(17), F.S. for any violations of offenses listed in s. 318.17 including ss. 316.1935, 316.027, 316.061, 877.111, chapter 893, ss. 316.193, 316.192, 316.067, 316.072(3), 316.545(1), or any other offense in chapter 316 which is classified as a criminal violation.

MANDATORY COURT COSTS AUTHORIZED BY LOCAL GOVERNMENTAL ENTITIES

☒ $ 2.00 Criminal Justice Education by Municipalities and Counties, pursuant to s. 938.15, F.S.
☒ $65.00 Additional court costs for local requirements and other county funded programs pursuant to s. 939.185(1)(a), F.S.
☒ $ 3.00 Teen Court pursuant to s. 938.19(2), F.S.

DISCRETIONARY

☐ $ 1.00 Per month during the term of supervision to the following nonprofit organization established for the sole purpose of supplementing the rehabilitative efforts of the Department of Corrections, pursuant to s. 948.039(2), F.S.: _____
☐ $ 40.00 Public Defender Application Fee, if not previously collected or waived, pursuant to s. 27.52 and s. 938.29, F.S.
☐ $____ Public Defender Fees and Costs, pursuant to s. 938.29, F.S. as determined locally.
☒ $50.00 Prosecution/Investigative Costs, pursuant to s. 938.27, F.S.

☐ Other _____

☐ Other: _____

DISCRETIONARY COSTS FOR SPECIFIC TYPES OF CASES

☒ $50.00 County Alcohol and Other Drug Abuse Trust Fund, pursuant to s. 938.21 and s. 938.23, F.S. for violations of s. 316.193, s.856.011, s. 856.015, or chapter 562, chapter 567, or chapter 568, F.S.
☐ $100.00 Operating Trust Fund of the FDLE, pursuant to s. 938.25, F.S. for violations of s. 893.13 offenses

* TOTAL $ 573.00

PAYMENT IS TO BE MADE THROUGH AND PAYABLE TO: ☒ Department of Corrections or ☐ Clerk of Court

(If collected by the Department of Corrections, a surcharge of 4% will be added to all payments ordered by the court, pursuant to s. 945.31, F.S.)

☐ Court Costs/Fines Waived
☐ Court Costs/Fines in the amount of _____ converted to _____ community service hours
☐ Court Costs/Fines in the amount of _____ reduced to civil judgment

SPECIFIC INSTRUCTIONS FOR PAYMENT: _____

EFTA00232408

RECYCLED PAPER

TO REORDER CALL 954-846-9399

EFTA00232409

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

STATE OF FLORIDA

vs.

JEFFREY EPSTEIN,

Defendant.
_____/

CASE NO.: 2006CF009454AXX
DIVISON: "W"

AGREED ORDER SEALING DOCUMENT IN COURT FILE

THIS MATTER came before the Honorable Judge Deborah Dale Pucillo on June 30, 2008 during a plea conference in the above-referenced case number. The Court being fully apprised in the circumstances, it is hereby:

ORDERED AND ADJUDGED that the attached document filed by the Defendant on July 2, 2008 be sealed by the Clerk in the court file.

DONE AND ORDERED in chambers, West Palm Beach, Palm Beach County, Florida this 2 day of July, 2008.

DEBORAH DALE PUCILLO
Circuit Court Judge

Copies forwarded to:

Jack A. Goldberger, Esq.
Counsel for the Defendant
250 Australian Avenue South, Ste. 1400
West Palm Beach, Florida 33401

Lanna Belohlavek, Esq.
Assistant State Attorney
(interoffice)

AB JUL 0 3 2008

LEGAL OFFICE PRODUCTS & SUPPLIES a/k/a ALL-S-XE USA, company since 1977

RECYCLED PAPER

TO REORDER CALL 9[redacted]

EFTA00232411

IN THE CIRCUIT COURT OF THE
~~FIFTEENTH JUDICAL CIRCUIT~~
IN AND FOR PALM BEACH COUNTY
FLORIDA, CRIMINAL DIVISION

STATE OF FLORIDA,

vs. Case Nos.2006-CF9454 AXX

JEFFREY EPSTEIN, 2008-9381CF AXX

Defendant.
_____/

NONPARTY [redacted]'S MOTION TO VACATE ORDER SEALING RECORDS AND UNSEAL RECORDS

[redacted], a nonparty, moves pursuant to the Rules of Judicial Administration Rule 2.420(d)(5) to vacate the order sealing records and unseal two documents in these files on the following grounds:

1. BW is a victim of sexual abuse by defendant who was convicted of procuring a person under 18 for prostitution and felony solicitation of prostitution. See attached judgments of conviction (Exhibit "A".) [redacted] presently has a pending civil action in this court against defendant for damages. Case number 502008CA028058XXXXMB AB.

2. On June 30, 2008 and August 25, 2008, this Court sealed two documents, a non-prosecution agreement and an addendum to non-prosecution agreement. See attached copies of envelopes containing the sealed documents and also an Agreed Order Sealing Document In Court File entered July 2, 2008 (Exhibit "B".)

3. The sealing of these documents was done without written motion required by Rule 2.420(d)(1) or notice to the public, the media, the record newspaper and the victims of defendant required by Rule 2.420(d)(2). The Agreed Order does not set forth the

grounds set forth in Rule 2.420(d)(3). The clerk of court did not post a copy of the notice of the order as required by Rule 2.420(d)(4).

4. The sealing of these documents was also done contrary to the Administrative Orders of this Court, AO 2.104, 2.032, 2.303 and 11.046.

5. The request to seal the first document was made orally at the plea hearing on June 30, 2008. A copy of the relevant portion of the transcript is attached (see pages 38-40) (Exhibit "C".)

6. It is against public policy for these documents to have been sealed and hidden from public scrutiny. As a member of the public, [redacted]. has a right to have these documents unsealed. Furthermore, these documents are relevant and material to [redacted].'s civil action against defendant. As stated in the plea colloquy, they were an inducement for defendant to enter into his guilty pleas. They are proper objects of discovery. However, unless they are unsealed, [redacted]. is unable to obtain them or utilize them in her case.

7. Pursuant to Rule 2.420(d)(5), the Court must hold a hearing on this motion in open court.

WHEREFORE movant requests the Court vacate the order sealing records and unseal the two documents.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been served via U.S. Mail and Facsmile this 12 day of May, 2009 to: Jack Alan Goldberger, Esq., Atterbury Goldberger et al., 250 Australian Ave. South, Suite 1400, West Palm Beach, FL 33401.

EFTA00232413

ROTHSTEIN ROSENFELDT ADLER
Attorneys for Plaintiff
401 East Las Olas Blvd., Suite 1650
Fort Lauderdale, Florida 33394
Telephone [redacted]
Telecopier [redacted]

By: _____
Bradley J. Edwards
Florida Bar No. [redacted]
[redacted]
William J. Berger
Florida Bar No. [redacted]
[redacted]

EFTA00232414

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

CASE NO. ~~06 CF 9454 AXX~~ 2006 CF 9454 AXX

OBTS NUMBER

CFN 20080267522
OR BK 22760 PG 1081
RECORDED 07/17/2008 08:52:50
Palm Beach County, Florida
Sharon R. Bock, CLERK & COMPTROLLE
Pg 1081; (1pg)

STATE OF FLORIDA [ ] COMMUNITY CONTROL VIOLATOR

v. [ ] PROBATION VIOLATOR

Jeffrey E. Epstein,
DEFENDANT

[redacted] W M
DATE OF BIRTH RACE GENDER SOCIAL SECURITY NUMBER

JUDGMENT

The above Defendant, being personally before this Court represented by J. Goldberger (attorney)

[ ] Having been tried and found guilty of the following crime(s):	[X] Having entered a plea of guilty to the following crime(s):	[ ] Having entered a plea of nolo contendere to the following crime(s):

COUNT	CRIME	OFFENSE STATUTE NUMBER(S)	DEGREE
1	Felony Solicitation of Prostitution	796.07(2)(f)	3rd

[X] and no cause having been shown why the Defendant should not be adjudicated guilty, IT IS ORDERED THAT the Defendant is hereby ADJUDICATED GUILTY of the above crime(s).

[ ] and having been convicted or found guilty of, or having entered a plea of nolo contendere or guilty regardless of adjudication, to attempts or offenses relating to sexual battery (ch. 794), lewd and lascivious conduct (ch. 800), or murder (s. 782.04), aggravated battery (s. 784.045), burglary (s. 810.02), carjacking (s. 812.133), or home invasion robbery (s. 812.135), or any other offense specified in section 943.325, the defendant shall be required to submit blood specimens.

[ ] and good cause be not shown, IT IS ORDERED THAT ADJUDICATION OF GUILT BE WITHHELD.

SENTENCE STAYED [ ] The Court hereby stays and withholds imposition of sentence as to count(s) and places the Defendant on [ ] Probation and/or [ ] Community Control under the supervision and Dept. of Corrections, conditions of probation set forth in separate order.

SENTENCE DEFERRED [ ] The Court hereby defers imposition of sentence until

The Defendant in Open Court was advised of his right to appeal from this Judgment by filing notice of appeal within thirty days from this date with the Clerk of this Court and his right to the assistance of counsel in taking said appeal at the expense of the State on showing of indigency.

[redacted] ORDERED in Open Court at Palm Beach County, Florida, this 30 day of June, 2008.

[redacted]
CIRCUIT COURT JUDGE

EXHIBIT A

EFTA00232415

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

CASE NO 08CF9381AXX DIV: W

OBTS NUMBER 50 08CF9381AXX

CFN 20080267252
OR BK 22760 PG 0565
RECORDED 07/17/2008 08:06:42
Palm Beach County, Florida
Sharon R. Bock, CLERK & COMPTROLLER
Pg 0565; (1pg)

STATE OF FLORIDA

[ ] COMMUNITY CONTROL VIOLATOR

[ ] PROBATION VIOLATOR

Jeffrey E. Epstein
DEFENDANT

1/20/53 | W | M | SOCIAL SECURITY NUMBER
DATE OF BIRTH | RACE | GENDER

JUDGMENT

The above Defendant, being personally before this Court represented by J. Goldberger (attorney)

[ ] Having been tried and found guilty of the following crime(s):	[X] Having entered a plea of guilty to the following crime(s):	[ ] Having entered a plea of nolo contendere to the following crime(s):

COUNT	CRIME	OFFENSE STATUTE NUMBER(S)	DEGREE
1	Procuring Person Under 18 for Prostitution	796.03	2°F

[X] and no cause having been shown why the Defendant should not be adjudicated guilty, IT IS ORDERED THAT the Defendant is hereby ADJUDICATED GUILTY of the above crime(s).

[ ] and having been convicted or found guilty of, or having entered a plea of nolo contendere or guilty regardless of adjudication, to attempts or offenses relating to sexual battery (ch. 794), lewd and lascivious conduct (ch. 800), or murder (s. 782.04), aggravated battery (s. 784.045), burglary (s. 810.02), carjacking (s. 812.133), or home invasion robbery (s. 812.135), or any other offense specified in section 943.325, the defendant shall be required to submit blood specimens

[ ] and good cause being shown, IT IS ORDERED THAT ADJUDICATION OF GUILT BE WITHHELD

SENTENCE STAYED [ ] The Court hereby stays and withholds imposition of sentence as to counts and places the Defendant on [ ] Probation and/or [ ] Community Control under the supervision of the Dept. of Corrections (conditions of probation set forth in separate order)

SENTENCE DEFERRED [ ] The Court hereby defers imposition of sentence until

The Defendant in Open Court was advised of his right to appeal from the Judgment by filing notice of appeal within thirty days following the date sentence is imposed or probation is ordered pursuant to this adjudication. The defendant was also advised of his right to the assistance of counsel in taking said appeal at the expense of the State upon showing of indigency.

DONE AND ORDERED in Open Court at Palm Beach County, Florida, this 30 day of June, 20 08

Circuit Court Judge

EFTA00232416

IN THE CIRCUIT COURT OF THE FIFTEEN
JUDICIAL CIRCUIT OF FLORIDA, IN AND F
PALM BEACH COUNTY

CASE NO. 2006 CF 009454A

DIVISION W

STATE OF FLORIDA

VS.

Jeffrey Epstein

ON July 2, 2008,

☐ Psychiatric (Medical, etc.) Report dated _____

from _____

☐ Presentence Investigation Report dated _____

from _____

☒ Other Non-Prosecution Agreement

_____

SEALED IN COURT FILE, NOT TO BE OPENED WITHOUT ORDER OF COURT

EXHIBIT B

JUL 03 2008

IN THE CIRCUIT COURT OF THE FIFTEEN JUDICIAL CIRCUIT OF FLORIDA, IN AND FI
PALM BEACH COUNTY

CASE NO. 06CF 009454AXV

DIVISION W

STATE OF FLORIDA

VS.

Jeffrey Epstein

ON 8/25/08,

FILED
AUG 29 2008
SHARON R. BOCK, CLERK
PALM BEACH COUNTY, FL

☐ Psychiatric (Medical, etc.) Report dated _____

from _____

☐ Presentence Investigation Report dated _____

from _____

SCANNED
AUG 30 2008

☑ Other Addendum to the non-prosecution Agreement

SEALED IN COURT FILE, NOT TO BE OPENED WITHOUT ORDER OF COURT

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

STATE OF FLORIDA

vs.

JEFFREY EPSTEIN,

Defendant.
_____/

CASE NO.: 2006CF009454AXX
DIVISON: "W"

AGREED ORDER SEALING DOCUMENT IN COURT FILE

THIS MATTER came before the Honorable Judge Deborah Dale Pucillo on June 30, 2008 during a plea conference in the above-referenced case number. The Court being fully apprised in the circumstances, it is hereby:

ORDERED AND ADJUDGED that the attached document filed by the Defendant on July 2, 2008 be sealed by the Clerk in the court file.

DONE AND ORDERED in chambers, West Palm Beach, Palm Beach County, Florida this 2 day of July, 2008.

Deborah Dale Pucillo
DEBORAH DALE PUCILLO
Circuit Court Judge

Copies forwarded to:

Jack A. Goldberger, Esq.
Counsel for the Defendant
250 Australian Avenue South, Ste. 1400
West Palm Beach, Florida 33401

Lanna Belohlavek, Esq.
Assistant State Attorney
(interoffice)

AB JUL 03 2008

EFTA00232419

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

STATE OF FLORIDA)
)
vs)
)
JEFFREY EPSTEIN)
)
Defendant.)

CASE NO. 06 CF9454AMB
08 9381CFAMB

FILED
2008 JUL 22 PM 12
SHARON R. BOCK, CLERK
PALM BEACH COUNTY, FL
CIRCUIT COURT

PLEA CONFERENCE

PRESIDING: HONORABLE DEBORAH DALE PUCILL

APPEARANCES:

ON BEHALF OF THE STATE:
BARRY E. KRISCHER, ESQUIRE
State Attorney
401 North Dixie Highway
West Palm Beach, Florida 33401
By: LANNA BELOHLAVEK, ESQUIRE
Assistant State Attorney

ON BEHALF OF THE DEFENDANT:
ATTERBURY, GOLDBERGER & WEISS, P.A.
250 Australian Avenue South
Suite 1400
West Palm Beach, Florida 33401
By: JACK GOLDBERGER, ESQUIRE

ORIGINAL

June 30, 2008
Palm Beach County Courthouse
West Palm Beach, Florida 33401
Beginning at 8:40 o'clock, a.m.

PHYLLIS A. DAMES, CE[illegible]EPORTER

EXHIBIT C

on that, Your Honor?

THE COURT: It is going to be recorded.

MR. GOLDBERGER: That's fine.

THE COURT: Defendant needs to approach as well.

(Whereupon, there was a conference at the bench.)

MR. GOLDBERGER: The reason why I asked to come sidebar, there is a nonprosecution agreement with the United States Attorney's office that triggers as a result of this plea agreement. In other words, they have signed off and said they will not prosecute Mr. Epstein in the Southern District of Florida for any offense upon his successful taking of this plea today. That is a confidential document that the parties have agreed to. Just in an abundance of caution, I wanted to tell the court.

THE COURT: I understand, that would also be invalidated should he violate his community control?

MR. GOLDBERGER: Absolutely. That

EFTA00232421

nonprosecution agreement --

MS. BELOHLAVEK: They spell all that out.

THE COURT: Mr. Epstein needs to come closer.

Mr. Epstein, your attorney has told me that in addition to everything, we talked about another Inducement, shall we say, to your taking this plea is that the U.S. Attorney for the Southern District of the State of Florida, federal prosecutor, has agreed to a nonprosecution agreement with you, meaning that if you successfully complete probation and do everything you're supposed to, they have, have agreed not to prosecute you federally, did you understand that?

THE DEFENDANT: Yes, ma'am.

THE COURT: And I would view that as a significant inducement in accepting this plea.

MS. BELOHLAVEK: They are actually in court here today, also.

THE COURT: Okay.

MR. GOLDBERGER: And the plea

EFTA00232422

agreement very carefully spelled out if there was a breach that would violate this agreement, so we are well aware of it.

THE COURT: Okay. I would request that a sealed copy of that -- Mr. Epstein has signed that document?

MR. GOLDBERGER: Yes, I would like to seal the copy.

THE COURT: I want a sealed copy of that filed in this case. That is the only other condition of the agreement that is influencing this defendant to make this decision?

MR. GOLDBERGER: Absolutely. I think that's the right idea.

(Return to open court.)

THE COURT: Mr. Epstein, is there anything else?

THE DEFENDANT: No, ma'am.

THE COURT: Because I don't take these pleas unless they are freely and voluntarily made.

THE DEFENDANT: I understand that.

THE COURT: I also don't want somebody or anybody coming back a year,

EFTA00232423

RECYCLED PAPER

TO REORDER CALL 954-846-9399

EFTA00232424

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

STATE OF FLORIDA

vs. Case Nos.: 2006-CF9454-AXX &
2008-9381CF-AXX

JEFFREY EPSTEIN

/

PALM BEACH POST'S MOTION TO INTERVENE AND PETITION FOR ACCESS

Palm Beach Newspapers, Inc., d/b/a The Palm Beach Post (the "Post") moves to intervene in this action for the limited purpose of seeking access to documents filed under seal. The documents relate directly to the Defendant's guilty plea and sentence. Thus, the sealed documents go to the heart of the disposition of this case. But in requesting that Judge Pucillo seal these documents, the parties failed to comply with Florida's strict procedural and substantive requirements for sealing judicial records. In addition, continued sealing of these documents is pointless, because these documents have been discussed repeatedly in open court records. For all of these reasons, the documents must be unsealed. As grounds for this Motion, the Post states:

1. The Post is a daily newspaper that has covered this matter and related proceedings. In an effort to inform its readers concerning these matters, the Post relies upon (among other things) law enforcement records and judicial records.

2. As a member of the news media, the Post has a right to intervene in criminal proceedings for the limited purpose of seeking access to proceedings and records. See Barron v. Florida Freedom Newspapers, Inc., 531 So. 2d 113, 118 (Fla. 1988) (news media have standing to challenge any closure order); Miami Herald Publ'g Co. v. Lewis, 426 So. 2d 1, 7 (Fla. 1982) (news media must be given an opportunity to be heard on question of closure).

3. The particular documents under seal in this case are a non-prosecution agreement that was docketed on July 2, 2008, and an addendum docketed on August 25, 2008. Together, these documents apparently restrict any federal prosecution of the Defendant for offenses related to the conduct to which he pleaded guilty in this case. Judge Pucillo accepted the agreement for filing during a bench conference on June 30, 2008. The agreement, Judge Pucillo found, was "a significant inducement in accepting this plea." Such agreements and related documents typically are public record. See Oregonian Publishing Co. v. United States District Court, 920 F.2d 1462, 1465 (9th Cir. 1990) ("plea agreements have typically been open to the public"); United States v. Kooistra, 796 F.3d 1390, 1390-91 (11th Cir. 1986) (documents relating to defendant's change of plea and sentencing could be sealed only upon finding of a compelling interest that justified denial of public access).

4. The Florida Constitution provides that judicial branch records generally must be open for public inspection. See Art. I, § 24(a), Fla. Const. Closure of such records is allowed only under narrow circumstances, such as to "prevent a serious and imminent threat to the fair, impartial and orderly administration of justice," or to protect a compelling governmental interest. See Fla. R. Jud. Admin. 2.420(c)(9)(A). Additionally, closure must be effective and no broader than necessary to accomplish the desired purpose, and is lawful only if no less restrictive measures will accomplish that purpose. See Fla. R. Jud. Admin. 2. 420(c)(9)(B) & (C); Lewis, 426 So. 2d at 3.

5. In this case, the non-prosecution agreement and, later, the addendum were sealed without any of the requisite findings. Rather, it appears from the record, the documents were sealed merely because the Defendant's counsel represented to Judge Pucillo that the non-prosecution agreement "is a confidential document." See Plea Conference Transcript page 38

EFTA00232426

(June 30, 2008). Such a representation falls well short of demonstrating a compelling interest, a genuine necessity, narrow tailoring, and that no less restrictive measures will suffice. Consequently, the sealing was improper and ought to be set aside.

6. In addition, at this time good cause exists for unsealing the documents because of their public significance. Since the Defendant pleaded guilty to soliciting a minor for prostitution, he has been named in at least 12 civil lawsuits that – like the charges in this case – allege he brought and paid teenage girls to come his home for sex and/or "massages."[1] At least 11 cases are pending. In another lawsuit, one of the Defendant's accusers has alleged that federal prosecutors failed to consult with her regarding the disposition of possible charges against the Defendant.[2] State prosecutors also have been criticized: The Palm Beach Police Chief has faulted the State Attorney's handing of these cases as "highly unusual" and called for the State Attorney's disqualification. Consequently, this case – and particularly the Defendant's agreements with prosecutors – are of considerable public interest and concern.

7. The Defendant's non-prosecution agreement with federal prosecutors also was important to Judge Pucillo. As she noted in the June 2008 plea conference, "I would view [the non-prosecution agreement] as a significant inducement in accepting this plea." See Plea Conference Transcript page 39. Florida law recognizes a strong public right of access to documents a court considers in connection with sentencing. See Sarasota Herald Tribune, Div.

[1] See, e.g., Doe v. Epstein, Case No. 08-80069 (S.D. Fla. 2008); Doe No. 2 v. Epstein, Case No. 08-80119 (S.D. Fla. 2008); Doe No. 3. v. Epstein, Case No. 08-80232 (S.D. Fla. 2008); Doe No. 4. v. Epstein, Case No. 08-80380 (S.D. Fla. 2008); Doe No. 5 v. Epstein, Case No. 08-80381 (S.D. Fla. 2008); [redacted] v. Epstein, Case No. 08-80811 (S.D. Fla. 2008); Doe v. Epstein, Case No. 08-80893 (S.D. Fla. 2008); Doe No. 7 v. Epstein, Case No. 08-80993 (S.D. Fla. 2008); Doe No. 6 v. Epstein, Case No. 08-80994 (S.D. Fla. 2008); Doe II v. Epstein, Case No. 09-80469 (S.D. Fla. 2009); Doe No. 101 v. Epstein, Case No. 09-80591 (S.D. Fla. 2009); Doe No. 102 v. Epstein, Case No. 09-80656 (S.D. Fla. 2009); Doe No. 8 v. Epstein, Case No. 09-80802 (S.D. Fla. 2009).

[2] See In re: Jane Doe, Case No. 08-80736 (S.D. Fla. 2008).

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of the New York Times Co. v. Holtzendorf, 507 So. 2d 667, 668 (Fla. 2d DCA 1987) ("While a judge may impose whatever legal sentence he chooses, if such sentence is based on a tangible proceeding or document, it is within the public domain unless otherwise privileged."). In this case, no interest justifies continued sealing of these "significant" documents that Judge Pucillo considered in accepting the plea and sentencing the Defendant. The lack of any such compelling interest – as well as the parties' failure to comply with the standards for sealing documents initially – provide good cause for unsealing the documents at this time.

8. Finally, continued closure of these documents is pointless, because many portions of the sealed documents already have been made public. For example, court papers quoting excerpts of the agreement have been made public in related federal proceedings.[3] As the Florida Supreme Court has noted, "there would be little justification for closing a pretrial hearing in order to prevent only the disclosure of details which had already been publicized." Lewis, 426 So. 2d at 8. Similarly, in this case, to the extent that information already has been made public, continued closure is pointless and, therefore, unconstitutional.

9. The Post has no objection to the redaction of victims' names (if any) that appear in the sealed documents. In addition, insofar as the Defendant or State Attorney seek continued closure, the Post requests that the Court inspect the documents in camera in order to assess whether, in fact, continued closure is proper.

[3] See, e.g., "Defendants Jeffrey Epstein and [redacted] Motion for Stay," [redacted] v. Epstein, Case No. 08-80811 (S.D. Fla. July 25, 2008) (filed publicly Jan. 7, 2009).

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WHEREFORE, the Post respectfully requests that this Court unseal the non-prosecution agreement and addendum and grant the Post such other relief as the Court deems proper.

Respectfully submitted,

THOMAS, LOCICERO & BRALOW PL

Fla Bar #

Deanna K. Shullman
Florida Bar No.:
James B. Lake
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101 N.E. Third Avenue, Suite 1500
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Telephone:
Facsimile:

Attorneys for The Palm Beach Post

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished via facsimile and U.S. Mail to: **R. Alexander Acosta**, United States Attorney's Office - Southern District, 500 S. Australian Ave., Ste. 400, West Palm Beach, FL 33401 (fax:); **Michael McAuliffe, Esq.**, and **Judith Stevenson Arco, Esq.**, State Attorney's Office - West Palm Beach, 401 North Dixie Highway, West Palm Beach, FL 33401 (fax:); **Jack Alan Goldberger, Esq.**, Atterbury Goldberger, et al., 250 S. Australian Ave., Ste. 1400, West Palm Beach, FL 33401 (fax:); and **Bradley J. Edwards, Esq. and William J. Berger, Esq.**, Rothstein Rosenfeldt Adler, 401 East Las Olas Blvd., Suite 1650, Fort Lauderdale, FL 33394 (fax:) on this 1st day of June, 2009.

Attorney

EFTA00232429

GTS LEGAL [redacted] PRODUCTS & SUPPLIES
SINCE 1977 [redacted] LEGAL company
RECYCLED PAPER
TO REORDER CALL 9[redacted]

EFTA00232430

IN THE CIRCUIT COURT OF THE 15TH JUDICIAL CIRCUIT IN AND FOR PALM BEACH COUNTY, FLORIDA

CASE NO: 2006CF009454AXX,
2008CF009381AXX

STATE,

vs.

EPSTEIN, JEFFREY E,

Defendant.

_____/

MOTION TO INTERVENE AND SUPPORTING MEMORANDUM OF LAW

COMES NOW, Applicant, [redacted]. and requests this Court, pursuant to Florida Rule of Civil Procedure 1.230, for leave to intervene as a party in Mr. Epstein's criminal matter for the following reasons:

1. Applicant's intervention is in subordination to, and in recognition of, the propriety of the main proceeding.
2. Applicant stands to either gain or lose by the court's direct legal operation and effect of judgment in the pending matter.
3. Applicant is not injecting a new issue into the pending matter.
4. Applicant's motion to intervene is timely.

5. Defense counsel, Robert Critton, Jr. in the civil matter, does not object to Applicant's motion, but Plaintiff's counsel has not heard back from Defendant Epstein's criminal counsel, Jack Goldberger as to whether he opposes this motion.

MEMORANDUM OF LAW

Anyone claiming an interest in pending litigation may at any time be permitted to assert a right by intervention, but the intervention shall be in subordination to, and in recognition of, the propriety of the main proceeding, unless otherwise ordered by the court in its discretion. Fla.R.Civ.P. 1.230. "A person seeking leave to intervene must claim an interest of such a direct and immediate character that the intervenor will either gain or lose by the direct legal operation and effect of the judgment." Litvak v. Scylla Properties, LLC, 946 So.2d 1165, 1172 (Fla. 5th DCA 2006). Additionally, "an intervenor my not inject a new issue into the case." Environmental Confederation of Southwest Florida, Inc., v. IMC Phosphates, Inc., 857 So.2d 207, 211 (Fla.1st DCA 2003). "An intervention is thus only appropriate where the issue the intervenor raises are related to the case being litigated." Racing Properties, L.P., v. Baldwin, 885 So.2d 881, 883 (Fla. 3rd DCA 2004).

Once the trial court determines that the intervenor's interest is sufficient, it exercises its discretion to determine whether to permit intervention. Union Cent. Life Ins. Co. v. Carlisle, 593 So.2d 505, 507 (Fla. 1992). "In deciding this question the court should consider a number of factors, including the derivation of the interest, any pertinent contractual language, the size of the interest, the potential for conflicts or new issues, and any other relevant circumstance." Id. Finally, an intervention is generally considered timely if it is made before a final decree has been entered. See Technical Chemicals And Products, Inc., v. Porchester Holdings, Inc., 748 So.2d 1090, 1091 (Fla. 4th DCA 2000).

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Applicant's proposed intervention is subordinate and in recognition of the propriety of the main proceeding. Additionally, Applicant will not inject any new issue into Mr. Epstein's criminal case. In fact, Applicant's intervention is for the limited purpose of joining already intervening parties "[redacted]" and "the Palm Beach Post" in their arguments regarding the sealed Federal non-prosecution agreement in Mr. Epstein's criminal file. Finally, Applicant's interest is of such a direct and immediate character that the Applicant stands to either gain or lose by the court's judgment in the pending matter. The Applicant currently has a civil complaint against Mr. Epstien regarding allegations similar to those in this pending criminal mater. The sealed document may contain discoverable information or may lead to the discovery of new relevant information. See Fla.R.Civ.P. 1.280(b)(1). Additionally, the document may contain valuable impeachment information that the Applicant would intend to use if the Applicant's civil case proceeded to trial.

WHEREFORE, Applicant, [redacted]., respectfully requests the Court [redacted] [redacted]'s motion to intervene in the pending criminal matter.

EFTA00232433

CERTIFICATE OF SERVICE

HEREBY CERTIFY that a true and correct copy of the foregoing was furnished by U. S. Mail, postage prepaid, this 11 day of June, 2009 to Jack A. Goldberger, Esq., 250 Australian Avenue, Suite 1400, West Palm Beach, FL 334101; Bruce E. [redacted], Esq., 250 Australian Avenue South, Suite 1400, West Palm Beach, FL 33401; Robert D. Critton, Jr., Michael J. Pike, 515 North Flagler Drive, Suite 400, West Palm Beach, FL 33401.

LEOPOLD~KUVIN, P.A.
2925 PGA Boulevard
Suite 200
Palm Beach Gardens, FL 33410
(561) [redacted]
(561) [redacted] (facsimile)

By: _____
SPENCER T. KUVIN, Esq.
Florida Bar No.: [redacted]

EFTA00232434

TO REORDER CALL [redacted]

RECYCLED PAPER

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

CASE NO. 2008CF009381A
DIVISION W

STATE OF FLORIDA

vs.

JEFFREY EPSTEIN,

Defendant.
_____/

MOTION TO MAKE COURT RECORDS CONFIDENTIAL

Comes now the Defendant, JEFFREY EPSTEIN, by and through his undersigned attorney's, pursuant to Florida Rule of Judicial Administration 2.420 and the Administrative Orders of this Court , specifically AO 2.303 and moves this Court to treat as confidential the following records.

A. A document referred to as "Non-Prosecution Agreement" filed under seal in the court file on July 2, 2008.

B. A document referred to as "The Addendum to the Non-Prosecution Agreement" filed under seal in the court file on August 25, 2008.

1. The above referenced documents were Ordered Sealed at a hearing held before the Honorable Judge Deborah Dale Pucillo on June 30, 2008.

2. A Motion to Vacate Order Sealing Records and Unseal Records was filed by Non-Party EW on or about May 15, 2009.

3. A Motion to Intervene and Petition for Access was filed by Non-party Palm Beach Post on June 1, 2009.

4. This Court granted Non-Party [redacted]. and Palm Beach Post Motion to Intervene on June 10, 2009 but took no immediate action on [redacted] Motion to Vacate Order Sealing Records and Unsealing Records or on Palm Beach Posts Petition For Access, pending a further hearing.

5.. The documents should remain confidential for the following reasons:

a. To prevent a serious imminent threat to the fair, impartial, and orderly administration of justice.

b. To protect a compelling government interest.

c. To avoid substantial injury to innocent third parties.

d. To avoid substantial injury to a party by disclosure of matters protected by a common law and privacy right, not generally inherent in these specific type of proceedings, sought to be closed.

WHEREFORE, Defendant moves this Honorable Court to enter an Order keeping the above referenced records confidential, and maintaining them under seal.

I HEREBY CERTIFY that this motion is made in good faith and supported by a sound and factual legal basis.

JACK A. GOLDBERGER, ESQ.

WITNESS my hand and seal in the County and State last aforesaid this 11 day of June, 2009.



Notary Public State of Florida
My Commission Expires

By hand delivery

CERTIFICATE OF SERVICE

WE HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished via ☐ U.S. Mail; ☐ Facsimile; ☐ Overnight Delivery to R. Alexander Acosta, United States Attorney's Office-Southern District, 500 S. Australian Ave., Suite 400, West Palm Beach, FL 33401, Judith Stevenson Areo, Esq., State Attorney's Office-West Palm Beach, 401 North Dixie Highway, West Palm Beach, FL 33401, William J Berger, Esq., ROTHSTEIN ROSENFELDT ADLER, 401 East Las Olas Blvd., Suite 1650, Fort Lauderdale, FL 33394; Bradley J. Edwards, Esq., ROTHSTEIN ROSENFELDT ADLER, 401 East Las Olas Blvd., Suite 1650, Fort Lauderdale, FL 33394; Deanna K. Shullman, 400 North [redacted] Drive, Suite 1100, P.O.Box 2602 (33601) Tampa, FL 33602, Robert D. Critton, BURMAN, CRITTON, LUTTIER, & COLEMAN, 515 N. Flagler Dr. Suite 400, West Palm Beach, Florida 33401. this 11 day of June, 2009.

and Spencer Kuvin.

BURMAN, CRITTON, LUTTIER & COLEMAN
515 N. Flagler Dr. Suite 400
West Palm Beach, Florida 33401
[redacted]

ROBERT D. CRITTON, ESQ.
Florida Bar No [redacted]

ATTERBURY, GOLDBERGER & WEISS, P.A.
250 Australian Avenue South
Suite 1400
West Palm Beach, Florida 33401
[redacted]

JACK A. GOLDBERGER, ESQ
Florida Bar No. [redacted]

and

RECYCLED PAPER

TO REORDER CALL [redacted]

EFTA00232439

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

CASE NO. 2008CF009381A
DIVISION W

STATE OF FLORIDA

v.

JEFFREY EPSTEIN,

Defendant.
_____/

EPSTEIN'S MOTION TO STAY DISCLOSURE OF THE NON-PROSECUTION AGREEMENT AND ADDENDUM PENDING REVIEW

Defendant, JEFFREY EPSTEIN ("EPSTEIN"), by and through his undersigned counsel and pursuant to Rule 9.310, Florida Rules of Appellate Procedure, moves to stay disclosure of the Non-Prosecution Agreement and Addendum (collectively, the "NPA") pending review, and states:

1. In the event the Court grants Nonparty [redacted]'s Motion to Vacate Order Sealing Records and Unseal Records, grants Palm Beach Post's Motion to Intervene and Petition for Access and/or denies EPSTEIN's Motion to Make Court Records Confidential, EPSTEIN moves to stay the disclosure of the NPA pending review by the Fourth District Court of Appeals.

2. Rule 9.310(a), Florida Rules of Appellate Procedure, provides in pertinent part, "...a party seeking to stay a final or non-final order pending review shall file a motion in the lower tribunal, which shall have continuing jurisdiction, in its discretion , to grant, modify or deny such relief."

3. A stay pending review is warranted under the circumstances because of the irreparable harm that would be caused by disclosure of the NPA including, but not limited to, substantial injury to a party by disclosing matters protected by common law and privacy rights, substantial injury to a compelling government interest, substantial injury to innocent third parties and a serious imminent threat to the fair, impartial and orderly administration of justice as set forth in the hearing record date June 25, 2009.

4. In Mariner Health Care of Nashville, Inc. v. Baker, 739 So. 2d 608, 609 (Fla. 1st DCA 1999), defendant Mariner filed a petition for writ of certiorari after the trial court compelled it to produce certain incident reports. Mariner also moved for a stay pending review pursuant to Fla. R. App. Pro. 9.310. The trial court advised the parties that Mariner would be required to submit the incident reports to the court under seal as a prerequisite to a stay. Mariner refused to produce the documents under seal and the trial court denied the motion for stay and imposed daily fines until the documents were produced. Id. The First District Court of Appeals affirmed the trial court's order and noted

> Mariner has failed to explain how the production of the reports under seal would result in any prejudice. To the contrary, the records will be protected from disclosure during the entire course of the certiorari proceeding before this court. No harm can be done if this court ultimately determines that the reports are protected by the work product privilege.

Id. at 610.

5. In the instant case the NPA is already filed under seal. Should the Court grant Nonparty [redacted]'s Motion to Vacate Order Sealing Records and Unseal Records, grant Palm Beach Post's Motion to Intervene and Petition for Access and/or deny

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EPSTEIN's Motion to Make Court Records Confidential, EPSTEIN requests the Court exercise its discretion under Fla. R. App. Pro. 9.310(a) and enter a stay pending review by the 4th DCA.

6. No harm will be done if the NPA remains under seal pending appellate review. To the contrary, EPSTEIN will suffer irreparable harm if a stay is not entered and the NPA is disclosed to the public.

WHEREFORE, Defendant, JEFFREY EPSTEIN, respectfully requests that if the Court grants Nonparty [redacted]'s Motion to Vacate Order Sealing Records and Unseal Records, grants Palm Beach Post's Motion to Intervene and Petition for Access and/or denies EPSTEIN's Motion to Make Court Records Confidential, the Court enter a stay pending review and grant any additional relief the Court deems just and proper.

Certificate of Service

WE HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished by Hand Delivery to JEFFREY SLOMAN, ESQ., United States Attorney's Office – Southern District, 500 S. Australian Avenue, Suite 400, West Palm Beach, FL 33401, JUDITH STEVENSON AREO, ESQ., State Attorney's Office – West Palm Beach, 401 North Dixie Highway, West Palm Beach, FL 33401, WILLIAM J. BERGER, ESQ., and BRADLEY J. EDWARDS, Rothstein Rosenfeldt Adler, 401 East Las Olas Boulevard, Suite 1650, Fort Lauderdale, FL 33394, JACK A. GOLDBERGER, ESQ., Atterbury, Goldberger & Weiss, P.A., 250 Australian Avenue South, Suite 1400, West Palm Beach, FL 33401, SPENCER T. KUVIN, ESQ., Leopold-Kuvin, P.A., 2925 PGA Blvd., Suite 200, Palm Beach Gardens, FL 33410, and DEANNA K. SHULLMAN,

EFTA00232442

400 North [redacted] Drive, Suite 1100, P.O. Box 2602 (33601) Tampa, FL 33602, this 25th day of June, 2009.

BURMAN, CRITTON, LUTTIER & COLEMAN, LLP
515 N. Flagler Drive, Suite 400
West Palm Beach, FL 33401
[redacted] Fax

By: _____
Robert D. Critton, Jr.
Florida Bar [redacted]
Michael J. Pike
Florida Bar #[redacted]
Counsel for Defendant Jeffrey Epstein)

and

Jack Alan Goldberger, Esq.
Atterbury Goldberger & Weiss, P.A.
250 Australian Avenue South
Suite 1400
West Palm Beach, FL 33401-5012
Fax: [redacted]
Counsel for Defendant Jeffrey Epstein

EFTA00232443

RECYCLED PAPER

TO REORDER CALL [redacted]

EFTA00232444

IN THE CIRCUIT COURT OF THE 15TH JUDICIAL CIRCUIT IN AND FOR PALM BEACH COUNTY, FLORIDA

CASE NO: 2006CF009454AXX,
2008CF009381AXX

STATE,

vs.

EPSTEIN, JEFFREY E,

Defendant.

COPY

INTERVENER'S RESPONSE TO MOTION TO STAY AND SUPPORTING MEMORANDUM OF LAW

COMES NOW, Intervener, [redacted]. and files this Response to Defendant Jeffrey Epstein's Motion to Stay, and states:

In their motion, Defendant asks the Court to stay its ruling on the production of the NPA agreement pending review by the Fourth DCA. Since this NPA was never properly sealed in the first place, a Stay is improper because this document is a public record until such time as it has been properly sealed. Furthermore, as Defendant EPSTEIN has failed to demonstrate that he is likely to succeed on the merits of his appeal or describe how he will be harmed by this disclosure, Intervener [redacted]. respectfully requests the Court deny their Motion.

Pursuant to Florida Rule of Appellate Procedure 9.310(a), a trial court has the discretion to enter a stay pending interlocutory review of a non-final order. The burden to satisfy the

requirements for a stay rests with the party requesting the stay. A trial court is not obligated, or even encouraged, to enter such a stay as the Appellate Rules specifically provide, "In the absence of a stay, during the pendency of a review of a non-final order, **the lower tribunal may proceed with all matters,** including trial or final hearing; provided that the lower tribunal may not render a final order disposing of the cause pending such review." Fla. R. App. P. 9.130(f) (emphasis added).

Defendants ask the Court to stay disclosure of a public document which was never properly sealed. Factors to be considered by a court when deciding whether to enter a stay "include the moving party's likelihood of success on the merits, and the likelihood of harm should a stay not be granted." Perez v. Perez, 769 So.2d 389, 391 n.4 (Fla. 3d DCA 1999). Defendants fail to adequately address these factors in their motion. In fact, Defendant completely ignores the likelihood of success analysis. Likely this is because there is no likelihood that the Fourth District would reverse this court's ruling since the proper procedures for sealing the NPA were never followed.

As to likelihood of harm, the only reference Defendant B.B. makes to this issue is in paragraph 3 of his motion. Here, Defendant merely makes a broad assertion that there will be "irreparable harm caused by the disclosure of the NPA." There is no explanation of who will be harmed or what harm will be caused. How can a public document which redacts the names of the minor victims cause harm? This necessary question is never answered. Defendant's broad and vague assertion is insufficient to grant a stay.

Finally, since there has been no showing by Defendant EPSTEIN that the proper procedure for sealing court documents were ever followed, the NPA is a public record.

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Therefore, Plaintiff respectfully requests the Court DENY Defendants' Motion to Stay the Proceedings.

CERTIFICATE OF SERVICE

HEREBY CERTIFY that a true and correct copy of the foregoing was furnished by U. S. Mail, postage prepaid, this 26 day of June, 2009 to Jack A. Goldberger, Esq., 250 Australian Avenue, Suite 1400, West Palm Beach, FL 334101; Bruce E. [redacted], Esq., 250 Australian Avenue South, Suite 1400, West Palm Beach, FL 33401; Robert D. Critton, Jr., Michael J. Pike, 515 North Flagler Drive, Suite 400, West Palm Beach, FL 33401.

COPY

LEOPOLD~KUVIN, P.A.
2925 PGA Boulevard
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[redacted] (facsimile)

By: _____
SPENCER T. KUVIN, Esq.
Florida Bar No.: [redacted]

EFTA00232447

Westlaw.

769 So.2d 389
769 So.2d 389, 24 Fla. L. Weekly D2439
(Cite as: 769 So.2d 389)

District Court of Appeal of Florida,
Third District.
Deborah PEREZ, Appellant,
v.
Jorge M. PEREZ, Appellee.
No. 99-2182.

Oct. 27, 1999.
Rehearing Denied Dec. 7, 1999.

Following divorce, parties agreed to modification of marital settlement agreement which specifically provided that mother could permanently relocate children to Utah. Father petitioned for modification of custody. The Circuit Court, Dade County, Eugene J. Fierro, J., split custody of children, and mother appealed. Parties and guardian ad litem filed various motions. Mother moved to prohibit further involvement in appellate proceedings by guardian ad litem and counsel appearing on behalf of guardian. The District Court of Appeal, Gersten, J., held that: (1) guardian did not have authority to submit brief or motions at appellate level of child custody proceeding, and (2) there was no authority permitting guardian ad litem to retain counsel on behalf of herself in appeal.

Motion granted.

Sorondo, J., filed concurring opinion

West Headnotes

[1] Appeal and Error 30 ⚖477

30 Appeal and Error
30IX Supersedeas or Stay of Proceedings
30k476 Upon Allowance by Court or Judge
30k477 k. Authority of Court or Judge. Most Cited Cases
District Court of Appeal has authority to issue stay for purpose of preserving status quo during appellate proceeding. West's F.S.A. R.App.P.Rule 9.310(f).

[2] Appeal and Error 30 ⚖479(1)

30 Appeal and Error
30IX Supersedeas or Stay of Proceedings
30k476 Upon Allowance by Court or Judge
30k479 Grounds for Allowance
30k479(1) k. In General. Most Cited Cases
Factors which are considered by District Court of Appeal in deciding whether to grant stay include moving party's likelihood of success on merits, and likelihood of harm should stay not be granted. West's F.S.A. R.App.P.Rule 9.310(f).

[3] Child Custody 76D ⚖905

76D Child Custody
76DXIII Appeal or Judicial Review
76Dk905 k. Transfer of Cause and Proceedings in General. Most Cited Cases
(Formerly 134k303(3))
Father's failure to return children to mother after summer vacation, as required under parties' post-divorce visitation arrangements, and father's attempts to manipulate children's custody preference were sufficient to establish that mother had likelihood of success on merits of her appeal of order modifying custody, warranting issuance of stay, for purpose of preserving status quo during appellate proceeding. West's F.S.A. R.App.P.Rule 9.310(f).

[4] Child Custody 76D ⚖903

76D Child Custody
76DXIII Appeal or Judicial Review
76Dk903 k. Right of Review and Parties. Most Cited Cases
(Formerly 211k19.3(6))
Guardian ad litem did not have authority to submit brief or motions at appellate level of child custody proceeding. West's F.S.A. § 61.401; West's F.S.A. R.App.P.Rule 9.020.

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[5] Infants 211 ⚿85

211 Infants
211VII Actions
211k76 Guardian Ad Litem or Next Friend
211k85 k. Duties and Liabilities. Most Cited Cases
(Formerly 211k19.2(2))
Universally recognized function of guardian ad litem in custody dispute is to protect best interests of children.

[6] Infants 211 ⚿77

211 Infants
211VII Actions
211k76 Guardian Ad Litem or Next Friend
211k77 k. In General. Most Cited Cases
(Formerly 211k19.3(1))
Guardians ad litem serve important role, under limited circumstances, by acting as representatives of children and promoting society's interest in protecting children from traumas commonly associated with divorce and custody disputes.

[7] Infants 211 ⚿85

211 Infants
211VII Actions
211k76 Guardian Ad Litem or Next Friend
211k85 k. Duties and Liabilities. Most Cited Cases
(Formerly 211k19.3(1))
Duties and responsibilities of guardian ad litem are not coextensive with those of attorney. West's F.S.A. § 61.403.

[8] Child Custody 76D ⚿900

76D Child Custody
76DXIII Appeal or Judicial Review
76Dk900 k. In General. Most Cited Cases
(Formerly 211k19.3(6))

Child Custody 76D ⚿903

76D Child Custody
76DXIII Appeal or Judicial Review
76Dk903 k. Right of Review and Parties. Most Cited Cases
(Formerly 211k19.3(6))
Appellate court is not fact-finding court and there is no proper role for guardian ad litem at appellate level. West's F.S.A. § 61.403.

[9] Infants 211 ⚿85

211 Infants
211VII Actions
211k76 Guardian Ad Litem or Next Friend
211k85 k. Duties and Liabilities. Most Cited Cases
(Formerly 211k19.2(2))
Guardians ad litem are required to act in the best interests of children even if this conflicts with the children's wishes, and must serve as independent fact investigators. West's F.S.A. § 61.403.

[10] Child Custody 76D ⚿903

76D Child Custody
76DXIII Appeal or Judicial Review
76Dk903 k. Right of Review and Parties. Most Cited Cases
(Formerly 211k19.3(6))
Filing of motions and brief by guardian ad litem in appellate custody proceedings conflicts with guardian's proper function of serving as independent fact investigator, and violates statutory prohibition against guardians acting as advocates. West's F.S.A. § 61.403.

[11] Child Custody 76D ⚿409

76D Child Custody
76DVIII Proceedings
76DVIII(A) In General
76Dk409 k. Parties; Intervention. Most Cited Cases
(Formerly 211k19.3(3))
Minor children in custody proceeding are not considered as "necessary parties" to action.

[12] Child Custody 76D ⚿903

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EFTA00232449

769 So.2d 389
769 So.2d 389, 24 Fla. L. Weekly D2439
(Cite as: 769 So.2d 389)

76D Child Custody
76DXIII Appeal or Judicial Review
76Dk903 k. Right of Review and Parties. Most Cited Cases
(Formerly 211k19.3(6))
There is no authority permitting guardian ad litem to retain counsel on behalf of herself in appeal, where guardian is not party to proceedings, and where guardian is purportedly appearing on behalf of children who are also not parties in appellate proceedings.

***390** Marsha B. Elser, Miami; Cynthia L. Greene, Miami, for appellant.

Podhurst, Orseck, Josefsberg, Eaton, Meadow, Olin, & Perwin, and Joel S. Perwin, Miami; Barranco, Kircher, Vogelsang & Boldt, and Kimberly L. Boldt, Miami, for appellee.

Before GERSTEN, SHEVIN, and SORONDO, JJ.

ON APPELLANT'S RENEWED MOTION TO PROHIBIT FURTHER INVOLVEMENT IN THESE APPELLATE PROCEEDINGS BY THE GUARDIAN [redacted] LITEM AND/OR COUNSEL APPEARING ON BEHALF OF THE GUARDIAN [redacted] LITEM

GERSTEN, Judge.

Appellant, Deborah M. Perez ("the Former Wife"), moves this Court to prohibit further involvement in these appellate proceedings by the Guardian ad Litem ("Guardian") and counsel appearing on behalf of the Guardian. We grant the Former Wife's motion and write further to discuss our serious concerns regarding the proceedings in this case, and to clarify that there is no statutory basis for a Guardian to file motions and a brief in a child custody appeal.[FN1]

FN1. Initially, we denied the Former Wife's motion to prohibit further involvement by the Guardian ad Litem. However, we cautioned in our ruling that the denial was "without prejudice to renew if necessary." At this stage of the proceedings, and during a flurry of emergency motions filed by the appellee, the Guardian had filed only two documents; one entitled "Guardian ad Litem's Emergency Motion for Rehearing of Stay" and one entitled "Guardian ad Litem's Emergency Motion to Relinquish Jurisdiction." Both were denied. Thereafter, the Guardian advised counsel for the Former Wife that a brief would be filed with this Court. The Former Wife then renewed her motion correctly observing that the Guardian intended to continue her wholly unauthorized and improper conduct.

Background Facts

The Former Wife and appellee Jorge M. Perez, ("the Former Husband") divorced in 1995. The Former Wife became primary residential parent of the parties' three minor children. In November of 1996, the parties agreed to a modification of the marital settlement agreement which specifically provided that the Former Wife could permanently relocate the children to the State of Utah in June of 1998.

In accordance with the 1996 agreement, the Former Wife purchased property in Utah, sold the home where she and the children were living in Miami, enrolled the children in a Utah school, and notified the Former Husband that she and the children would be relocating to Utah on June 18, 1998. However, two weeks prior to the scheduled and agreed upon departure date, the Former Husband filed a petition for modification of custody and attempted on an emergency basis to enjoin the Former Wife from relocating the children. The trial court denied the emergency motion determining the parties had agreed to the relocation, and the Former Wife and children moved to Utah.

Thereafter, pursuant to the parties' visitation agree-

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ment, the children spent the *391 summer of 1999 visiting with the Former Husband. The children having been enrolled in school in Utah, were to be returned to the Former Wife on August 21, 1999. During this agreed summer visitation, the Former Husband's petition for modification proceeded to trial. On July 30, 1999, the trial court entered an order modifying custody which is the subject of the main appeal.

The order split custody of the children, awarding custody of the two sons to the Former Husband, and custody of the parties' daughter to remain with the Former Wife.[FN2]The trial court's basis for splitting custody was the expressed preference of the two sons to live in Miami.

> FN2. We note that the Former Husband's petition did not seek an award of split custody.

In its order, the court noted that the Guardian, Jacqueline Valdespino, testified there was a substantial change in circumstances in accord with the Former Husband's position. However, the court explained that it did not base its decision solely on the Guardian's testimony and report, because "part of her testimony at trial, as well as part of her conclusions in the Guardian Ad Litem's report ... are based partly on evidence which is clearly hearsay...."

On August 9, 1999, the Former Wife filed a Motion for Rehearing and Motion For Stay Pending Appeal which was denied by the trial court on August 20, 1999.[FN3] On August 23, 1999, the Former Wife filed her notice of appeal, and the next day filed an emergency motion seeking a stay of the trial court order, pending review in this Court.

> FN3. The children had been enrolled in school in Utah for over a year, and the agreement provided that they were to be returned to the Former Wife on August 21st. In spite of the fact that the trial court's custody modification order had been suspended by the filing of the Former Wife's Motion for Rehearing, the Former Husband placed the children in school in Miami on August 18th. The children were not returned to the Former Wife, although the primary residence of the children remained with the Former Wife at the time the Former Husband enrolled them in school.

Appellate Proceedings: A Barrage of Motions

[1][2][3] On August 24, 1999, the Former Wife filed an Emergency Motion for Stay Pending Review and a Motion to Expedite Appeal. The Former Wife's motion for stay alleged a likelihood of success on the merits, and that the best interests of the children required maintaining the status quo. Pursuant to her agreement with the Former Husband, the Former Wife requested that the children resume school in Utah pending a final decision on appeal. This Court granted the Former Wife's motions ordering a stay pending appeal, and that the appeal be expedited.[FN4]

> FN4. This Court has authority to issue a stay under Rule 9.310(f), Florida Rules of Appellate Procedure, for the purpose of preserving the status quo during an appellate proceeding. *See Hirsch v. Hirsch,* 309 So.2d 47 (Fla. 3d DCA 1975). Once a stay is issued, the stay remains in effect until the appellate court mandate is issued. Rule 9.310(e), Fla. R.App. P. Factors which are considered by this Court in deciding whether to grant a stay include the moving party's likelihood of success on the merits, and the likelihood of harm should a stay not be granted. *See State ex rel. Price v. McCord,* 380 So.2d 1037 (Fla.1980).
>
> During the course of the trial court proceedings, the children had been spending the summer with the Former Husband pursuant to the parties' visitation arrangements. The Former Husband did

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not return the children to the Former Wife, *see supra* note 3, and the Former Wife's motions contain facts and arguments indicating the Former Husband used this summer time as a means to manipulate the children's custody prefer- ence.

These facts and others were sufficient to establish the Former Wife had a likelihood of success on the merits. Coupled with our additional concerns regarding the children's schooling and their best interests, greater harm could result if the status quo were not preserved. *See Offerman v. Offerman*, 643 So.2d 1184 (Fla. 5th DCA 1994)(granting motion to stay temporary custody order). The facts raised by the Former Wife in support of her motion for a stay are most troubling, and we emphasize that this Court will not tolerate the improper use of visitation to manipulate a child's custody preference.

***392** This Court's order granting the stay resulted in a flood of motions, including an "Emergency Motion For Rehearing of Stay" filed by the Guardian advocating the Former Husband's position, and a "Notice of Appearance filed by an attorney on behalf the Guardian".[FN5] Not surprisingly, the Former Husband also filed an emergency motion for review of the order granting the stay.[FN6] On August 26, 1999, this Court denied both the Former Husband's and the Guardian's motions.

FN5. The Notice of Appearance filed by the attorney stated she appeared "on behalf of the Guardian." A Notice of Appearance was also filed by the Guardian "on behalf of the minor children as Guardian Ad Litem."

FN6. The Former Husband's motion has the rather lengthy title of "Emergency Motion For Rehearing and For En Banc Review of the Court's Ex Parte Order Granting the Wife's Motion to Stay Execution of a Child Custody Order, Without Waiting for the Husband's Response to That Motion." It incorrectly states that this Court's ruling constitutes an "ex parte judicial determination ... [which] is simply and flatly a violation of due process." There is no authority for an "en banc review" of an order issued by an appellate panel granting a stay pending review. More importantly, this Court has the inherent authority in its discretion to enter a ruling on a motion at any time, with or without a responsive pleading. In any event, the Former Husband's Emergency Motion was thoroughly considered at the time it was filed, and was denied by this Court.

In accordance with this Court's mandate, the parties' two sons were sent to Utah on August 27, 1999. Three days later, on August 30th, the oldest son traveled to Miami where he was met at the airport by the Former Husband. This prompted the Guardian and the Former Husband to once again attempt to evade the stay order.

The Former Husband first filed an emergency motion in the trial court where the trial judge held an emergency hearing by telephone. The Former Husband told the trial court that the Guardian had "advised" him not to return the child to the Former Wife in Utah "before [the child sees] a professional counselor who can address his present state of mind." The trial court denied the motion finding that this Court had "effectively taken jurisdiction" over the matter, and ordered the child be returned to Utah to "comply with the law that is now the law of this case; i.e. the stay of these proceedings."

Instead of returning the child, however, both the Guardian and the Former Husband then decided to file motions again in this Court. The Guardian's emergency motion asked this Court to "relinquish jurisdiction" to the trial court to consider testimony as to possible emotional damage to the parties' eld-

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est son. The Former Husband filed a similar motion entitled "Father/Appellee's Response in Support of Guardian Ad Litem's Emergency Motion to Relinquish Jurisdiction." Both the Former Husband's and the Guardian's motions were denied. Our denial of these motions was based upon what should be an obvious theorem-that parents and their minor children must obey court orders.

We are extremely concerned over this type of motion practice and caution counsel that "appellate motion practice is not a game of ping-pong in which the last lawyer to serve wins." *See Sarasota County v. Ex*, 645 So.2d 7 (Fla. 2d DCA 1994). To an even greater extent, we are extremely concerned with the impact of such behavior on children. Children should not be "played" as if in a game of ping-pong where the parent with the greater resources to serve the greatest number of motions wins.

Apparently, the Former Wife was also disturbed by the Guardian's involvement in the appellate proceedings, and moved to prohibit further involvement by the Guardian when she filed her response to the Guardian's second emergency motion on September 1, 1999. Although we denied the motion to prohibit at this time, *see infra* note 1, the denial was "without prejudice to renew if necessary." When the Guardian notified counsel for the Former ***393** Wife of her intent to file an appellate brief with this Court, the Former Wife renewed her motion. For the reasons that follow, we grant the motion and prohibit further involvement of the Guardian in these appellate proceedings.

The Role of a Guardian Ad Litem In Child Custody Appellate Proceedings

[4][5][6] The universally recognized function of a guardian ad litem in a custody dispute is to protect the best interests of children. Litigation involving custody issues can be particularly acrimonious and, unfortunately, children are particularly vulnerable to the harms commonly associated with hostility and conflict between parents. Guardians ad litem serve an important role, under limited circumstances, by acting as representatives of children and promoting society's interest in protecting children from the traumas commonly associated with divorce and custody disputes. *See Scaringe v. Herrick*, 711 So.2d 204 (Fla. 2d DCA 1998); *Representing Children: Standards For Attorneys and Guardians Ad Litem In Custody or Visitation Proceedings (With Commentary)*, 13 J. Am. Acad. Matrim. Law. 1 (Summer 1995).

[7] Once appointed, the powers and authority of a guardian ad litem include investigation, discovery matters, requesting necessary examinations of the parties or the child, obtaining impartial examinations and making recommendations to the court. *See*§ 61.403 Fla. Stat. (1997). However, the duties and responsibilities of a guardian ad litem are not coextensive with those of an attorney. *See Roski v. Roski*, 730 So.2d 413 (Fla. 2d DCA 1999); *see also Representing Children: Standards For Attorneys and Guardians Ad Litem In Custody or Visitation Proceedings (With Commentary)*, 13 J. Am. Acad. Matrim. Law. 1 (Summer 1995)(a guardian ad litem who is also an attorney should not combine the roles of counsel and guardian; Standard 3.1). In fact, Section 61.401, Florida Statutes (1997) specifically provides that the role of a guardian ad litem is "to act as next friend of the child, investigator or evaluator, not as attorney or advocate." *See also,*§ 61.403 Fla. Stat. (1997).

And so we come to the crux of our concerns in these proceedings. Section 61.401 states that the guardian shall not act as an advocate and the Guardian's role is defined as limited to the specific litigation in which the Guardian is appointed. *See Roski v. Roski*, 730 So.2d at 413; Black's Law Dictionary 70 (6th ed.1990). Section 61.403 delineates the Guardian's powers and authority in the context of trial court proceedings. Nowhere is there any reference to appellate court proceedings in the statutes pertaining to the responsibilities of guardians ad litem.[FN7]

FN7. The Former Husband contends that

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> Section 61.401 should be interpreted broadly as permitting guardians ad litem to participate in appellate proceedings, because this Section states the guardian "shall be a party to any judicial proceeding." We disagree for the reasons discussed throughout this opinion, and based upon our conclusion that the statute's reference to the guardian's status as a party in judicial proceedings, refers to the trial court proceedings in which the guardian was appointed. Our interpretation is consistent with the prohibition against guardian's acting as advocates contained within this very same section, and with common sense.

[8] An appellate court is not a fact-finding court and there is simply no proper role for a Guardian at the appellate level. The Guardian fulfilled her statutorily defined duty when she completed her investigation and report to the trial court-the court in which she was appointed.[FN8]

> FN8. We note that the Guardian's report is part of the appellate record and is at the disposal of both the Former Husband and the Former Wife in this proceeding.

[9][10] When attorneys are appointed to serve as guardians ad litem, their roles in the litigation process are significantly different than the roles they would otherwise assume as lawyers. Guardians ad litem are required to act in the best interests***394** of children even if this conflicts with the children's wishes, and must serve as independent fact investigators. The filing of motions and a brief by the Guardian in appellate proceedings conflicts with these functions, and violates the statutory prohibition against Guardians acting as advocates. *See* § 61.403 Fla. Stat. (1997); *Scaringe v. Herrick*, 711 So.2d at 204. Simply, the Guardian does not have a statutory right to appear in these proceedings. *See Betz v. Betz*, 254 Neb. 341, 575 N.W.2d 406, 410 (1998).[FN9]

> FN9. Although *Betz* involved the role of the guardian ad litem at the trial court level, we find many of the observations made by the court as to the proper function of the guardian relevant to our analysis. The *Betz* court noted that the primary function of a guardian is to provide the *appointing* court with necessary information by way of admissible evidence.
>
> The court further cautioned that: "A guardian ad litem may be an attorney, but an attorney who performs the functions of a guardian ad litem does not act as an attorney and is not to participate in the trial in an adversarial fashion such as calling or examining witnesses *or filing pleadings or briefs*." *Betz v. Betz*, 575 N.W.2d at 409 (emphasis added). For purposes of this decision, we agree with *Betz* that it is improper for a guardian ad litem to file a brief in an appellate proceeding. Such participation on appeal violates the proscription against a guardian ad litem assuming the role of an advocate, and exceeds the bounds of the guardian's limited duties toward the appointing trial court.

The Guardian is further prohibited from appearing in these proceedings because she is not a proper party under Rule 9.020, Florida Rules of Appellate Procedure. It is well established that only parties (or their representatives) who have suffered an adverse affect in the lower tribunal cause of action are entitled to participate in an appeal. *See Stas v. Posada*, 760 So.2d 954 (Fla. 3d DCA 1999); *Orange County, Fla. v. Game and Fresh Water Fish Commission*, 397 So.2d 411 (Fla. 5th DCA 1981); Florida Civil Practice Guide, Vol. 6, § 143.03 (Lexis Publishing 1998).

[11] Rule 9.020 defines the "parties" to an appeal as the "appellant" and the "appellee." Neither the Former Husband nor the Former Wife sought relief against the children. Further, minor children in a

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custody proceeding are not considered as "necessary parties" to the action. *See Shienvold v. Habie,* 622 So.2d 538 (Fla. 4th DCA 1993). Therefore, it is manifestly obvious that the minor children in this case are not "parties" to this proceeding, and thus the Guardian cannot appear on their behalf.

[12] We are also disturbed by the Guardian's retention of an attorney to represent the Guardian in the appellate proceedings. As noted earlier, on the same day the Guardian filed her notice of appearance "on behalf of the children," an attorney filed a notice of appearance "on behalf of the Guardian." However, this attorney had never been appointed by any court to serve in any capacity in this case. There is no authority permitting a Guardian to retain counsel on behalf of herself in an appeal, where the Guardian is not a party to the proceedings, and where the Guardian is purportedly appearing on behalf of children who are also not parties in the appellate proceedings. *See generally Betz v. Betz,* 254 Neb. 341, 575 N.W.2d 406, 410 (1998)(a guardian who feels the need to retain an attorney should apply to the appointing court for permission).

In conclusion, there is no authority for a Guardian, or an attorney purportedly representing a Guardian, to submit motions or a brief in a child custody appeal.[FN10] Guardians***395** render an important service to the courts of this state, and we recognize that the lines separating the functions of an attorney as Guardian and an attorney as advocate, can become easily blurred. We hope the line has now become more distinct.

> FN10. Nothing in this opinion shall be construed as affecting the role of a Guardian in other types of cases, or in the obvious situation where a child is the real party interest. *See generally, S.A.P. v. State, Dep't of Health and Rehabilitative Servs.,* 704 So.2d 583, 585 (Fla. 1st DCA 1997)(minor may not bring action on her own behalf, and can only sue by and through a guardian ad litem, next friend or other duly appointed representative); *Kingsley v. Kingsley,* 623 So.2d 780, 784 (Fla. 5th DCA 1993)(guardian ad litem or next friend is required to represent a minor in a termination of parental rights case), *review denied,* 634 So.2d 625 (Fla.1994);Fla. R. Civ. P., Rule 1.210(b) (minors do not have legal capacity to initiate legal proceedings in their own names).

The Former Wife's motion is granted. The motions filed by the Guardian are stricken, and the Guardian, as well as counsel appearing on behalf of the Guardian, are prohibited from filing an appellate brief as a party in these proceedings.[FN11]

> FN11. The Guardian's motion for leave to file an amicus curiae brief pursuant to Florida Rule of Appellate Procedure 9.370 is granted. The Guardian is permitted to file an amicus curiae brief only.

Motion to prohibit granted.

SHEVIN, Judge, concurs.SORONDO, J. (specially concurring).
I agree with the majority that the guardian ad litem does not have standing to file a brief in this case. I write separately because I arrive at the same conclusion through a somewhat different analysis.

Deborah Perez (the mother), argues that the statute's mandate that the guardian "act as next friend of the child, investigator or evaluator, not as attorney or advocate," in section 61.401, Florida Statutes (1997), precludes the guardian from taking a position in this appeal because the guardian's arguments will place her in the role of advocate.[FN12] The mother further argues that the appointment of the guardian by the lower court does not authorize her to file pleadings in this Court.

> FN12. Needless to say, the guardian's position in this case is contrary to that of the mother.

Jorge M. Perez (the father), responds that the stat-

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ute is ambiguous because although it sets forth the language cited above, the statute also makes the guardian a "party." This elevates the guardian to the same level as the other parties in the case, the father and the mother. As such the guardian has the right to file pleadings with this Court in furtherance of the best interest of the children.

When first passed by the Florida Legislature, section 61.401 Florida Statutes (Supp.1990), as pertinent here, read as follows:

Appointment of guardian ad litem.-In an action for dissolution of marriage, modification, parental responsibility, custody, or visitation, if the court finds it is in the best interest of the child, the court may appoint a guardian ad litem to represent the child.

As relevant to the issues before us, section 61.403, Florida Statutes (Supp.1990), stated:
Guardians ad litem; powers and authority.-A guardian ad litem when appointed shall act as a representative of the child and shall act in the child's best interest.

In 1994, the Legislature amended both statutes. Section 61.401 was amended to read:
Appointment of guardian ad litem.-In an action for dissolution of marriage, modification, parental responsibility, custody, or visitation, if the court finds it is in the best interest of the child, the court may appoint a guardian ad litem to ***act as next friend of the child, investigator or evaluator, not as attorney or advocate. The court in its discretion may also appoint legal counsel for the child to act as attorney or advocate; however, the guardian and the legal counsel shall not be the same person. ...The guardian ad litem shall be a party to any judicial proceeding from the date of the appointment until the date of discharge.***

Ch. 94-204, § 3, Laws of Fla. (amending § 61.401, Fla. Stat. (1993))(emphasis added).***396** Section 61.403, as pertinent here, was also amended:
Guardians ad litem; powers and authority. A guardian ad litem when appointed shall act as ***next friend*** of the child, ***investigator or evaluator, not as attorney or advocate but*** shall act in the child's best interest.

Ch. 94-204, § 5, Laws of Fla. (amending § 61.401, Fla. Stat. (1993)) (emphasis added).

In 1994, the legislature excised all language concerning the "representation" of the child, and included language specifically stating that the guardian was not to act as "attorney or advocate." The amended statute went on to provide that the trial court could appoint counsel for the child to serve that function. The legislature clearly intended that the function of the guardian be one of "next friend" to the child. This role includes the power to investigate and evaluate the case, and to make recommendations to the trial judge which are consistent with the best interest of the child. *See*§ 61.403(5), (8), Fla. Stat. (1997). In short, the guardian's role is to discover, analyze and communicate facts to the judge which will assist the trial court in the performance of its duty to determine the best interest of children in divorce proceedings. The role of advocate for the child, the legislature reserved for counsel, which the court can appoint if it considers appropriate and necessary. The trial judge in this case did not appoint counsel.

The father's argument that the guardian's elevation to the status of "party" gives her the right to file pleadings in this Court is unpersuasive. First, it is clear that the guardian is not a party to this action in the strict and acknowledged sense of the word. In defining the word, Black's Law Dictionary 1122 (6th ed.1990) states:

"Party" is a technical word having a precise meaning in the legal parlance; it refers to those by or against whom a legal suit is brought, whether in law or equity, the party plaintiff or defendant, whether composed of one or more individuals and whether natural or legal persons; all others who may be affected by the suit, indirectly or consequently, are persons interested but not parties.

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*See also*59 Am.Jur.2d Parties § 7 (1987)(The word party or parties "designates the opposing litigants in a judicial proceeding-the persons seeking to establish a right and those upon whom it is sought to impose a corresponding duty or liability ..."). Under this definition the guardian in this case is not a party. Accordingly, the guardian is a "party" in this judicial proceeding only because the legislature has made her such. Because this status is created by statute it can be defined by statute, and the statutes in question do just that. The legislature first chose to limit the guardian's role as a "party" by forbidding her from acting in a certain way, i.e. as an advocate for the child. Next, in section 61.403(2), (3), and (6), the legislature required the guardian to petition the court and file pleadings only through counsel-a "true" party could do so *pro se.* Finally, the guardian does not become a party at the inception of the litigation or because she has a personal interest, she attains that status by judicial appointment and retains her identity as such only until discharged by the judge. Thus, although the legislature has created this special class of "party," it has also defined its limitations. As I read the statute, the guardian does not have a party's right to file pleadings in this Court because this will, mandatorily, require her to become an advocate.

The majority correctly observes that there is no role for the guardian to play in this Court because all factual issues and determinations have been fully developed below. This Court is in a position to read the record of the lower court, which contains all of the guardian's contributions to this lawsuit. A brief review of that record indicates that the guardian's position is the same as that of the father in this case and has been repeatedly and zealously expressed in both the lower court and this ***397** Court. Indeed, the father relies heavily on the recommendations of the guardian. The guardian's presence in this appellate proceeding is therefore superfluous.

I do acknowledge that in certain cases the guardian may serve a valuable role on appeal. Usually, the guardian's recommendations will bolster the legal position of one of the parents. There are extraordinary cases, however, where the guardian's conclusions could be detrimental to both parents. I refer specifically to cases which contain issues concerning the parents' mental and emotional stability and cases involving domestic violence and/or child abuse. In such cases, a guardian could recommend that neither parent be awarded custody or that custody should be predicated upon a particular parent's participation in some type of psychological counseling. These cases may call for a guardian to file a brief in an appeal and this Court has the authority, which the majority has chosen to exercise in this case, to allow the guardian to appear as amicus curiae pursuant to rule 9.370 of the Florida Rules of Appellate Procedure.[FN13] I do not believe that this appeal calls for the guardian's participation.

> FN13. Even under these circumstances the guardian must seek leave of court to hire counsel. I join the majority in its conclusion that the guardian's *sua sponte* decision to hire counsel in this case, presumably at the expense of the parties, was highly improper.

Fla.App. 3 Dist.,1999.
Perez v. Perez
769 So.2d 389, 24 Fla. L. Weekly D2439

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TO REORDER CALL [redacted]

RECYCLED PAPER

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

CRIMINAL DIVISION "W"

CASE NO. 502008CF009381AXXMB
502006CF009454AXXMB

STATE OF FLORIDA,

vs.

JEFFREY EPSTEIN,
Defendant
_____/

ORDER

THIS MATTER came before the Court on the following:

a) Non-party [redacted].'s Motion to Vacate Order Sealing Records and Unseal Records

b) Palm Beach Post's Motions to Intervene and Petition for Access

c) [redacted].'s Motions to Intervene and for an Order to Unseal Records

d) Jeffrey Epstein's Motion to Make Court Records Confidential

A hearing was conducted on these matters on June 25, 2009. The Court notes that Mr. Goldberger, Esq. and Mr. Critton, Esq. were present on behalf of Jeffrey Epstein. Ms. Shullman, Esq. was present on behalf of the Palm Beach Post, Mr. Berger, Esq. and Mr. Edwards, Esq. were present on behalf of [redacted], Mr. Kuvin, Esq. was present on behalf of [redacted], Assistant State Attorney Barbara Burns was present on behalf of the State of Florida. No appearance was filed on behalf of the United States. After giving an opportunity for all parties to be heard, the Court finds as follows:

1. The State of Florida charged the Defendant, Jeffrey Epstein, with Felony Solicitation of Prostitution.

2. The State of Florida and Mr. Epstein came to a negotiated resolution of the charges. Part of that resolution included an agreement entered into between Mr. Epstein and the United States. At the plea conference in State court Mr. Epstein plead guilty to the State charges. At the plea conference the agreement between Mr. Epstein and the United States were made part of this Court's record. The agreement was sealed in two separate filings. At the time the State court took these matters under seal, the proper procedure for sealing such documents had not been followed. The June 25th hearing was to give Mr. Epstein, the State, and/or the United States an opportunity to comply with the well-defined and narrow parameters for sealing such documents. After hearing argument of counsel, the Court makes the following findings and rulings:

1) Neither the State of Florida nor the U.S. Government nor Mr. Epstein have presented sufficient evidence to warrant the sealing of documents currently held by the Court.

2) The Motions to seal the Court records are denied.

3) The Motions to intervene are granted.

4) The Motion to unseal the documents is granted.

5) The originals will not be disclosed, however the undersigned will do an in-camera inspection and redact the names of the underage victims, if any, so their identity will be indicated by their initials.

6) This Order is in no way to be interpreted as permission to not comply with U.S. District Court Kenneth Marra's previous Orders.

7) The disclosure of the sealed documents shall be stayed at least until June 26, 2009, at 9:00 a.m., at which time the Court will hear "Epstein's Motion to Stay Disclosure of Non-Prosecution Agreement and Addendum Pending Review".

DONE AND ORDERED in West Palm Beach, Palm Beach County, Florida this ____ day of June, 2009.

SIGNED AND DATED
JUN 25 2009
JUDGE JEFFREY J. COLBATH

JEFFREY J. COLBATH
Circuit Court Judge

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LEGAL
RECYCLED PAPER
TO REORDER CALL [redacted]9

EFTA00232463

IN THE CIRCUIT COURT OF THE FIFTEENTH JUDICIAL CIRCUIT, IN AND FOR PALM BEACH COUNTY, FLORIDA
CRIMINAL DIVISION "W"

CASE NO. 502008CF009381AXXMB
502006CF009454AXXMB

STATE OF FLORIDA,

vs.
JEFFREY EPSTEIN,
Defendant
_____/

ORDER DENYING MOTION TO STAY DISCLOSURE AGREEMENT

THIS MATTER came before the Court at a hearing on June 26, 2009, on Jeffrey Epstein's Motion to Stay the Disclosure of the Non-Prosecution Agreement and the Addendum thereto. The Court notes the parties were present and represented by counsel. Based upon argument, it is

ORDERED AND ADJUDGED that

1. The Motion to Stay is denied.

2. The Clerk of Court shall make the documents available for disclosure at noon on Thursday, July 2, 2009. It is the intent of the Court to give the Defendant, Mr. Epstein, and his attorney an opportunity to have this Court's orders reviewed by the 4th DCA. If the Clerk gets no direction from the Appellate Court, she shall disclose the documents on the date referred to above.

DONE AND ORDERED in West Palm Beach, Palm Beach County, Florida this ____ day of June, 2009.

SIGNED AND DATED
JUN 26 2009
JUDGE JEFFREY J. COLBATH

JEFFREY J. COLBATH
Circuit Court Judge

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EFTA00232466

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

STATE OF FLORIDA)
)
vs.) CASE No. 2008CF009381AXX
)
JEFFREY EPSTEIN,)
)
Defendant.)
_____)

CERTIFIED COPY

PROCEEDINGS BEFORE THE COURT

PRESIDING: HONORABLE JEFFREY COLBATH

APPEARANCES:

ON BEHALF OF THE STATE:
BARRY E. KRISCHER, ESQUIRE
State Attorney
401 North Dixie Highway
West Palm Beach, Florida 33401
By: BARBARA BURNS, ESQUIRE
Assistant State Attorney

ON BEHALF OF THE DEFENDANT:
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West Palm Beach, Florida 33401
And
ROBERT CRITTON, ESQUIRE
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West Palm Beach, Florida 33401

ON BEHALF OF THE PALM BEACH POST:
DEANNA SHULLMAN, ESQUIRE
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ON BEHALF OF EW, THE INTERVENER:
WILLIAM J. BERGER, ESQUIRE
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SUSAN WIGGINS, R.P.R. AND OFFICIAL COURT REPORTER

ON BEHALF OF EB,
MOTION INTERVENER'S PLEADING:
SPENCER KUVIN, ESQUIRE
2925 PGA Blvd Ste 200
Palm Beach Gardens, Florida 33410

June 25, 2009
Palm Beach County Courthouse
West Palm Beach, Florida 33401
Beginning at 1:50 o'clock, p.m.

SUSAN WIGGINS, R.P.R. AND OFFICIAL COURT REPORTER

BE IT REMEMBERED that the following proceedings were had in the above-entitled cause before the HONORABLE JEFFREY COLBATH, one of the judges of the aforesaid court, at the Palm Beach County Courthouse, located in the City of West Palm Beach, State of Florida on June 25, 2009 beginning at 1:50 o'clock, p.m. with appearances as hereinbefore noted, to wit:

THEREUPON:

THE COURT: Let me call up the case of the state of Florida versus Jeffrey Epstein. Let me have counsel announce their appearances for the record.

MS. SHULLMAN: Deanna Shullman of [redacted] LoCicero & Bralow on behalf of the Palm Beach Post.

THE COURT: Ms. Shullman, nice to see you again, good morning.

MS. SHULLMAN: You too.

MR. GERBER: William J. Berger for EW, the intervener.

MR. EDWARDS: Brad Edwards also on behalf of the EW.

MR. KUVIN: Spencer Kuvin on behalf of EB, motion intervener's pleading.

MR. GOLDBERGER: Good afternoon, Judge, Jack Goldberger and Robert Critton on behalf of Jeffrey Epstein.

THE COURT: And I'm guessing that, Mr. Kuvin, if I grant the motion to unseal that which has been sealed, your motion to intervene will be moot.

MR. KUVIN: Will be.

THE COURT: I thought so. This is what I'm thinking and -- oh, we've got more.

MS. BURNS: One more appearance, excuse me, Judge, Barbara Burns on behalf of the state of Florida, the state attorney's office of the 15th Judicial Circuit.

THE COURT: All right. Procedurally, I think the way that this came to us is that at the conclusion or at some point during a plea conference between the state of Florida and Mr. Epstein, the state and the defense hand an agreed order to Judge Puccillo.

MS. BURNS: Puccillo.

THE COURT: And asked her to sign an

agreement to seal some portion of some documents, which she signed off on and now it is the intervener's and the Post's motion to unseal those documents; is that kind of procedurally where we are?

MR. GOLDBERGER: Procedurally not exactly correct, I don't know if you want me to clarify that.

THE COURT: Please do.

MR. GOLDBERGER: Your Honor, this started during the course of a plea colloquy in Mr. Epstein's state proceeding before Judge Puccillo, who is a retired senior judge who was filling in for Judge McSorley on that day, who was the judge assigned to this division. It was a plea agreement with the state attorney's office and it is normal and consistent with any plea colloquy Judge Puccillo asked the defense whether there were any other promises or inducements for Mr. Epstein to enter into his plea agreement other than what was contained in the state standard plea agreement that we had. I felt obligated under the circumstances to alert

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to the Court that there was a confidential agreement between Mr. Epstein's -- Mr. Epstein's attorneys and the United States attorney's office for the Southern District of Florida which would have been triggered upon the successful taking of the plea by Judge Puccillo.

In other words, if the plea was accepted by Judge Puccillo, there's a confidential agreement between U.S. attorney's office and the defense that would be triggered and they would agree not to take some actions against Mr. Epstein. I advised Judge Puccillo of that, and at that time she said she would like to see the matter sealed in the court file. I said fine, and then we later -- I then filed that document, and the clerk's office notified me and said we need an order sealing this, and we submitted an order to seal the document.

THE COURT: All right. Is there anybody here from the U.S. attorney's office? Has anybody notified them, or is there a dog in this fight or do they care?

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If they're a party to this confidential thing, wouldn't you think that they might be.

MR. GOLDBERGER: Your Honor, they have been noticed. They have taken a position in parallel proceedings that this matter should remain confidential, and they have done that in federal court, and I believe that is their position still.

MR. EDWARDS: Your Honor, I have been in communication with the U.S. attorney's office, and they are not taking a position on this issue, which is why they're not in court right now.

THE COURT: What's going on in federal court?

MR. GOLDBERGER: There are a number of civil cases that are pending right now.

THE COURT: And they're talking about the same documents that are under seal here in our court?

MR. EDWARDS: Yes.

MR. GOLDBERGER: Yes, your Honor, and I will address that at the appropriate time what's going on here.

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THE COURT: All right. So thank you, Mr. Goldberger for getting that straightened out.

MR. GERBER: Judge, just to clarify one other point.

THE COURT: Sure.

MR. GERBER: I think actually there's an additional step because Mr. Goldberger on behalf of Mr. Epstein or Mr. Critton I believe filed motion, and I think that that will tell us who goes first today and who has the burden today.

THE COURT: This is -- and I'm thinking outloud that my take on that is that my review of the file shows that the appropriate steps to seal these documents wasn't followed initially. I'm looking at it as it would be whoever's moving to have them sealed, it's their burden to prove the steps that you have to prove to get things sealed by the Court, and so that's -- I hinted last meeting that we all had together but that's where I'd go, so I'd shift the burden over to the federal government and to Mr. Epstein, that's what

I'm thinking. Let me ask first go over to the Post, Ms. Shullman, what are your thoughts on that procedure?

MS. SHULLMAN: Your Honor, I think that's the correct procedure here. I think Mr. Epstein's motion to make court records confidential tacitly admits what we suspected last time, which was that the initial closure of the documents was not done pursuant to the acceptable procedures.

THE COURT: All right. Mr. Berger, Mr. Edwards, that's all right with you?

MR. EDWARDS: We agree.

MR. GERBER: That's what my point was, yes, your Honor, thank you.

THE COURT: Mr. Goldberger, what do you think?

MR. GOLDBERGER: That's fine, your Honor, with the -- I'll wait until after the proceeding.

THE COURT: All right. You may proceed.

MR. GOLDBERGER: Judge, as I said to clarify the record, this matter started during the course of Mr. Epstein's plea

colloquy in state court and just so that the record was clear that all inducements for Mr. Epstein's plea was on the record when Judge Puccillo asked me if there had been any promises made to Mr. Epstein, I think properly and ethically we told the Court that there was an agreed -- confidential agreement with the federal government that was in place that basically said we will not prosecute Mr. Epstein for federal offenses if the state plea agreement is accepted by the Court and Mr. Epstein's sentence is imposed.

The state proceeding was over at the time that I advised Judge Puccillo that, in other words, we had gone through the plea colloquy and I simply was advising her of this other agreement. It was Judge Puccillo who then asked us to approach, and the Court has a copy of that transcript, I believe. It was Judge Puccillo that said I'd like to have that document sealed in the court file, and I acquiesced to that, I said that's fine.

So, first, as a preliminary matter,

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it wasn't like we were coming into court on that day and asking to seal something, so it would have been presumptuous of me to file something to request to have something sealed when it came up during the course of the proceeding, and, in fact, the committee notes on the rule of judicial administration talk about that and say matters come up all the time during the course of hearings and the fact that something is not filed in advance does not necessarily taint the entire process, so we agreed to come forward and file our motion to seal after the fact, because we didn't know this matter would be coming up.

But having said that, Judge, this confidential agreement was not part of any state plea agreement, it's not part of the proceedings, it was ancillary to the state proceedings and it had nothing to do with the state proceedings. As an accommodation to Judge Puccillo, we filed it in the court file. Quite frankly, it's unnecessary, it doesn't need to be there, and the simplest approach would be to simply remove it from

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the court file at this point. We didn't have for it to be there. It's not part of the plea, it's not part of the state resolution of the case, and that would be the simple logical approach to that.

If the Court is inclined not do that or if the parties object to that, then I think we move onto some other very, very important issues in this case and for both the intervenors in this case as well as the Palm Beach Post motion for access to this proceeding for really two very, very significant reasons, they are in the wrong place and they're attempting to march up the wrong hill here, your Honor.

This matter needs to -- has to be litigated in federal court before Judge Marra who has already heard hearings on this matter. Now, at our last abbreviated hearing two weeks ago, I told you for the first time that there have been two hearings in front of Judge Marra on this very issue, whether this nonprosecution agreement and that's the matter that is sealed in your court file,

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whether this nonprosecution agreement should be released to the plaintiffs for their use.

Judge Marra heard two hearings on this matter and the court has those orders. And in the first hearing Judge Marra very, very, carefully balanced the confidentiality issues of the nonprosecution agreement, the intent of the parties as well of the rules of criminal procedure that I will talk about in a moment, with the plaintiff's right to know what's going on and to have access to this agreement. And Judge Marra crafted an order and in the nature of a protective order and said, plaintiffs, you can have this nonprosecution agreement, you can use it, you can review it, you cannot give it to anyone else other than your clients, and if you want to use it or you want to give it to your clients, you need to tell them about this order that is not to be disclosed to anybody else. And these plaintiffs that are sitting here will tell you that from day one they have had this

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nonprosecution agreement, they have it for their use, they know every clause that's in that nonprosecution agreement, and I suggest to the Court as to their motions why are we here; they have an agreement already.

They went back to Judge Marra sometime thereafter and asked the Court to expand their use of the nonprosecution agreement, and they said, Judge Marra, we have the nonprosecution agreement but we would like to be able to disclose that agreement to other sides, and Judge Marra in another carefully crafted order said, nuh-uh, no, you have not satisfied your burden, you cannot disseminate this to anyone else, and the order that I have entered remains in place, but most significantly he said, you know what, this is without prejudice.

If you have some basis, you have some need that you have not briefed, you have not litigated with me yet concerning dissemination of nonprosecution agreement, come back to me and I'll review it for you.

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And they have every right to do so, and they have not done so, and it is this motion to intervene that they filed in this court is simply an effort to skirt and to avoid and to go behind the order of Judge Marra that dealt with this issue already.

And I think just for the purpose of our hearing, we need to have the two orders of Judge Marra entered into the record of this proceeding. I know I gave copies to the Court, but I have additional copies.

MR. GOLDBERGER: Your Honor, I believe there is no objection from either of the parties.

THE COURT: Thank you so much. Let's go ahead and mark these as Defendant's Exhibits No. 1 and 2 for identification purposes. Anybody object to me taking judicial notice of Judge Marra's order? By hearing no objection, I'll go ahead and take judicial notice of it.

MR. GOLDBERGER: So, your Honor, Judge Marra has dealt with this issue squarely, there's a procedure in place and

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these matters should be litigated in front of the district court judge that has already heard these matters.

THE COURT: Well, let's say that may be true as it relates to these individual plaintiffs in the federal litigation, what about the Post's and the press's -- the media's right to take a look at these things?

MR. GOLDBERGER: Your Honor, and this is the second reason why not only the plaintiffs but the Post appear to be marching up the wrong hill here. The Palm Beach Post has filed a motion for access to these documents and they certainly do have first amendment rights and no one would dispute that they have first amendment rights to access to public records, however, most significantly in this case is that the nonprosecution agreement which we gave the court permission to review two weeks ago and presumably the Court has had an opportunity to take a look at it, the nonprosecution agreement talks about and relates to a grand jury matter that is

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absolutely 100 percent protected from disclosure by Federal Rule of Criminal Procedure Six. I have a copy of that rule for the Court.

THE COURT: Let me take a look of that, please.

MR. GOLDBERGER: Give us one moment, your Honor, we have it here somewhere.

MR. KUVIN: Your Honor, just briefly while they're looking on behalf of the plaintiff EB, I just wanted to point out on my client motion to intervene, we are not party to the federal action. She only has a state court claim. She's not bound by any federal court order, she is not with the federal court on their claim, so as to that issue, my client stands here synonymous with the Post.

THE COURT: Thank you for pointing that out to me.

MR. GOLDBERGER: We'll have it for you in one moment, your Honor.

Your Honor, Federal Rule of Criminal Procedure Six is a rule that deals with grand jury proceedings, and it confers in

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the federal system secrecy of all grand jury matters and it's pretty clear in this case that the nonprosecution agreement specifically talks about a grand jury investigation of Mr. Epstein, there's specific reference to a grand jury investigation in the nonprosecution agreement.

The rule does not prevent us from telling the Court that there was a grand jury investigation of Mr. Epstein, but what it prevents us from doing, what it prevents this Court from doing, I believe, is disclosing the content of the grand jury investigation, and the agreement itself is very specific as to the grand jury investigation of Mr. Epstein.

However, all is not lost for the Palm Beach Post and the intervenors, for that matter. The rule has a specific procedure that allows you to go to the district court where the grand jury is convened, in this case it would be in the Southern District of Florida before Judge Marra and that is under Rule 6E, your Honor, I think it's 6E

3E actually. It says: In limited circumstances the Court may authorize disclosure of grand jury matters under request made in connection with the judicial proceeding, so -- and the rule goes onto clearly say, that request must be filed in the district where the grand jury is proceeding.

So the first -- you know the Palm Beach Post may have first amendment rights to access but those first amendment rights cannot circumvent the federally protected secrecy of grand jury proceedings and that's what the Post is doing by making this request before this Court.

This matter has been sealed for almost a year now, 11 months and some days and the Palm Beach Post has not filed anything in this matter until most recently, and their remedy is to go into the federal court and invoke the process of Rule Six and asked Judge Marra to make a limited disclosure of the nonprosecution agreement and the grand jury matters that are contained therein. Who knows whether

he will do it, but that's where this needs to be fought.

As a matter of comity, your Honor this Court should defer to Judge Marra because, A, he has already ruled on the disclosure of the nonpros agreement -- and even more importantly, the supremacy requires you to defer to the federal rules of criminal procedure that say these matters should be protected and should be disclosed unless the district court so.

If the Court is going to go on and wants to go to the issues that would be contained if it were not dealing with a grand jury proceeding, obviously there's a test that the Court must then use under the Rules of Judicial Administration and it says matters can be sealed but they should be sealed if there's a compelling government interest or if the sealing is important to the administration of justice. There's a couple other criteria, but the ones obviously that would apply in this case are the compelling government

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As a matter of comity, your Honor, this Court should defer to Judge Marra because, A, he has already ruled on the disclosure of the nonpros agreement, but even more importantly, the supremacy clause requires you to defer to the federal laws of criminal procedure that say these matters should be protected and should not be disclosed unless the district court says so.

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interest, and the importance to the administration of justice.

Again, we are dealing with a secret grand jury matter. We cannot circumvent that secrecy by asking the Court to invoke its unsealing power.

THE COURT: Thank you.

MR. GOLDBERGER: Thank you, your Honor.

THE COURT: Let me go over to the other parties and we'll get back to Mr. Goldberger and his client. Post, who wants to go first?

MS. SHULLMAN: Mr. Edwards.

THE COURT: Mr. Edwards.

MR. EDWARDS: Your Honor, inasmuch as Mr. Epstein is relying on Judge Marra's order to support the argument that the nonprosecution agreement needs to remain sealed, I'd like to address that if you are inclined to be persuaded by that argument at all.

The orders that have now been moved into evidence are in case No. 80736, and just to put that order in context in

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actuality, the order says -- specifically puts it back on this Court and confers authority on this Court over this particular document, when in the second page of the February 12th, 2009 order, it's misdated 2009 but it's a 2009 order, and the last two sentences read: If and when petitioners have a specific tangible need to be relieved of the restrictions, they should file an appropriate motion, which we believe we have done in this case, if a specific tangle need arises in the civil cases, which are in circuit court in Palm Beach County, then relief should be sought there and notice to all parties, so to give the Court context for that order, there was a state court plea taken June 30th, 2008, where Mr. Epstein pled guilty to the state court cases as it related to two victims.

Now, parallel to that, there was an investigation in federal court where the United States attorney's office and the FBI had more than 30 victims of sex abuse of Mr. Epstein's and they were working with these girls and their cases. Now, several

of those girls came to me and said, hey, we're worried that there's a secret deal going on between Epstein and the U.S. attorney's office, so I filed an emergency petition against the U.S. attorney's office asking the federal court to intervene and get in the middle of this and not let this deal go forward without meaningfully conferring with these girls because I was alleging it violated the Crimes Victim's Rights Act; these girls have a right to be heard. That emergency motion was filed July 7th, 2008, and I have that for the Court, and I'd like to enter that into evidence as well.

THE COURT: We'll mark that as [redacted]'s Exhibit No. 1.

MR. EDWARDS: And an emergency hearing was held four days later in front of Judge Marra, who was randomly assigned to this case at the time the plea was taken and the prosecution agreement was sealed. Judge Marra had nothing to do with the agreement, with Epstein, he didn't know anything about it.

So four days later now we're in front of him and the United States attorney's office says for the first time, sorry, girls, you are too late, the deal has already been done as to all of your federal cases and it resulted in the nonprosecution agreement that is attached in the state court case. Judge Marra turned to us and said, what is your remedy.

At that point in time I said we don't know because we don't know what protections are inside that agreement, so we want you to unseal it, that's where the motion for protective order came about where he gave us the agreement so we can look at it and determine what remedy, if any, was available. Once we had that agreement under the caveat that we were not able to disseminate to third parties and reviewed it and saw there is very little protection for the girls, we asked to unseal it completely, so that we can talk to third parties, to victim's rights groups and get some insight as to what our possible remedy would be.

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And so our reason for wanting him to unseal it at that time was we want to be able to talk to other people, and that's where this order from February 12th, 2009, came in, and he denied that motion to unseal it for three reasons.

First and foremost, this nonprosecution agreement was not sealed in my Court, you are talking to the wrong judge, you need to go back, so we're getting the back and forth here and it's not in my court, I can't mess with some other judge's order. Obviously, there was a hearing held and that document was sealed for a reason, I'm not privy for those reasons, so I'm not going to override whatever that judge was thinking when they sealed that document.

Second, your reason is you just want to talk to other people about them, and if I'm going to override some other judge's order, I need to have a more compelling reason than you just want to talk to people about.

Third, if and when a specific need

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arises in any of the civil cases, which by the time this order was coming about they were stacking up in state and federal court against Mr. Epstein, petition that court, petition the appropriate court, and he implies that appropriate court is this court where it was initially sealed, which we've done in this case.

This court has none of the problems that Judge Marra had in that it was sealed in this courtroom. We have noticed Mr. Epstein to be heard at this hearing, which is one of the requirements that Judge Marra placed on us, and a specific need has arisen. It has been sealed for over a year now, correct, Mr. Goldberger is correct, but the specific need is arising because we are in the middle of discovery. And this document is, as Mr. Goldberger said, a great inducement to Mr. Epstein pleaing guilty to sex crimes in state court, and to ultimately being labeled a sex offender, and the only document that pertains to my clients, my client as a victim of Mr. Epstein's sex crime, so at

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the very least, we should be allowed to ask people in deposition and do discovery about how this document came about. There is a need here.

THE COURT: I don't quite get -- I don't think it's relevant to what my task is here, but I don't get how it's relevant in the civil cases what the federal government did or didn't do with regard to prosecuting Mr. Epstein. I don't get that, but I don't know that I need to.

MR. EDWARDS: The standard for discovery is just reasonably calculated to lead to discovery of admissible evidence and without going in depth we do have intention --

MR. GERBER: Your Honor, can I --

MR. EDWARDS: And with respect to the grand jury argument, you've seen the document, it's only page five and six that it's even referred to.

THE COURT: All right. Let me turn it over to -- does the Post want to speak?

MS. SHULLMAN: I do, but I think he wants to go first so whenever.

THE COURT: I haven't considered your motion to intervene yet.

MR. KUVIN: I don't believe it was an objection. When it was filed, there was no objection by Mr. Goldberger or Mr. Critton.

THE COURT: Are you going to advocate by motion to intervene or are you going to be jumping into the merits of the sealing?

MR. KUVIN: I'll jump right into the merits, I'm not going to duplicate anything that was just raised or anything that the press is going to raise, I have an individual interest.

THE COURT: All right. Go ahead Mr. Kuvin.

MR. KUVIN: Very briefly, your Honor. I represent [redacted] who has filed only a state court action, she is not under the federal jurisdiction of Judge Marra, she does not subject herself to the federal jurisdiction of Judge Marra, she was never provided an opportunity to brief any issues before Judge Marra with respect to that order that was entered by Judge Marra or either order. In addition, what's also very important is

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she has never seen this document, so she does not know what is in the contents of the order, so the issue is raised by Mr. Goldberger about the girls are able to see the document and evaluate how they might need to evaluate this document does not apply to my client because she has never seen it and, frankly, without subjecting herself voluntarily to the jurisdiction of Judge Marra, which she chooses not to do, then she cannot get this document, otherwise she would have to go to federal court, submit herself to the jurisdiction of the federal court to then see a state court document, which does not make any sense because if it is a state court document in state court, as previously stated under Judge Marra's order, it is within your purview and your jurisdiction to rule on a state court document.

Finally, with respect to why the document may be relevant, the contents of that document speak to the issues of whether or not Mr. Epstein can or cannot

assert his fifth amendment right against self incrimination, and we believe on a good faith believe that on the contents of that document speak to the issues of whether or not he can or cannot deny the claims that have been brought against him both in state and federal court. In other words, whether or not he must, in fact, admit that he molested these 14 year old girls, so, therefore, the content of that document is paramount as to the issues in the civil proceedings that are currently pending in state court which is why we would like that document.

THE COURT: Okay. Thank you. Thank you so very much. Ms. Shullman from the Post.

MS. SHULLMAN: Thank you, your Honor. I feel a little bit like I have stepped into the twilight zone here, so I'd like to address a couple of the things we've addressed and get us to what we are really here to do today.

THE COURT: I don't know if you are referring specifically to the courtroom or

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the convoluted situation that brings us to the courtroom.

MS. SHULLMAN: Just this whole federal state situation. There is no hill for the public and the press to march up in Judge Marra's court as Mr. Edwards pointed out, Judge Marra has specifically held the agreement was not filed in this case under seal or otherwise, so were I to march into Judge Marra's courtroom and do my whole public access spiel, he would say take it to you, your Honor, because it's not a record in my court. It is a record here, and in the state court as we talked about the last time, we were here, there's a presumption of openness. The burden is on Mr. Epstein to overcome that presumption. While he filed a very brief memorandum after our last hearing, which identified for interest, he has by no means met the test of either establishing those interest or establishing the remainder of that test which would be that closures no broader than necessary ineffective no other reasonable alternatives, so if I could, I'd

like to sort of focus us back to the inquiry we're here to make today in this court, and that is whether your Honor is going to provide public access to two records that are, I think, indisputably in your Honor's court file in this court's file.

It's a plea agreement and an addendum; those are historically and typically open records.

Mr. Goldberger mentioned that the plea agreement was sort of incidentally filed in this court file, and that it was sort of an afterthought that happened. He never came into court intending that it even be part of the court file, but Judge Pucillo specifically said, this is a significant inducement to accepting the plea in my court. This agreement that you have with federal prosecutors is significantly the reason why you're entering this plea before me. And she took those records into the court file presumably because they are significant to this litigation. Even if there was an

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incidental filing, which cannot possibly be the case here, there is no mechanism in Florida law to call a Mulligan and to pull it out of the court file. As you know, the Floridians have a constitutional right of access, there's no mechanism in that law to just say, oopsy, let's take it out of the file, so they have to meet their burden and they have to show under Rule 2.420 that one of those interests is satisfied. They have identified four here. I have not heard them discuss them at any great length. But I will go through them quickly.

The imminent threat to the fair, impartial orderly administration of justice, or to protect a compelling government interest. As your Honor is aware, the federal government is not here today. I have spoken with the state attorney's office who has indicated that their only interest is in protecting to the extent necessary because I've not seen these documents the identity of the victims of these crimes.

The Post in its motion to intervene

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has already set forth that we have no objection to redacting the victim's names if, in fact, that is required because we haven't seen the agreement. To avoid substantial injury to innocent third parties, again, absolutely no showing on that test. I have no burden at this point, but I will simply state that the law in Florida is clear that Mr. Epstein doesn't have standing to assert that interest.

And, finally, something else I heard nothing about to avoid substantial injury to a party which, I guess, presumably would be Mr. Epstein by disclosure of matters protected by a privacy right not generally inherent in this specific type of proceedings. Again, I have not heard any attempt to meet the burden on that issue, however, Florida law is equally clear that participants in crimes lose their privacy interest in the matters and facts and circumstances of the commission of those crimes, so Mr. Epstein surely cannot establish that there is a separate privacy interest not inherent in a criminal

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prosecution regarding the molestation of young girls.

The circumstances under which closure is allowed in Florida are exceedingly narrow. We first -- and before we do anything else -- have to find that one of those interests is met here, that it exists and that the movant has met its burden in demonstrating that it's significant enough to require the court to consider closure. That's not the end of inquiry. And, of course, I have not yet heard anything else about that second half of the test which talks about the idea that closure is no broader than necessary to protect that interest and that it would be effective and that there are no other alternatives.

In speaking of the federal litigation there are instances when both Mr. Epstein's lawyers and the federal prosecutors have placed portions of the agreement into the public court file. There are -- thus attempts to seal those records in the federal litigation have been unsuccessful, so part of this agreement the cat is

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already out of the bag. But there is also an enormous public interest in what's going on here, apart from the idea that this man is accused of having many, many victims who were all young children which, of course, in itself creates a lot of public concern, the chief of police at the time sent a letter to the state prosecutors and said, what are you guys doing, how are you handling this, this is highly unusual; I don't like what I'm seeing here. And even went so far as to say, state attorney's office, should you all step away from this case.

So we have public interest from the perspective of the police chief questioning the state attorney's office about whether it's doing its job. We have public interest that's spurned by the idea that some of the victims in the federal prosecution -- in the federal court claimed they weren't aware of it, we just heard Mr. Edwards talk about the fact that his clients weren't aware of the agreement unless it all went down, so we have a

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significant public interest about how everybody in this litigation is doing their job. There is nothing more fundamentally important than the ability of the public and the press to observe how its government, all branches of its government, do its job.

There are multiple, as Mr. Edwards also mentioned, multiple civil lawsuits that have spurned as a result of Mr. Epstein's conduct, and, again, the public has an interest in what's going on in civil litigation matters.

In short, this matter involves a major public interest from a lot of different levels. There is no basis for closure that has been asserted here. It's a heavy burden to meet. We start with the idea that openness is the right thing to do but there is essentially no purpose served at this point by keeping these agreements sealed in this case.

Unless your Honor has any questions, I think that's it.

THE COURT: Okay. Thank you so very

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much. Ms. Burns, on behalf of the state of Florida, anything you'd like to add or advocate?

MS. BURNS: If I may, your Honor.

THE COURT: Sure.

MS. BURNS: Good afternoon, your Honor.

THE COURT: Good afternoon.

MS. BURNS: Your Honor, the State is not here to take a position on whether or not this court should seal -- continue to seal the records or unseal the records. We are here merely to uphold the state laws which require all of us as members of the judicial system to protect the rights of the confidentiality of the victims. I do see two issues here, your Honor.

One is if you decide to unseal the records based upon the arguments that have been presented to you, then the State would ask that the court first do an incamera viewing, not just merely open up that portion of the file for viewing by all interested parties, first, that the Court do an incamera viewing to make two

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evaluations.

Number one, does the document, in fact, have a relationship to the criminal case in the state matter. And, number two, evaluate the right of public access versus the victim's right to confidentiality. If this Court does decide to unseal those records, then the State would ask that this Court before making the document public access, then make certain that in place is that the victim's identities are amended to initials if their names are used.

The State does have a concern regarding the argument of the Federal Rule Six in that is this Court bound by a federal rule which perhaps has been made unenforcible by virtue of making it a part of the state file, so I think the Court also would need to address that issue before making its ruling.

THE COURT: All right, great. Thank you so much.

MS. BURNS: Thank you, Judge.

THE COURT: One last chance for the federal government, they're not here and

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I'll let rebuttal of any other presentation, Mr. Goldberger, or, Mr. Critton, you'd like to make.

MR. GOLDBERGER: Thank you, your Honor. As to the last argument made by Ms. Burns as to the applicability of Federal Rule 6 of the Rules of Federal Criminal Procedure it's something that we learned in the law school that the supremacy clause controls and to the extent there's a conflict between the federal doctrine and the state doctrine, the supremacy clause requires the federal rule of law to apply and to control. And certainly in this case you cannot use a state procedure to circumvent a federal rule of criminal procedure that confers secrecy to a grand jury proceeding.

And the Palm Beach Post response to the argument never made note of the grand jury rule, they simply avoided that issue and that in our mind is equally important as the fact in the interest of comity this Court should defer to the rulings of Judge Marra already.

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As to Mr. Kuvin's argument that he has a client that is in state court and is not in federal court and therefore he doesn't have a remedy in federal court. With all due respect to Mr. Kuvin, that's similarly wrong. Judge Marra's order specifically dealt with a class of individuals who were identified as victims of Mr. Epstein's conduct, and Judge Marra's order says that anyone who's been identified by the United States attorney's office as a victim has right to the nonprosecution agreement under the same rules.

Just so the Court understands, I know we are talking like the Court understands everything about this case. There was a list of victims that was created at the time that the nonprosecution agreement was entered into and Mr. Kuvin's client is on that list. That list was created by the U.S. attorney's office. He has the same rights to the nonprosecution agreement as if he filed this case in federal court and he knows that we've told him that he has

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that access.

As to the fact that the nonprosecution agreement is presumably not filed in the federal case in our last hearing in front of Judge Marra on June 5th -- I'm sorry, June 12th, Mr. Edwards advised Judge Marra that he had, in fact, filed a nonprosecution agreement to no one's surprise under seal in the federal file, so the nonprosecution agreement according to Mr. Edwards' declaration at that hearing is contained in the federal court system.

For all of those reasons, your Honor, and the reasons that I previously indicated to the Court, we would ask the Court to defer to the federal court in this matter.

THE COURT: Okay. Thank you very much. Here is what I'm planning on doing, so you know where I'm going on this. I'll make an oral announcement and I'll follow it up with a written order so that you all can have something to take to wherever you want to take it.

I find that the appropriate procedure

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to seal or close these documents has not been met, so I'll deny the motion to seal the documents. I'll grant the motion to unseal them. I will take a look at the documents. I will redact out of them the -- what I'll do is, I'll leave the originals intact sealed in the court file to protect the names of any underage victims.

I will make copies of those. I'll redact out the names leaving -- expose the initials of any of the individuals. I'll get that done -- I'll get my written order out granting and denying the respective motions hopefully by the end of today. If not today, tomorrow. I plan on releasing the redacted versions probably Monday, so that those will be available for public consumption on Monday.

MR. GOLDBERGER: Your Honor, thank you. Thank you for the oral pronouncement. Your Honor, based on the Court's ruling, we do have a motion to stay disclosure of the nonprosecution agreement. The rules of appellate procedure require us to file that

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before, your Honor.

Your Honor, we do intend to take certiorari on this to the Fourth District Court.

THE COURT: That's why I figure between the written rule and the disclosure give you a chance to catch your breath and do that. I guess you might want that. Is Monday 5 p.m. enough time for you to get over to the DCA?

MR. GOLDBERGER: Actually, your Honor, the Rule of Appellate Procedure maintains jurisdiction with you on this matter to entertain the motion to stay.

THE COURT: So I need to handle the motion to stay?

MR. GOLDBERGER: Correct, your Honor.

THE COURT: Do you want to argue that now? Do you want to take a look at that, catch your breath, come back and see me Monday sometime; what's your pleasure?

MR. GOLDBERGER: We're ready to do it now, your Honor. We're ready to do it now.

THE COURT: All right. Interveners, your thoughts.

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MR. KUVIN: Matter of procedure point, I just want to make sure that the motion to intervene is, in fact, granted.

THE COURT: You're BB's motion to intervene is granted. Do you have a written order for me to sign off on there?

MR. KUVIN: I can submit that.

THE COURT: Why don't you catch your breath and come back tomorrow and I'll hear argument. It will give me a chance to read the motion, check out the rules, take a look, got to get myself gassed up. Anybody want to drop anything off for me to read before the hearing, please do that. Why don't we do that tomorrow morning, and why don't we reconvene here tomorrow at 1:30 on the motion to stay.

MR. GOLDBERGER: That's fine.

THE COURT: How does your schedule look?

MR. GERBER: Your Honor, is it possible to have it a little later, perhaps an hour later tomorrow?

THE COURT: 2:30.

MR. GERBER: If possible.

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THE COURT: How about a little later than that still, let me take a look at our official calendaring system here.

MR. CRITTON: Judge Colbath, I'm gone tomorrow, I'm going to Gainesville at one or 12:30-ish. I told my wife I would be home at one. My daughter's birthday, 21, she's having a party, I plan to be there. Can we do it tomorrow morning any time, it would be great.

THE COURT: Tomorrow morning is ugly. This isn't going to take long.

MS. BURNS: This is a five-minute motion.

THE COURT: Why don't we do this, meet at 8:15?

MS. SHULLMAN: Your Honor, I'm not going to be able to get my kids to school if I have to be here at 8:15. My husband is in California right now.

MR. GOLDBERGER: I don't mean to jump in. I wonder if we can do some of this telephonically.

MS. SHULLMAN: Yes, I can appear by phone or I can have one of my partners.

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THE COURT: In the morning what would be a good start time for you?

MS. SHULLMAN: Nine would be getter. I can't drop them off before eight.

THE COURT: It's going to be brief argument, let's do it 9:00 tomorrow morning; 9:00 work for you?

MR. CRITTON: Yes, sir. Thank you.

MR. GOLDBERGER: Just very briefly, the Court is going to look at the nonprosecution agreement and do some redacting, I believe. I just need to advise the court in addition to Mr. Epstein and perhaps victims mention the nonprosecution agreement, there are third parties who the Court needs to look about redacting their names also, and that's contained in the nonprosecution agreement.

In other words, there are other people beside Mr. Epstein and Mr. Victims whose names are mentioned in the nonprosecution agreement, and I would ask the Court to look at those names also for the purpose of redacting.

THE COURT: I'll like a look.

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MR. EDWARDS: Your Honor, those are not names of victims, those are co-conspirators as listed in the agreement and we would object to any redaction of those names. I don't think there's any standing to ask for that.

THE COURT: I'll take a look. All right. See you all tomorrow morning at nine. If you want to send anything to me later this afternoon or tomorrow morning before we take the bench, I'm happy to receive it. Have a good afternoon.

(Proceedings concluded.)

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C E R T I F I C A T E

THE STATE OF FLORIDA,
COUNTY OF PALM BEACH.

I, SUSAN S. WIGGINS, R.P.R. Official Court Reporter for the Fifteenth Judicial Circuit, Criminal Division, in and for Palm Beach County, Florida; do hereby certify that I was authorized to and did report the foregoing proceedings before the Court at the time and place aforesaid; and that the preceding pages numbered from 1 to 48, inclusive, represent a true and accurate transcription of my steno notes taken at said proceedings.

IN WITNESS WHEREOF, I have hereunto affixed my official signature this 29th day of June, 2009.

Susan S Wiggins

SUSAN S. WIGGINS, R.P.R.

EFTA00232516

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TO REORDER CALL [redacted]

EFTA00232517

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

STATE OF FLORIDA	)	
	)	
vs.	)	CASE No. 2008CF009381AXX
	)	
JEFFREY EPSTEIN,	)	
	)	
Defendant.	)	

CERTIFIED COPY

PROCEEDINGS BEFORE THE COURT

PRESIDING: HONORABLE JEFFREY COLBATH

APPEARANCES:

ON BEHALF OF THE STATE:
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State Attorney
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West Palm Beach, Florida 33401
By: BARBARA BURNS, ESQUIRE
Assistant State Attorney

ON BEHALF OF THE DEFENDANT:
JACK GOLDBERGER, ESQUIRE
250 S Australian Ave Ste 1400
West Palm Beach, Florida 33401
And
ROBERT CRITTON, ESQUIRE
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West Palm Beach, Florida 33401

ON BEHALF OF THE PALM BEACH POST:
DEANNA SHULLMAN, ESQUIRE
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ON BEHALF OF EW, THE INTERVENER:
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BRAD EDWARDS, ESQUIRE
225 NE Mizner Blvd Ste 675
Boca Raton, Florida 33432

SUSAN S. WIGGINS. R.P.R. and OFFICIAL COURT REPORTER

ON BEHALF OF EB,
MOTION INTERVENER'S PLEADING:
SPENCER KUVIN, ESQUIRE
2925 PGA Blvd Ste 200
Palm Beach Gardens, Florida 33410

June 26, 2009
Palm Beach County Courthouse
West Palm Beach, Florida 33401
Beginning at 9:59 o'clock, a.m.

SUSAN S. WIGGINS. R.P.R. and OFFICIAL COURT REPORTER

BE IT REMEMBERED that the following proceedings were had in the above-entitled cause before the HONORABLE JEFFREY COLBATH, one of the judges of the aforesaid court, at the Palm Beach County Courthouse, located in the City of West Palm Beach, State of Florida, on June 26, 2009, beginning at 9:59 o'clock, a.m., with appearances as hereinbefore noted, to wit:

THEREUPON:

THE COURT: Epstein.

MR. GOLDBERGER: Yes, your Honor.

THE COURT: Let me call up the State of Florida versus Epstein. Let's have everyone announce their appearance, please, name on the record.

MR. CRITTON: Robert Critton and Jack Goldberger on behalf of Mr. Epstein as well as Barbara Compiani from the office of Jane Walsh.

MS. SHULLMAN: Deanna Shullman of [redacted] LoCicero and Bralow on behalf of the Palm Beach Post.

MR. KUVIN: Spencer Kuvin on behalf of the intervener [redacted]

MS. BURNS: Barbara Burns on behalf

of the State of Florida.

THE COURT: That's it.

MR. CRITTON: That's it, it's a wrap.

THE COURT: Okay. Orders. Who's not here that I have to mail it to?

MR. GOLDBERGER: Mr. Edwards is not here, your Honor.

THE COURT: Okay. Mr. Berger, Mr. Edwards. Did I give you enough copies of the order?

MR. GOLDBERGER: I ran out. I have just enough. Do you want me to get a copy to Mr. Edwards?

THE COURT: Yes, if you'd mail a copy to Mr. Edwards. I got spares if anybody's interested. Anybody need a spare?

MR. GOLDBERGER: We're good, your Honor.

THE COURT: All right. Motion to Stay, Mr. Goldberger.

MR. GOLDBERGER: Thank you, your Honor.

THE COURT: Mr. Critton.

MR. CRITTON: Good morning, Judge Colbath, do you have a copy of our Motion

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to Stay?

THE COURT: I do, the one that was handed up to me yesterday?

MR. CRITTON: Yes, sir, and I have a proposed order in the event the Court chooses to grant; may I provide that to the Court as well?

Your Honor, as you know, Mr. Goldberger and I represent Mr. Epstein. We have hired Ms. Walsh and Ms. Compiani as appellate counsel to assist in the filing of a writ of certiorari. I know that comes as no surprise to the Court in that whoever prevailed and lost yesterday, I think the Court recognized we probably filed a writ of certiorari.

THE COURT: Let me ask real quick. Anybody objecting to the defendant having the ability to have my decision reviewed by the appellate court before I release these things? I mean, it seems pretty straight forward.

MS. SHULLMAN: We have an objection, your Honor, to some extent. The -- you know, the procedure in place here is very

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similar to that for which they would have to obtain a preliminary injunction.

THE COURT: Right.

MS. SHULLMAN: So to demonstrate likelihood of success and irreparable harm, I don't think they can do that. I think the plan that you put in -- proposed yesterday is a good one, that is you redact and you release on Monday and that gives them today and Monday to get to the Fourth, otherwise, we're stuck in a position where we have a 30-day window to appeal, and we are all delay, delay, delay.

THE COURT: What if I do that? I don't know if it's a difference with that or distinction, but, procedurally, I was thinking I was leaning yesterday towards issuing the order that I just issued. I think that that's a fairly accurate rendition of the written version of my oral pronouncement yesterday, but I order that nothing -- that the redacted orders not be released until -- I'll make it, you know, five of five Monday. That will give you Monday to get down to the Fourth to get

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them to stop this from being released; what do you think?

MR. CRITTON: Here's what the problem is, Judge, is Ms. Compiani and Ms. Walsh spoke to them yesterday and today, we need a transcript from the hearing yesterday which has not yet been obtained. They need the underlying motions, they need some time to research. It's not a matter of simply filing a writ of petition and that stays the release of the order. There would have to be a separate motion that would be filed with the Appellate Court. The Motion to Stay that we file under Appellate Rule 9.310, subsection A, it provides that the party that seeks review shall come to the lower tribal, which is the trial court, which is you, in this instance, and then it's within your discretion either to stay or not to stay under the circumstances, and we simply don't have the time within which to file the appeal under those circumstances.

There are two criteria that have to be met here, one is the likelihood of

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harm where no stay is granted, and the second criteria, not necessary mutually exclusive; that is, you don't have to have both of them, but you certainly have to give an indicia of both of them. The second one is the likelihood of success on the merits.

We believe that based upon the Court decision, respectfully, that the Court, that the Appellate Court, will quash your order, for the reasons Judge Puccillo was the one who requested that the document in this -- this was argued yesterday, so I'm going to be very brief. She is the one who requested post sentencing, that the document be filed under seal. It was her request that the defense seceded to that under the circumstances. That certainly was inadvertent, could have just as easily remained under seal with Mr. Goldberger or with the State Attorney under those circumstances.

Secondly, that it relates to the portions of it, specifically, within the MPA to deal with the grand jury proceeding,

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that would be a violation of Federal Rule Six. I note you just handed us your order about two minutes ago, Judge, so no one's had an opportunity to review it, certainly appellate counsel has not had an opportunity to review it. I don't know if you dealt with the appellate rule, but I do note that within your written order, that you, basically, said that in the second to last page, you said this order is no way to be interpreted as permission not to comply with U.S. District Court Judge Marra's previous orders.

We respectfully submit that it would not comply with Judge Marra's previously issued orders. We also believe that the supremacy clause, as Mr. Goldberger argued yesterday in conjunction with comity principle, that we think that there's a substantial likelihood on success of the merits on this.

With regard to the likelihood of harm, this is a paramount issue here. It's undisputed that this was a confidential agreement. It's a confidential contract

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between Mr. Epstein and the United States. United States vigorously defended Mr. Edwards when he came into federal court and filed an action to have the MPA released, Judge Marra subsequently entered an order. Another attempt that was made to make the MPA public again.

All plaintiffs' counsel has it. The only ones that don't have it is the Post, under the circumstances, and public under the circumstances, but all the plaintiffs' lawyers of the alleged victims, they either have the MPA and the addendum, which I will refer to as the MPA, or they have the ability to get that. That is very clear from Judge Marra's order.

So there's certainly no harm to the plaintiffs from under these circumstances. And the harm in this instance is only to Mr. Epstein under the circumstances because as Judge Letz (phonetic) once said, it's very much like an attorney/client privilege or a privilege document where once the proverbial horse is out of the barn, you can't get him back in.

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We cited a case called Mariner versus Baker 3 -- So. 39, So.2d 608 First District 1989. In the Mariner case, this was not a usual incident report and the Court, I know your Honor previously did a great deal of personal injury work and related work, you're very familiar. In fact, you commented yesterday and said, I don't see how the MPA is going to be admissible in a civil proceeding anyway. Again, you're not ruling on that ultimately, the judges in both the State and federal court cases will do that.

In the Mariner case, the judge ordered that the defendants object at the direction of incident reports. The judge said, sorry, you've got to produce those incident reports. And the Court said, give them to me under seal because, again, we are talking about incident reports as distinct from an agreement between two parties which was deemed to be confidential between the United States government and Mr. Epstein. Only irreparable harm here as to Mr. Epstein because if it's released,

you cannot remedy that harm on appeal.

And in the Mariner case, if the judge said, if you put the documents under seal, which is exactly the situation we have now is, I will grant the stay and let the appellate court determine whether or not incident reports, which have a much lower threshold for production or for discovery reasons, and, again, there's no harm in an instance like that, even in an incident report came out in the Mariner cases, so what. It won't be used, you can't use any of the information you obtained. In this particular instance, because it is confidential, there is no way the Court can remedy the harm.

With regard to the defendants in this case, again, I think we've demonstrated both irreparable harm, and we believe a substantial likelihood on the success. Again, how do you demonstrate a substantial likelihood on the success? The fact that we would -- if this Court thought that we should prevail, my guess, you would not have ruled as you did, but as the Court is

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aware, oh, surprise to all of the lawyers here. Sometimes judges get reversed. I know that's a shock to most of the lawyers in this room and most of the courts, but that happens on occasion, and, therefore, we believe we can show through the supremacy clause, the grand jury reference that we will prevail and that your order will be quashed.

With regard to alleged harm by any other party, the Post in this instance reported at the sentencing of Mr. Epstein on or about June 30th of 2008. They waited until June 1st of '09. This was such a pressing issue, the Post wanted to get this desperately out to the public, they were so anxious to do it, that they waited 11 months before they did anything.

Mr. Edwards, who is not here today, filed a federal court action and those issues were talked about and discussed at some length with regard to Judge Marra's two orders.

Judge Marra's rule, you can't get them, if you want to get them, go to that

EFTA00232530

case, that would be Judge Hafele or two of Mr. Edwards' cases are where is Mr. Kuvin's case is or Judge Marra, where Mr. Edwards' case is. Judge Marra can certainly control whether or not they should be released, and I've covered Mr. -- oh, and Mr. Edwards because he could have gone back to Judge Marra because he's got one federal court case -- did he try for that form and get it -- no, they came in here. He tried to do it in a run around Judge Marra.

He didn't file his motion until late May of '09. My guess is it was Mr. Edwards who probably said to the Post, gee, why don't you join in this, you haven't been here for 11 months, why don't you come in now, maybe intervene. And then Mr. Kuvin, on behalf of his client, [redacted] estate court case, came in on June 11th, again, almost a year to the date after Mr. Epstein's sentence.

It's no burning issue, there's no fire here to put out, giving us 30 days, or at least a reasonable period of time to file petition for writ, and then if the

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Court denies our stay at least asking the appellate court for stay under the circumstances. There's no harm to them. The harm is only to Mr. Epstein, and we think as a substantial likelihood, that we would succeed.

Therefore, we would request the Court grant a stay as I've suggested in my proposed order for 30 days of giving Ms. Walsh and Ms. Compiani an opportunity to actually do their job under the circumstances, so the court reporter doesn't have to work over the weekend to expedite transcripts for us, and secondly, if we file within the 30 days, then let the appellate court determine whether or not the stay remains or not.

THE COURT: Thank you much.

Ms. Shullman, don't worry about responding to the issue of motive or seeking this relief or the timing of your request or party's request. I don't think that bears upon the merits of either parties.

MS. SHULLMAN: The constitutional

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right of access doesn't have a waiver provision, your Honor.

THE COURT: Well, go ahead. Let me hear -- I'm on board so far with Mr. Critton's version of, Judge, if you let it out, you let it out, so irreparable harm is kind of easy. I think that it is a two-prong test. I think he's got to jump over both hurdles. I think he's got to show some likelihood of success. If you want to spend some energy arguing that there's no irreparable harm, you may do so, but if I hand it out today and everybody gets to see it, you can't fix that tomorrow.

MS. SHULLMAN: Sure.

THE COURT: So I think they've established that.

MS. SHULLMAN: Let me address that very briefly first, your Honor, to remind you in meeting this burden that they failed to meet yesterday, they identified four interests which they liken now to the motion to stay to the four harms.

One, of -- for the first three of

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them, they mentioned they have no standing to assert the compelling government interest, the government didn't show up, the imminent threat to the administration of justice, again, that's the government's issue. The innocent third party privacy rights, they have no standing. The only one is, he's not really articulated today it's some sort of invasion of Mr. Epstein's privacy rights.

Florida law is clear that those who are participants in crimes do not have privacy rights with respect to the facts and circumstances surrounding those crimes. So unless I'm going hear something outside of the context of Mr. Epstein's criminal prosecution, he has no privacy right in this agreement.

THE COURT: Let me share with you what I'm thinking about doing, even at the conclusion of Mr. Critton's presentation, and that is deny the motion to stay, but delay the release of the records in question until noon Friday. That will give them a little bit of time to see if the

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Fourth sees this case from a different vantage point, a different light, and maybe they'll look down and say, oh, Judge Colbath, you missed it and, you know, stay the matter. That will give them a reasonable amount of time to get the transcripts to go to the Fourth because I'm a big fan of appellate review and making case law.

MS. SHULLMAN: And I understand, your Honor, if you are suggesting a week from today, that's a little bit long. Remember the status quo here, we are in sort of a strange procedural posture because your Honor decided that the initial closure was improper, but the recent request for closure was denied, so instead of a status quo where we have a document that should be released, it's under seal where it shouldn't be, so any moment that it is kept under seal is a serious deprivation of the public and the press's right to access, which you have already determined they have, we think you are correct, of course, so I would ask that any stay --

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MR. CRITTON: She's pandering, your Honor.

MS. SHULLMAN: I will say he respectfully disagreed with you, so I think a week is too long. I do this day in and day out, I have spent many a weekend on these matters in my career. If you want to give them till Tuesday, I'll be kind, but the Fourth will act quickly on this. I don't think that a week's delay is necessary. I think, in fact, it under minds the public purpose here.

THE COURT: All right. Any other respondents want to go anything further?

MS. SHULLMAN: The State Attorney's office also advises me that Friday is a holiday and the courts are closed.

THE COURT: Thank you for telling me that. Friday is a holiday.

MR. KUVIN: July 4th.

THE COURT: The day of the birth of our constitution.

MR. KUVIN: Good morning, your Honor. On behalf of intervenor [redacted] obviously, the Court is inclined to delay the disclosure

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of this, but under Rule 9.310, if your Honor were to issue such a stay, we would point out the provision C of the rule, which requires a posting of the bond.

We not only agree with your Honor's ruling, but we believe such appeal they are filing is absolutely frivolous and we are going to be requesting fees and cost for the filing of that appeal, so as a result, we are requesting a bond be posted if a stay of any type is issued in this case because of the fact that we want to make sure that our attorneys' fee and costs are covered for the frivolous nature of the appeal. And it's dictated strictly in subsection A. It gives the Court the authority. It says:

A stay pending review may be conditioned upon a good and sufficient bond, other conditions or both. Therefore, we believe your Honor does have the authority to issue such a requirement that the posting of a bond be issued.

THE COURT: All right. Thank you very much. I will deny the motion to stay.

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I will delay the release of the documents until noon Thursday. I will deny the request to compel the movant, the defendant, Mr. Epstein, to post a bond, and I'll let the appellate court tell us and teach us what the law on this case will be.

It's always interesting how these cases unfold and come to us a little different than everyone else. Now, let me have the attorneys come up here and approach.

(The following proceedings were held sidebar, out of the hearing of the jury.)

THE COURT: I reviewed the two documents, I didn't see any kids' names in there. Everybody was hinting the children's names or the initials' names. I had my big black highlighter out, I don't see anything worth redacting, so.

MR. GOLDBERGER: It's the plaintiff's document that identifies the children's names. It's a letter to me actually.

THE COURT: I was wondering if everybody thought there was something in there that wasn't in there.

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MR. CRITTON: It's a test of your skills, your Honor.

THE COURT: You're right, exactly. One is page one through seven, and the second one is just two pages that's not even signed by everybody.

MR. GOLDBERGER: While we're all up here chatting, there are references to other names up here.

THE COURT: Yes, Mr. Goldberger, and no one has identified in the document says these are people that are not going to be prosecuted. Mr. Kuvin made the argument that these are co-conspirators. These are innocent people that have nothing to do with these proceedings. They have nothing to do with --

MS. SHULLMAN: They have a standing.

THE COURT: I will renew my ruling that I gave you yesterday, and deny your request to redact those names out of there. All right, so I'll hang on to these till Thursday at noon, and anybody that comes -- wants to come and get them, I don't know if there's a mechanism for -- I stand on the

EFTA00232539

courthouse steps and pass them out.

MS. SHULLMAN: If there are no redactions to be made.

THE COURT: No redaction.

MS. SHULLMAN: I would do an order directing the Court to release them and they may become unsealed. You don't need --

MS. COMPIANI: Your Honor, are you going to write up a written order denying --

MR. GOLDBERGER: Are you going to do that?

THE COURT: Put together a written order?

MS. SHULLMAN: Denying the stay?

THE COURT: Yes, A, denying the stay; B, delaying the disclosure or unsealing of these documents until noon Thursday; C, denying the motion for bond.

MR. GOLDBERGER: And you'll need that order quickly.

THE COURT: Yeah, fax that and we'll get it signed quick today.

MR. GOLDBERGER: Are you forcing the

EFTA00232540

court reporter to work over the weekend so we can get a transcript?

MR. CRITTON: Thank you, your Honor, for moving us this morning.

(Side bar conference held outside the hearing of the jury concluded.)

EFTA00232541

C E R T I F I C A T E

THE STATE OF FLORIDA,
COUNTY OF PALM BEACH.

I, SUSAN S. WIGGINS, R.P.R., Official Court Reporter for the Fifteenth Judicial Circuit, Criminal Division, in and for Palm Beach County, Florida; do hereby certify that I was authorized to and did report the foregoing proceedings before the Court at the time and place aforesaid; and that the preceding pages numbered from 1 to 24, inclusive, represent a true and accurate transcription of my stenonotes taken at said proceedings.

IN WITNESS WHEREOF, I have hereunto affixed my official signature this 29th day of June 2009.

Susan S Wiggins

SUSAN S. WIGGINS,R.P.R.

EFTA00232542

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing has been sent by E-Mail and Federal Express this 30th day of June, 2009, to:

JEFFREY H. SLOMAN
U.S. Attorney's Office-Southern District
500 South Australian Avenue, Suite 400
West Palm Beach, FL 33401

JUDITH STEVENSON ARCO
State Attorney's Office-West Palm Beach
401 North Dixie Highway
West Palm Beach, FL 33401

WILLIAM J. BERGER
ROTHSTEIN ROSENFELDT ADLER
401 East Las Olas Boulevard, Suite 1650
Fort Lauderdale, FL 33394
Counsel for [redacted].

DEANNA K. SHULLMAN
400 North [redacted] Drive, Suite 1100
P. O. Box 2602 (33601)
Tampa, FL 33602
Counsel for The Palm Beach Post

SPENCER T. KUVIN
LEOPOLD-KUVIN, P.A.
2925 PGA Boulevard, Suite 200
Palm Beach Gardens, FL 33410
Counsel for [redacted].

HONORABLE JEFFREY COLBATH
Palm Beach County Courthouse
205 North Dixie Highway
Room 11F
West Palm Beach, FL 33401

ROBERT D. CRITTON
BURMAN, CRITTON, LUTTIER & COLEMAN
515 North Flagler Drive, Suite 400
West Palm Beach, FL 33401
[redacted]

and

JACK A. GOLDBERGER
ATTERBURY, GOLDBERGER & [redacted], P.A.
250 Australian Avenue South, Suite 1400
West Palm Beach, FL 33401
[redacted]

and

JANE KREUSLER-WALSH and
BARBARA J. COMPIANI of
KREUSLER-WALSH, COMPIANI & VARGAS, P.A.
501 South Flagler Drive, Suite 503
West Palm Beach, FL 33401-5913
[redacted]
Counsel for Petitioner

By: _____
JANE KREUSLER-WALSH
Florida Bar No. [redacted]

EPSTEIN NEW YORK
CASE

[redacted]

EFTA00232545

MARTIN G. WEINBERG, [redacted]
ATTORNEY [redacted] *LAW*

20 PARK PLAZA, SUITE 1000
BOSTON, MASSACHUSETTS 02116

[redacted]

FAX [redacted]

NIGHT EMERGENCY: [redacted]

EMAIL ADDRESSES: [redacted]

July 22, 2011

[redacted]
Assistant United States Attorney
United States Attorney's Office
Southern District of Florida
500 S. Australian Ave. Suite 400
West Palm Beach, Florida 33401

Re: Jeffrey Epstein

Dear Ms. [redacted]:

Roy Black forwarded to me your letter to him dated July 21, 2011, from the District Attorney of the County of New York. We thank you for providing notice of the intended disclosure but we do object to any disclosure of the Non-Prosecution Agreement and the related list of witness/victims on the basis of the confidentiality provisions of paragraph 13. Absent an enforceable subpoena - which we would have the right to move to quash in the Court from which it was issued - there exists no right or duty to disclose the confidential Non-Prosecution Agreement or the non-public witness/victim list which was referenced in paragraph 7 of the NPA. Further, given that the witness/victim list was compiled based on the federal grand jury investigation, we object under Fed. R. Crim. P. 6(e) to its disclosure absent an appropriate court order.

Very truly yours,

Martin G. Weinberg

cc: Roy Black

MARTIN G. WEINBERG, P.C.
ATTORNEY [redacted] LAW

20 PARK PLAZA, SUITE 1000
BOSTON, MASSACHUSETTS 02116

[redacted]

FAX [redacted]

NIGHT EMERGENCY:
(617) 901-3472

EMAIL ADDRESSES:
[redacted]

July 22, 2011

[redacted]
Assistant United States Attorney
United States Attorney's Office
Southern District of Florida
500 S. Australian Ave. Suite 400
West Palm Beach, Florida 33401

Re: Jeffrey Epstein

Dear Ms. [redacted]:

Roy Black forwarded to me your letter to him dated July 21, 2011, from the District Attorney of the County of New York. We thank you for providing notice of the intended disclosure but we do object to any disclosure of the Non-Prosecution Agreement and the related list of witness/victims on the basis of the confidentiality provisions of paragraph 13. Absent an enforceable subpoena - which we would have the right to move to quash in the Court from which it was issued - there exists no right or duty to disclose the confidential Non-Prosecution Agreement or the non-public witness/victim list which was referenced in paragraph 7 of the NPA. Further, given that the witness/victim list was compiled based on the federal grand jury investigation, we object under Fed. R. Crim. P. 6(e) to its disclosure absent an appropriate court order.

Very truly yours,

Martin G. Weinberg

cc: Roy Black

BLACK SREBNICK KORNSPAN STUMPF
TRIAL ATTORNEYS

Roy Black
Howard M. Srebnick
Scott A. Kornspan
Larry A. Stumpf
Maria Neyra
Jackie Perczek
Mark A.J. Shapiro
Jared [redacted]
Marcos Beaton, Jr.

Jessica Fonseca-Nader
Kathleen P. Phillips
Jenifer J. Soulikias
Noah Fox
Joshua Shore

Email: [redacted]

FACSIMILE TRANSMITTAL SHEET

FAX: [redacted] **TELEPHONE:** [redacted]

TO: AUSA [redacted], Esq.

RE: JEFFREY EPSTEIN – N.Y. DA's Request

DATE: July 22, 2011

SENDER: Jackie Perczek

NO. OF PAGES (INCLUDING TRANSMITTAL SHEET): TWO .

MESSAGE:

KINDLY DELIVER ASAP.

****IF YOU DO NOT RECEIVE ALL PAGES, PLEASE CALL** [redacted]*****

THIS FACSIMILE CONTAINS PRIVILEGED AND CONFIDENTIAL INFORMATION INTENDED ONLY FOR THE USE OF THE INDIVIDUAL OR ENTITY NAMED ABOVE. IF THE READER OF THIS FACSIMILE IS NOT THE INTENDED RECIPIENT, OR THE EMPLOYEE OR AGENT RESPONSIBLE FOR DELIVERING IT TO THE INTENDED RECIPIENT, YOU ARE HEREBY NOTIFIED THAT ANY DISSEMINATION OR COPYING OF THIS FACSIMILE IS STRICTLY PROHIBITED. IF YOU HAVE RECEIVED THIS FACSIMILE IN ERROR, PLEASE IMMEDIATELY NOTIFY US BY TELEPHONE, AND RETURN THE ORIGINAL FACSIMILE TO US AT THE ABOVE ADDRESS VIA THE U.S. POSTAL SERVICE. THANK YOU.

U.S. Department of Justice

United States Attorney
Southern District of Florida

500 S. Australian Ave, Ste 400
West Palm Beach, FL 33401
[redacted]
Facsimile: [redacted]

July 27, 2011

DELIVERY BY FACSIMILE
Martin G. Weinberg, Esq.
20 Park Plaza, Suite 1000
Boston, MA 02116

Re: Jeffrey Epstein

Dear Mr. Weinberg:

Thank you for your letter of July 22, 2011. In order to review and address the objections that you raised in that letter, the Office deferred making its planned disclosure to the District Attorney of the County of New York of the Non-Prosecution Agreement ("Agreement") and the list of identified victims that was provided to Mr. Epstein pursuant to the Agreement. Nonetheless, after completing a full review of your objections, the Office still intends to proceed with the planned disclosures.

The Agreement requires the Office only to provide Mr. Epstein with notice prior to a disclosure *of the Agreement* "[i]f the United States receives a Freedom of Information Act request or any compulsory process"; the Agreement does not require Mr. Epstein's concurrence in any disclosure. Contrary to your suggestion, the Agreement (including paragraph 13) also does not make the Agreement itself "confidential." On the contrary, the Agreement expressly contemplates that disclosures of the Agreement may be made, and the Agreement further contemplates, contrary to your suggestion, that such disclosures of the Agreement may be made other than in response to "compulsory process." Here, moreover, the District Attorney of the County of New York, as a local law enforcement agency, has provided a legitimate request for disclosure of the requested information, as well as a promise to maintain the confidentiality of the information, particularly the names of the minor victims.

Your objection pursuant to Federal Rule of Criminal Procedure 6(e) also does not impact the planned disclosures. The victim list itself is not grand jury material, and, thus, disclosure of that list to the District Attorney's Office will not violate Rule 6(e).

If you wish to supply any additional authority (other than citation to Rule 6(e) and to paragraph 13 of the Agreement) for your claims that the Office cannot disclose the Agreement and

the victim list to the District Attorney of the County of New York, we would be willing to consider those authorities before making any disclosure, provided that any such authorities are furnished to us before 5:00 p.m. on July 29, 2011. Otherwise, seeing no obstacle to the previously-planned disclosures, the Office will be disclosing copies of both the Non-Prosecution Agreement and the list of identified victims that was provided to Mr. Epstein to the District Attorney of the County of New York at 5:00 p.m. on July 29, 2011.

Sincerely,

Wifredo A. Ferrer
United States Attorney

By: [redacted]
Assistant United States Attorney

cc: [redacted], Chief, Northern Division
Deborah L. Morse, Assistant District Attorney, County of New York
Roy Black, Esq.

United States Attorney's Office
Southern District of Florida
500 S. Australian Ave., Suite 400
West Palm Beach, FL 33401-6235

DATE: 7/27/2011

TO: MARTIN WEINBERG

ORGANIZATION:

FAX #: [redacted]

SUBJECT: JEFFREY EPSTEIN

FROM: [redacted]

[redacted] (Fax)

NUMBER OF PAGES, INCLUDING THIS PAGE: 3

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United States Attorney's Office
Southern District of Florida
500 S. Australian Ave., Suite 400
West Palm Beach, FL 33401-6235

DATE: 7/27/2011

TO: MARTIN WEINBERG

ORGANIZATION:

FAX #: [redacted]

SUBJECT: JEFFREY EPSTEIN

FROM: [redacted]
(561) 820-8711
(561) 820-8777 (Fax)

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United States Attorney's Office
Southern District of Florida
500 S. Australian Ave., Suite 400
West Palm Beach, FL 33401-6235

DATE: 7/27/2011

TO: Deborah Morse

ORGANIZATION: New York District Attorney's Office

FAX #: [redacted]

SUBJECT: Jeffrey Epstein

FROM: [redacted] (Fax)

NUMBER OF PAGES, INCLUDING THIS PAGE: 3

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United States Attorney's Office
Southern District of Florida
500 S. Australian Ave., Suite 400
West Palm Beach, FL 33401-6235

DATE: 7/27/2011

TO: Deborah Morse

ORGANIZATION: New York District Attorney's Office

FAX #: [redacted]

SUBJECT: Jeffrey Epstein

FROM: [redacted]
[redacted] ax)

NUMBER OF PAGES, INCLUDING THIS PAGE: 3

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U.S. Department of Justice

United States Attorney
Southern District of Florida

500 S. Australian Ave, Ste 400
West Palm Beach, FL 33401
[redacted]
Facsimile: [redacted]

July 21, 2011

DELIVERY BY ELECTRONIC MAIL
Roy Black, Esq.
Black Srebnick Kornspan & Stumpf P.A.
201 S. Biscayne Blvd, Suite 1300
Miami, FL 33131

Re: Jeffrey Epstein

Dear Mr. Black:

On July 17, 2011, the Office received a written request from the District Attorney of the County of New York for a copy of the signed Non-Prosecution Agreement and the list of identified victims that was provided to Mr. Epstein pursuant to the Non-Prosecution Agreement. Pursuant to the District Attorney's request, the U.S. Attorney's Office intends to disclose these items to Deborah L. Morse, Assistant District Attorney, at 5:00 p.m. on Friday, July 22, 2011. Pursuant to the terms of the Non-Prosecution Agreement, the Office is hereby giving you notice of this intended disclosure.

Sincerely,

Wifredo A. Ferrer
United States Attorney

By: [redacted]
Assistant United States Attorney

cc: [redacted], Chief, Northern Division
Deborah L. Morse, Assistant District Attorney, County of New York

United States Attorney's Office
Southern District of Florida
500 S. Australian Ave., Suite 400
West Palm Beach, FL 33401-6235

DATE: 7/21/2011

TO: Deborah Morse

ORGANIZATION: District Attorney's Office - Appeals Bureau

FAX #: [redacted]

SUBJECT:

FROM: [redacted]

[redacted] (Fax)

NUMBER OF PAGES, INCLUDING THIS PAGE: 2

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United States Attorney's Office
Southern District of Florida
500 S. Australian Ave., Suite 400
West Palm Beach, FL 33401-6235

DATE: 7/21/2011

TO: Deborah Morse

ORGANIZATION: District Attorney's Office - Appeals Bureau

FAX #: [redacted]

SUBJECT:

FROM: [redacted]
[redacted] (Fax)

NUMBER OF PAGES, INCLUDING THIS PAGE: 2

COMMENTS:

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[redacted] Fax: Jul 17 2011 10:15pm P001/002

DISTRICT ATTORNEY
OF THE
COUNTY OF NEW YORK
ONE HOGAN PLACE
New York, N. Y. 10013
[redacted]

CYRUS R. VANCE, JR.
DISTRICT ATTORNEY

APPEALS BUREAU
FAX DOCUMENT COVERSHEET
FAX # 212-335-9288

Date: July 17, 2011

To: AUSA [redacted]

Fax: [redacted]

From: Deborah Morse

Tel #: [redacted]

# of Pages 2 (includes cover sheet)

☐	**URGENT**	☐	**ROUTINE**
☐	Deliver Immediately	☐	Discuss with Appropriate Person(s)
☐	As Requested	☐	For Your Approval
☐	Review and Comment	☐	Take Necessary Action
☐	For Your Information	☐	Reply Via FAX
☐	File	☐	Reply Via Messenger
☐	Reply Directly	☐	Progress Report
☐	Investigate	☐	Let's Discuss
☐	Prepare Reply for Signature		
☐	Other Action To Be Taken/Additional Comments:		

My transmittal sheet from Friday says it didn't go through at that time. If this is a repeat, I apologize.
Again, I appreciate your cooperation —
Deborah Morse

DISTRICT ATTORNEY
OF THE
COUNTY OF NEW YORK
ONE HOGAN PLACE
New York, N. Y. 10013
[redacted]

CYRUS R. VANCE, JR.
DISTRICT ATTORNEY

July 15, 2011

[redacted], Esq.
Assistant United States Attorney
Office of the United States Attorney
Southern District of Florida
500 S. Australian Avenue
Suite 400
West Palm Beach, Florida 33401

Dear Ms. [redacted],

As we have discussed, I am currently working on the appeal brought by defendant Jeffrey Epstein in which he challenges his risk-offender designation under New York State's Sexual Offender Registration Act.

The non-prosecution agreement between defendant and your Office would be of assistance to us in fashioning our response on appeal. I would appreciate it if you would send us a copy of that agreement, including the list of victims.

Please let me know if you need any further information in order to make this material available. I appreciate your assistance, and courtesy, in this matter.

Yours truly,

Deborah L. Morse

Deborah L. Morse
Assistant District Attorney
[redacted]

U.S. Department of Justice

United States Attorney
Southern District of Florida

500 S. Australian Ave, Ste 400
West Palm Beach, FL 33401
[redacted]
Facsimile: [redacted]

July 21, 2011

DELIVERY BY ELECTRONIC MAIL
Roy Black, Esq.
Black Srebnick Kornspan & Stumpf P.A.
201 S. Biscayne Blvd, Suite 1300
Miami, FL 33131

Re: Jeffrey Epstein

Dear Mr. Black:

On July 17, 2011, the Office received a written request from the District Attorney of the County of New York for a copy of the signed Non-Prosecution Agreement and the list of identified victims that was provided to Mr. Epstein pursuant to the Non-Prosecution Agreement. Pursuant to the District Attorney's request, the U.S. Attorney's Office intends to disclose these items to Deborah L. Morse, Assistant District Attorney, at 5:00 p.m. on Friday, July 22, 2011. Pursuant to the terms of the Non-Prosecution Agreement, the Office is hereby giving you notice of this intended disclosure.

Sincerely,

Wifredo A. Ferrer
United States Attorney

By: [redacted]
Assistant United States Attorney

cc: [redacted], Chief, Northern Division
Deborah L. Morse, Assistant District Attorney, County of New York

DISTRICT ATTORNEY
OF THE
COUNTY OF NEW YORK
ONE HOGAN PLACE
New York, N. Y. 10013
[redacted]

CYRUS R. VANCE, JR.
DISTRICT ATTORNEY

May 6, 2011

[redacted], Esq.
Assistant United States Attorney
Office of the United States Attorney
Southern District of Florida
500 S. Australian Avenue
Suite 400
West Palm Beach, Florida 33401

Dear Ms. [redacted],

As I explained during our telephone conversation last week, I am currently working on an appeal brought by defendant Jeffrey Epstein. Defendant Epstein challenges the designation that he was given under New York State's Sexual Offender Registration Act. The underlying sexual misconduct at issue was the subject of an investigation and/or prosecution by your Office, as well as the Florida State's Attorney Office in Palm Beach County.

I know that you handled the matter on behalf of your office when the case was presented to the federal grand jury. Those grand jury proceedings would be of assistance to us in fashioning our response on appeal, and I would appreciate it if you would send us a transcript of those proceedings. If we furnish the minutes to the appellate court, we would do so under seal for the purpose of an in camera review.

Please let me know if you need any further information in order to make the materials available. I appreciate your assistance, and courtesy, in this matter.

Yours truly,

Deborah L. Morse

Deborah L. Morse
Assistant District Attorney
[redacted]

DISTRICT ATTORNEY
OF THE
COUNTY OF NEW YORK
ONE HOGAN PLACE
New York, N. Y. 10013
[redacted]

CYRUS R. VANCE, JR.
DISTRICT ATTORNEY

August 15, 2011

[redacted], Esq.
Assistant United States Attorney
Office of the United States Attorney
Southern District of Florida
500 S. Australian Avenue
Suite 400
West Palm Beach, Florida 33401

Dear Ms. [redacted],

Pursuant to our conversation, I have enclosed copies of the brief and appendix filed by defendant Jeffrey Epstein on appeal, as well as a copy of our brief in response.

I look forward to hearing your opinion.

Yours truly,

Deborah L. Morse
Assistant District Attorney
[redacted]

New York County Clerk's Index No. 30129/2010

New York Supreme Court

APPELLATE DIVISION—FIRST DEPARTMENT

PEOPLE OF THE STATE OF NEW YORK,

Respondent,

—against—

JEFFREY E. EPSTEIN,

Defendant-Appellant.

APPENDIX

CYRUS R. VANCE, JR.
NEW YORK COUNTY DISTRICT
ATTORNEY'S OFFICE
One Hogan Place
New York, New York 10013
[redacted]

Attorneys for Respondent

JAY P. LEFKOWITZ
SANDRA LYNN MUSUMECI
KIRKLAND & ELLIS LLP
601 Lexington Avenue
New York, New York 10022
[redacted]

Attorneys for Defendant-Appellant

REPRODUCED ON RECYCLED PAPER

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SUPREME COURT FOR THE STATE OF NEW YORK
COUNTY OF NEW YORK

PEOPLE OF THE STATE OF NEW YORK, Plaintiff-Respondent, - against - JEFFREY E. EPSTEIN, Defendant-Appellant.	Index No.: 30129-2010 **PRE-ARGUMENT STATEMENT**

1. TITLE OF ACTION: As set forth in caption.

2. FULL NAMES OF ORIGINAL PARTIES AND ANY CHANGE IN THE PARTIES: As set forth in caption. There has been no change in the parties.

3. NAME, ADDRESS, AND TELEPHONE NUMBER OF COUNSEL FOR APPELLANT OR PETITIONER:

Jay P. Lefkowitz, P.C.
Sandra Lynn Musumeci
KIRKLAND & ELLIS LLP
601 Lexington Avenue
New York, New York 10022-4611
Telephone: [redacted]
Facsimile:

4. NAME, ADDRESS, AND TELEPHONE NUMBER OF COUNSEL FOR RESPONDENT:

Cyrus R. Vance, Jr.
NEW YORK DISTRICT ATTORNEY'S OFFICE
One Hogan Place
New York, NY 10013
Telephone: [redacted]

5. COURT AND COUNTY, OR ADMINISTRATIVE BODY, FROM WHICH APPEAL IS TAKEN: New York Supreme Court (Criminal Term), New York County.

6. THE NATURE AND OBJECT OF THE CAUSE OF ACTION OR SPECIAL PROCEEDING: Sex Offender Registration Act (SORA) hearing, pursuant to Article 6-C of the Correction Law.

7. RESULT REACHED IN THE COURT OF ADMINISTRATIVE BODY BELOW: Supreme Court, New York County, adjudged appellant Jeffrey E. Epstein to be a Level 3 sexual offender, without additional designation.

8. GROUNDS FOR SEEKING REVERSAL, ANNULMENT, OR MODIFICATION: The Court's designation of appellant Jeffrey E. Epstein as a Level 3 sexual offender was an abuse of

discretion and constituted reversible legal error based, in part, on the following: (1) the Court improperly relied on untrustworthy double and triple hearsay contained in the recommendation of the Board of Examiners of Sex Offenders, even though the District Attorney, as the party appearing on behalf of the State, rejected much of the Board's recommendation as not constituting clear and convincing evidence to support a Level 3 designation where such hearsay allegations were rejected as a basis for state prosecution; (2) the Court failed to provide the parties with an opportunity to present evidence on contested issues, as required by statute, and instead relied wholesale upon the recommendation of the Board, over the objection of the District Attorney, without any inquiry; (3) the Court did not apply the guidelines established by the Board, as required by statute; and (4) the Court failed to set forth the findings of fact and conclusions of law on which its determinations in support of a Level 3 designation were based, as required by statute.

9. THERE IS NO RELATED ACTION OR PROCEEDING NOW PENDING IN ANY COURT OF THIS OR ANY OTHER JURISDICTION.

10. THERE IS NO ADDITIONAL APPEAL PENDING IN THIS ACTION.

Dated: February 9, 2011

Jay P. Lefkowitz, P.C.
Sandra Lynn Musumeci

KIRKLAND & ELLIS LLP
601 Lexington Avenue
New York, New York 10022-4611
Telephone:
Facsimile:

Attorneys for Defendant-Appellant Jeffrey E. Esptein.

EFTA00232568

A3

Appellant's Notice of Appeal, dated February 9, 2011

SUPREME COURT FOR THE STATE OF NEW YORK
COUNTY OF NEW YORK

THE PEOPLE OF THE STATE OF NEW YORK,

Plaintiff,

- against -

JEFFREY E. EPSTEIN,

Defendant.

NOTICE OF APPEAL

Index No. 30129-2010

CRIMINAL TERM PART 66
JUSTICE RUTH PICKHOLZ

PLEASE TAKE NOTICE that the above named defendant, Jeffrey E. Epstein, hereby appeals to the Appellate Division of the New York Supreme Court in and for the First Department, from an order entered in the above entitled action in the office of the Clerk of New York County on the 18th day of January 2011, which order adjudged defendant Jeffrey E. Epstein to be a Level 3 sexual offender pursuant to Article 6-C of the Correction Law, and this appeal is taken from each and every part of that order as well as from the whole thereof.

Dated: February 9, 2011

To:

Clerk, New York County

Cyrus R. Vance, Jr.
NEW YORK DISTRICT ATTORNEY'S OFFICE
One Hogan Place
New York, NY 10013
Telephone: [redacted]

Jay P. Lefkowitz, P.C.
Sandra Lynn Musumeci
KIRKLAND & ELLIS LLP
601 Lexington Avenue
New York, New York 10022-4611
Telephone: [redacted]
Facsimile: [redacted]

Attorneys for Defendant
Jeffrey E. Epstein

FILED

FEB 09 2011

SUPREME COURT
NEW YORK COUNTY
APPEALS BUREAU

A4

Order Appealed From, dated January 18, 2011 with Notice of Entry

[pp. A4-A5]

STATE OF NEW YORK
BOARD OF EXAMINERS OF SEX OFFENDERS
4 TOWER PLACE
ALBANY, NEW YORK 12203-3764

TO: NEW YORK COUNTY SUPREME COURT DATE: 8/19/2010

FROM: BOARD EXAMINER: STEPHEN D. WEBER SDW

RE: JEFFREY E EPSTEIN NYSID# OR BOARD ID# OS1909

REPORTED ADDRESS: 9 EAST 71ST STREET
NEW YORK, NY 10021

SUPERVISING OFFICER:
SUPERVISING AGENCY: NONE, OFFENDER IS UNSUPERVISED

The above referenced individual has committed an offense in another jurisdiction and has established residence in New York State at the address indicated. It has been determined that the offender is required to register and be risk assessed as a sex offender in New York State.

The NYS Board of Examiners of Sex Offenders is recommending a risk level and designation for the offender, as indicated on the attached risk assessment instrument, case summary and designation form. Pursuant to Correction Law Section 168-k(2), the County or Supreme Court in the county of residence of the offender shall determine the offender's risk level and designation. The Court must determine whether the offender meets the definition of sexually violent offender, predicate sex offender or sexual predator as set forth in Correction Law Section 168-a(7).

Please note, pursuant to Chapter 684 of the Laws of 2005, as of October 4, 2005, Correction Law Section 168-d, 168-k and 168-n have been amended to provide that the Court shall conduct the risk level and designation hearing if the sex offender, having been given notice including the date, time, and place of the proceeding, fails to appear without sufficient excuse. **Please note that until the court determines the offender's risk level, no community notification can occur.**

A copy of the order setting forth the risk level and designation determinations, and the findings and conclusions of law on which such determinations are based, shall be submitted to the Division of Criminal Justice Services Sex Offender Registry Unit by the Court. In addition, please complete and attach this form indicating the offender's risk level and designation to the Court's order. Please distribute the remaining copies as indicated below.

Information below is to be completed by Sentencing Court

FINAL RISK LEVEL DETERMINATION (circle one) 1 2 (3)

DESIGNATION: Please check any that apply pursuant to Article 6-C of the NYS Correction Law:

___ Sexually Violent Offender ___ Sexual Predator ___ Predicate Sex Offender ___ No such designation

Judge's Name (please print): RUTH PICKHOLZ

Judge's signature:

Date signed: 1/18/2011

WHITE COPY: Sex Offender Registry Unit, DCJS, 4 Tower Pl., Albany, NY 12203 YELLOW COPY: Court PINK COPY: Offender

SUPREME COURT FOR THE STATE OF NEW YORK
COUNTY OF NEW YORK

THE PEOPLE OF THE STATE OF NEW YORK,

Plaintiff,

- against -

JEFFREY E. EPSTEIN,

Defendant.

NOTICE OF ENTRY

Index No. 30129-2010

CRIMINAL TERM PART 66
JUSTICE RUTH PICKHOLZ

PLEASE TAKE NOTICE that the within is a copy of an order entered in this action on the 18th day of January 2011, in the office of the Clerk of the County of New York.

Dated: February 9, 2011

To:

Clerk, New York County

Cyrus R. Vance, Jr.
NEW YORK DISTRICT ATTORNEY'S OFFICE
One Hogan Place
New York, NY 10013
Telephone: [redacted]

Jay P. Lefkowitz, P.C.
Sandra Lynn Musumeci
KIRKLAND & ELLIS LLP
601 Lexington Avenue
New York, New York 10022-4611
Telephone:
Facsimile: [redacted]

Attorneys for Defendant Jeffrey E. Epstein

FILED
FEB 09 2011
SUPREME COURT
NEW YORK COUNTY
APPEALS BUREAU

A6

Palm Beach Police Department - Probable Cause Affidavit of Det. Joe Recarey - Defendant [redacted], dated May 1, 2006

[pp. A6-A27]

Probable Cause Affidavit

Palm Beach Police Department

Agency ORI# FLO 500600

Police Case#: 05-368 (2)

Defendant: [redacted]
Race/Sex: White Female
DOB: [redacted]
Charges: **Principal in the 1st Unlawful Sexual Activity with a Minor (4) counts**
Principal in the 1st Lewd and Lascivious Molestation (1) count

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From March 15, 2005, through February 2006, the Palm Beach Police Department conducted a sexual battery investigation involving Jeffrey Epstein, [redacted] and [redacted] Sworn taped statements were taken from five victims and seventeen witnesses concerning massages and unlawful sexual activity that took place at the residence of Jeffrey Epstein, 358 El Brillo Way, Palm Beach. Several of the victims were recruited by and brought to the residence by [redacted] to perform massages for Epstein, for which [redacted] received monetary compensation. During the visit they would be introduced to [redacted], Epstein's assistant, who in turn would record their telephone numbers and name. The victims would be brought to Epstein's bedroom to provide the massage. Epstein would enter the room and order the victims to remove their clothing to provide the massage. As the victims complied and provided the massages, Epstein would rub his fingers on their vaginas. On occasion, Epstein would introduce a massager/vibrator and rub the victims vaginas as they provided the massage. On three separate occasions, Epstein had intercourse and inserted his penis/fingers in the victims vaginas. At the conclusion of the massages the victims were paid sums of money ranging from $200 - $1,000. The facts, as reported, are as follows:

On 03/15/2005, A fourteen year old white female, hereinafter referred to as [redacted] dob [redacted] and her family reported unlawful sexual activity which occurred at a residence within the Town of Palm Beach. [redacted] reported that a subject known to her as "Jeff" had touched her vaginal area with a vibrator/massager while within his residence. "Jeff" was later identified as Jeffrey Epstein through a photo line up.

During a sworn taped interview, [redacted] stated that [redacted] dob [redacted], a cousin [redacted] boyfriend and classmate at [redacted] High School, worked for a wealthy man and did sexual favors for him. She also admitted that [redacted] had offered her an opportunity to make money. During the beginning of the month of February 2005, [redacted] explained that she was first approached by [redacted] to go with her to Epstein's house. [redacted] stated that [redacted] along with a Hispanic female, later identified as [redacted] pick her up at her father's house on a Sunday. [redacted] was not sure of the exact dates but knew it was a Sunday. [redacted] told her father that they were going shopping but in reality [redacted] drove them to Palm Beach. During the drive a

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The foregoing instrument was sworn to or affirmed before me this 1st day of May, 2006 by Det Joe Recarey, who is personally known to me.

Signature of Police Officer (F.S.S. 117.10)

State of Florida
County of Palm Beach

Signature/Arresting Officer

Date: 05/01/2006

EFTA00232572

Probable Cause Affidavit

Palm Beach Police Department

Agency ORI# FLO 500600

conversation occurred between [redacted] and [redacted] whereas [redacted] reportedly told [redacted] that if Jeff asked her age, she should say she was eighteen. It was later confirmed by the [redacted] father that [redacted] picked his daughter up on February 6, 2005. According to [redacted] father, [redacted] drove a pick up truck.

[redacted] described Epstein's house as a two-story pink house with a Cadillac Escalade parked in the driveway. She recalled that Jeff's house was on a dead end street. Upon arriving at the house [redacted] stated that they walked up a driveway, past what appeared to be a small guard/security room. A male approaching them asking what they wanted. [redacted] stated they were there to see Epstein. The male allowed them to continue walking up to the house. [redacted] stated the man told them that Epstein was not there but was expected back. He allowed them to enter the house, via the kitchen. He offered them something to drink while they waited inside. Shortly thereafter, Epstein and his assistant, described as white female with blond hair and later identified as [redacted], entered the kitchen. Epstein introduced himself to [redacted] [redacted] described Epstein as being approximately forty-five years old, having a long face and bushy eyebrows, with graying hair.

[redacted] and Epstein left the kitchen leaving [redacted] alone in the kitchen. They returned a short time later. They all spoke briefly in the kitchen. [redacted] was instructed to follow [redacted] upstairs. [redacted] recalled walking up a flight of stairs, lined with photographs, to a room that had a massage table in it. Upon entering the room there was a large bathroom to the right and a hot pink and green sofa in the room. There was a door on each side of the sofa. [redacted] recalled there being a mural of a naked woman in the room, as well as several photographs of naked women on a shelf. [redacted] told the victim that Epstein would be up in a second.

Epstein entered the room wearing only a towel and told [redacted] to take off her clothes. [redacted] stated Epstein was stern when he told her to take off her clothes. [redacted] said she did not know what to do as she was the only one there in the room so she took off her shirt leaving her bra on. Epstein had removed his towel and told the [redacted] to take off everything. [redacted] stated Epstein was nude when he took his towel off, placing it on the floor as he laid down on the table. [redacted] stated she then removed her pants leaving her thong panties on. Epstein then instructed her to give him a massage pointing to a specific lotion for her to use. As [redacted] began to give Epstein the massage, he told her to get on his back. [redacted] stated she straddled herself on Epstein's back whereby her exposed buttocks were touching Epstein's bare buttocks. [redacted] said Epstein was specific in his instruction to her on how to massage him, telling her to go clockwise or counter clockwise. Epstein then turned over and instructed [redacted] to massage his chest. [redacted] was now standing on the ground and resumed massaging Epstein's chest area. [redacted] stated Epstein held onto the small of her back as she massaged his chest and shoulder area. Epstein then turned to his side and started to rub his penis in an up and down motion. Epstein then pulled out a purple vibrator and began to

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State of Florida
County of Palm Beach

Signature of Police Officer (F.S.S. 117.10)

Signature/Arresting Officer

Date: 05/01/2006

EFTA00232573

Probable Cause Affidavit

Palm Beach Police Department

Agency ORI# FLO 500600

massage [redacted] vaginal area. [redacted] stated there was no penetration as the vibrator was on top of her underwear. [redacted] recalled Epstein ejaculating because he had to use the towel to wipe himself as he got off the table. Epstein then left the room and [redacted] got dressed. She went back downstairs where she met with [redacted] [redacted] said she was paid three hundred dollars in cash from Epstein. Before she left, Epstein asked [redacted] to leave her phone number. As [redacted] [redacted] and [redacted] were leaving the house, [redacted] told [redacted] she received two hundred dollars that day for bringing her.

During the course of the investigation, parental consent was granted for [redacted] to assist with the investigation. At our direction [redacted] conducted controlled taped phone calls to [redacted] cellular telephone 561-[redacted]2. [redacted] spoke with [redacted] in an attempt to arrange another meeting with Epstein. [redacted] asked [redacted] what did she need to do to make more money. [redacted] stated, "the more you do, the more you get paid." [redacted] had subsequently called back [redacted] and left a voice mail message for her indicating that she had set up an appointment for [redacted] to go to Epstein's house at 11:00 am on April 5, 2005. This message was recorded from [redacted] voice mail.

Based on the above, trash pulls were established at Epstein's residence with Supervisor Tony Higgins of the Sanitation Bureau of the Town of Palm Beach. The trash pull from April 5, 2005 revealed a telephone message for Epstein which stated [redacted] and [redacted] name at 11:00 am. This was the time frame [redacted] had informed [redacted] to be ready to go work at Epstein's house.

On October 3, 2005, Sgt Frick and I went to [redacted] residence and viewed her vehicle parked in the driveway, a red Dodge Neon. Sgt. Frick and I knocked on the door and met with [redacted] [redacted] was told that we were investigating a claim involving Jeffrey Epstein of El Brillo Way, in Palm Beach. [redacted] was asked if she would accompany us back to the police station for further questioning. She was also told that at the conclusion of the interview she would be returned home. [redacted] voluntarily came with us back to the Palm Beach Police Department.

Upon our arrival at the police station, [redacted] was brought to the interview room in the Detective Bureau where I obtained a taped, sworn statement. I began the interview by asking [redacted] how she became acquainted with Epstein. [redacted] stated that approximately two years ago, just after she turned 17 years of age, she was approached by a friend named [redacted] at the Canopy Beach Resort in Rivera Beach. [redacted] was asked if she wanted to make money. She was told she would have to provide a massage and should make $200.00. [redacted] thought about the offer and agreed to meet with Jeffrey.

The foregoing instrument was sworn to or affirmed before me this 1st day of May, 2006 by Det Joe Recarcy, who is personally known to me.

Signature of Police Officer (F.S.S. 117.10)

State of Florida
County of Palm Beach

Signature Arresting Officer

Date: 05/01/2006

EFTA00232574

Probable Cause Affidavit

Palm Beach Police Department

Agency ORI# FLO 500600

[redacted] (Unknown last name) and Tony (Unknown last name) picked [redacted] up and she was taken to Epstein's house. Upon her arrival to the house she was introduced to Epstein in the kitchen of the house. She was also introduced to a white female known to her as [redacted]. She was led upstairs to the main bedroom known to her as Jeff Epstein's bedroom. [redacted] arranged the massage table and covered the table with a sheet. She brought out the massage oils and laid them next to the massage bed. [redacted] then left the room and informed [redacted] Jeff would be in, in a minute. Jeff entered the bedroom wearing only a towel. He removed the towel and laid nude on the massage table. He laid on the table onto his stomach and picked a massage oil for [redacted] to rub on him. During the massage, [redacted] stated "He tried to touch me and I stopped him." I asked how he tried to touch her. [redacted] stated that Epstein grabbed her buttocks and she felt uncomfortable. [redacted] told Epstein, I'll massage you but I don't want to be touched. [redacted] stated she performed the massage naked. At the conclusion of the massage, Epstein paid [redacted] $200.

After the massage Epstein stated to [redacted] that he understood she was not comfortable, but he would pay her if she brought over some girls. He told her the younger the better. [redacted] stated she once tried to bring a 23 year old female and Epstein stated that the female was too old. [redacted] stated that in total she only remembers six girls that she brought to see Epstein, each time she was paid $200. [redacted] stated she had brought the following girls: [redacted] (a16 year old female), [redacted] (a 16 year old female) [redacted] said that at the time she brought these girls to Epstein's house they were all14 through 16 years of age. I asked [redacted] which one was the youngest. [redacted] advised [redacted] was the youngest as she was fourteen when the massage occurred. [redacted] stated every girl she brought knew what to expect when they arrived. They were told they would provide a massage, possibly naked, and allow some touching. I asked her if [redacted] was aware. She stated every girl she brought knew what to expect. She explained she knew that [redacted] wanted to make money. She approached [redacted] and explained about going to work for Jeff, [redacted] agreed and arrangements were made to bring her to Epstein's house on a weekend. [redacted] stated that she and [redacted] (Later identified [redacted] picked up [redacted] at her house. [redacted] stated that at that time she was driving a red pickup truck. They traveled to Epstein's house and entered through the kitchen door. They met with the house chef and Epstein's assistant [redacted]. [redacted] was introduced to Epstein while they were in the kitchen area. [redacted] led [redacted] upstairs and Epstein went upstairs. When the massage was over [redacted] returned to the kitchen area. [redacted] stated she was paid $200.00 for bringing [redacted] to Epstein's house. [redacted] stated [redacted] told her she was paid $300.00 for the massage.

[redacted] stated that [redacted] was the last person she brought to Epstein's house. She had changed her cellular number to avoid being contacted by [redacted]. She continued stating that she had no direct contact with Epstein

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State of Florida
County of Palm Beach

Signature Arresting Officer

Signature of Police Officer (F.S.S. 117.10)

Date: 05/01/2006

EFTA00232575

Probable Cause Affidavit

Palm Beach Police Department

Agency ORI# FLO 500600

when he was going to travel to Palm Beach. [redacted] said when Epstein announces to his assistant, [redacted], that he is traveling to Palm Beach, [redacted] would then contact [redacted] to arrange girls to "work" for Epstein. [redacted] stated that once her parents discovered that she was visiting Epstein, they disapproved of the encounters with him and she stopped. [redacted] further stated that [redacted] still tries to call Robson's house and leaves messages.

Sgt Frick entered the room and explained to [redacted] that based on her own statements, she had implicated herself by bringing underage girls to Epstein's house. [redacted] provided cellular telephone numbers for the girls she had mentioned previously. Additionally, she also provided possible addresses and areas in which they lived.

As [redacted] was being taken home in the vehicle, a tape recorder was placed within the vehicle to record any conversations within the vehicle. During the drive back to her home, [redacted] made the comment " I'm like a Heidi Fleiss." (Hollywood Madam who sent girls to clients for sexual favors in California). [redacted] was dropped off at her house without incident.

On October 3, 2005, Sgt Frick and I went to speak with [redacted] a sixteen year-old female who was brought to Epstein's residence by [redacted] We met with [redacted] mother at their front door. We explained the ongoing investigation and asked to speak with [redacted] as we had information that she had "worked" for Jeff. Mrs. [redacted] introduced us to her husband and allowed us entry into the home. We sat in the dining room and met with [redacted] Date of Birth [redacted]. As she was under the age of eighteen, Mrs [redacted] was advised we would be speaking with her. She expressed if her daughter had information, she wanted to assist. We interviewed [redacted] who denied having any inappropriate encounters with Jeff (Epstein). She stated she had gone to Jeff's house with [redacted] approximately eight months ago and sat in the kitchen with the house chef, but nothing happened. As the parents were present during the interview, we felt that [redacted] was withholding information from us. She made several comments as to putting the entire incident behind her. I left my telephone number and advised should she wish to speak with me again to telephone me. Sgt Frick and I thanked Mrs. [redacted] for her time and left the area. She stated she would ask [redacted] again after we left as to what happened at Epstein's house. I informed her that [redacted] had my telephone number and hopefully she would call.

On October 4, 2005, Det Dawson and I drove to the [redacted] home and met with [redacted] and [redacted]. During a sworn taped statement, [redacted] stated approximately a year ago when she was seventeen years old, she was taken to a house by [redacted] stated she knows [redacted] because they both attend [redacted] High School. She was told she could make money working

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Signature of Police Officer (F.S.S. 117.10)

State of Florida
County of Palm Beach

Signature/Arresting Officer

Date: 05/01/2006

EFTA00232576

Probable Cause Affidavit

Palm Beach Police Department

Agency ORI# FLO 500600

for Jeff. She was told she would have to provide a massage to Jeff. [redacted] stated upon her arrival to the house she was brought to the kitchen area by [redacted] They met with the house chef who was already in the kitchen area. [redacted] stated [redacted] would wait for her in the kitchen. [redacted] was introduced to [redacted], Jeff's assistant, who brought her upstairs to the master bedroom. [redacted] prepared the room and massage table for a massage. Epstein entered the room wearing only a towel and she provided a massage. [redacted] stated she kept her clothes on during the massage. She advised sometime during the massage, Epstein grabbed her buttocks and pulled her close to him. [redacted] said she was uncomfortable by the incident involving Jeff. At the conclusion of the massage, she was paid $200.00 for the massage. I [redacted] if she has any formal training in massages to which she replied no. I asked her if [redacted] received any monies for taking her to perform the massage. [redacted] stated [redacted] had received money for taking her there but was unsure in the amount. [redacted] stated she returned to Epstein's house on another occasion with [redacted] and another girl, [redacted] stated she waited in the kitchen with [redacted] while [redacted] was taken upstairs by [redacted] stated she only did the massage once as she was uncomfortable with the whole experience.

At the conclusion of the interview, the tape was stopped. I was informed that [redacted] had attempted to reach [redacted] via cell phone. A voice mail message on October 4, 2005 at 10:59 am, revealed a female voice who identified herself as [redacted] who requested [redacted] to call her back reference the police questioning. [redacted] provided the incoming telephone number as [redacted]. stated she inadvertently told [redacted] about the police investigation because [redacted] had called her to tell her about how she just received a rental car from Jeff Epstein. [redacted] had called her to tell her that she was given a rental car, a 2005 Silver Nissan Sentra, to utilize to visit family and visit Epstein. [redacted] asked her what was going on at the house that the police would be asking questions [redacted] stated [redacted] then called Jeff and [redacted] and asked what was going on reference the ongoing police investigation. According to [redacted], [redacted] has since then been trying to contact her to ask about the police questions. I instructed [redacted] not to contact [redacted] and do not provide any more information to [redacted] as she would notify Jeff Epstein and [redacted] what was transpiring.

On October4, 2005, I made telephone contact with [redacted] who had left several messages for me to contact her. During the message, she advised she was not completely truthful when we met in person but would like to speak with me to advise what had happened. She further advised she did not want to speak of this incident in front of her mother. At approximately 3:48 pm I made telephone contact with [redacted] During a taped recorded statement [redacted] stated the following: approximately a year ago, when she was sixteen years of age, [redacted] took her to Epstein's house twice. She knows [redacted] because they both attend [redacted] High School. The first time she went, [redacted] drove to the house. They entered through the kitchen area where she was

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Signature of Police Officer (F.S.S. 117.10)

State of Florida
County of Palm Beach

Signature/Arresting Officer

Date: 05/01/2006

EFTA00232577

Probable Cause Affidavit

Palm Beach Police Department

Agency ORI# FLO 500600

introduced to [redacted] and Epstein. She was taken upstairs to a bedroom by [redacted] who set the room up with a massage bed and brought out the oils to use. Epstein then entered the room wearing a towel. He laid on the table and picked out a lotion for [redacted] to rub on him. At one point during the massage he tried to remove her shirt, at which point she became very upset and discontinued the massage. Both [redacted] and Epstein had a verbal disagreement, at which time she left without being paid. She got with [redacted] who was sitting in the kitchen and told her "let's go." [redacted] advised she received no money for that day. [redacted] also said that [redacted] had told her if she was uncomfortable with what was going on, to let him know and he'll stop. She knew that the more you do the more you get paid. [redacted] advised that several weeks later she agreed to be taken a second time by [redacted] Once they arrived at the residence, [redacted] sat in the kitchen and [redacted] took her upstairs to the master bedroom again. [redacted] set the room up with a massage bed and brought out the oils to use. Epstein then entered the room wearing a towel. He laid on the table and picked out a lotion for [redacted] to rub on him. At one point during the massage he tried to touch her buttocks. As [redacted] was wearing tight jeans and had a tight belt on Epstein was unable to touch her buttocks. Epstein then rolled onto his back during the massage and then attempted to touch her breasts. [redacted] then became upset again and told Epstein she didn't want to be touched. [redacted] discontinued the massage and was paid $200.00. [redacted] then went downstairs where [redacted] was waiting for her. She told [redacted] she wanted to leave. [redacted] said she never returned to the house. [redacted] stated she is aware that her friend, [redacted] was also at the house and had a problem with Epstein.

I later researched [redacted], dob [redacted], and met with her at her residence. During a sworn taped statement, [redacted] stated the following: on or about November 2004, she was approached at [redacted] High School by [redacted] a fellow student. [redacted] asked [redacted] if she wanted to make money. She agreed and was told she would provide a massage to wealthy man in Palm Beach. [redacted] picked her up and drove her to a house in Palm Beach. She was brought into the kitchen area of the house. She further stated that fellow [redacted] High School students [redacted] and [redacted]) came with them. They were brought into the kitchen where she was introduced to Epstein and other females. [redacted] stated she was introduced to a female helper of Epstein, the female was described as white female (unknown name), with blond hair. She stated that the assistant was familiar with [redacted] The assistant brought her upstairs into a master bedroom area. The assistant set up the massage table and put out lotions to be used. She told [redacted] Epstein would be available in a minute. Epstein entered the room wearing only a towel. Epstein removed his towel, and laid naked on the massage table and picked a lotion to rub on his thighs and back. [redacted] further stated during the massage, Epstein asked her to remove her clothes. She complied and removed her pants and blouse. [redacted] didn't remember if she had removed her bra but feels that she did. [redacted] was certain that she stayed in her thong underwear. [redacted] continued the massage and at one point she climbed onto the massage

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State of Florida
County of Palm Beach

Signature of Police Officer (F.S.S. 117.10)

Signature/Arresting Officer

Date: 05/01/2006

EFTA00232578

Probable Cause Affidavit

Palm Beach Police Department

Agency ORI# FLO 500600

table, straddling Epstein to massage his back. While doing this her buttocks were touching Epsteins. was instructed to return to the ground at which time Epstein turned to have his chest rubbed. advised she was sure he was masturbating based on his hand movements going up and down on his penis area. did not want to look at his penis area because she was uncomfortable. Epstein removed a large white vibrator which was next to the massage table and turned it on. stated Epstein began rubbing the vibrator over her thong underwear on her vaginal area. Shortly thereafter, Epstein ejaculated and removed himself from the table. He walked over to where the shower was and opened the glass door. She waited as he was taking a shower in her direct view. When I asked how old she was when this occurred, she stated she had just turned seventeen. At the conclusion of the shower, was paid either $350.00 or $400.00. She stated she wasn't sure, but knows it was close to $400.00. stated she never returned to provide a massage for Epstein.

At approximately 2:10 pm, Det Dawson and I met with [redacted] at her residence. As [redacted] was only seventeen years of age, I had notified her mother, that she would be interviewed reference an ongoing investigation in Palm Beach. I assured her that her daughter was not a suspect. I explained the possibility of her being either a witness or victim. Mrs [redacted] advised she wanted [redacted] to cooperate and consented to the interview.

During a sworn taped statement, [redacted] stated the following: at the age of sixteen, during the month of September 2004, she was approached by [redacted] for a chance to make money. [redacted] was friends with associates of [redacted] and knew the same people. [redacted] had been previously told by her friends from [redacted] High School, what [redacted] did for Epstein. [redacted] called a person known to [redacted] as [redacted] and scheduled the appointment. [redacted] picked [redacted] up and drove her to Palm Beach to a street called "Brillo Way". They drove to the end of the street and entered a large driveway. They entered the kitchen area of the house and met with Epstein. [redacted] was introduced to Jeff Epstein. [redacted] led [redacted] upstairs to the main bedroom area and set up the room with a massage table and set out the oils. [redacted] stated that while going up the stairs and into the bedroom she observed numerous photographs of naked young girls. [redacted] dimmed the lights and turned on soft music. [redacted] exited the room and Epstein entered the room wearing only a towel. Epstein picked oils and instructed her to rub his legs, under his buttocks, back and chest area. Epstein asked her to get comfortable. [redacted] advised she did not remove her clothes. She was wearing tight jeans and a cropped tank top exposing her belly area. During the massage, Epstein removed his towel and laid on the massage table naked. As [redacted] rubbed Epstein's chest area, he attempted to reach down her pants to touch her buttocks area however was unable to due so due to the tightness of the jeans and a tight belt. [redacted] advised Epstein began to masturbate as she rubbed his chest. Epstein moaned as she rubbed his chest. She observed he was continuing to masturbate and

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Signature of Police Officer (F.S.S. 117.10)

State of Florida
County of Palm Beach

Signature Arresting Officer

Date: 05/01/2006

EFTA00232579

Probable Cause Affidavit

Palm Beach Police Department

Agency ORI# FLO 500600

attempted to reach up her tank top and touch her breasts. [redacted] pulled back and Epstein stopped, however he kept masturbating until he climaxed. He cleaned himself with the towel he was previously wearing. [redacted] was paid $200.00 for the massage and left the area. She met with [redacted] who was waiting in the kitchen area and left the house.

[redacted] then explained she never provided another massage for Epstein. She did however, go to the house with [redacted] and [redacted], as they took another friend [redacted]s. [redacted] advised she was present when [redacted] went to work for Epstein. She advised she rode over and sat in the kitchen area with [redacted] to wait for [redacted]. [redacted] advised while they waited for [redacted] the house chef prepared lunch for them as it was almost lunchtime when they went. When [redacted] was finished with the massage they left the area. I asked [redacted] if [redacted] ever told her what would be expected when she provided a massage. [redacted] stated yes, [redacted] told her that a massage would be expected, possibly naked and possibly some touching involved. [redacted] has no formal training in providing massages. [redacted] spoke about a third and last time she went to Epstein's house. [redacted] drove another girl, [redacted] (sixteen years of age) who is [redacted] friend, to Epstein's house. [redacted] stated [redacted] knew that [redacted] had made money massaging Epstein and wanted to make money herself. [redacted] took them in the kitchen area of the house and introduced [redacted] to [redacted]. [redacted] and [redacted] took [redacted] upstairs to the main bedroom. [redacted] advised she doesn't know what happened as [redacted] did not speak about what happened in the room. [redacted] received $100.00 from [redacted] for going with her to Epstein's house and recommending [redacted]

On October 6, 2005, at 11:45 am, I met with [redacted], dob [redacted] at Lynn University and explained to her why we there to interview her. She advised she was aware of the ongoing investigation. [redacted] stated she had previously spoken with [redacted] who told her she was interviewed by detectives. During a sworn taped statement, [redacted] stated she knew that [redacted] worked for Jeff Epstein in Palm Beach. [redacted] advised she originally had been taken to the Epstein house by [redacted] whom she met when they both attended [redacted]. She began going to the house when she was sixteen years of age and stated she had been there a lot of times to provide massages over the past two years. I asked her if she had formal training in providing massages, which [redacted] stated she had not. [redacted] advised she was told what was expected of her by providing massages and she would have to remove clothing but if she felt uncomfortable just to say so and Epstein would stop pushing the issue. [redacted] began providing massages and advised she kept her clothes on. She considered Epstein a pervert and he kept pushing to go further and further. [redacted] explained she would keep telling him she had a boyfriend and would not be right to her boyfriend. It wasn't until recently that [redacted] began removing her clothes and staying in her thong underwear to provide a massage. [redacted] explained

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Signature of Police Officer (F.S.S. 117.10)

State of Florida
County of Palm Beach

Signature/Arresting Officer

Date: 05/01/2006

EFTA00232580

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Palm Beach Police Department

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Epstein wanted to be rubbed on his back and recently he began turning over and have her rub his chest as he masturbated. He would try to touch her breasts as she rubbed his chest. stated "Jeff would try to get away with more and more on each massage". stated Epstein would try to touch her more and on one occasion he attempted to use a massager/vibrator on her. drove to the house for the original massage. left her cell phone number and every time Epstein would come into town, would call her for an appointment to "work". Each time she went, would meet her at the kitchen door area. She would bring her upstairs and prepare the massage table. advised Epstein would ask her questions about herself. Epstein knew she was a soccer player and would be attending Lynn University. I asked if Epstein knew her real age. stated Epstein did and didn't care. The most recent massage she provided was on October 1, 2005. During the massage, she asked Epstein if she could borrow one of his vehicles to visit her family and boyfriend in Orlando, Florida. Epstein had told her she could borrow one of his vehicles but later stated he would rent her a car. She continued with the massage as Epstein grabbed her buttocks and caressed the buttocks cheeks. I asked if she was wearing undergarments to which she replied her thong underwear. Once he tried to touch her breasts, she would pull away from him and he would stop. was asked if he ever used a vibrator on her. was aware of the vibrator but advised she never would allow him to use the vibrator on her. She described the vibrator as the large white vibrator with a huge head on the tip of the vibrator. She stated he kept the vibrator in a closet near the massage table.

stated that on October 3, 2005, she was contacted by Epstein's assistant, , who informed her that Jeff Epstein had rented her a new Nissan Sentra and she should come by the house to pick it up. informed she would have the car for a month. stated Epstein knew her car was not working properly and that she had missed appointments in the past because of her car being inoperable. explained the car is currently parked next to the Lynn University Gym field. I asked her if she ever took any one to the house. explained she took , a friend of hers who attended High School, who has relocated to Orlando to attend college. I asked if she ever allowed another female in the room. advised no one was brought into the room with her.

At the conclusion of the interview, Det Dawson and I went to the gym area of Lynn University and located the Silver Nissan Sentra bearing Florida tag . The vehicle is registered to Dollar Rent a Car out of the Palm Beach International Airport. The vehicle was rented by Janusz Banasiack, later learned to be Epstein's houseman, and paid with Epstein's credit card.

On September 11, 2005, w/f dob was arrested by the Palm Beach Police Department

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Date: 05/01/2006

EFTA00232581

for misdemeanor possession of marijuana. During the arrest [redacted] told the arresting officer that she had information about sexual activity taking place at the residence of Jeffrey Epstein. Additionally, during the ongoing trash pulls from Epstein's residence, discarded papers were found which contained [redacted] name and cell phone number.

On October, 11, 2005, Det Dawson and I met with [redacted] and obtained a sworn taped statement. [redacted] explained she had been going to Epstein's house since 2002, when she was sixteen years of age. Since then she has gone to the house hundreds of times. [redacted] stated she became his "number one girl." She explained that on her first visit she was brought to the house by fellow [redacted] High School classmate, [redacted] said she was brought through the kitchen area where she met [redacted] for the first time. [redacted] was led to the master bedroom, Epstein s room. [redacted] explained that as she was walking up the stairs she observed several photographs of naked women along the walls and tables of the house. [redacted] further explained that she was brought into the bedroom, where [redacted] prepared the room by setting up the massage table and provided the oils for her to rub on Epstein. [redacted] explained she remembered the steam room area, which contained two large showers. Epstein entered the room from the steam room area and introduced himself. Epstein lay on the table and told her to get comfortable. [redacted] removed her skirt and kept her shirt on. Epstein then instructed her to remove her shirt. [redacted] removed her shirt and remembered she was not wearing a bra. [redacted] stated she provided the massage wearing only her panties. She continued rubbing his legs, thighs and feet. [redacted] advised he turned over onto his back. Epstein touched her breasts and began to masturbate. Epstein ejaculated which meant the massage was over. At the conclusion of the massage, [redacted] was paid $200.00. They walked together downstairs where [redacted] and [redacted] were waiting. [redacted] stated [redacted] received an unknown amount of money for taking her to Epstein. Epstein instructed to leave her cellular telephone number so that he could contact her when he is in town.

[redacted] stated that during her many visits a routine was established between her and Epstein. She would enter the house and get naked in the bedroom. She would then start with a back m[redacted] Epstein would roll on to his back and allow her to massage his chest area. [redacted] stated Epstein would then began to masturbate himself and at the same time would insert his fingers in her vagina and masturbate her with his fingers. [redacted] explained Epstein would continue this process until he ejaculated. He would then utilize a vibrator/massager on her vagina until [redacted] climaxed. [redacted] advised that during her frequent visits, Epstein asked for her real age, [redacted] stated she was sixteen. Epstein advised her not to tell anyone her real age. [redacted] advised that things escalated within the home as Epstein would instruct and pay [redacted] to have intercourse with his female friend, [redacted] [redacted] explained the intercourse included using strap on dildos, large rubber penis' and other devices that Epstein had at his disposal. Epstein would watch them have intercourse and masturbate himself . Occasionally, Epstein would then join in

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Probable Cause Affidavit

Palm Beach Police Department

Agency ORI# FLO 500600

during the female on female intercourse and provide oral sex to both [redacted] and [redacted] This occurred during the time [redacted] was sixteen years of age.

[redacted] advised this continued to escalate during two years. The routine became familiar to [redacted] Epstein's assistant [redacted] would telephone her every time Epstein was in the Town of Palm Beach and would place appointments for her to visit and work for Epstein. Each time something new was introduced, additional monies were produced and offered for [redacted] to allow the acts to happen. [redacted] consented to perform all these acts but was adamant that there was an understanding with Epstein that no vaginal penetration would occur with his penis. [redacted] explained that Epstein's penis was deformed. [redacted] explained that his penis was oval shaped. [redacted] claimed when Epstein's penis was erect, it was thick toward the bottom but was thin and small toward the head portion. [redacted] called Epstein's penis "egg-shaped." [redacted] stated Epstein would photograph [redacted] and her naked and having sex and proudly display the photographs within the home. [redacted] stated during one visit to Epstein's house in which she provided a massage to Epstein, his female friend, Nada Marcinkova, was also present. [redacted] provided the massage in which [redacted] and her would fondle each others breasts and kiss for Epstein to enjoy. Towards the end of this massage, Epstein grabbed [redacted] and turned her over onto her stomach on the massage table and forcibly inserted his penis into her vagina. [redacted] stated Epstein began to pump his penis in her vagina. [redacted] became upset over this. She said her head was being held against the table forcibly, as he continued to pump inside her. She screamed "No!" and Epstein stopped. She told him that she did not want to have his penis inside of her. Epstein did not ejaculate inside of her and apologized for his actions and subsequently paid her a thousand dollars for that visit. [redacted] stated she knows he still displays her photographs through out the house.

On October 12, 2005, Det Dawson and I met with [redacted], dob [redacted], who stated during a sworn taped statement, that nothing happened between her and Epstein. [redacted] appeared nervous during the interview. I assured her that I have spoken with other people who advised differently. [redacted], stated on several occasions she provided a massage to Epstein. She stated she was brought to the Epstein house in March of 2005. [redacted], a classmate at [redacted] High School, approached her and asked her if she wanted to "work". [redacted] made the arrangements with [redacted] Epstein's assistant. [redacted], who has no formal training in providing massages, stated she provided a massage, fully clothed for $200.00. As I sensed hesitancy in her answers, I asked [redacted] if she had been contacted by anyone from Epstein's organizations or his house. [redacted] stated she was interviewed already by a private investigator for Epstein. He identified himself as "[redacted]" and inquired about the police investigation, and left his telephone number [redacted] for additional contact. [redacted] provided no additional information, as it appeared her responses were almost scripted.

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On November 6, 2005, at approximately 3:30 pm, I met with , dob , at the Palm Beach Police Department. was identified as a potential witness/victim through information obtained during the trash pulls. During the sworn taped statement, advised she was at Jeffrey Epstein's house one time, approximately two months ago. She was approached by a girl, , who was dating 's roommate, for an opportunity to make some quick money. advised she needed to make some quick cash to make the rent that month. She agreed to go to the house. She had been told by that the massage would have to be done in her underwear. She advised drove with her and brought her into the house. They walked into the kitchen area, and took the stairs upstairs. further stated she was brought into a master bedroom area. She advised she recalled seeing portraits of naked women throughout the room. A massage table was already out near the sauna/shower area in the master bedroom. Epstein entered the room wearing only a towel and introduced himself as "Jeff." At Epstein's direction, and removed their clothing down to their panties, Epstein laid on his stomach area and they provided a massage on his legs and feet area. I asked if she had any formal massage training and she replied "no." advised she was topless and the panties she wore were the boy shorts lace panties. She and continued the massage until the last ten minutes of the massage, Epstein, told to leave the room so that could finish the massage. got dressed, and left the room as Epstein turned over onto his back. Epstein then removed the towel and laid naked . Epstein requested that . rub his chest area. stated as she did this, Epstein, began masturbating. stated Epstein pulled down her boy short panties, and he produced a large white vibrator with a large head. She stated it was within his reach in a drawer in his master bathroom. He rubbed the vibrator on her vaginal area. advised he never penetrated her vagina with the vibrator. He continued to rub her vagina with the vibrator as he continued to masturbate. stated she was very uncomfortable during the incident but knew it was almost over. Epstein climaxed and started to remove himself from the table. He wiped himself with the towel he had on previously and went into the shower area. got dressed and met with in the kitchen area. Epstein came into the kitchen and provided $200.00 for bringing and paid $200.00 to for providing the massage. was told to leave her telephone number with for future contact. provided her cellular telephone number. was asked if she was recently contacted about this investigation by anyone from the Epstein organization. She replied she was called but it was for work. She stated she was called by for her to return to "work" for Epstein. stated "work" is the term used by to provide the massages and other things. advised she declined as she was not comfortable in providing that type of "work."

On November 7, 2005, Det Sandman and I met with , dob During a sworn taped statement, . stated she met Jeffrey Epstein through when they were still

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attending [redacted] High School. [redacted] would approach females who wished to work for Epstein. [redacted] stated she was offered to work for Epstein but declined. [redacted] explained that "work" means give massages. She was asked about any formal training in providing massages which she said "no." [redacted] said she accompanied [redacted] and other females who were taken to Epstein's house to provide massages. [redacted] further stated she had been to the house approximately 4 or 5 times in the past year. She accompanied [redacted] with [redacted], and [redacted]. Each time the girls were taken over, they were previously told they would have to provide a massage, possibly naked. They were also told that should Epstein require them to do anything extra, and they were not comfortable just to tell him and he would stop. [redacted] stated [redacted] received $200.00 for each girl she brought over to massage Jeffrey Epstein. When I asked which girl appeared to be the youngest, she replied, [redacted] who was really young, fifteen years old at the most. [redacted] further stated each time she went to the house, she sat in the kitchen and waited with [redacted] until the massage was over. She further stated that the cook would make lunch or a snack for them as they waited. I asked her if there was anything that caught her attention within the home. [redacted] stated there were a lot of naked girls in photographs throughout the house.

On November 8, 2005, at approximately 2:00pm , I met with [redacted], dob [redacted], at the Palm Beach Police Department. During a sworn taped statement, [redacted] stated she had met Epstein approximately two years ago when she was first approached by [redacted] a classmate at [redacted] High School. [redacted] approached her about working for Epstein and providing a massage to him for $200.00. [redacted] had made the arrangements however was unable to take her the day the arrangements were made. [redacted] had take [redacted] also attended [redacted] High School and was familiar with Epstein. [redacted] recalled she was brought there and entered through the back kitchen door. She had met with an assistant [redacted] and another assistant Adrianna. [redacted] brought her upstairs as she observed several photographs of naked females throughout the house. [redacted] stated Epstein came in the room, wearing only a towel, and laid on the table. [redacted] stated he picked out the oils he wanted her to use and requested she remove her clothing to provide the massage. [redacted] stated that on the first massage she provided she did not remove her clothing. [redacted] stated she had returned several times after that. Each time she returned it was more than a massage. Epstein would walk into the master bedroom/bathroom area wearing only a towel. He would masturbate as she provided a massage. [redacted] stated she was unsure if he climaxed as he masturbated under the towel. Additionally, she never looked below his waist. She claimed that Epstein would convince her to remove her clothes. She eventually removed her clothes and stayed in her thong panties. On occasion, Epstein would use a massager/vibrator, which she described as white in color and a large head. Epstein would rub the vibrator/massager on her vaginal area as he would masturbate. [redacted] stated she had been to the house

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numerous times. added she has no formal training in providing a massage. stated she brought two females during her visits to provide massages. stated she brought a girl named "" and from [redacted] High School. stated she received $200.00 for each girl she brought.

On November 8, 2005, I met with , W/F, [redacted] at the Palm Beach Police Department. During a sworn taped statement, stated she had met Jeffrey Epstein approximately one year ago. She was approached by a subject known to her as [redacted] had asked her if she wanted to make money providing massages to Epstein. had heard that several girls from [redacted] High School were doing this and making money. She agreed and was taken to the house by [redacted] had introduced her to [redacted] and Epstein and brought her upstairs to a master bedroom where a massage table was prepared and the proper oils were selected. [redacted] left the room and waited downstairs for her. stated Epstein entered the room wearing a towel and laid on his stomach. She provided a massage wearing only her thong panties. advised Epstein had masturbated every time she provided a massage. She stated Epstein continued to masturbate until he climaxed. Once that occurred the massage was over. She felt the whole situation was weird but she advised she was paid $200.00 for providing the massage. She also stated [redacted] was paid $200.00 by Epstein for bringing stated she had gone a total of 15 times to Epstein's residence to provide a massage and things had escalated from just providing a massage. Epstein began touching her on her buttocks and grabbed her closer to him as he masturbated. Epstein also grabbed her breasts and fondled her breasts with his hands as she provided the massage. stated on one occasion, while she was only seventeen years of age, he offered extra monies to have vaginal intercourse. She stated this all occurred on the massage table. stated Epstein penetrated her vagina with his penis and began having intercourse with her until he reached the point of climax. Epstein removed his penis from her vagina and climaxed onto the massage table. received $350.00 for her massage. I asked her if she had any formal training in providing massages, stated she did not. continued to state on one other occasion, Epstein introduced his girlfriend, [redacted] into the massage. [redacted] was brought into room with to provide a massage. Epstein had them kiss and fondle each other around the breasts and buttocks as they provided a massage to Epstein. Epstein, watched and masturbated as this occurred. On other occasions, Epstein, introduced the large white vibrator/massager in the massage. Epstein stroked the vibrator/massager on vagina as she provided the massage.

On November 14, 2005, Det Sandman and I met with , dob [redacted] During a sworn taped statement she advised she started going to the house approximately one year ago and has been there approximately five or six times. also stated she was sixteen years old when she first went to Epstein's house. On her first visit she was brought by a fellow student from [redacted] High School known to her

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as stated brought her into the house and she was introduced to [redacted]. [redacted] then brought her upstairs into a master bathroom, located within the bedroom. stated she met Epstein in the bathroom. He laid on the table and picked the massage oils. She provided the massage as he laid naked on the massage bed. She stated she rubbed his calves and back area. Upon the end of the massage, Epstein removed himself from the massage table and paid her $300.00 for the massage. said each subsequent time she went to the house, she was notified by [redacted] that Epstein was in town and would like her to "work". stated she returned to the house and was again led upstairs by [redacted]. She provided the massage, clothed. , was asked if she ever removed her clothing to provide a massage. stated it was not until the third time that she went that she removed her clothing. stated she was notified by [redacted] that Epstein wanted her to come to work. She arrived at the house and was led upstairs by [redacted]. She started providing the massage when Epstein asked her to remove her clothing. removed her pants, shirt and bra. She stayed in her thong panties and continued rubbing Epstein. Epstein turned over onto his back and she rubbed his chest area. stated she knew he was masturbating himself as she providing the massage. stated she believed he climaxed based on his breathing. She did not want to view either the climax or the fact that he was masturbating. stated once the breathing relaxed he got up and told her to get dressed. She was paid $300.00 for her services. stated on the last time she went to provide a massage, she was notified by [redacted] to come to the house and "work". stated she was now dating her current boyfriend and did not feel comfortable going. She recalled it was approximately January 2005. She said she went, already thinking that this would be the last time. She went upstairs and went into the master bathroom. She met with Epstein, who was wearing only a towel, and laid onto the table. stated Epstein caught her looking at the clock on several occasions. Epstein asked her if she was in a hurry. stated her boyfriend was in the car waiting for her. further stated that Epstein got upset as he wasn't enjoying the massage. She told him that she didn't want to continue and she would not be back. Epstein told her to leave as she was ruining his massage. advised she had no formal training in providing any massages. stated although she had a falling out with Epstein, she still received a Christmas bonus from Epstein. stated she was wired money from Western Union for her Christmas bonus. Subpoena results from Western Union revealed money was sent from Jeffrey Epstein on December 23, 2004. received $200.00 from Epstein for her Christmas bonus.

On November 15, 2005, Det. Sandman and I met with [redacted] dob [redacted] During a sworn taped statement, [redacted] stated she met Jeffrey Epstein over a year ago. She was sixteen years of age and was approached by , a fellow [redacted] High School student, who informed her that she could make $200.00 providing a massage to Epstein. had informed her that she would have to provide this

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massage topless. [redacted] made the arrangements with Epstein and his assistants and took [redacted] to the house. [redacted] stated [redacted] and she entered through a glass door that led into a kitchen. She was taken upstairs by [redacted], to a master bedroom. She recalled the master bathroom had a large pink couch, sauna and matching shower. Epstein entered into the room wearing only a towel. [redacted] and [redacted] removed their clothing remaining only in thong underwear. She further stated that Epstein laid on his chest on the table. The oils were selected on which ones to use. Both [redacted] and [redacted] provided the massage on his legs, back and feet. Forty minutes into the massage, Epstein turned over onto his back and requested [redacted], wait downstairs in the kitchen area for [redacted] Epstein instructed [redacted] to finish the massage. As [redacted] got dressed, [redacted] starting rubbing Epstein's chest. [redacted] left the room, and Epstein began masturbating as [redacted] rubbed Epstein's chest. [redacted] stated Epstein continued masturbating until he climaxed on the towel he was wearing. When asked if he had removed the towel she stated he turned the towel around so that the opening would allow him to expose himself. After he cleaned himself off with the towel he instructed [redacted] the massage was done and to get dressed and meet with him downstairs. [redacted] got dressed and met with Epstein in the kitchen area. She was paid $200.00 dollars for providing the massage. [redacted] stated she was aware that [redacted] also received monies for the same thing. The second time she went to the house she was again approached by [redacted] advised if she wanted to return to the house to provide another massage. [redacted] agreed and the arrangements were made by [redacted] for her to return to the house. [redacted] stated [redacted] drove her to the house and knocked on the same glass door which leads to the kitchen area. They were allowed entry into the house by one of the staff members. [redacted] led her upstairs to the master bedroom and master bathroom area. [redacted] left [redacted] this time to do the massage alone. Epstein entered the room again wearing only a towel. [redacted] began removing her clothing as she did the last time she was at the house. Epstein instructed her to get naked. He laid on the table onto his stomach as [redacted] began massaging his legs and back. As [redacted] finished with Epstein's back and legs, Epstein then turned over onto his back. [redacted] started to rub his chest and he began masturbating. As [redacted] rubbed his chest, Epstein leaned over and produced a massager/vibrator. He turned it on and began rubbing [redacted] vagina and masturbating himself at the same time. [redacted] stated she continued to rub his chest as this was occurring. She described the vibrator/massager as large grey with a large head. Epstein rubbed her vagina for approximately two to three minutes with the massager/vibrator. He then removed the vibrator from her vaginal area and concentrated on masturbating himself. [redacted] stated Epstein climaxed onto the towel again and informed her that the massage was done. [redacted] got dressed and met with [redacted] who was waiting in the kitchen area. She received $200.00 for the massage. [redacted] said she never returned to the house and had no desire to return to the house. [redacted] was asked if she received any formal massage training. She advised she had no formal training. [redacted] was asked if Epstein knew her real age. [redacted] stated he knew, as he asked her questions about herself and high school. He was aware she attended, and is still attending [redacted] School.

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State of Florida
County of Palm Beach

Signature of Police Officer (F.S.S. 117.10)

Signature/Arresting Officer

Date: 05/01/2006

EFTA00232588

Probable Cause Affidavit

Palm Beach Police Department

Agency ORI# FLO 500600

During the course of the investigation a search warrant was executed at Jeffrey Epstein's home located at 358 El Brillo Way in Palm Beach. While in the home I observed the pink and green couch within the master bedroom area just as the girls previously mentioned. The stairway, which is located from the kitchen area to the master bedroom area, is lined with photos of naked young girls. Additionally, numerous photographs of naked young females, some of which appeared to be the girls I previously interviewed, were on display throughout the house. Also located in the house were various phone message books. The telephone message books have a duplicate copy (Carbon Copy) which, once a phone message is written into the book, the top copy is then torn on the perforated edge and the carbon copy is left in the book. First names of girls, dates and telephone numbers were on the copy of the messages. I recognized various numbers and names of girls that had already been interviewed. The body of the messages were time of the day that they called for confirmation of "work." Other names and telephone numbers were located in which the body of the messages were, "I have girls for him" or "I have 2 girls for him." These messages were taken by [redacted], who signed the bottom of the messages. During the execution of the warrant, I located a [redacted] High School transcript for [redacted] in Epstein's bedroom desk. This desk had stationary marked Jeffrey E Epstein. I located a wood colored armoire beside Epstein's bed that contained a bottle of "Joy Jelly," which is used to provide a warm massage. Several massage tables were located throughout the second floor of the residence, including a massage table found in Epstein's bedroom. On the first floor of the residence I found two covert cameras hidden within clocks. One was located in the garage and the other located in the library area on a shelf behind Epstein's desk. A computer was located which was believed to contain the images from the covert cameras. The computer's hard drive was reviewed which showed several images of [redacted] and other witnesses that have been interviewed. All of these images appeared to come from the camera positioned behind Epstein's desk.

On December 13, 2005, Det. Dawson and I met with [redacted] dob [redacted] During a sworn taped statement, [redacted] stated that when she was sixteen years old she was taken to Epstein's house to provide a massage for money. [redacted] stated it was before Christmas last year (2004) when an associate, [redacted] approached her and asked if she needed to make money for Christmas. [redacted] made arrangements to take [redacted] to the house and drove [redacted] to the house to "work." They were encountered by a white female with long blond hair. [redacted] was unable to remember the name of the white female with blond hair but knew she was Epstein's assistant. She was led upstairs by the white female who explained that there would be lotions out already and Epstein would choose the lotion he wanted her to use. She was led through a spiral staircase which led to a master bedroom and bathroom. The massage table was already set up in the bathroom. [redacted] described the bathroom as a large spacious bathroom with a steam room and shower beside it. [redacted] was introduced to Epstein who was on the phone when she entered the room. Epstein was wearing a white towel and laid on his stomach so that [redacted] may

The foregoing instrument was sworn to or affirmed before me this 1st day of May, 2006 by Det Joe [redacted], who is personally known to me.

Signature of Police Officer (F.S.S. 117.10)

State of Florida
County of Palm Beach

Signature/Arresting Officer

Date: 05/01/2006

EFTA00232589

Probable Cause Affidavit

Palm Beach Police Department

Agency ORI# FLO 500600

massage his feet and calves. [redacted] started the massage with the oils Epstein chose and rubbed his feet and calves. Epstein got off the phone and requested she massage his back as well. [redacted] began rubbing his back and got to the small of his back. During the rubbing of his back, Epstein asked her to get comfortable. He requested she remove her pants and shirt. [redacted] removed her shirt and pulled her pants off. [redacted] stayed in her bra and thong panties. As she finished massaging the small of Epstein's back, he then turned onto his back. Epstein instructed [redacted] to rub his chest and pinch his nipples. As she began to rub his chest, Epstein asked her questions about herself. [redacted] remembered telling him she attended [redacted] High School. Epstein asked her if she was sexually active. Before [redacted] could answer, he also asked what sexual position does she enjoy. [redacted] stated she was shy and didn't like talking about those things. She continued rubbing his chest. Epstein reached up and unsnapped her bra from the front. [redacted] explained the bra she used had a front snapping device. Epstein rubbed her breasts and asked her if she like having her breasts rubbed. [redacted] said "no, I don't like that." Epstein then removed his towel and laid on the bed naked exposing his penis to [redacted] He began touching his penis and masturbated as he touched her breasts. [redacted] explained Epstein then touched her vaginal area by rubbing her vagina with his fingers on the outside of her thong panties. [redacted] tensed up and stated Epstein was aware that she was uncomfortable. [redacted] stated that Epstein said to her, "Relax, I'm not going inside." She further explained Epstein commented to her how beautiful and sexy she was. Epstein then moved her thong panties to one side and began stroking her clitoris. [redacted] said, "He commented how hard my clit was." He then inserted two fingers in her vagina and was stroking her within her vagina. She tried pulling back to pull out his fingers from within her vagina. Epstein removed his fingers from within her vagina and apologized for putting his fingers inside her. During this time, he kept his hand on her vaginal area and continued to rub her vagina. [redacted] stated he rubbed her really hard as he was masturbating. [redacted] said he climaxed onto the towel he had been previously wearing and got up from the table. Epstein told her there was $200.00 dollars for her on the dresser within the master bathroom. Epstein also told her that there was an additional $100.00 that was to be given to [redacted] for bringing her there to massage him. Epstein told her to leave her telephone number with his assistant as he wanted to see her again. Epstein stated his assistant would contact her to work again soon. I asked her if she ever received any formal massage training to which [redacted] stated she did not. [redacted] stated it was the only time she ever went to work for Jeff and knew what happened to her was wrong. She further stated that she had never been contacted for any additional work.

On January 9, 2006, I located and interviewed another victim, [redacted] dob [redacted]. [redacted] was identified as a potential victim/witness from information obtained during trash pulls from Epstein's residence. [redacted] stated she met Epstein when she was fifteen years of age. She was approached by a friend from Royal Palm Beach High School, [redacted] [redacted] to be taken to Jeffrey Epstein's house to work. She was originally told she would be able

The foregoing instrument was sworn to or affirmed before me this 1st day of May, 2006 by Det Joe Recarey, who is personally known to me.

Signature of Police Officer (F.S.S. 117.10)

State of Florida
County of Palm Beach

Signature/Arresting Officer

Date: 05/01/2006

EFTA00232590

Probable Cause Affidavit

Palm Beach Police Department

Agency ORI# FLO 500600

to model lingerie for a wealthy Palm Beacher. [redacted] was taken to Epstein's house located on El BrilloWay. [redacted] introduced [redacted] to Jeffrey Epstein. Epstein had his personal chef prepare dinner for [redacted] and [redacted] At the conclusion of dinner, [redacted] and Epstein brought [redacted] upstairs into a master bedroom area. [redacted] observed a large massage table with a sheet on it. Epstein entered through a door and exited wearing only a towel. [redacted] informed [redacted] that they were going to provide a massage on Epstein. [redacted] asked why were they doing this instead of modeling lingerie. [redacted] explained to [redacted] that this was his routine and to rub his calves and feet. Epstein had told [redacted] to get comfortable. [redacted] removed her pants and blouse. [redacted] she stayed only in panties as she did not wear a bra that evening. [redacted] stated while rubbing his calves and feet, Epstein turned over onto his back. Epstein told [redacted] to rub his chest and rub his nipples. [redacted] stated that as she started rubbing his chest, Epstein began masturbating himself. Epstein touched her breasts and stroked her vagina with his fingers. Epstein continued to masturbate himself as he stroked her vagina. Epstein ejaculated on his towel and paid [redacted] $200.00 for the massage. Epstein told [redacted] that if she told anyone what happened at his house that bad things could happen. [redacted] and [redacted] were brought home by Epstein's houseman and [redacted] was afraid that Epstein knew where she lived. [redacted] stated that several days later she received a telephone call from [redacted] who coordinated for [redacted] to return to "work." [redacted] returned to the house and was brought to Epstein's bedroom area by [redacted] who prepared the room for the massage. Epstein entered the room wearing only a towel. Epstein had [redacted] remove her clothing and provide the massage naked. [redacted] began rubbing his feet and calves and Epstein turned over onto his back. Epstein rubbed her vagina with his fingers. Epstein began to masturbate himself with an upwards and downward motion on his penis. Epstein continued to touch her vagina with one hand and masturbate with the other hand. Once Epstein ejaculated onto the towel he was wearing, the massage was over. [redacted] was paid $200.00 for the massage. Epstein again told [redacted] not to speak of what happened at his house or bad things would happen. [redacted] wanted to notify authorities however she was afraid of what would happen to either her or her family.

During the course of the investigation, several subjects were identified as a potential witness/victim through information obtained during the trash pulls, physical surveillance and telephone message books retrieved from the search warrant. While conducting research on the subjects, I discovered that the females were age eighteen or older. Interviews were conducted on the consenting adults whose statements provided the same massage routine when they went to "work" for Epstein. The females would be notified by [redacted], and made appointments for the females to "work" for Epstein. The females would come to Epstein's house and were led upstairs, through a stairwell from the kitchen area, by [redacted] to Epstein's bedroom. Epstein would then enter the room wearing only a towel, and ask them to get comfortable. The females would then provide the massage naked as Epstein would either touch their vaginas with his fingers and/or utilize the massager/vibrator on

The foregoing instrument was sworn to or affirmed before me this 1st day of May, 2006 by Det Joe Recarey, who is personally known to me.

Signature of Police Officer (F.S.S. 117.10)

State of Florida
County of Palm Beach

Signature/Arresting Officer

Date: 05/01/2006

EFTA00232591

Probable Cause Affidavit

Palm Beach Police Department

Agency ORI# FLO 500600

their vaginal area. He would masturbate during the massage and upon his climaxing, the massage would end. The girls were then paid two or three hundred dollars for the massage.

On November 21, 2005 I interviewed Jose Alessi, a former houseman for Jeffrey Epstein. Alessi stated he was employed for eleven years with Mr. Epstein, from approximately 1993 through 2004. Alessi stated he was the house manager, driver and house maintenance person. It was his responsibility to prepare the house for Epstein s arrival. When asked about cooks or assistants, Alessi stated they traveled with Epstein on his private plane. I asked Mr. Alessi about the massages that have occurred at Epstein's home. Alessi stated Epstein receives three massages a day. Each masseuse that visited the house was different. Alessi stated that towards the end of his employment, the masseuses were younger and younger. When asked how young, Mr. Alessi stated they appeared to be sixteen or seventeen years of age at the most. The massages would occur in Epstein's bedroom or bathroom. He knew this because he often set up the massage tables. I asked if there were things going on other than a massage. Alessi stated that there were times towards the end of his employment that he would have to wash off a massager/vibrator and a long rubber penis, which were in the sink after the massage. Additionally, he stated the bed would almost always have to be made after the massage.

On January 4, 2006 I interviewed another former houseman, Mr Alfredo Rodriguez. During a sworn taped statement, Mr. Rodriguez stated he was employed by Jeffrey Epstein for approximately six months, from November 2004 through May of 2005. His responsibilities as house manager included being the butler, chauffeur, chef, houseman, run errands for Epstein and provide for Epstein's guests. I asked Rodriguez about masseuses coming to the house. Rodriguez stated Epstein would have two massages a day. Epstein would have one massage in the morning and one massage in the afternoon everyday he was in residence. Rodriguez stated he would be informed to expect someone and make them comfortable until either [redacted] or Epstein would meet with them. Rodriguez stated once the masseuses would arrive, he would allow them entry into the kitchen area and offer them something to drink or eat. They would then be encountered by either [redacted] or Epstein. They would be taken upstairs to provide the massage. I asked Rodriguez if any of the masseuses appeared young in age. Rodriguez stated the girls that would come appeared to be too young to be masseuses. He stated one time under Epstein's direction, he delivered a dozen roses to [redacted] High School for one of the girls that came to provide a massage. He knew the girls were still in high school and were of high school age. I asked Rodriguez about the massages. He felt there was a lot more going on than just massages. He would often clean Mr. Epstein's bedroom after the alleged massages and would discover massagers/vibrators and sex toys scattered on the floor. He also said he would wipe down the vibrators and sex toys and put them away in an armoire. He described the armoire as a small wood armoire which was on the wall close to Epstein's

The foregoing instrument was sworn to or affirmed before me this 1st day of May, 2006 by Det Joe Recarey, who is personally known to me.

Signature of Police Officer (F.S.S. 117.10)

State of Florida
County of Palm Beach

Signature/Arresting Officer

Date: 05/01/2006

EFTA00232592

Probable Cause Affidavit

Palm Beach Police Department

Agency ORI# FLO 500600

bed. On one occasion Epstein ordered Rodriguez to go to the Dollar rent a car and rent a car for the same girl he brought the roses to, so that she could drive her self to Epstein's house without incident. Rodriguez said the girl always needed rides to and from the house. Rodriguez produced a green folder which contained documents, and a note with Mr. Epstein's stationary with direction to deliver a bucket of roses to [redacted] High School [redacted] high school drama performance. Also in that same note was direction to rent a car for [redacted] and direction to extend the rental contract.

During the course of the investigation, subpoenas were obtained for cell phone and home phone records from several victims and witnesses along with the cell phone records of [redacted]. An analysis of these records was conducted which found numerous telephone calls were made between [redacted] and the victims. These records indicate the dates the calls were made are consistent with the dates and times they victims/witnesses stated they were contacted. Specifically, The phone records showed [redacted] called [redacted] during the exact times and dates when victim [redacted] advised the incident occurred. [redacted] also coordinated the encounters with [redacted] during the time frame the girls stated they occurred.

Pursuant to a lawful subpoena I obtained Epstein's private plane records for 2005 from Jet Aviation. The plane records show arrival and departure of Epstein's plane at Palm Beach International airport. These records were compared to the cell phone records of [redacted] This comparison found that all the phone calls [redacted] made to [redacted] and the victims were made in the days just prior to their arrival or during the time Epstein was in Palm Beach. [redacted]

Jeffrey Epstein, who at the time of these incidents was fifty one years of age, did have vaginal intercourse either with his penis or digitally with [redacted] who were minors at the time this occurred, and who at the time of the incident was fifty two years of age, did use a vibrator on the external vaginal area [redacted] a fourteen year old minor. Therefore, as [redacted] coordinated and aided in the recruitment of minors to frequent Epstein's house so that sexual services were provided to Epstein, scheduled the said minors to return to the work for Epstein, secured their appointments for the purpose of sexual activity and lewd and lascivious acts and arranged the bedroom for said minors, there is sufficient probable cause to charge [redacted] with four counts of Principal in the 1st degree Unlawful Sexual Activity with a Minor, in violation of Florida State Statute 794.05(1) , a second degree felony and there is sufficient probable cause to charge her with Lewd and Lascivious Molestation, in violation of Florida State Statute 800.04 (5), a second degree felony.

The foregoing instrument was sworn to or affirmed before me this 1st day of May, 2006 by Det Joe Recarey, who is personally known to me.

Signature of Police Officer (F.S.S. 117.10)

State of Florida
County of Palm Beach

Signature/Arresting Officer

Date: 05/01/2006

EFTA00232593

A28

Palm Beach Sheriffs Office Booking Card for Jeffrey Epstein, dated July 23, 2006

EPSTEIN, JEFFREY — JACKET #: 0338617 — BOOK #: 2006036744

ALIAS NAMES: OVER 8 NAMES: ☐

NONE

Sunday, July 23, 2006
2:02:44 AM

PALM BEACH SHERIFFS OFFICE
BOOKING CARD



INCARCERATION DATE/TIME 07/23/2006 1:56
PRISONER TYPE LOCAL CHARGES
DOB: [redacted]
AGE: 53
SSN:
R/S: W/M
HEIGHT: 6 ft 0 in
WEIGHT: 180
BKG.LOC: MDC INTAKE
BKG. ID #: 6199
HAIR COLOR: GRY
EYE COLOR BLU

ADDRESS: 358 EL BRILLO WY CITY: PALM BEACH STATE: FL ZIP: 33480

ID #: 20060723017
SID #:
ALIEN #:
FBI #:
POUCH: 1291
AFIS:
U.S. MARSHAL #:
OBTS #:
NCIC:
DOC #:
INCIDENT #:

ARREST ADDRESS: 3228 GUN CLUB ROAD CITY: WPB STATE: FL ZIP: 33406
ARREST DATE: 07/23/2006 ARREST TIME: 1:30
BKG. DATE: 07/23/2006 BKG. TIME: 1:56 CURRENT BOND: $3,000.00
WARRANT/CASE#: 06009454CFA99 W COURT DIVISION: T - MARX, KRISTA
ARREST OFFICER: CASTILLO ARREST AGENCY: 01 - PBSO
TRANS. OFFICER: SELF SURRENDER TRANS. AGENCY:

CASE TYPE: FELONY
NOTE:

STATUTE:	COUNT:	DESCRIPTION:	CASE FLAG:
796.07 2E (FT)	1	PROSTITUTION-OFFER COMMIT ENGAGE 3RD SUBSQ OFF	
()	0	CT1) FELONY SOLICITATION OF PROSTITUTION (3F)	
()	0	**SEALED INDIC[redacted]ENT** NO INFORMATION GIVEN ** SEALED INDICTMENT JUDGE KROLL	

HOLDS:

HOLD DATE/TIME:	HOLD BY:	HOLD DEPT.:	HOLD REM.DATE/TIME:	HOLD REM. BY:	HOLD REM. DEPT:

ALERT DESCRIPTION: ALERT NARRATIVE:

OVER 3 ALERTS: ☐

KEEP SEPARATE FROM:
NONE
OVER 6 NAMES: ☐

ASSIGNED HOUSING: NTA DATE/TIME: NTA LOC:
CIC INTAKE: NCIC RELEASE: F.P. ENTERED: F.P. C[redacted]R:
ALMS REL.: PHOTO ID: CLASSIFICATION: MED.CLEAR IN:
MED. CLEAR REL: RELEASE MOVE:
RELEASE DATE/TIME: RELEASE INFORMATION:
COURT DATE/TIME: COURT LOCATION:

CLERK ☐ WARRANTS ☐ STATE ATTY ☐ CENTRAL RCDS ☐ CLASS ☐

A29

2006 Grand Jury Indictment of Felony Solicitation of Prostitution - Jeffrey E. Epstein
[pp. A29-A30]

A TRUE BILL

IN THE NAME OF AND BY THE AUTHORITY OF THE STATE OF FLORIDA

IN THE CIRCUIT COURT OF THE FIFTEENTH JUDICIAL CIRCUIT OF THE STATE OF FLORIDA

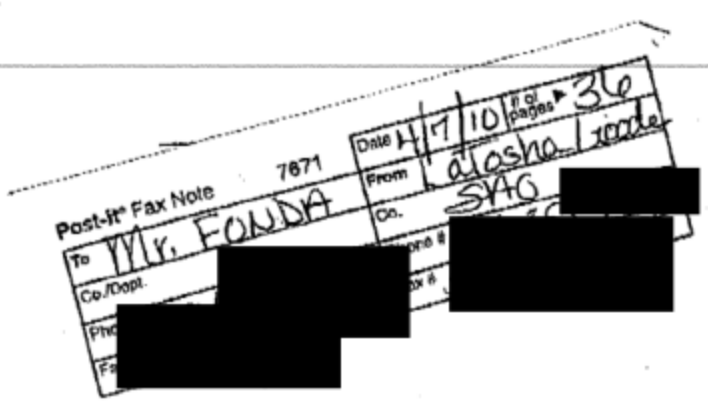
For Palm Beach County, at the Spring Term thereof, in the year of our Lord Two Thousand and Six, to-wit: The Grand Jurors of the State of Florida, inquiring in and for the body of said County of Palm Beach, upon their oaths do present that JEFFREY E. EPSTEIN in the County of Palm Beach aforesaid, in the Circuit and State aforesaid,

COUNT ONE
FELONY SOLICITATION OF PROSTITUTION

on or about or between the 1st day of August in the year of our Lord Two Thousand and Four and October 31, 2005, did solicit, induce, entice, or procure another to commit prostitution lewdness, or assignation, contrary to Florida Statute 796.07(1) on three or more occasions between August 01, 2004 and October 31, 2005, contrary to Florida Statute 796.07(2)(f) and (4)(c). (3 DEG FEL)(LEVEL 1)

against the form of the statute, to the evil example of all others, and against the peace and dignity of the State of Florida.

I hereby certify that I have advised the Grand Jury returning this indictment as authorized and required by law.



Assistant State Attorney of the Fifteenth Judicial Circuit of the State of Florida, prosecuting for the said State

GRAND JURY FOREPERSON

DATE

Jeffrey E. Epstein, Race: White, Sex: Male, DOB: [redacted]
Issue Warrant

A31

Information for Procuring Person under 18 for Prostitution - Jeffrey E. Epstein, dated June 26, 2008

IN THE CIRCUIT COURT OF THE FIFTEENTH JUDICIAL CIRCUIT
IN AND FOR PALM BEACH COUNTY, STATE OF FLORIDA
CRIMINAL DIVISION "W" (LB) 08CF9381

STATE OF FLORIDA

vs.

JEFFREY E EPSTEIN, W/M, [redacted]

ARISES FROM BOOKING NO.: 2006036744

FILED
08 JUN 26 PM 3:30
SHARON R. BOCK, CLERK
PALM BEACH COUNTY, FL
CIRCUIT CRIMINAL

INFORMATION FOR:

1) PROCURING PERSON UNDER 18 FOR PROSTITUION

In the Name and by Authority of the State of Florida:
BARRY E. KRISCHER, State Attorney for the Fifteenth Judicial Circuit, Palm Beach County, Florida, by and through his undersigned Assistant State Attorney, charges that JEFFREY E EPSTEIN on or about or between the 1st day of August in the year of our Lord Two Thousand and Four and October 9, 2005, did knowingly and unlawfully procure for prostitution, or caused to be prostituted, [redacted] a person under the age of 18 years, contrary to Florida Statute 796.03. (2 DEG FEL) [redacted]

LANNA BELOHLAVEK
FL. BAR NO. [redacted]
Assistant State Attorney

STATE OF FLORIDA
COUNTY OF PALM BEACH

Appeared before me, LANNA BELOHLAVEK Assistant State Attorney for Palm Beach County, Florida, personally known to me, who, being first duly sworn, says that the allegations as set forth in the foregoing information are based upon facts that have been sworn to as true, and which, if true, would constitute the offense therein charged, that this prosecution is instituted in good faith, and certifies that testimony under oath has been received from the material witness or witnesses for the offense.

Assistant State Attorney

Sworn to and subscribed to before me this 26th day of June, 2008.

Damaris Pina
NOTARY PUBLIC, State of Florida

Damaris Pina
MY COMMISSION # DD580795 EXPIRES
August 2, 2010
BONDED THRU TROY FAIN INSURANCE, INC.

LB/dp

FCIC REFERENCE NUMBERS:
1) FELONY SOLICITATION OF PROSTITUTION 3699

CAA JUN 26 2008

EFTA00232597

A32

Guilty Plea for Felony Solicitation of Prostitution and Procuring Person under 18 for Prostitution - Jeffrey E. Epstein, dated June 30, 2008

PLEA IN THE CIRCUIT COURT
THE FOLLOWING IS TO REFLECT ALL TERMS OF THE NEGOTIATED SETTLEMENT

Name: Jeffrey E. Epstein

Plea: Guilty X

Case No.	Charge	Count	Lesser	Degree
08CF009454AMB	Felony Solicitation of Prostitution	1	No	3 FEL
08CF009381AMB	Procuring Person Under 18 for Prostitution	1	No	2 FEL

PSI: Waived/Not Required X Required/Requested ____

ADJUDICATION: Adjudicate [x]

SENTENCE:

On 08CF009454AMB, the Defendant is sentenced to 12 months in the Palm Beach County Detention Facility, with credit for 1 (one) day time served.

On 08CF009381AMB, the Defendant is sentenced to 6 months in the Palm Beach County Detention Facility, with credit for 1 (one) day time served. This 6 month sentence is to be served consecutive to the 12 month sentence in 08CF009454AMB. Following this 6 month sentence, the Defendant will be placed on 12 months Community Control 1 (one). The conditions of community control are attached hereto and incorporated herein.

OTHER COMMENTS OR CONDITIONS:

As a special condition of his community control, the Defendant is to have no unsupervised contact with minors, and the supervising adult must be approved by the Department of Corrections.

The Defendant is designated as a Sexual Offender pursuant to Florida Statute 943.0435 and must abide by all the corresponding requirements of the statute, a copy of which is attached hereto and incorporated herein.

The Defendant must provide a DNA sample in court at the time of this plea.

Assistant State Attorney

6/30/08
Date of Plea

Attorney for the Defendant

Defendant

A33

Judgment for Procuring Person under 18 for Prostitution, dated June 30, 2008

95 4050

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

CASE NO. ~~08 CF 9381 AMB~~ DIV. W

OBTS NUMBER 2008CF9381AXX

CFN 20080267252
OR BK 22760 PG 0565
RECORDED 07/17/2008 08:06:42
Palm Beach County, Florida
Sharon R. Bock, CLERK & COMPTROLLER
Pg 0565; (1pg)

STATE OF FLORIDA

[ ] COMMUNITY CONTROL VIOLATOR

[ ] PROBATION VIOLATOR

v.

Jeffrey E. Epstein, DEFENDANT

[redacted] DATE OF BIRTH | W RACE | M GENDER | [redacted] SOCIAL SECURITY NUMBER

JUDGMENT

The above Defendant, being personally before this Court represented by J. Goldberger (attorney)

[ ] Having been tried and found guilty of the following crime(s):	[X] Having entered a plea of guilty to the following crime(s):	[ ] Having entered a plea of nolo contendere to the following crime(s):

COUNT	CRIME	OFFENSE STATUTE NUMBER(S)	DEGREE
1	Procuring Person Under 18 for Prostitution	796.03	2°F

[X] and no cause having been shown why the Defendant should not be adjudicated guilty, IT IS ORDERED THAT the Defendant is hereby ADJUDICATED GUILTY of the above crime(s).

[ ] and having been convicted or found guilty of, or having entered a plea of nolo contendere or guilty, regardless of adjudication, to attempts or offenses relating to sexual battery (ch. 794), lewd and lascivious conduct (ch. 800), or murder (s. 782.04), aggravated battery (s. 784.045), burglary (s. 810.02), carjacking (s. 812.133), or home invasion robbery (s. 812.135), or any other offense specified in section 943.325, the defendant shall be required to submit blood specimens.

[ ] and good cause being shown: IT IS ORDERED THAT ADJUDICATION OF GUILT BE WITHHELD. JUN 30 2008

SENTENCE STAYED [ ] The Court hereby stays and withholds imposition of sentence as to count(s) and places the Defendant on [ ] Probation and/or [ ] Community Control under the supervision of the Dept. of Corrections (conditions of probation set forth in separate order).

SENTENCE DEFERRED [ ] The Court hereby defers imposition of sentence until _____.

The Defendant in Open Court was advised of his right to appeal from the Judgment by filing notice of appeal with the Clerk of Court within thirty days following the date sentence is imposed or probation is ordered pursuant to this adjudication. The defendant was also advised of his right to the assistance of counsel in taking said appeal at the expense of the State upon showing of indigency.

DONE AND ORDERED in Open Court at Palm Beach County, Florida, this 30 day of June, 2008.

Deborah Dale Nucci
CIRCUIT COURT JUDGE

FILED: JUL 07 2008

2-A

A34

Sentence for Procuring Person under 18 for Prostitution - Jeffrey E. Epstein, dated June 30, 2008

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

SENTENCE

(As to Count(s) 1)

Defendant Jeffrey Epstein

Case Number 2008CF 9381AXX

OBTS Number _____

The Defendant, being personally before this Court, accompanied by the defendant's attorney of record, J. Goldberger, and having been adjudicated guilty herein, and the Court having given the Defendant an opportunity to be heard and to offer matters in mitigation of sentence, and to show cause why defendant should not be sentenced as provided by law, and no cause being shown,

IT IS THE SENTENCE OF THE COURT that:

The Defendant pay a fine of $_____ pursuant to § _____, Florida Statutes, plus all costs and additional charges as outlined in the Order assessing additional charges, costs and fines as set forth in a separate order entered herein

The Defendant is hereby committed to the custody of the

[ ] Department of Corrections
[√] Sheriff of Palm Beach County, Florida
[ ] Department of Corrections as a youthful offender

for a term of 6 mos. It is further ordered that the Defendant shall be allowed a total of 1 days as credit for time incarcerated prior to imposition of this sentence. It is further ordered that the composite term of all sentences imposed for the counts specified in the order shall run

[X] consecutive to [ ] concurrent with (check one) the following:

[ ] Any active sentence being served.
[√] Specific sentences: 2006CF 9454AXX JUN 30 2008

In the event the above sentence is to the Department of Corrections, the Sheriff of Palm Beach County, Florida is hereby ordered and directed to deliver the Defendant to the Department of Corrections together with a copy of the Judgment and Sentence, and any other documents specified by Florida Statute. Additionally, pursuant to §947.16(4), Florida Statutes, the Court retains jurisdiction over the Defendant.

[ ] Pursuant to §§322.055, 322.056, 322.26, 322.274, Fla. Stat., the Department of Highway Safety and Motor Vehicles is directed to revoke the Defendant's privilege to drive. The Clerk of the Court is Ordered to report the conviction and revocation to the Department of Highway Safety and Motor Vehicles.

The defendant in Open Court was advised of the right to appeal from this Sentence by filing notice of appeal within thirty days from this date with the Clerk of the Court. The Defendant was also advised of the right to the assistance of counsel in taking said appeal at the expense of the State upon showing of indigency.

DONE AND ORDERED in Open Court at West Palm Beach, Palm Beach County, Florida this 30 day of JUNE, 2008.

Deborah Dale Nucci

CIRCUIT COURT JUDGE

Form Circuit 5 (rev 8/2000)

A35

Community Control Standard Conditions, dated June 30, 2008

[pp. A35-A46]

FURTHER ORDERED THAT YOU SHALL COMPLY WITH THE FOLLOWING CONDITIONS OF SUPERVISION:

I. COMMUNITY CONTROL STANDARD CONDITIONS:

(a) You will remain confined to your residence except one half hour before and after your approved employment, community service work, or any other activities approved by your probation officer.

(b) You will maintain an hourly accounting of all your activities on a daily log which you will submit to your supervising officer upon request.

(c) The Department of Corrections, may at its discretion, places you on Electronic Monitoring during the term of your Community Control. If placed on Electronic Monitoring, you will wear a monitor at all times. You will maintain a private phone line, be financially responsible for any lost or damaged equipment and follow all rules and regulations as instructed. The telephone will be available within five working days of being placed on Electronic Monitoring Program. While on electronic monitoring you will remain confined to your residence and are prohibited from being outside the residential walls.

(d) If while being monitored and the monitor is found to have been tampered with you shall be taken into custody immediately, if the officer determines that your were not at your schedules place of work or school while allowed to be outside the residence then in that event you shall be taken into custody immediately. If taken into custody, you shall be held without bond and shall, on the next working day, brought before a Judge presiding over his or her case for further disposition at the discretion of the presiding Judge.

(e) If placed on Electronic Monitoring you will pay to the State of Florida, for the cost of Electronic Monitoring $1.00 per day, per F.S. 948.09.

(f) Defendant will be residing at 358 El Brillo Way, Palm Beach, Florida, 33480

II. DRUG OFFENDER PROBATION STANDARD CONDITIONS

(a) You will submit to and, unless otherwise waived, be financially responsible for drug testing, urinalysis at least on a monthly basis, and counseling if deemed appropriate by your supervising officer.

(b) You will enter and successfully complete a non-secure or inpatient drug treatment program if deemed appropriate by your officer.

(c) You will comply with any curfew restrictions, confinement approved residence or travel restrictions as instructed by your officer and approved by the Officer's Supervisor.

III. ~~SEX OFFENDER STANDARD CONDITIONS:~~

(a) you shall submit to a mandatory curfew from 10:00 PM to 6:00 AM

(b) (if the victim was under the age of 18 years) you shall not live within 1000 feet of a school, day care center, park, playground, or other place where children regularly congregate.

(c) you shall enter, actively participate in, and successfully complete a sex offender treatment program with a therapist particularly trained to treat sex offender, at probationer's or community controlees expense.

(d) you shall not have any contact with the victim, directly or indirectly, including through a third person, unless approved by the victim, the therapist and sentencing court.

(e) (if the victim was under the age of 18 years) you shall not, until you successfully attend and complete the sex offender program, have any unsupervised contact with a child under the age of 18 years, unless authorized by the sentencing court, without an adult present who is responsible for the child's welfare and which adult has been advised of the crime and is approved by the sentencing court.

(f) (if the victim was under the age of 18 years) you shall not work for pay or as a volunteer in any school, day care center, park, playground, or other place where children regularly congregate.

(g) ~~Unless otherwise indicated in the treatment plan provided by the sexual offender treatment program~~, you shall not view, own, or posses any obscene, pornographic or sexually stimulating visual or auditory material, including telephone, electronic media, computer programs or computer services that are relevant to your deviant behavior pattern.

(h) You shall submit two specimens of blood to the Florida Department of Law Enforcement to be registered with the DNA Data Bank.

(i) You shall make restitution to the victim as ordered by this court pursuant to F.S. 775.089 for all necessary medical and related professional services relating to the physical, psychiatric and psychological care of the victim.

(j) You shall submit to a warrantless search by your probation officer or community control officer of your person, residence, or vehicle.

(g) Defendant to have contact with his ~~probation~~ community control officer at a minimum one time a week.

(h) Defendant to work @ Florida Science Foundation, 150 Australian Ave. WPB FL.

PV. SEX OFFENDER PROBATION/COMMUNITY CONTROL STANDARD CONDITIONS:

you shall submit to a mandatory curfew from 10:00 PM to 6:00 AM

(if the victim was under the age of 18 years) you shall not live within 1000 feet of a school, day care center, park, playground, or other place where children regularly congregate.

(c) you shall enter, actively participate in, and successfully complete a sex offender treatment program with a therapist particularly trained to treat sex offender, at probationer's or community controlees expense.

(d) you shall not have any contact with the victim, directly or indirectly, including through a third person, unless approved by the victim, the therapist and sentencing court.

(e) (if the victim was under the age of 18 years) you shall not, until you successfully attend and complete the sex offender program, have any unsupervised contact with a child under the age of 18 years, unless authorized by the sentencing court, without an adult present who is responsible for the child's welfare and which adult has been advised of the crime and is approved by the sentencing court.

(f) (if the victim was under the age of 18 years) you shall not work for pay or as a volunteer in any school, day care center, park, playground, or other place where children regularly congregate.

(g) Unless otherwise indicated in the treatment plan provided by the sexual offender treatment program, you shall not view, own, or posses any obscene, pornographic or sexually stimulating visual or auditory material, including telephone, electronic media, computer programs or computer services that are relevant to your deviant behavior pattern.

(h) You shall submit two specimens of blood to the Florida Department of Law Enforcement to be registered with the DNA Data Bank.

(i) You shall make restitution to the victim as ordered by this court pursuant to F.S. 775.089 for all necessary medical and related professional services relating to the physical, psychiatric and psychological care of the victim.

(j) You shall submit to a warrantless search by your probation officer or community control officer of your person, residence, or vehicle.

(k) you shall, as part of a treatment program, participate once/twice annually in polygraph examination to obtain information necessary for risk management and treatment and to reduce your denial mechanisms. Your polygraph examinations must be conducted by a polygrapher trained specifically in the use of polygraph for monitoring sex offenders and it shall be paid by you. The results of the polygraph examinations shall not be used as evidenced in court to prove that a violation of community supervision occurred.

(l) You shall maintain a driving log, you shall not drive a motor vehicle while alone without prior approval of your supervising officer.

(m) (if there was sexual contact) you shall submit to, at probationer's or community controlee's expense, an HIV test with the results to be released to the victim, or the victim's parents or guardian.

(n) You will not obtain or use a Post Office Box without the prior approval of the supervising officer.

(o) You will submit to electronic monitoring when deemed necessary by the community control or probation officer and his or her supervisor, and ordered by the court at the recommendation of the Department of Corrections.

ber: _____

HE COURT RESERVES THE RIGHT TO RESCIND, MODIFY, OR REVOKE SUPERVISION TO THE EXTENT PROVIDED BY LAW
ONE AND ORDERED [redacted] West Palm Beach, Palm Beach County, Florida, this 30th day of June, 2006
nunc Pro Tunc: 10/5/2005.

Honorable Sandra K. McSorley
Judge, Circuit Court

have received a copy of the terms and conditions of my supervision. I have read and understand these conditions and agree to report to the Department of Corrections Probation Office for further instructions. Also, I hereby consent to the disclosure of my alcohol and drug abuse patient records, the confidentiality of which is federally regulated under 42CFR, Part II, for the duration of my supervision.

DEFENDANT 6/30/06 DATE [redacted] INSTRUCTED BY

AP 10/11/2005

948.101 Terms and conditions of community control and criminal quarantine community control.—

(1) The court shall determine the terms and conditions of community control. Conditions specified in this subsection do not require oral pronouncement at the time of sentencing and may be considered standard conditions of community control.

(a) The court shall require intensive supervision and surveillance for an offender placed into community control, which may include but is not limited to:

1. Specified contact with the parole and probation officer.

2. Confinement to an agreed-upon residence during hours away from employment and public service activities.

3. Mandatory public service.

4. Supervision by the Department of Corrections by means of an electronic monitoring device or system.

5. The standard conditions of probation set forth in s. 948.03.

(b) For an offender placed on criminal quarantine community control, the court shall require:

1. Electronic monitoring 24 hours per day.

2. Confinement to a designated residence during designated hours.

(2) The enumeration of specific kinds of terms and conditions does not prevent the court from adding thereto any other terms or conditions that the court considers proper. However, the sentencing court may only impose a condition of supervision allowing an offender convicted of s. 794.011, s. 800.04, s. 827.071, or s. 847.0145 to reside in another state if the order stipulates that it is contingent upon the approval of the receiving state interstate compact authority. The court may rescind or modify at any time the terms and conditions theretofore imposed by it upon the offender in community control. However, if the court withholds adjudication of guilt or imposes a period of incarceration as a condition of community control, the period may not exceed 364 days, and incarceration shall be restricted to a county facility, a probation and restitution center under the jurisdiction of the Department of Corrections, a probation program drug punishment phase I secure residential treatment institution, or a community residential facility owned or operated by any entity providing such services.

(3) The court may place a defendant who is being sentenced for criminal transmission of HIV in violation of s. 775.0877 on criminal quarantine community control. The Department of Corrections shall develop and administer a criminal quarantine community control program emphasizing intensive supervision with 24-hour-per-day electronic monitoring. Criminal quarantine community control status must include surveillance and may include other measures normally associated with community control, except that specific conditions necessary to monitor this population may be ordered.

[redacted]

'943.0435 Sexual offenders required to register with the department; penalty.--

(1) As used in this section, the term:

(a)1. "Sexual offender" means a person who meets the criteria in sub-subparagraph a., sub-subparagraph b., sub-subparagraph c., or sub-subparagraph d., as follows:

a.(I) Has been convicted of committing, or attempting, soliciting, or conspiring to commit, any of the criminal offenses proscribed in the following statutes in this state or similar offenses in another jurisdiction: s. 787.01, s. 787.02, or s. 787.025(2)(c), where the victim is a minor and the defendant is not the victim's parent or guardian; s. 794.011, excluding s. 794.011(10); s. 794.05; s. 796.03; s. 796.035; s. 800.04; s. 825.1025; s. 827.071; s. 847.0133; s. 847.0135, excluding s. 847.0135(4); s. 847.0137; s. 847.0138; s. 847.0145; or s. 985.701(1); or any similar offense committed in this state which has been redesignated from a former statute number to one of those listed in this sub-sub-subparagraph; and

(II) Has been released on or after October 1, 1997, from the sanction imposed for any conviction of an offense described in sub-sub-subparagraph (I). For purposes of sub-sub-subparagraph (I), a sanction imposed in this state or in any other jurisdiction includes, but is not limited to, a fine, probation, community control, parole, conditional release, control release, or incarceration in a state prison, federal prison, private correctional facility, or local detention facility;

b. Establishes or maintains a residence in this state and who has not been designated as a sexual predator by a court of this state but who has been designated as a sexual predator, as a sexually violent predator, or by another sexual offender designation in another state or jurisdiction and was, as a result of such designation, subjected to registration or community or public notification, or both, or would be if the person were a resident of that state or jurisdiction, without regard to whether the person otherwise meets the criteria for registration as a sexual offender;

c. Establishes or maintains a residence in this state who is in the custody or control of, or under the supervision of, any other state or jurisdiction as a result of a conviction for committing, or attempting, soliciting, or conspiring to commit, any of the criminal offenses proscribed in the following statutes or similar offense in another jurisdiction: s. 787.01, s. 787.02, or s. 787.025(2)(c), where the victim is a minor and the defendant is not the victim's parent or guardian; s. 794.011, excluding s. 794.011(10); s. 794.05; s. 796.03; s. 796.035; s. 800.04; s. 825.1025; s. 827.071; s. 847.0133; s. 847.0135, excluding s. 847.0135(4); s. 847.0137; s. 847.0138; s. 847.0145; or s. 985.701(1); or any similar offense committed in this state which has been redesignated from a former statute number to one of those listed in this sub-subparagraph; or

d. On or after July 1, 2007, has been adjudicated delinquent for committing, or attempting, soliciting, or conspiring to commit, any of the criminal offenses proscribed in the following statutes in this state or similar offenses in another jurisdiction when the juvenile was 14 years of age or older at the time of the offense:

(I) Section 794.011, excluding s. 794.011(10);

(II) Section 800.04(4)(b) where the victim is under 12 years of age or where the court finds sexual activity by the use of force or coercion;

(III) Section 800.04(5)(c)1. where the court finds molestation involving unclothed genitals; or

(IV) Section 800.04(5)(d) where the court finds the use of force or coercion and unclothed genitals.

2. For all qualifying offenses listed in sub-subparagraph (1)(a)1.d., the court shall make a written finding of the age of the offender at the time of the offense.

For each violation of a qualifying offense listed in this subsection, the court shall make a written finding of the age of the victim at the time of the offense. For a violation of s. 800.04(4), the court shall additionally make a written finding indicating that the offense did or did not involve sexual activity and indicating that the offense did or did not involve force or coercion. For a violation of s. 800.04(5), the court shall additionally make a written finding that the offense did or did not involve unclothed genitals or genital area and that the offense did or did not involve the use of force or coercion.

(b) "Convicted" means that there has been a determination of guilt as a result of a trial or the entry of a plea of guilty or nolo contendere, regardless of whether adjudication is withheld, and includes an adjudication of delinquency of a juvenile as specified in this section. Conviction of a similar offense includes, but is not limited to, a conviction by a federal or military tribunal, including courts-martial conducted by the Armed Forces of the United States, and includes a conviction or entry of a plea of guilty or nolo contendere resulting in a sanction in any state of the United States or other jurisdiction. A sanction includes, but is not limited to, a fine, probation, community control, parole, conditional release, control release, or incarceration in a state prison, federal prison, private correctional facility, or local detention facility.

(c) "Permanent residence" and "temporary residence" have the same meaning ascribed in s. 775.21.

(d) "Institution of higher education" means a career center, community college, college, state university, or independent postsecondary institution.

(e) "Change in enrollment or employment status" means the commencement or termination of enrollment or employment or a change in location of enrollment or employment.

(f) "Electronic mail address" has the same meaning as provided in s. 668.602.

(g) "Instant message name" means an identifier that allows a person to communicate in real time with another person using the Internet.

(2) A sexual offender shall:

(a) Report in person at the sheriff's office:

1. In the county in which the offender establishes or maintains a permanent or temporary residence within 48 hours after:

a. Establishing permanent or temporary residence in this state; or

b. Being released from the custody, control, or supervision of the Department of Corrections or from the custody of a private correctional facility; or

2. In the county where he or she was convicted within 48 hours after being convicted for a qualifying offense for registration under this section if the offender is not in the custody or

control of, or under the supervision of, the Department of Corrections, or is not in the custody of a private correctional facility.

Any change in the sexual offender's permanent or temporary residence, name, any electronic mail address and any instant message name required to be provided pursuant to paragraph (4)(d), after the sexual offender reports in person at the sheriff's office, shall be accomplished in the manner provided in subsections (4), (7), and (8).

(b) Provide his or her name, date of birth, social security number, race, sex, height, weight, hair and eye color, tattoos or other identifying marks, occupation and place of employment, address of permanent or legal residence or address of any current temporary residence, within the state and out of state, including a rural route address and a post office box, any electronic mail address and any instant message name required to be provided pursuant to paragraph (4)(d), date and place of each conviction, and a brief description of the crime or crimes committed by the offender. A post office box shall not be provided in lieu of a physical residential address.

1. If the sexual offender's place of residence is a motor vehicle, trailer, mobile home, or manufactured home, as defined in chapter 320, the sexual offender shall also provide to the department through the sheriff's office written notice of the vehicle identification number; the license tag number; the registration number; and a description, including color scheme, of the motor vehicle, trailer, mobile home, or manufactured home. If the sexual offender's place of residence is a vessel, live-aboard vessel, or houseboat, as defined in chapter 327, the sexual offender shall also provide to the department written notice of the hull identification number; the manufacturer's serial number; the name of the ves[redacted] live-aboard vessel, or houseboat; the registration number; and a description, including color scheme, of the vessel, live-aboard vessel, or houseboat.

2. If the sexual offender is enrolled, employed, or carrying on a vocation at an institution of higher education in this state, the sexual offender shall also provide to the department through the sheriff's office the name, address, and county of each institution, including each campus attended, and the sexual offender's enrollment or employment status. Each change in enrollment or employment status shall be reported in person at the sheriff's office, within 48 hours after any change in status. The sheriff shall promptly notify each institution of the sexual offender's presence and any change in the sexual offender's enrollment or employment status.

When a sexual offender reports at the sheriff's office, the sheriff shall take a photograph and a set of fingerprints of the offender and forward the photographs and fingerprints to the department, along with the information provided by the sexual offender. The sheriff shall promptly provide to the department the information received from the sexual offender.

(3) Within 48 hours after the report required under subsection (2), a sexual offender shall report in person at a driver's license office of the Department of Highway Safety and Motor Vehicles, unless a driver's license or identification card that complies with the requirements of s. 322.141(3) was previously secured or updated under s. 944.607. At the driver's license office the sexual offender shall:

(a) If otherwise qualified, secure a Florida driver's license, renew a Florida driver's license, or secure an identification card. The sexual offender shall identify himself or herself as a sexual offender who is required to comply with this section and shall provide proof that the sexual offender reported as required in subsection (2). The sexual offender shall provide any of the information specified in subsection (2), if requested. The sexual offender shall submit to the taking of a photograph for use in issuing a driver's license, renewed license, or identification card, and for use by the department in maintaining current records of sexual offenders.

(b) Pay the costs assessed by the Department of Highway Safety and Motor Vehicles for issuing or renewing a driver's license or identification card as required by this section. The driver's license or identification card issued must be in compliance with s. 322.141(3).

(c) Provide, upon request, any additional information necessary to confirm the identity of the sexual offender, including a set of fingerprints.

(4)(a) Each time a sexual offender's driver's license or identification card is subject to renewal, and, without regard to the status of the offender's driver's license or identification card, within 48 hours after any change in the offender's permanent or temporary residence or change in the offender's name by reason of marriage or other legal process, the offender shall report in person to a driver's license office, and shall be subject to the requirements specified in subsection (3). The Department of Highway Safety and Motor Vehicles shall forward to the department all photographs and information provided by sexual offenders. Notwithstanding the restrictions set forth in s. 322.142, the Department of Highway Safety and Motor Vehicles is authorized to release a reproduction of a color-photograph or digital-image license to the Department of Law Enforcement for purposes of public notification of sexual offenders as provided in this section and ss. 943.043 and 944.606.

(b) A sexual offender who vacates a permanent residence and fails to establish or maintain another permanent or temporary residence shall, within 48 hours after vacating the permanent residence, report in person to the sheriff's office of the county in which he or she is located. The sexual offender shall specify the date upon which he or she intends to or did vacate such residence. The sexual offender must provide or update all of the registration information required under paragraph (2)(b). The sexual offender must provide an address for the residence or other location that he or she is or will be occupying during the time in which he or she fails to establish or maintain a permanent or temporary residence.

(c) A sexual offender who remains at a permanent residence after reporting his or her intent to vacate such residence shall, within 48 hours after the date upon which the offender indicated he or she would or did vacate such residence, report in person to the agency to which he or she reported pursuant to paragraph (b) for the purpose of reporting his or her address at such residence. When the sheriff receives the report, the sheriff shall promptly convey the information to the department. An offender who makes a report as required under paragraph (b) but fails to make a report as required under this paragraph commits a felony of the second degree, punishable as provided in s. 775.082, s. 775.083, or s. 775.084.

(d) A sexual offender must register any electronic mail address or instant message name with the department prior to using such electronic mail address or instant message name on or after October 1, 2007. The department shall establish an online system through which sexual offenders may securely access and update all electronic mail address and instant message name information.

(5) This section does not apply to a sexual offender who is also a sexual predator, as defined in s. 775.21. A sexual predator must register as required under s. 775.21.

(6) County and local law enforcement agencies, in conjunction with the department, shall verify the addresses of sexual offenders who are not under the care, custody, control, or supervision of the Department of Corrections in a manner that is consistent with the provisions of the federal Adam Walsh Child Protection and Safety Act of 2006 and any other federal standards applicable to such verification or required to be met as a condition for the receipt of federal funds by the state. Local law enforcement agencies shall report to the department any failure by a sexual offender to comply with registration requirements.

(7) A sexual offender who intends to establish residence in another state or jurisdiction other than the State of Florida shall report in person to the sheriff of the county of current residence within 48 hours before the date he or she intends to leave this state to establish residence in another state or jurisdiction. The notification must include the address, municipality, county, and state of intended residence. The sheriff shall promptly provide to the department the information received from the sexual offender. The department shall notify the statewide law enforcement agency, or a comparable agency, in the intended state or jurisdiction of residence of the sexual offender's intended residence. The failure of a sexual offender to provide his or her intended place of residence is punishable as provided in subsection (9).

(8) A sexual offender who indicates his or her intent to reside in another state or jurisdiction other than the State of Florida and later decides to remain in this state shall, within 48 hours after the date upon which the sexual offender indicated he or she would leave this state, report in person to the sheriff to which the sexual offender reported the intended change of residence, and report his or her intent to remain in this state. The sheriff shall promptly report this information to the department. A sexual offender who reports his or her intent to reside in another state or jurisdiction but who remains in this state without reporting to the sheriff in the manner required by this subsection commits a felony of the second degree, punishable as provided in s. 775.082, s. 775.083, or s. 775.084.

(9)(a) A sexual offender who does not comply with the requirements of this section commits a felony of the third degree, punishable as provided in s. 775.082, s. 775.083, or s. 775.084.

(b) A sexual offender who commits any act or omission in violation of this section may be prosecuted for the act or omission in the county in which the act or omission was committed, the county of the last registered address of the sexual offender, or the county in which the conviction occurred for the offense or offenses that meet the criteria for designating a person as a sexual offender.

(c) An arrest on charges of failure to register when the offender has been provided and advised of his or her statutory obligations to register under subsection (2), the service of an information or a complaint for a violation of this section, or an arraignment on charges for a violation of this section constitutes actual notice of the duty to register. A sexual offender's failure to immediately register as required by this section following such arrest, service, or arraignment constitutes grounds for a subsequent charge of failure to register. A sexual offender charged with the crime of failure to register who asserts, or intends to assert, a lack of notice of the duty to register as a defense to a charge of failure to register shall immediately register as required by this section. A sexual offender who is charged with a subsequent failure to register may not assert the defense of a lack of notice of the duty to register.

(d) Registration following such arrest, service, or arraignment is not a defense and does not relieve the sexual offender of criminal liability for the failure to register.

(10) The department, the Department of Highway Safety and Motor Vehicles, the Department of Corrections, the Department of Juvenile Justice, any law enforcement agency in this state, and the personnel of those departments; an elected or appointed official, public employee, or school administrator; or an employee, agency, or any individual or entity acting at the request or upon the direction of any law enforcement agency is immune from civil liability for damages for good faith compliance with the requirements of this section or for the release of information under this section, and shall be presumed to have acted in good faith in compiling, recording, reporting, or releasing the information. The presumption of good faith is not overcome if a technical or clerical error is made by the department, the Department of Highway Safety and Motor Vehicles, the Department of Corrections, the Department of Juvenile

Justice, the personnel of those departments, or any individual or entity acting at the request or upon the direction of any of those departments in compiling or providing information, or if information is incomplete or incorrect because a sexual offender fails to report or falsely reports his or her current place of permanent or temporary residence.

(11) Except as provided in s. 943.04354, a sexual offender must maintain registration with the department for the duration of his or her life, unless the sexual offender has received a full pardon or has had a conviction set aside in a postconviction proceeding for any offense that meets the criteria for classifying the person as a sexual offender for purposes of registration. However, a sexual offender:

(a)1. Who has been lawfully released from confinement, supervision, or sanction, whichever is later, for at least 25 years and has not been arrested for any felony or misdemeanor offense since release, provided that the sexual offender's requirement to register was not based upon an adult conviction:

a. For a violation of s. 787.01 or s. 787.02;

b. For a violation of s. 794.011, excluding s. 794.011(10);

c. For a violation of s. 800.04(4)(b) where the court finds the offense involved a victim under 12 years of age or sexual activity by the use of force or coercion;

d. For a violation of s. 800.04(5)(b);

e. For a violation of s. 800.04(5)(c)2. where the court finds the offense involved unclothed genitals or genital area;

f. For any attempt or conspiracy to commit any such offense; or

g. For a violation of similar law of another jurisdiction,

may petition the criminal division of the circuit court of the circuit in which the sexual offender resides for the purpose of removing the requirement for registration as a sexual offender.

2. The court may grant or deny relief if the offender demonstrates to the court that he or she has not been arrested for any crime since release; the requested relief complies with the provisions of the federal Adam Walsh Child Protection and Safety Act of 2006 and any other federal standards applicable to the removal of registration requirements for a sexual offender or required to be met as a condition for the receipt of federal funds by the state; and the court is otherwise satisfied that the offender is not a current or potential threat to public safety. The state attorney in the circuit in which the petition is filed must be given notice of the petition at least 3 weeks before the hearing on the matter. The state attorney may present evidence in opposition to the requested relief or may otherwise demonstrate the reasons why the petition should be denied. If the court denies the petition, the court may set a future date at which the sexual offender may again petition the court for relief, subject to the standards for relief provided in this subsection.

3. The department shall remove an offender from classification as a sexual offender for purposes of registration if the offender provides to the department a certified copy of the court's written findings or order that indicates that the offender is no longer required to comply with the requirements for registration as a sexual offender.

(b) As defined in sub-subparagraph (1)(a)1.b. must maintain registration with the department for the duration of his or her life until the person provides the department with an order issued by the court that designated the person as a sexual predator, as a sexually violent predator, or by another sexual offender designation in the state or jurisdiction in which the order was issued which states that such designation has been removed or demonstrates to the department that such designation, if not imposed by a court, has been removed by operation of law or court order in the state or jurisdiction in which the designation was made, and provided such person no longer meets the criteria for registration as a sexual offender under the laws of this state.

(12) The Legislature finds that sexual offenders, especially those who have committed offenses against minors, often pose a high risk of engaging in sexual offenses even after being released from incarceration or commitment and that protection of the public from sexual offenders is a paramount government interest. Sexual offenders have a reduced expectation of privacy because of the public's interest in public safety and in the effective operation of government. Releasing information concerning sexual offenders to law enforcement agencies and to persons who request such information, and the release of such information to the public by a law enforcement agency or public agency, will further the governmental interests of public safety. The designation of a person as a sexual offender is not a sentence or a punishment but is simply the status of the offender which is the result of a conviction for having committed certain crimes.

(13) Any person who has reason to believe that a sexual offender is not complying, or has not complied, with the requirements of this section and who, with the intent to assist the sexual offender in eluding a law enforcement agency that is seeking to find the sexual offender to question the sexual offender about, or to arrest the sexual offender for, his or her noncompliance with the requirements of this section:

(a) Withholds information from, or does not notify, the law enforcement agency about the sexual offender's noncompliance with the requirements of this section, and, if known, the whereabouts of the sexual offender;

(b) Harbors, or attempts to harbor, or assists another person in harboring or attempting to harbor, the sexual offender; or

(c) Conceals or attempts to conceal, or assists another person in concealing or attempting to conceal, the sexual offender; or

(d) Provides information to the law enforcement agency regarding the sexual offender that the person knows to be false information,

commits a felony of the third degree, punishable as provided in s. 775.082, s. 775.083, or s. 775.084.

(14)(a) A sexual offender must report in person each year during the month of the sexual offender's birthday and during the sixth month following the sexual offender's birth month to the sheriff's office in the county in which he or she resides or is otherwise located to reregister.

(b) However, a sexual offender who is required to register as a result of a conviction for:

1. Section 787.01 or s. 787.02 where the victim is a minor and the offender is not the victim's parent or guardian;

2. Section 794.011, excluding s. 794.011(10);

3. Section 800.04(4)(b) where the court finds the offense involved a victim under 12 years of age or sexual activity by the use of force or coercion;

4. Section 800.04(5)(b);

5. Section 800.04(5)(c)1. where the court finds molestation involving unclothed genitals or genital area;

6. Section 800.04(5)c.2. where the court finds molestation involving unclothed genitals or genital area;

7. Section 800.04(5)(d) where the court finds the use of force or coercion and unclothed genitals or genital area;

8. Any attempt or conspiracy to commit such offense; or

9. A violation of a similar law of another jurisdiction,

must reregister each year during the month of the sexual offender's birthday and every third month thereafter.

(c) The sheriff's office may determine the appropriate times and days for reporting by the sexual offender, which shall be consistent with the reporting requirements of this subsection. Reregistration shall include any changes to the following information:

1. Name; social security number; age; race; sex; date of birth; height; weight; hair and eye color; address of any permanent residence and address of any current temporary residence, within the state or out of state, including a rural route address and a post office box; any electronic mail address and any instant message name required to be provided pursuant to paragraph (4)(d); date and place of any employment; vehicle make, model, color, and license tag number; fingerprints; and photograph. A post office box shall not be provided in lieu of a physical residential address.

2. If the sexual offender is enrolled, employed, or carrying on a vocation at an institution of higher education in this state, the sexual offender shall also provide to the department the name, address, and county of each institution, including each campus attended, and the sexual offender's enrollment or employment status.

3. If the sexual offender's place of residence is a motor vehicle, trailer, mobile home, or manufactured home, as defined in chapter 320, the sexual offender shall also provide the vehicle identification number; the license tag number; the registration number; and a description, including color scheme, of the motor vehicle, trailer, mobile home, or manufactured home. If the sexual offender's place of residence is a vessel, live-aboard vessel, or houseboat, as defined in chapter 327, the sexual offender shall also provide the hull identification number; the manufacturer's serial number; the name of the vessel, live-aboard vessel, or houseboat; the registration number; and a description, including color scheme, of the vessel, live-aboard vessel or houseboat.

4. Any sexual offender who fails to report in person as required at the sheriff's office, or who fails to respond to any address verification correspondence from the department within 3 weeks of the date of the correspondence or who fails to report electronic mail addresses or

instant message names, commits a felony of the third degree, punishable as provided in s. 775.082, s. 775.083, or s. 775.084.

(d) The sheriff's office shall, within 2 working days, electronically submit and update all information provided by the sexual offender to the department in a manner prescribed by the department.

A47

Palm Beach Sheriffs Office Booking Card for Jeffrey Epstein, dated June 30, 2008

04/26/2010 14:51 3553626 CIRCUIT CRIMINAL PAGE 04/20

NAME: EPSTEIN, JEFFREY JACKET #: 0338617 #: 2008039316

ALIAS NAMES: OVER 8 NAMES: ☐

EPSTEIN, JEFFREY - EPSTEIN, JEFFREY EDWARD -

Monday, June 30, 2008
11:33:10 AM

PALM BEACH SHERIFFS OFFICE
BOOKING CARD



INCARCERATION DATE/TIME 06/30/2008 11:12
PRISONER TYPE: LOCAL CHARGES
DOB: [redacted]
AGE: 55
SSN: [redacted]
R/S: W/M
HEIGHT: 6 ft 0 in
WEIGHT: 200
BKG.LOC: MOBILE BOOKING
BKG. ID#: 8548
HAIR COLOR: GRY
EYE COLOR: BLU
CITIZEN
COUNTRY: USA

ADDRESS: 358 EL BRILLO WY CITY: PALM BEACH STATE: FL ZIP: 33480

ID #: 20080630061 POUCH: 3050 NCIC:
SID #: 06587245 AFIS: 2006036744 DOC #:
ALIEN #: U.S. MARSHAL #: INCIDENT #:
FBI #: 787075K6 OBTS #:

ARREST ADDRESS: 205 N DIXIE HWY (MAIN CT HOUSE) CITY: WPB STATE: FL ZIP:
ARREST DATE: 06/30/2008 ARREST TIME: 10:15
BKG. DATE: 06/30/2008 BKG. TIME: 11:12 CURRENT BOND: $0.00
WARRANT/CASE#: COURT DIVISION:
ARREST OFFICER: D/S DELPLATO ARREST AGENCY: 01 - PBSO
TRANS. OFFICER: D/S MCINTOSH TRANS. AGENCY: 01 - PBSO

CASE TYPE: RECOMMIT-FELONY
NOTE:

STATUTE:	CT:	DESCRIPTION:	CASE FLAG: NO BOND	VOFC:	B TYPE:	CUR. BOND:
9999.0004 (NN)	1	-RE-COMMIT		☐	NO	$0.00
()	0	PROCURE PERSON UNDER AGE OF 18 FOR PROSTITUTION // CASE: 2008CF009361AXX-W		☐		$0.00

HOLDS:

	HOLD DATE/TIME:	HOLD BY:	HOLD DEPT.:	HOLD REM.DATE/TIME:	HOLD REM. BY:	HOLD REM. DEPT:
1						
2						
3						

	ALERT DESCRIPTION:	ALERT NARRATIVE:
1	31	DNA NOT ON FILE/FELONY CONVICTION
2		
3		

OVER 3 ALERTS: ☐

KEEP SEPARATE FROM:
NONE
OVER 6 NAMES: ☐

ASSIGNED HOUSING: NTA DATE/TIME: NTA LOC:

ICIC INTAKE: NCIC RELEASE: F.P. ENTERED: F.P. CLEAR:
ALMS REL.: PHOTO ID: CLASSIFICATION: MED.CLEAR IN: DE JUL 1 2008
IED. CLEAR REL: RELEASE MOVE:
ELEASE DATE/TIME: RELEASE INFORMATION:
OURT DATE/TIME: COURT LOCATION:

CLERK ☐ WARRANTS ☐ STATE ATTY ☐ CENTRAL RCDS ☐ CLASS ☐

3

A48

Order granting Jeffrey E. Epstein's Motion for Travel, dated December 18, 2009

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

CASE NO: 2008 CF 9381 AXX MB

STATE OF FLORIDA

vs.

Jeffrey Epstein

Defendant.

FILED
Circuit Criminal Department
DEC 18 2009
SHARON R. BOCK
Clerk & Comptroller
Palm Beach County

Agreed

ORDER ON MOTION D's Motion for travel

THIS MATTER comes before the Court upon D's mot for travel.

The Court, having been made aware that both counsel have agreed to said motion.

Accordingly, it is hereby:

ORDERED and ADJUDGED that D's motion is granted under the following conditions: D's travel is weekdays only, no weekends his travel for any trip may include 1 overnight only. The D's travel must be reviewed and approved by the D's probation officer Carmen Sloan 48 hours in advance

DONE and ORDERED in Chambers, West Palm Beach, Palm Beach County, Florida, this _____ day of 12/18/09

Circuit Court Judge

EFTA00232614

A49

Letter from Florida Department of Corrections Regarding Termination of Supervision, dated July 21, 2010

FLORIDA
DEPARTMENT of
CORRECTIONS

FILED
2010 JUL 27 A 11:29
SHARON R. BOCK, CLERK
PALM BEACH COUNTY, FL
CIRCUIT CRIMINAL

Governor
CHARLIE CRIST

Secretary
JAMES R. McDONOUGH.

An Equal Opportunity Employer

2601 Blair Stone Road Tallahassee, FL 32399-2500

http://www.dc.state.fl.us

Date: 7/21/2010

RE: TERMINATION OF SUPERVISION
DC# W35755
DOCKET/UC NO(S) 502008CF009381AXXX

Mr. Epstein
358 El Brillio Way
Palm Beach, FL 33480

Dear Mr. Epstein

You are hereby notified that you have completed your term(s) of supervision, as referenced above, and are no longer under the supervision of the Department of Corrections.

If you were adjudicated guilty of a felony offense, your name will be submitted to the Florida Parole Commission for consideration for restoration of the civil rights that you lost as a result of your felony conviction (right to vote, right to hold public office, and the right to serve on a jury). If your rights are restored, a certificate of restoration of civil rights will be mailed by the Office of Executive Clemency to your last mailing address of record usually within one year following the termination of supervision. If your rights are not restored through this initial referral, you will be notified by the Florida Parole Commission and furnished an additional application for submission for restoration of civil rights with a hearing. If you have any questions about your civil rights, you may contact the Office of Executive Clemency for further information by calling [redacted] or by writing to that office at Florida Parole Commission, 2601 Blair Stone Road, Building C, Tallahassee, Florida 32399-2450. Information and application forms may be accessed through the following web site: www.state.fl.us/fpc/exclem.html.

After eight (8) years from termination of your supervision, you may apply to regain your right to own firearms. Applications can be obtained from the Office of Executive Clemency or be accessed by the web site noted above.

If adjudication was withheld, you did not lose your civil rights, however, the Florida Department of Law Enforcement (FDLE) may refuse the right for you to purchase a firearm following successful completion of supervision, pursuant to Section 790.065 Florida Statutes. Contact your local FDLE office if you have questions regarding this law.

I would like to extend to you best wishes for a very successful future.

Sincerely, Candice Elkins
Candice Elkins

☒ If you were on supervision for a sexual offense, attached is a copy of the Notice of Responsibilities, which outlines your continued responsibilities in accordance with Florida Statutes.

☐ If you were sentenced as a career offender, attached is a copy of the Career Offender Notice of Responsibilities, which outlines your continued responsibilities in accordance with Florida Statutes.

Original: Offender
Copy: Offender File
Florida Parole Commission (if applicable)
Clerk of Court (if required)
(Revised 03/03)

A50

Letter from Palm Beach Sheriff's Office Regarding Jeffrey Epstein's Participation in the Work Release Program, dated August 12, 2010

PALM BEACH COUNTY
SHERIFF'S OFFICE
RIC L. BRADSHAW, SHERIFF



DEPUTY K. SMITH 3656
ALTERNATIVE CUSTODY UNIT
PHONE: [redacted] FAX: [redacted] E-MAIL: [redacted]

August 12th 2010

To Whom It May Concern:

Jeffery Epstein DOB 01/20/53 was a participant of the Palm Beach County Sheriff's Office work release program. Epstein was a participant of the work release program starting 10/10/08 and ending 07/22/09.

If you have any questions or concerns please contact me.

Deputy K. Smith

A51

Letter from Jack A. Goldberger to NYS Sex Offender Registry Regarding Florida Registration Level applicable to Jeffrey E. Epstein, dated August 12, 2010

[pp. A51-A52]

ATTERBURY GOLDBERGER

* JOSEPH R. ATTERBURY
† JACK A. GOLDBERGER
* JASON S. WEISS
* Board Certified Criminal Trial Attorney
† Member of New Jersey & Florida Bars

August 12, 2010

New York State Division of Criminal Justice Services
Sex Offender Registry
4 Tower Place
Albany, N.Y. 12203

RE: Jeffrey E. Epstein

To Whom It May Concern:

The undersigned represented Jeffrey E. Epstein in the investigation that lead to his entry of a guilty plea on June 30, 2008 to a felony charge in the State of Florida that required sex offender registration. The purpose of this letter is to clarify the level of registration that was applicable to Mr. Epstein's case

Under Florida's registration scheme there are two levels of registration available based on a risk assessment. Florida characterizes these two levels as sexual predator and sexual offender. The sexual predator designation is obviously the more serious classification.

Mr. Epstein, based on the offense on which his guilty plea was entered, was classified as a sexual offender, Florida's lowest level of sexual registration. In fact, within the sexual offender designation there are two sub-levels of reporting requirements. One classification requires reporting to the local Sheriff's Office twice a year and one requires reporting four times a year. In Mr. Epstein's case he is required to report at the lowest level, two times per year. Accordingly, under the Florida registration scheme, Mr. Epstein's registration requirements are at the lowest level for a person for whom registration is required.

During the incarcerative portion of Mr. Epstein's sentence, he was allowed to participate in the Sheriff's Office work release program, an option that would not have been available to him had he been at a higher registration level. Additionally, while Mr. Epstein was in probationary status, he was allowed to travel on a limited basis for business purposes. This would not have been available to him had he been classified as a sexual predator.

One Clearlake Centre, Suite 1400 250 Australian Avenue South West Palm Beach, FL 33401

P [redacted] [redacted] www.agwpa.com

I hope this information assists your department in determining the registration requirements for Mr. Epstein. Should you desire to speak to me or need any further information, please feel free to contact me.

Very truly yours,

Jack A. Goldberger

JAG/slm

A53

Letter from Martin G. Weinberg to NYS Board of Examiners of Sex Offenders Regarding Risk Level and Designation Determination for Jeffrey Epstein, dated August 16, 2010 [pp. A53-A57]

MARTIN G. WEINBERG, P.C.
ATTORNEY [redacted] LAW

20 PARK PLAZA, SUITE 1000
BOSTON, MASSACHUSETTS 02116

[redacted]

FAX [redacted]

NIGHT EMERGENCY:
[redacted]

EMAIL ADDRESSES:
[redacted]

August 16, 2010

New York State
Board of Examiners of Sex Offenders
4 Tower Place
Albany, New York 12203-3764

Re: Jeffrey Epstein
NYSID # OS1909

Dear Sir or Madam:

This letter and the accompanying materials are submitted to the Board pursuant to its notice of August 2, 2010, concerning the risk level and designation determination to be made with respect to Jeffrey Epstein. Their purpose is to demonstrate to the Board that, based upon Mr. Epstein's history and personal characteristics, the circumstances of the offense which triggered the registration requirement, his acceptance of responsibility, his successful completion of his sentence and subsequent supervision, and the extraordinary unlikelihood of his ever again reoffending, the appropriate risk level designation is level 1.

Overview

Mr. Epstein, who is presently 58 years old, is a successful and respected financial advisor who also founded and heads a philanthropic organization, the C.O.U.Q. Foundation, Inc. which funds medical, educational, and advanced scientific research. The offense which led to the requirement that he register as a sex offender in Florida, which in turn triggered this state's reporting requirement, ended almost five years ago and involved an exchange of money and consensual conduct with a young woman who, for all but a few months of the prostitution offense charged, was over the age of 17. Notably, as addressed in greater detail, *infra*, the conduct which occurred after [redacted] reached the age of 17 would not even have been a misdemeanor under the cognate New York statute at the time the offense was committed.

Mr. Epstein pled guilty to that offense in the Circuit Court for Palm Beach County, Florida, and has fully and sincerely accepted responsibility for his conduct. There have been no subsequent incidents of criminal misconduct of any description.

Florida has classified Mr. Epstein as its lowest level sex offender, with the lowest level of reporting requirement, as verified by the attorney who represented Mr. Epstein in the Florida proceedings:

> Under Florida's registration scheme there are two levels of registration available based on a risk assessment. Florida characterizes these two levels as sexual predator and sexual offender. The sexual predator designation is obviously the more serious classification.
>
> Mr. Epstein, based on the offense on which his guilty plea was entered was classified as a sexual offender, Florida's lowest level of sexual registration. In fact, within the sexual offender designation there are two-sub-levels of reporting requirements. One classification requires reporting to the local Sheriff's Office twice a year and one requires reporting four times a year. In Mr. Epstein's case, he is required to report at the lowest level, two times per year. Accordingly, under the Florida registration scheme, Mr. Epstein's registration requirements are at the lowest level for a person for whom registration is required.

Letter of Jack A. Goldberger, Esq., Ex. A. That Florida authorities did not – and do not – believe that Mr. Epstein presented a risk of reoffense is evidenced not just by Mr. Epstein's lowest-level reporting designation but also by the fact that he was permitted, while serving his sentence in the West Palm Beach County Jail, to leave the jail on a daily basis on work release for most of the period of his 13-month incarceration and that during his subsequent year of community control supervision (a probationary-type sentence), both the court and his probation officer agreed to permit him to travel outside Florida for business purposes on a significant number of occasions. He has now completed his year of community control supervision, having fully complied with all the requirements and obligations imposed on him.

In addition, Mr. Epstein has participated in therapy with a clinical psychologist, Stephen R. Alexander, Psy. D., who, based on his evaluation of, and therapy sessions with, Mr. Epstein and his long experience as a forensic psychologist, attests that Mr. Epstein presents no threat to the community and that the risk of his reoffending is "negligible":

> Since my initial assessment of Mr. Epstein he has been extremely cooperative with all of the services provided to him. He has spent a great deal of time and energy focusing on his behavior and the attitudes, beliefs and expectations that undergird his approach to life. He has examined his priorities and undergone a comprehensive self-exploration on more than one occasion, primarily because of the vast changes that have occurred in his life and the upheaval these events have caused. Throughout it all Mr. Epstein has remained willing to focus on himself and how to turn even the most dire personal circumstances into productive experiences to the fullest extent possible. In my opinion Mr. Epstein has been highly cooperative with and benefited from the treatment provided. Relying upon my 25 years of experience as a forensic psychologist and the plethora of data gathered by me, I state with confidence that Mr. Epstein poses no threat to himself or the community. It is abundantly clear that he has learned his lesson and the probability of his reoffending is negligible. Mr.

EFTA00232620

> Epstein poses no threat to either himself or the general community, and he requires no additional intervention or treatment for his no-risk/low-risk status to be maintained into the future.

Letter of Stephen R. Alexander, Psy. D., submitted herewith as Ex. B.[1]

All of these circumstances – Mr. Epstein's low-risk classification in Florida, the state where the offense was committed, the low-risk assessment inherent in the decisions of Florida authorities responsible for the protection of the community, who knew him first-hand, to admit him to work release during his period of incarceration and to permit him to travel outside of Florida during his period of community control supervision, Dr. Alexander's well-supported judgment that Mr. Epstein presents little or no risk of reoffense, the fact that the offense ended almost five years ago, and there has been no subsequent criminal misconduct of any kind, and the fact that Mr. Epstein is a mature, responsible, professional adult who uses neither alcohol nor drugs all support the conclusion that the supervision which accompanies a level 1 designation will more than suffice to serve the purposes of SORA. That conclusion is supported by the calculation of Mr. Epstein's risk assessment guidelines score.

The Conduct Underlying the Offense Triggering the Florida Registration Requirement Would For the Most Part Not Even Have Been a Registerable Offense in New York Had the Conduct Occurred in New York

The offense which required Mr. Epstein to register as a sex offender in the state of Florida was a violation of Fla. Stat. §796.03, which criminalizes procuring a person under the age of 18 (the age of consent in Florida) for prostitution, specifically, here, one "[redacted]." The nearest New York cognate among the registerable offenses listed in N.Y. Correction Law §168-a is N.Y. Penal Law §230.04 (patronizing a prostitute). The information to which Mr. Epstein pled guilty charged that the offense occurred between August 1, 2004, and October 9, 2005, *see* Information, Ex. C, that latter date being the day before [redacted]'s 18th birthday. Thus, for almost all of the duration of the charged offense, [redacted]. was over the age of 17, and the wholly consensual conduct in exchange for money which occurred between the two would not even have been a registerable offense in New York. *See* §168-a(2)(a)(i)(§230.04 a registerable offense only if "person patronized" is in fact under 17 years old). Indeed, at the time of the offense at issue, the conduct which occurred after [redacted]. turned 17 years of age would not even have been a crime under that statute if the conduct had taken place in New York.[2] Mr. Epstein's offense ranks among the least serious of those which trigger the requirement of SORA registration. The single Florida offense which required registration involved

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[1] Dr. Alexander's CV is included in Ex. B.

[2] In 2007, §230.04 was amended to extend its coverage to prostitution offenses involving individuals of any age, not just those under the age of 17, as the statute was written when Mr. Epstein's offense was committed in 2004-05. Under §230.04 as written in 2004-05, the offense, to the extent that [redacted]. was in the last three months of her 16th year, would only have been a misdemeanor had it been committed in New York.

EFTA00232621

only one woman, and there was no force or violence involved at any time, nor did [redacted]. suffer from any mental disability, mental incapacity, or physical helplessness. The points attributable to the Current Offense factors (factors 1-7) total less than 70.

Criminal History

Prior to the offense at issue, Mr. Epstein had no prior criminal history whatsoever. Mr. Epstein's date of birth is [redacted], and he was, accordingly, more than twenty years of age when the offense at issue was committed. Mr. Epstein does not use alcohol or illegal drugs and has no history of either drug or alcohol abuse. Accordingly, Mr. Epstein should be scored at zero for the Criminal History factors (factors 8-11).

Post-Offense Behavior

On June 30, 2008, Mr. Epstein pled guilty to the offense which subjected him to the requirement that he register as a sex offender in Florida and has fully accepted responsibility for his conduct. Mr. Epstein served approximately 13 months in a West Palm Beach County jail (rather than in a state correctional facility). During most of his period of confinement, from October 10, 2008, through July 22, 2009, the date of his release, Mr. Epstein participated in the jail's work release program, *see* Letter of Deputy K. Smith, Ex. D, which permitted him to leave the jail in the morning six days a week for his place of employment, the Florida Science Foundation, and return in the evening. That Mr. Epstein satisfactorily complied with the requirements of the program is evidenced by the fact that he remained in the work release program up to the time of his release from custody.

After his release on July 22, 2009, Mr. Epstein was subject to a one-year period of community control, which required, among other conditions, that he maintain contact with the probation office as required, that he be confined to his residence during the hours when he was not working or performing public service, that he not leave his county of residence without the consent of his probation officer, that he commit no further violations of the law, and that he maintain employment. During Mr. Epstein's period of community control from July 22, 2009, through July 21, 2010, he was permitted by the court, with the assent of his probation officer and without opposition by the state's attorney, to travel (including overnight stays) to New York and to the Virgin Islands for business purposes on a number of occasions, thus demonstrating a substantial level of trust by both the court and his supervising probation officer in Mr. Epstein's ability to refrain from unlawful conduct of any kind and to conform his conduct to the terms of his community control order and to the orders authorizing his travel, which he did on every such occasion.[3] Mr. Epstein successfully completed his term of community control on July, 21, 2010, *see* Florida Department of Corrections Termination of Supervision notice, Ex. F, having at all times fully complied with all obligations and restrictions imposed upon him.

Mr. Epstein has never refused or been expelled from any treatment since the time of his sentencing (factor 12(2)). *See* pages 2-3, *supra*. Based on his professional expertise and the

[3] One such travel order is attached as Ex. E.

EFTA00232622

substantial time he has spent with Mr. Epstein, Dr. Alexander is able to state unequivocally that Mr. Epstein has learned his lesson, that he presents no threat to the community, and that there is negligible risk that he will ever reoffend. Accordingly, Mr. Epstein should be scored at zero for the Post-Offense Behavior factors (factors 12-13).

Release Environment

Factor 14 contemplates that the risk level assessment will be made, as required under New York law, prior to the offender's release from incarceration. Here, as the preceding section shows, Mr. Epstein was released from jail more than a year ago and was subject to close supervision for a period of one year afterwards. During the same time, he continued to meet with Dr. Alexander. The score for factor 14 should, accordingly, be zero.

Mr. Epstein maintains a vacation residence in Manhattan, which he owns, as well as residences in Florida and the Virgin Islands. Mr. Epstein's interactions in connection with both his employment and philanthropic work are with adult business professionals, scientists, and educators. There is nothing in either Mr. Epstein's living or employment situations which could even remotely be considered "inappropriate." The score on factor 15 too should be zero.

Overrides

None of the listed factors are of any relevance or applicability to Mr. Epstein's risk level designation.

Conclusion

Based on all the relevant factors, Mr. Epstein should be classified as a level 1 sex offender. Even should the Board somehow conclude that Mr. Epstein's risk assessment guidelines score exceeds 70, the circumstances addressed in this letter differentiate this case so markedly from the norm of level 2 sex offenders that the Board should recommend a level 1 classification, as it is empowered to do under the Sex Offender Guidelines. The ultimate issue is the risk that the offender will reoffend, and the information provided to the Board with this letter persuasively demonstrates that such a risk is virtually nonexistent in this case.

Very truly yours,

Martin G. Weinberg

EFTA00232623

A58

Letter from Stephen R. Alexander, Psy.D. to Jack Goldberger Regarding Opinion of Jeffrey E. Epstein, dated August 16, 2010
[pp. A58-A61]

Stephen R. Alexander, Psy.D.
Clinical Psychologist
1825 Forest Hill Boulevard, Suite 204
West Palm Beach, Florida 33406
[redacted]

August 16, 2010

Jack Goldberger, Esq.
Atterbury, Goldberger and Weiss, P.A.
250 South Australian Avenue, Suite 1400
West Palm Beach, Florida 33401

Re.: Jeffrey Epstein

Dear Mr. Goldberger:

Since my initial assessment of Mr. Epstein he has been extremely cooperative with all of the services provided to him. He has spent a great deal of time and energy focusing on his behavior and the attitudes, beliefs and expectations that undergird his approach to life. He has examined his priorities and undergone a comprehensive self-exploration on more than one occasion, primarily because of the vast changes that have occurred in his life and the upheaval these events have caused. Throughout it all Mr. Epstein has remained willing to focus on himself and how to turn even the most dire personal circumstances into productive experiences to the fullest extent possible. In my opinion Mr. Epstein has been highly cooperative with and benefited from the treatment provided. Relying upon my 25 years of experience as a forensic psychologist and the plethora of data gathered by me, I state with confidence that Mr. Epstein poses no threat to himself or the community. It is abundantly clear that he has learned his lesson and the probability of his reoffending is negligible. Mr. Epstein poses no threat to either himself or the general community, and he requires no additional intervention or treatment for his no-risk/low-risk status to be maintained into the future.

If any questions remain or I can be of additional assistance, please contact my office.

Sincerely,

Stephen R. Alexander, Psy.D.
Clinical Psychologist

SRA/bl

Epstein-06037-L2A

Stephen R. Alexander, Psy.D.
Clinical Psychologist
1825 Forest Hill Boulevard, Suite 204
West Palm Beach, Florida 33406
[redacted]

EDUCATION

Psy.D.	Florida Institute of Technology; Clinical Psychology, 1985
M.S.	Eastern Kentucky University; Clinical Psychology, 1980
B.A.	University of North Carolina at Chapel Hill; 1977

LICENSURE

Florida Board of Psychological Examiners: Psychologist, PY0003713

CERTIFICATIONS

Supreme Court of Florida: Family Court Mediator 19355 CF
Supreme Court of Florida: County Court Mediator 19355 CF

PROFESSIONAL EXPERIENCE

Clinical Psychologist: Private practice providing services to children, adolescents, adults and families. Specialization in psychodiagnostic evaluations (personality, forensic, psychoeducational), forensic psychology, and psychotherapy. July 1989 to present.

Chief Psychologist: Juvenile and Family Divisions of the Fifteenth Judicial Circuit and Division of Youth Affairs, Palm Beach County, Florida. September 1987 to July 1989.

Duties: Supervise Psychological Services provided to Juvenile and Family Court including psychological evaluations of children, adolescents and adults in delinquency, dependency, custody, and sex abuse cases; testimony as Expert Witness.

Program Supervision of Sable Palm Youth Service Center, a 48 bed residential treatment program for emotionally and behaviorally disturbed adolescents; family therapy approach to treatment.

Program Supervision of the Youth Service Bureau, a community based family counseling/delinquency prevention program.

Directing program evaluation and basic research within the Division of Youth Affairs.

Directing APA Approved continuing education office for professional staff under the Chief Psychologist (5 Psy.D./Ph.D. psychologists, and 20 M.A./M.S.W. counselors).

Court Psychologist: Juvenile and Family Divisions of the Fifteenth Judicial Circuit and the Division of Youth Affairs, Palm Beach County, Florida. October 1985 to September 1987.

Duties: Psychodiagnostic evaluations of children, adolescents and adults for the court in delinquency, dependency, custody and sex abuse cases. Clinical Supervisor of the Sable Palm Youth Service Center.

Staff Psychologist: Scotland County Mental Health Center, Laurinberg, North Carolina. February to August 1982.

Duties: Individual and family psychotherapy (60% child services, 40% adult outpatient). Consultant to Scotland County School system. Competency evaluations for courts.

Staff Psychologist: Robeson County Mental Health Center, Lumberton, North Carolina. August 1980 to July 1981.

Duties: Outpatient Individual and family psychotherapy (60% child services, 40% adult outpatient). Psychodiagnostic evaluations for Center patients, local courts, and the Division of Vocational Rehabilitation.

Program evaluation of 15 Head Start Centers in a four county area for H.E.W.

Consultant to Red Springs City School system, Southeastern Sheltered Workshop, and Robeson County Group Homes.

INTERNSHIP

Louisiana State University Medical School (APA Approved): New Orleans, Louisiana. September 1984 to August 1985. Training consisted of equal time spent in three rotations: Adult, Child and Neuropsychology. Year long training in outpatient psychotherapy and community mental health services at West Jefferson Mental Health Center (1 day per week), psychoanalytic treatment of adults at LSU Medical Center, weekly psychoanalytic psychotherapy seminars and weekly psychodiagnostics seminars.

PRACTICUM PLACEMENTS

Neuropsychiatry Unit: Wuesthoff Memorial Hospital, Rockledge, Florida. 20 hours per week (200 total hours); January to March, 1984.

Center for Student Development: Florida Institute of Technology, Melbourne, Florida 10 hours per week (200 total hours); June to December 1983.

Melbourne Head Start Center: Melbourne, Florida. 10 hours per week (100 total hours); September to December 1983.

Robeson County Mental Health Center: Lumberton, North Carolina. 40 hours per week (1040 total hours); January to June 1980.

University of Kentucky Medical Center (Outpatient Psychiatry): Lexington, Kentucky. 20 hours per week (640 total hours); January to December 1979.

PUBLICATIONS & RESEARCH PAPERS

Alexander, S. & Wiatrowski, M. (1989). Delinquency prevention in a Youth Service Bureau. Unpublished manuscript.

Alexander, S. (1992). Choosing and using experts. In, *Child Custody and Visitation in Florida.* Eau Claire, WI: National Business Institute, Inc.

AWARDS

1993 Special Service Award presented by the Legal Aid Society and the Palm Beach County Bar Association for pro bono services to the community.

PROFESSIONAL POSITIONS

Education Chair of the Palm Chapter of the Florida Psychological Association, 1994.

President of the Palm Chapter of the Florida Psychological Association, 1995.

COMMUNITY SERVICE POSITIONS

Board of Directors Fern House, West Palm Beach, Florida. Fern House is a residential rehabilitation center for male alcoholics and drug addicts. 2004 to present.

Offender Name: JEFFREY E EPSTEIN **NYSID #:** OS1909 **1ST Reviewer Initials:** SOW

The following is the Board of Examiners of Sex Offenders' recommendation pursuant to Section 168-l of Article 6-C of the NYS Correction Law as to whether the offender [redacted] be designated a Sexually Violent Offender, Predicate Sex Offender, or Sexual Predator as defined in subdivision seven of Section 168-a or whether the offender does not fit any of those categories due to his conviction.

Please check all that apply:

1. ☐ **Sexually Violent Offender - a sex offender who has been convicted of a sexually violent offense defined in Correction Law section 168-a (3).**

Please check which conviction(s) apply, also please indicate whether the conviction was for an attempt at an offense:

Attempt			Attempt		
___	___	130.35 - Rape 1st degree	___	___	130.53 - Persistent sexual abuse
___	___	130.50 - Sodomy 1st degree/Criminal Sexual Act 1st degree	___	___	130.65-a - Aggravated sexual abuse 4th degree
___	___	130. 65 - Sexual Abuse 1st degree	___	___	130.90 - Facilitating a sex offense with a controlled substance
___	___	130.66 - Aggravated sexual abuse 3rd degree	___	___	a conviction of or a conviction for an attempt to commit any provisions of the foregoing sections committed or attempted as a hate crime defined in section 485.05 of the penal law or as a crime of terrorism defined in section 490.25 of such law.
___	___	130.67- Aggravated sexual abuse 2nd degree			
___	___	130.70 - Aggravated sexual abuse 1st degree	___	___	a conviction of an offense in any other jurisdiction which includes all of the essential elements of any such felony provided for above or conviction of a felony in any other jurisdiction for which the offender is required to register as a sex offender in the jurisdiction which the conviction occurred.
___	___	130.75 - Course of sexual conduct against a child 1st degree			
___	___	130.80 - Course of sexual conduct against a child 2nd degree			

2. ☐ **Predicate Sex Offender - a sex offender who has been convicted of an offense set forth in subdivision 2 or 3 of Correction Law Section 168-a when the offender has been previously convicted of an offense set forth in subdivision 2 or 3 of Section 168-a, regardless of the date of the prior conviction and regardless of whether the offender was required to register for the previous conviction.**

Please identify below the offenders previous qualifying conviction(s) as well as the offender's current qualifying conviction, also please indicate whether the conviction was for an attempt at an offense:

Current	Previous	Attempt		Current	Previous	Attempt		Current	Previous	Attempt	
___	___	___	130.20 - Sexual Misconduct	___	___	___	130.60 - Sexual Abuse 2nd degree	___	___	___	135.20 - Kidnapping 2nd deg
___	___	___	130.25 - Rape 3rd degree	___	___	___	255.25 - Incest	___	___	___	135.25 - Kidnapping 1st degree
___	___	___	130.30 - Rape 2nd degree	___	___	___	Article 263 offense - Sexual Performance by a Child				
___	___	___	130.40 - Sodomy 3rd degree/ Criminal Sexual Act 3rd	___	___	___	135.05 - Unlawful Imprisonment 2nd degree				
___	___	___	130.45 - Sodomy 2nd degree/ Criminal Sexual Act 2nd	___	___	___	135.10 - Unlawful Imprisonment 1st degree				

(*Note: 135.05, 135.10, 135.20, 135.25 - the victim must be less than 17 years old and the offender must not be the parent of the victim)

Continued on the next page.

2. (Cont'd)

Current	Previous	Attempt	
____	____	____	230.04 - Patronizing a prostitute 3rd degree (victim <17 years old)
____	____	____	230.05 - Patronizing a prostitute 2nd degree
____	____	____	230.06 - Patronizing a prostitute 1st degree
____	____	____	230.30 (2) - Promoting prostitution 2nd degree
____	____	____	230.32 - Promoting prostitution 1st degree
____	____	____	235.22 - Disseminating indecent material to minors 1st degree
____	____	____	a conviction of or a conviction for an attempt to commit any provisions of a listed sex offense committed or attempted as a hate crime defined in section 485.05 of the penal law or as a crime of terrorism defined in section 490.25 of such law.
____	____	____	130.52 - Forcible touching (victim<18 years old)
____	____	____	130.55 - Sexual abuse 3rd degree (victim<18 years old)
____	____	____	Conviction/Attempt to commit any provision of 130.52 or 130.55 of the penal law regardless of age of victim and the offender has previously been convicted of: (i) a sex offense listed in Correction Law Section 168-a (2), or (ii) a sexually violent offense listed in Correction Law Section 168-a (3), or (iii) any of the provisions of section 130.52 or 130.55 of the penal law or an attempt thereof.
____	____	____	A conviction of (i) an offense in any other jurisdiction which includes all of the essential elements of any such crime provided for in Correction Law Section 168-a (2) (a), or (ii) a felony in any other jurisdiction for which the offender is required to register as a sex offender in the jurisdiction in which the conviction occurred, or (iii) any of the provisions of 18 U.S.C. 2251, 18 U.S.C. 2251A, 18 U.S.C. 2252, 18 U.S.C. 2252A, or 18 U.S.C. 2260 provided the elements of such crime of conviction are substantially the same as those which are part of such offense as of March 11, 2002.

Current	Previous	Attempt	
____	____	____	130.35 - Rape 1st degree
____	____	____	130.50 - Sodomy 1st degree/Criminal Sexual Act 1st degree
____	____	____	130. 65 - Sexual Abuse 1st degree
____	____	____	130.66 - Aggravated sexual abuse 3rd degree
____	____	____	130.67- Aggravated sexual abuse 2nd degree
____	____	____	130.70 - Aggravated sexual abuse 1st degree
____	____	____	130.75 - Course of sexual conduct against a child 1st degree
____	____	____	130.80 - Course of sexual conduct against a child 2nd degree
____	____	____	130.53 - Persistent sexual abuse
____	____	____	130.65-a - Aggravated sexual abuse 4th degree
____	____	____	130.90 - Facilitating a sex offense with a controlled substance
____	____	____	a conviction of or a conviction for an attempt to commit any provisions of a sexually violent offense as set forth in Correction Law Section 168-a (3) committed or attempted as a hate crime defined in section 485.05 of the penal law or as a crime of terrorism defined in section 490.25 of such law.
____	____	____	a conviction of an offense in any other jurisdiction which includes all of the essential elements of any such felony provided for above or conviction of a felony in any other jurisdiction for which the offender is required to register as a sex offender in the jurisdiction which the conviction occurred.
____	____	____	250.45(2),(3)and(4) - Unlawful surveillance 2nd degree
____	____	____	250.50 - Unlawful surveillance 1st degree

3. ☐ **Sexual Predator - a sex offender who has been convicted of a sexually violent offense defined in Correction Law Section 168-a (3) and who suffers from a mental abnormality or personality disorder that makes him or her likely to engage in [redacted] sexually violent offenses.**

4. ☒ **None of the above.**

A63

SEX OFFENDER REGISTRATION ACT
RISK ASSESSMENT INSTRUMENT

RISK FACTOR	VALUE		SCORE
I. CURRENT OFFENSE(S)			
1. Use of Violence			
Used forcible compulsion	+10	X	
Inflicted physical injury	+15		10
Armed with a dangerous instrument	+30		
2. Sexual Contact with Victim			
Contact over clothing	+5		
Contact under clothing	+10		
Sexual intercourse, deviate sexual intercourse or aggravated sexual abuse	+25	X	25
3. Number of Victims			
Two	+20		
Three or more	+30	X	30
4. Duration of offense conduct with victim			
Continuing course of sexual misconduct	+20	X	20
5. Age of victim			
11 through 16	+20	X	20
10 or less, 63 or more	+30		
6. Other victim characteristics			
Victim suffered from mental disability or incapacity or from physical helplessness	+20		0
7. Relationship with victim			
Stranger or established for purpose of victimizing or professional relationship	+20	X	20
II. CRIMINAL HISTORY			
8. Age at first act of sexual misconduct			
20 or less	+10		0
9. Number and nature of prior crimes			
Prior history/no sex crimes or felonies	+5	X	
Prior history/non-violent felony	+15		5
Prior violent felony, or misdemeanor sex crime or endangering welfare of a child	+30		
10. Recency of prior offense			
Less than 3 years	+10		0
11. Drug or Alcohol abuse			
History of abuse	+15		0
COLUMNS 1- 11 SUBTOTAL			130

SEX OFFENDER REGISTRATION ACT
RISK ASSESSMENT INSTRUMENT

RISK FACTOR	VALUE		SCORE
III. POST-OFFENSE BEHAVIOR			
12. Acceptance of Responsibility			
Not accepted responsibility	+10		0
Not accepted responsibility / refused or expelled from treatment	+15		
13. Conduct while confined / supervised			
Unsatisfactory	+10		0
Unsatisfactory with sexual misconduct	+20		
IV. RELEASE ENVIRONMENT			
14. Supervision			
Release with specialized supervision	0		
Release with supervision	+5		0
Release without supervision	+15		
15. Living / employment situation			
Living or employment inappropriate	+10		0
COLUMNS 12-15 SUBTOTAL			0
COLUMNS 1-11 SUBTOTAL			130
TOTAL RISK FACTOR SCORE (add 2 subtotals)			130

1 2 X

Level 1 (low)	=	0 to +70
Level 2 (moderate)	=	+75 to +105
Level 3 (high)	=	+110 to +300

Note: The Sex Offender Registration Act requires the court or Board of Examiners of Sex Offenders to consider any victim impact statement in determining a sex offender's level of risk.

Offender Name: JEFFREY E EPSTEIN

NYSID #: OS1909

Docket #:

RISK LEVEL: 3

Assessor's Signature: Stuart D. Weber

Date: 8-19-10

A. Overrides (If any override is circled, offender is presumptively a Level 3)

1. Offender has a prior felony conviction for a sex crime
2. Offender inflicted serious physical injury or caused death
3. The offender has made a recent threat that he will reoffend by committing a sexual or violent crime
4. There has been a clinical assessment that the offender has a psychological, physical, or organic abnormality that decreases ability to control impulsive sexual behavior

B. Departure

1. A departure from the risk level is warranted

☐ Yes ☒ No

2. If yes, circle the appropriate risk level 1 2 3
3. If yes, explain the basis for departure (See Summary)

A64

RE: JEFFREY E EPSTEIN
NYSID #: OS1909

DATE: 8/23/2010

CASE SUMMARY

This assessment is based upon a review of the inmate's file which may include but is not limited to the pre-sentence investigation, prior criminal history and post-offense behavior.

Jeffrey Epstein is a 57-year-old sex offender who pled guilty in the state of Florida on 6/30/2008 to two felony sex offenses, Procuring a Person Under 18 for Prostitution and Felony Solicitation of Prostitution. He was sentenced to12 months in jail followed by 12 months of Community Control.

It would appear he was convicted in London England of Unlawful Possession of an Offensive Weapon, a Sword Stick, and was sentenced to a Conditional Discharge on 1/4/1973.

Regarding the instant offense, Epstein was approximately 51 years of age on or about the year 2005 when he sexually assaulted numerous females between the approximate ages of 14 and 17. Most of the victims were recruited by one of Epstein's female employees from a local high school in the Palm Beach Florida area. Some of the female participants were age 18 or older. The contact included vaginal intercourse, mouth to vagina sodomy, the touching of the breasts and vagina, placing his fingers inside the vagina and Epstein using a vibrator on the victim's vaginal area. The available police reports from the Palm Beach Police Department include conversations with numerous female victims who in most cases, did not know Epstein when they were victimized. Most of the females were embarrassed to speak with police regarding what had happened to them while they were at Epstein's home. Sworn statements were taken from at least five victims and seventeen witnesses concerning massages and unlawful sexual activity that took place at the residence of Jeffrey Epstein. Most of the victims were paid at least $200.00 each time they performed a massage.

The victims were told they would be giving Epstein a massage and they were escorted to his bedroom. Most victims noted numerous pictures of naked young females, (some of the photos depicted females who would be eventually interviewed by police), on display throughout the home. The offender would enter the room only wearing a towel. In most cases he would remove the towel and ask the victim to remove her clothing. In some cases he would masturbate into a towel while receiving a massage. In other cases he would touch the breasts or vagina of the victim with his hands or use the vibrator. One 14 year old described how Epstein touched her vaginal area with a vibrator and thereafter, when contacted by law enforcement, she had to identify the offender through the use of a photo array. Another 16-year-old victim described giving Epstein massages for two years and at times, he grabbed her buttocks and caressed her butt cheeks as she gave him a massage. Another 16-year-old described going to the offender's home at least 100 times. He would touch her breasts, insert his fingers into her vagina and sometimes use the vibrator on her while masturbating. He would also pay this underage victim to have sex with a female friend while he watched. Occasionally, he would join both girls and perform oral sex on both. This 16-year-old victim described for police how one time, Epstein turned her over on the massage table and forcibly raped her. When she screamed, "NO," he stopped and subsequently apologized for his actions.

The offenders conduct while on Community Control will be considered satisfactory and he does not have a history of substance abuse. Based upon his plea of guilty, Epstein will be credited with accepting responsibility for his actions. He will be scored for sexual and deviate sexual intercourse, forcible compulsion, numerous victims and their ages, a continued course of sexual misconduct, a prior misdemeanor conviction in England absent specific information, for his stranger relationship to most victims and for establishing a relationship with these underage girls for the purpose of victimization.

The Board acknowledges correspondence received from the offender's attorney.

RE: JEFFREY E EPSTEIN
NYSID #: OS1909

DATE: 8/23/2010

CASE SUMMARY

Jeffrey Epstein used his wealth and power in such a way so that he could take advantage of many teenage girls to satisfy his own sexual perversions. He scores as a Level III Sex Offender with absolutely no basis for downward departure.

A67

Letter from Supreme Court attaching Notification, Recommendation and Notice of Right to Appeal, dated August 26, 2010

Supreme Court
of the
State of New York

100 CENTRE STREET
NEW YORK, N.Y. 10013

TO: PART **66**

FROM: CORRESPONDENCE UNIT

SUBJECT: SEX OFFENDER RISK ASSESSMENT

RE: Jeffrey Epstein SCID. # 30129-2010

Please refer to the attached:

1) Notification to sex offender, defense attorney and D.A.'s office of the scheduled risk assessment;

2.) Recommendation from Board of Examiners

3.) Notice of Right to Appeal and Appeal Application.

Please be advised that the above named defendant, his assigned counsel, Sex Crimes Unit of the D.A.'s office, City and State Correctional Facilities have been notified of the sex offender risk level assessment hearing which has been scheduled in your part.

Upon completion of the risk assessment, you must endorse the calendar and worksheet and forward the ***COURT FILE AND ASSESSMENT DOCUMENTS*** to this office.

BE FURTHER ADVISED THAT THE DIVISION OF PAROLE MAY HOLD THE DEFENDANT UNTIL A RISK LEVEL HAS BEEN ASSIGNED.

A REQUEST FOR 18B ASSIGNMENT HAS BEEN MADE. ONCE YOU ARE NOTIFIED THAT AN ATTORNEY HAS BEEN ASSIGNED PLEASE SEND THE ATTACHED NOTIFICATION LETTER AND BOARD OF EXAMINER'S PACKAGE TO HIM/HER

A68

Letter from Supreme Court to Jeffrey E. Epstein Informing of SORA Level Determination Hearing, dated August 26, 2010

Supreme Court
of the
State of New York

100 CENTRE STREET
NEW YORK, N.Y. 10013

August 26, 2010

Mr. Jeffrey Epstein
9 East 71st Street
New York, N.Y. 10021

Re: SCID # 30129-2010

Dear Mr. Epstein:

Please be advised that pursuant to the 1996 Sex Offender Registration Act, the court must conduct a hearing to determine whether you will be classified as a level 1, 2 or 3 sex offender and if you will be designated as a sexual predator, a sexually violent offender or a predicate sex offender. The court's decision will determine how long you must register as a sex offender and how much information can be provided to the public concerning your registration. The court's determination may be higher, lower or the same as the one recommended by the Board of Examiners.

Your hearing has been scheduled for September 15, 2010 at 9:30 a.m., before the Hon. Ruth Pickholz in part 66 located at 111 Centre Street, New York, N.Y. You have a right to attend this hearing. If you wish to waive your appearance for the hearing enclosed is a waiver form which must be notarized and returned to this office within ten days of receipt. **A request has been made for an attorney to represent you at this hearing.**

If you fail to appear at this proceeding, without sufficient excuse, it shall be held in your absence. Failure to appear may result in a longer period of registration or a higher level of community notification because you are not present to offer evidence or contest evidence offered by the District Attorney.

Enclosed please find the Board of Examiners summary with their recommendation that you be assigned a risk level of 3 and a document which describes what your duties will be after you are assigned a risk level. At the conclusion of the determination hearing you will receive a copy of the court's final recommendation with a notice to appeal.

Very truly yours,

Mary A. Price, CCS
Supreme Court - Criminal Term, New York County

encs.

A69

Order Sheet for Jeffrey Epstein, dated August 26, 2010 [pp. A69-A70]

ORDER SHEET

Court: Supreme Court, Criminal Term — Date: August 26, 2010

County: New York — Part: Correspondence Unit

The People of the State of New York,
vs.
Jeffrey Epstein
Defendant

Docket Ind.#: 30129-2010

Highest Charge (Penal Law):

Homicide [ ] Felony [x] Misdemeanor [ ] Violation [ ]

Special Proceeding: Sex Offender Hearing

Being satisfied after a review of the financial status of the defendant named, that he is financially unable to obtain counsel, and upon his request for the appointment of counsel, it is,

Ordered that the following member of the Bar be and hereby is appointed to represent such defendant in all matters pertaining to this action:

Procuring a person under 18 for prostitution

Adjourned Date: Sept. 15, 2010 — Adjourned Part: 66

Assigning Judge: Ruth Pickholz

Defendant's Status: Paroled [x] Bailed [ ] Incarcerated [ ] Age: 57

Defendant's Address: 9 East 71st Street, New York, N.Y.

Comments:

Prior Attorney:

Clerk's Name: Mary A. Price, CCS — Telephone #: [redacted]

A70

TRANSMISSION VERIFICATION REPORT

TIME : 08/26/2010 10:58
NAME : CORRESP UNIT
FAX : [redacted]
TEL :
SER.# : BROK5J356431

DATE,TIME	08/26 10:58
FAX NO./NAME	18B ASSIGNED
DURATION	00:00:18
PAGE(S)	01
RESULT	OK
MODE	STANDARD ECM

ORDER SHEET

Court Supreme Court, Criminal Term

County New York

Date August 26, 2010

Part Correspondence Unit

The People of the State of New York.

vs.

Jeffrey Epstein

Defendant

Docket Ind.# 30129-2010

Highest Charge (Penal Law)

Homicide [ ] Felony [x] Misdemeanor [ ] Violation [ ]

Special Proceeding Sex Offender Hearing

Being satisfied after a review of the financial status of the defendant named, that he is financially unable to obtain counsel, and upon his request for the appointment of counsel, it is,

Ordered that the following member of the Bar be and hereby is appointed to represent such defendant in all matters pertaining to this action:

Procuring a person under 18 yrs prostitution

Adjourned Date Sept. 15, 2010 Adjourned Part 66

A71

Letter from Supreme Court to Counsel Informing of SORA Level Determination Hearing (with attachments), dated August 26, 2010
[pp. A71-A76]

Supreme Court
of the
State of New York

100 CENTRE STREET
NEW YORK, N.Y. 10013

August 26, 2010

Defense Attorney
18B To Be Assigned

Ms. Inn-Young Park
NYC District Attorneys Office
1 Hogan Place, Room 831
New York, N.Y. 10013

Re: Jeffrey Epstein
SCID # 30129-2010

Dear Sir/Madam:

The above named defendant is scheduled for a Sex Offender Risk Level Determination before the Hon. Ruth Pickholz in part 66 on September 15, 2010 at 9:30 a.m. The defendant has been notified under separate cover of this hearing and forwarded a copy of the Board of Examiners recommendation, advised of his/her right to appear, advised of the name and address of the attorney assigned to represent him or that one is being assigned, risk level guidelines, and of his right to waive his appearance.

Enclosed please find a copy of the Board of Examiners recommendation.

Very truly yours,

Mary A. Price, CCS
Supreme Court - Criminal Term
New York County

enc.

Offender Name: JEFFREY E EPSTEIN NYSID #: OS1909 1ST Reviewer Initials:

The following is the Board of Examiners of Sex Offenders' recommendation pursuant to Section 168-l of Article 6-C of the NYS Correction Law as to whether the offender [redacted] be designated a Sexually Violent Offender, Predicate Sex Offender, or Sexual Predator as defined in subdivision seven of Section 168-a or whether the offender does not fit any of those categories due to his conviction.

Please check all that apply:

1. ☐ **Sexually Violent Offender - a sex offender who has been convicted of a sexually violent offense defined in Correction Law section 168-a (3).**

Please check which conviction(s) apply, also please indicate whether the conviction was for an attempt at an offense:

Attempt		
____	____	130.35 - Rape 1st degree
____	____	130.50 - Sodomy 1st degree/Criminal Sexual Act 1st degree
____	____	130. 65 - Sexual Abuse 1st degree
____	____	130.66 - Aggravated sexual abuse 3rd degree
____	____	130.67- Aggravated sexual abuse 2nd degree
____	____	130.70 - Aggravated sexual abuse 1st degree
____	____	130.75 - Course of sexual conduct against a child 1st degree
____	____	130.80 - Course of sexual conduct against a child 2nd degree

Attempt		
____	____	130.53 - Persistent sexual abuse
____	____	130.65-a - Aggravated sexual abuse 4th degree
____	____	130.90 - Facilitating a sex offense with a controlled substance
____	____	a conviction of or a conviction for an attempt to commit any provisions of the foregoing sections committed or attempted as a hate crime defined in section 485.05 of the penal law or as a crime of terrorism defined in section 490.25 of such law.
____	____	a conviction of an offense in any other jurisdiction which includes all of the essential elements of any such felony provided for above or conviction of a felony in any other jurisdiction for which the offender is required to register as a sex offender in the jurisdiction which the conviction occurred.

2. ☐ **Predicate Sex Offender - a sex offender who has been convicted of an offense set forth in subdivision 2 or 3 of Correction Law Section 168-a when the offender has been previously convicted of an offense set forth in subdivision 2 or 3 of Section 168-a, regardless of the date of the prior conviction and regardless of whether the offender was required to register for the previous conviction.**

Please identify below the offenders previous qualifying conviction(s) as well as the offender's current qualifying conviction, also please indicate whether the conviction was for an attempt at an offense:

Current	Previous	Attempt	
____	____	____	130.20 - Sexual Misconduct
____	____	____	130.25 - Rape 3rd degree
____	____	____	130.30 - Rape 2nd degree
____	____	____	130.40 - Sodomy 3rd degree/ Criminal Sexual Act 3rd
____	____	____	130.45 - Sodomy 2nd degree/ Criminal Sexual Act 2nd

Current	Previous	Attempt	
____	____	____	130.60 - Sexual Abuse 2nd degree
____	____	____	255.25 - Incest
____	____	____	Article 263 offense - Sexual Performance by a Child
____	____	____	135.05 - Unlawful Imprisonment 2nd degree
____	____	____	135.10 - Unlawful Imprisonment 1st degree

Current	Previous	Attempt	
____	____	____	135.20 - Kidnapping 2nd degree
____	____	____	135.25 - Kidnapping 1st degree

(*Note: 135.05, 135.10, 135.20, 135.25 - the victim must be less than 17 years old and the offender must not be the parent of the victim)

Continued on the next page.

A72

2. (Cont'd)

Current	Previous	Attempt	
____	____	____	230.04 - Patronizing a prostitute 3rd degree (victim <17 years old)
____	____	____	230.05 - Patronizing a prostitute 2nd degree
____	____	____	230.06 - Patronizing a prostitute 1st degree
____	____	____	230.30 (2) - Promoting prostitution 2nd degree
____	____	____	230.32 - Promoting prostitution 1st degree
____	____	____	235.22 - Disseminating indecent material to minors 1st degree
____	____	____	a conviction of or a conviction for an attempt to commit any provisions of a listed sex offense committed or attempted as a hate crime defined in section 485.05 of the penal law or as a crime of terrorism defined in section 490.25 of such law.
____	____	____	130.52 - Forcible touching (victim<18 years old)
____	____	____	130.55 - Sexual abuse 3rd degree (victim<18 years old)
____	____	____	Conviction/Attempt to commit any provision of 130.52 or 130.55 of the penal law regardless of age of victim and the offender has previously been convicted of: (i) a sex offense listed in Correction Law Section 168-a (2), or (ii) a sexually violent offense listed in Correction Law Section 168-a (3), or (iii) any of the provisions of section 130.52 or 130.55 of the penal law or an attempt thereof.
____	____	____	A conviction of (i) an offense in any other jurisdiction which includes all of the essential elements of any such crime provided for in Correction Law Section 168-a (2) (a), or (ii) a felony in any other jurisdiction for which the offender is required to register as a sex offender in the jurisdiction in which the conviction occurred, or (iii) any of the provisions of 18 U.S.C. 2251, 18 U.S.C. 2251A, 18 U.S.C. 2252, 18 U.S.C. 2252A, or 18 U.S.C. 2260 provided the elements of such crime of conviction are substantially the same as those which are part of such offense as of March 11, 2002.

Current	Previous	Attempt	
____	____	____	130.35 - Rape 1st degree
____	____	____	130.50 - Sodomy 1st degree/Criminal Sexual Act 1st degree
____	____	____	130. 65 - Sexual Abuse 1st degree
____	____	____	130.66 - Aggravated sexual abuse 3rd degree
____	____	____	130.67- Aggravated sexual abuse 2nd degree
____	____	____	130.70 - Aggravated sexual abuse 1st degree
____	____	____	130.75 - Course of sexual conduct against a child 1st degree
____	____	____	130.80 - Course of sexual conduct against a child 2nd degree
____	____	____	130.53 - Persistent sexual abuse
____	____	____	130.65-a - Aggravated sexual abuse 4th degree
____	____	____	130.90 - Facilitating a sex offense with a controlled substance
____	____	____	a conviction of or a conviction for an attempt to commit any provisions of a sexually violent offense as set forth in Correction Law Section 168-a (3) committed or attempted as a hate crime defined in section 485.05 of the penal law or as a crime of terrorism defined in section 490.25 of such law.
____	____	____	a conviction of an offense in any other jurisdiction which includes all of the essential elements of any such felony provided for above or conviction of a felony in any other jurisdiction for which the offender is required to register as a sex offender in the jurisdiction which the conviction occurred.
____	____	____	250.45(2).(3)and(4) - Unlawful surveillance 2nd degree
____	____	____	250.50 - Unlawful surveillance 1st degree

3. ☐ **Sexual Predator - a sex offender who has been convicted of a sexually violent offense defined in Correction Law Section 168-a (3) and who suffers from a mental abnormality or personality disorder that makes him or her likely to engage in [redacted] sexually violent offenses.**

4. ☒ **None of the above.**

A73

SEX OFFENDER REGISTRATION ACT
RISK ASSESSMENT INSTRUMENT

RISK FACTOR	VALUE		SCORE
I. CURRENT OFFENSE(S)			
1. Use of Violence			
Used forcible compulsion	+10	X	
Inflicted physical injury	+15		10
Armed with a dangerous instrument	+30		
2. Sexual Contact with Victim			
Contact over clothing	+5		
Contact under clothing	+10		
Sexual intercourse, deviate sexual intercourse or aggravated sexual abuse	+25	X	25
3. Number of Victims			
Two	+20		
Three or more	+30	X	30
4. Duration of offense conduct with victim			
Continuing course of sexual misconduct	+20	X	20
5. Age of victim			
11 through 16	+20	X	20
10 or less, 63 or more	+30		
6. Other victim characteristics			
Victim suffered from mental disability or incapacity or from physical helplessness	+20		0
7. Relationship with victim			
Stranger or established for purpose of victimizing or professional relationship	+20	X	20
II. CRIMINAL HISTORY			
8. Age at first act of sexual misconduct			
20 or less	+10		0
9. Number and nature of prior crimes			
Prior history/no sex crimes or felonies	+5	X	
Prior history/non-violent felony	+15		5
Prior violent felony, or misdemeanor sex crime or endangering welfare of a child	+30		
10. Recency of prior offense			
Less than 3 years	+10		0
11. Drug or Alcohol abuse			
History of abuse	+15		0
COLUMNS 1- 11 SUBTOTAL			130

SEX OFFENDER REGISTRATION ACT
RISK ASSESSMENT INSTRUMENT

RISK FACTOR	VALUE		SCORE
III. POST-OFFENSE BEHAVIOR			
12. Acceptance of Responsibility			
Not accepted responsibility	+10		0
Not accepted responsibility / refused or expelled from treatment	+15		
13. Conduct while confined / supervised			
Unsatisfactory	+10		0
Unsatisfactory with sexual misconduct	+20		
IV. RELEASE ENVIRONMENT			
14. Supervision			
Release with specialized supervision	0		
Release with supervision	+5		0
Release without supervision	+15		
15. Living / employment situation			
Living or employment inappropriate	+10		0
COLUMNS 12-15 SUBTOTAL			0
COLUMNS 1-11 SUBTOTAL			130
TOTAL RISK FACTOR SCORE (add 2 subtotals)			130

1 2 X

Level 1 (low)	=	0 to +70
Level 2 (moderate)	=	+75 to +105
Level 3 (high)	=	+110 to +300

Note: The Sex Offender Registration Act requires the court or Board of Examiners of Sex Offenders to consider any victim impact statement in determining a sex offender's level of risk.

Offender Name: JEFFREY E EPSTEIN

NYSID #: OS1909

Docket #:

RISK LEVEL: 3

Assessor's Signature

Date:

A. Overrides (If any override is circled, offender is presumptively a Level 3)

1. Offender has a prior felony conviction for a sex crime
2. Offender inflicted serious physical injury or caused death
3. The offender has made a recent threat that he will reoffend by committing a sexual or violent crime
4. There has been a clinical assessment that the offender has a psychological, physical, or organic abnormality that decreases ability to control impulsive sexual behavior

B. Departure

1. A departure from the risk level is warranted

☐ Yes ☒ No

2. If yes, circle the appropriate risk level 1 2 3
3. If yes, explain the basis for departure (See Summary)

A74

RE: JEFFREY E EPSTEIN
NYSID #: OS1909

DATE: 8/23/2010

CASE SUMMARY

This assessment is based upon a review of the inmate's file which may include but is not limited to the pre-sentence investigation, prior criminal history and post-offense behavior.

Jeffrey Epstein is a 57-year-old sex offender who pled guilty in the state of Florida on 6/30/2008 to two felony sex offenses, Procuring a Person Under 18 for Prostitution and Felony Solicitation of Prostitution. He was sentenced to12 months in jail followed by 12 months of Community Control.

It would appear he was convicted in London England of Unlawful Possession of an Offensive Weapon, a Sword Stick, and was sentenced to a Conditional Discharge on 1/4/1973.

Regarding the instant offense, Epstein was approximately 51 years of age on or about the year 2005 when he sexually assaulted numerous females between the approximate ages of 14 and 17. Most of the victims were recruited by one of Epstein's female employees from a local high school in the Palm Beach Florida area. Some of the female participants were age 18 or older. The contact included vaginal intercourse, mouth to vagina sodomy, the touching of the breasts and vagina, placing his fingers inside the vagina and Epstein using a vibrator on the victim's vaginal area. The available police reports from the Palm Beach Police Department include conversations with numerous female victims who in most cases, did not know Epstein when they were victimized. Most of the females were embarrassed to speak with police regarding what had happened to them while they were at Epstein's home. Sworn statements were taken from at least five victims and seventeen witnesses concerning massages and unlawful sexual activity that took place at the residence of Jeffrey Epstein. Most of the victims were paid at least $200.00 each time they performed a massage.

The victims were told they would be giving Epstein a massage and they were escorted to his bedroom. Most victims noted numerous pictures of naked young females, (some of the photos depicted females who would be eventually interviewed by police), on display throughout the home. The offender would enter the room only wearing a towel. In most cases he would remove the towel and ask the victim to remove her clothing. In some cases he would masturbate into a towel while receiving a massage. In other cases he would touch the breasts or vagina of the victim with his hands or use the vibrator. One 14 year old described how Epstein touched her vaginal area with a vibrator and thereafter, when contacted by law enforcement, she had to identify the offender through the use of a photo array. Another 16-year-old victim described giving Epstein massages for two years and at times, he grabbed her buttocks and caressed her butt cheeks as she gave him a massage. Another 16-year-old described going to the offender's home at least 100 times. He would touch her breasts, insert his fingers into her vagina and sometimes use the vibrator on her while masturbating. He would also pay this underage victim to have sex with a female friend while he watched. Occasionally, he would join both girls and perform oral sex on both. This 16-year-old victim described for police how one time, Epstein turned her over on the massage table and forcibly raped her. When she screamed, "NO," he stopped and subsequently apologized for his actions.

The offenders conduct while on Community Control will be considered satisfactory and he does not have a history of substance abuse. Based upon his plea of guilty, Epstein will be credited with accepting responsibility for his actions. He will be scored for sexual and deviate sexual intercourse, forcible compulsion, numerous victims and their ages, a continued course of sexual misconduct, a prior misdemeanor conviction in England absent specific information, for his stranger relationship to most victims and for establishing a relationship with these underage girls for the purpose of victimization.

The Board acknowledges correspondence received from the offender's attorney.

RE: JEFFREY E EPSTEIN
NYSID #: OS1909

DATE: 8/23/2010

CASE SUMMARY

Jeffrey Epstein used his wealth and power in such a way so that he could take advantage of many teenage girls to satisfy his own sexual perversions. He scores as a Level III Sex Offender with absolutely no basis for downward departure.

A77

Letter from Jay P. Lefkowitz to Hon. Ruth Pickholz Requesting a Continuance of the Hearing, dated September 9, 2010

KIRKLAND & ELLIS LLP
AND AFFILIATED PARTNERSHIPS

601 Lexington Avenue
New York, New York 10022

Jay P. Lefkowitz, [redacted]
To Call Writer Directly:
[redacted]

[redacted]

www.kirkland.com

Facsimile:
[redacted]

September 7, 2010

BY FACSIMILE

The Honorable Ruth Pickholz
New York County Supreme Court
Part 66
111 Centre Street
New York, NY 10013

Re: SCID No. 30129-2010

Dear Justice Pickholz:

I am writing regarding the hearing for Mr. Jeffrey Epstein in the above-referenced matter, which is currently scheduled for 9:30 a.m. on Wednesday, September 15, 2010.

We respectfully request a continuance of the hearing. Kirkland & Ellis was only recently retained by Mr. Epstein to represent him in this matter and due to the holidays this week and because the matter arises out of Florida, we will need some time in order to collect information to prepare for the hearing.

We are available on or after October 4, 2010 for a hearing on this matter if that would be acceptable to the Court. We are available to discuss at the Court's convenience.

Respectfully submitted,

Jay P. Lefkowitz, P.C.

EFTA00232643

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Letter from Supreme Court to Sex Offender Registry Unit Enclosing Final Determinations, dated January 19, 2011
[pp. A78-A79]

Supreme Court
of the
State of New York

100 CENTRE STREET
NEW YORK, N.Y. 10013

January 19, 2011

Sex Offender Registry Unit
NYS Division of Criminal Justice Services
4 Tower Place
Albany, NY 12203

Dear Sir/Madam:

Enclosed please find the Final Determinations on the following cases:

Name	Ind.#	Risk Level
Jeffrey Epstein	30129-2010	Three (3)

Respectfully yours,

Encl.

F. Halwick, SCC
Correspondence Unit
Supreme Court, Criminal Term

cc: Mr. Jeffrey Epstein
9 East 71st Street
New York, NY 10021

STATE OF NEW YORK
BOARD OF EXAMINERS OF SEX OFFENDERS
4 TOWER PLACE
ALBANY, NEW YORK 12203-3764

TO: NEW YORK COUNTY SUPREME COURT DATE: 8/19/2010

FROM: BOARD EXAMINER STEPHEN D. WEBER SDW

RE: JEFFREY E EPSTEIN NYSID# OR BOARD ID#: OS1909

REPORTED ADDRESS: 9 EAST 71ST STREET
NEW YORK, NY 10021

SUPERVISING OFFICER:
SUPERVISING AGENCY: NONE, OFFENDER IS UNSUPERVISED

The above referenced individual has committed an offense in another jurisdiction and has established residence in New York State at the address indicated. It has been determined that the offender is required to register and be risk assessed as a sex offender in New York State.

The NYS Board of Examiners of Sex Offenders is recommending a risk level and designation for the offender, as indicated on the attached risk assessment instrument, case summary and designation form. Pursuant to Correction Law Section 168-k(2), the County or Supreme Court in the county of residence of the offender shall determine the offender's risk level and designation. The Court must determine whether the offender meets the definition of sexually violent offender, predicate sex offender or sexual predator as set forth in Correction Law Section 168-a(7).

Please note, pursuant to Chapter 684 of the Laws of 2005, as of October 4, 2005, Correction Law Section 168-b, 168-k and 168-n have been amended to provide that the Court shall conduct the risk level and designation hearing if the sex offender, having been given notice including the date, time, and place of the proceeding, fails to appear without sufficient excuse. **Please note that until the court determines the offender's risk level, no community notification can occur.**

A copy of the order setting forth the risk level and designation determinations, and the findings and conclusions of law on which such determinations are based, shall be submitted to the Division of Criminal Justice Services' Sex Offender Registry Unit by the Court. In addition, please complete and attach this form indicating the offender's risk level and designation to the Court's order. Please distribute the remaining copies as indicated below.

Information below is to be completed by Sentencing Court

FINAL RISK LEVEL DETERMINATION (circle one) 1 2 (3)

DESIGNATION: Please check any that apply pursuant to Article 6-C of the NYS Correction Law:

___ Sexually Violent Offender ___ Sexual Predator ___ Predicate Sex Offender ___ No such designation

Judge's Name (please print): ROBERT PICKHOLZ

Judge's signature: Robert Pickholz

Date signed: 1/18/2011

WHITE COPY: Sex Offender Registry Unit, DCJS, 4 Tower Pl., Albany, NY 12203 YELLOW COPY: Court PINK COPY: Offender

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Court Action Sheet - Jeffrey Epstein, No. 30129-2010

COUNTY OF _____

PEOPLE VS Jeffrey Epstein ~~INDICTMENT~~ SCI NO. 30129-2010

N.Y.S.I.D. NO. _____ DATE OF BIRTH _____ SEX M

ADDRESS _____

NOTICE OF APPEARANCE _____ 20__

FILED BY _____

ADDRESS _____

TELEPHONE NO. _____

RET ☐ L.A. ☐ 18B ☐

SUBSTITUTION _____ 20__

FILED BY _____

ADDRESS _____

TELEPHONE _____

RET ☐ L.A. ☐ 18B ☐

KIRKLAND & ELLIS LLP
AND AFFILIATED PARTNERSHIPS

JAY P. LEFKOWITZ, P.C.

601 [redacted] • New York, New York 10022
Tel [redacted] • Fax [redacted]

jay.lefkowitz@kirkland.com

INTERPRETER _____

COURT CLERK _____

ARTICLE 730 EXAMINATION

ORDERED _____ 20__

JUSTICE _____

COURT CLERK _____

COURT REPORTER _____

ORDERED _____ 20__

JUSTICE _____

COURT CLERK _____

COURT REPORTER _____

COMMITTED TO COMMISSIONER OF MENTAL HYGIENE:

RECOGNIZANCE

ROR _____ 20__

BAIL FIXED _____

AMOUNT _____

COURT CLERK _____

JUSTICE _____

COUNSEL PRESENT _____

ON CONSENT OF ADA _____

COURT REPORTER _____

BAILED _____ 20__ $ _____

SURETY _____

COURT CLERK _____

ROR REVOKED-BW _____ 20__

JUSTICE _____

BAIL FORF.-BW _____ 20__

JUSTICE _____

BAIL EXONERATED _____

JUSTICE _____

SURR. BY SURETY _____ 20__

SUBSEQUENT ACTION RE RECOGNIZANCE

PART 1-18-2011 20__

Level #3

JUSTICE Ruth Pickholz

ADA PRESENT J. Gafford

COUNSEL PRESENT J. Lefkowitz

COURT REPORTER V. Benkel

COURT CLERK [signature]

PART _____ 20__

JUSTICE _____

ADA PRESENT _____

COUNSEL PRESENT _____

A81

Handwritten Notations on Court Jacket - Jeffrey Epstein, No. 30129-2010

Jeffrey Epstein

(S D H)

SCO 30129-2010

AUSA – Jennifer Galluzzo /
Def Attys – Jay Lefkowitz

PTG	9-15-10	Atty	10/5	K. Gotsorg	Atty	J. Brieden Jr.
PTG DEI	10/5	Atty	11-9	A. BOSIER		J. Brieden
1-7-2010	Cathy Rotkowitz Atty		11-29	K. Levy		J. Brieden
29-2010	Cathy Rotkowitz Atty		1-18-2011	[redacted] G. Menda		J. Brieden
18-2011	Cathy Rotkowitz			V. Barnhart	Sara Kelly	David Sol J. Brieden (Atty Steve Chevedden Attorney)

SUPREME COURT NEW YORK COUNTY
TRIAL TERM PART 66

THE PEOPLE OF THE STATE OF NEW YORK: INDICTMENT # 30129/2010

AGAINST

JEFFREY EPSTEIN
Defendant.

SORA HEARING

111 Centre Street
New York, New York 10013
January 18, 2011

B E F O R E:

HONORABLE RUTH PICKHOLZ
Justice of the Supreme Court

A P P E A R A N C E S:

For the People: CYRUS R. VANCE, JR., ESQ.,
New York County District Attorney
One Hogan Place
New York, New York 10013
BY: [redacted] GAFFNEY, ESQ.
Assistant District Attorney

For the Defense: KIRKLAND & ELLI, LLP
153 East 53rd Street
New York, New York 10022
BY: JAY LEFKOWITZ, ESQ.
SANDRA MUSUMECI, ESQ.

Vikki J. Benkel
Senior Court Reporter

COURT CLERK: This is number two on the calendar, matter of Jeffrey Epstein.

Your appearances please.

MS. GAFFNEY: [redacted] Gaffney for the People.

Good afternoon, Your Honor.

MR. LEFKOWITZ: Jay Lefkowitz and Sandra Musumeci for Mr. Epstein.

THE COURT: Mr. Epstein is not here.

MR. LEFKOWITZ: That's correct.

THE COURT: Are you waiving his appearance?

MR. LEKWOWITZ: Yes.

MS. GAFFNEY: Your Honor, this case is on for a SORA hearing this afternoon.

The People did receive the board's recommendation of a Level Three. However, we received the underlying information from them and also had some contact with Florida, and we don't believe that we can rely on the entire probable cause affidavit.

I don't know if the board sent that to you as well.

THE COURT: I don't know why you cannot rely on it.

MS. GAFFNEY: Because in Florida of all of the victims in that probable cause affidavit, they actually only went forward on one case. There was only an indictment for

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one victim and that is what the defendant plead to.

So it is unlike a situation where everything was indicted and then we get to sort of assess points for all of the victims, if it was part of a plea bargain. They did not actually choose to go forward on any except for the one victim.

So under the board guidelines, the risk assessment interim guidelines, it actually says, you know, by way of contrast if an offender is not indicted for an offense, it is strong evidence that the offense did not occur and I don't think --

THE COURT: Do you find that if somebody is not indicted it is strong evidence that it did not occur?

MS. GAFFNEY: I don't know that we can rely on it as clear and convincing evidence if the prosecutor's office never went forward on it. The prosecution said that the victims, although they spoke to the police early on, did not cooperate with them. So we don't have any follow up information.

THE COURT: But the board found a Level Three.

I have to tell you, I am a little overwhelmed because I have never seen the prosecutor's office do anything like this. I have never seen it. I had a case with one instance it was a marine who went to a bar, and I wish I had the case before me, but he went to a bar and a 17

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year old, he was an adult obviously, he was a Marine, a 17 year old came up to him and one thing lead to another and he had sex with her and the People would not agree to a downward modification on that.

So I am a little overwhelmed here because I see -- I mean I read everything here, I am just a little overwhelmed that the People are making this application.

I could cite many many, I have done many SORAs much less troubling than this one where the People would never make a downward argument like this.

MS. GAFFNEY: I agree with Your Honor, it is incredibly unusual for us to make a downward argument. But the problem is the one thing that we have from the board is it seems to be in contradiction to their own guidelines which if something was not indicted, you are not supposed to rely on it.

THE COURT: They obviously took that into consideration.

MS. GAFFNEY: And I tried to reach -- I reached the authorities in Florida to try to see if they had all the interview notes or other things that we can then subsequently rely on that might be considered clear and convincing evidence, if they had interviewed these women on their own, and they never did. No one was cooperative and they did not go forward on any of the cases and none of them

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were indicted. So I don't know.

THE COURT: And you spoke to the prosecutor?

MS. GAFFNEY: The actual prosecutor left the office. I spoke to the prosecutor that took over the case.

THE COURT: Maybe you can find the prosecutor that left the office.

You have done more in other cases looking into it. I have never seen the prosecutor's office do this. I have to tell you, I am shocked.

MS. GAFFNEY: Right, but I spoke to the prosecutor that took over the case and they don't have anything, any affidavits, any statements, any notes.

THE COURT: Why don't you speak to the prosecutor that did do the case, I am sure you could find that prosecutor.

MS. GAFFNEY: I can find her, but based upon what the other prosecutor said, they did not speak to that prosecutor either.

THE COURT: You did not speak to the prosecutor yourself, you did not speak to them, that is hearsay. You did not speak to the prosecutor that handled the case.

MS. GAFFNEY: That's right.

THE COURT: I don't think you did much of an investigation here.

MS. GAFFNEY: I mean I called the prosecutor.

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Even though the first prosecutor left, presumably the prosecutor's office has the file.

THE COURT: I would still call the prosecutor.

MS. GAFFNEY: Anything from these women they would have forwarded it to us.

THE COURT: I don't know that, I think you have to speak to the prosecutor.

But be that as it may, I hear your argument.

Anything else?

MS. GAFFNEY: I mean that is why I don't think we can, I don't think we are entitled to rely on this because they did not go forward.

THE COURT: The board made a recommendation.

MS. GAFNEY: Correct.

MS. MUSUMECI: May I speak, Your Honor?

THE COURT: Yes.

MS. MUSUMECI: Good afternoon.

I would like to bring a few additional points to Your Honor's attention that don't come across in the board recommendation.

The first is that Mr. Epstein is not a resident of New York, unlike most of these out of state, he has not changed his address and moved to New York, he maintains a vacation home in New York. His primary residence is the U.S. Virgin Islands.

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He is registered in the U.S. Virgin Islands, he has been since his release from jail. He notifies the Virgin Island authorities every time he leaves that jurisdiction. Virgin Island authorities rated him at the lowest level of registration.

He also registered in Florida, which is the state of this particular offense, and the only reason that this conviction is even before Your Honor.

The offense for which he was convicted is not a registrable offense in New York. He is only registrable here arguably because based on the provision of SORA that says if a crime is registrable in the state of conviction, then it is registrable here in New York. And the Florida authorities that considered that rated him at the lowest level of their SORA statute.

He additionally has a vacation home in New Mexico and is registered in New Mexico. The New Mexican authorities when they considered his offenses, determined he need not register at all. Nevertheless, he has voluntarily registered with New Mexico and maintains that registration.

Additionally, because of his possession of a vacation home in New York, he has been voluntarily registered with New York SOMU, the Sex Offender Monitoring Unit since May of this year. He notifies them whenever he comes to travel to New York. He never comes to New York for

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more than seven days or at least he has not since he has been registered. He has no intention to ever be here for longer than a period of ten days.

Like I said, he does notify the authorities when he is here. He fully understands the reason for voluntary registration, he wants to be compliant with the Federal SORA law which requires wherever you own a property to register.

To require Mr. Epstein to register as a Level Three offender in New York would actually require him to come to New York more than he does normally, it would require him to come every 90 days and renew his registration.

He is very diligent in registering with New York authorities.

All of the other jurisdictions that have considered his case have determined that he either not register at all or register at the lowest level, and he has been more than compliant with all of those requirements.

Your Honor, we would join in the prosecutor's application.

THE COURT: I am sure you would.

MS. MUSUMECI: By way of background, we have been in contact with the prosecutor's office on this matter since I believe certainly since Mr. Epstein got his notification, which I believe was in August. We have met with the

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prosecutor and provided numerous materials for the prosecutor to consider. We have included in that a deposition from the detective who headed this investigation who acknowledged in a sworn deposition that the lead prosecutor who originally had the case, whose name I cannot pronounce, Lanna Belohlavek, I apologize for the mispronunciation, said to the detective after her investigation, there are no real victims here.

All of the alleged conduct that is cited in the board's write up was commercial conduct. All of the alleged conduct the women went voluntarily, there are no allegations of force certainly none.

THE COURT: There was no allegation of force in the marine either, who met a girl in a bar, a young girl 17, there was no force there.

MS. MUSUMECI: It is our understanding that the prosecutor in Florida conducted a full investigation, as full as she was able with the cooperation afforded by these complainants, and determined that the only case that she could present to the grand jury was this indictment for a non registrable offense then --

THE COURT: But it is registrable here.

I don't know what you mean non registrable offense.

MS. MUSUMECI: Let me explain, Your Honor.

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Mr. Epstein plead to two charges, one was an indictment which is an offense that is not registrable, it is a Florida indictment for --

THE COURT: Then why does he have to register here?

MS. MUSUMECI: It was a second offense that he plead to --

THE COURT: That is registrable.

MS. MUSUMECI: That is registrable.

That offense was by information and that is the only registrable offense, that is what the DA's office is considering in doing their scoring.

The indictment which was the only case that the prosecutor even prosecuted through grand jury is not even a registrable offense.

THE COURT: He plead guilty to a registrable offense.

MS. MUSUMECI: Yes.

THE COURT: What did he plead guilty to?

MS. GAFFNEY: He plead guilty to the procuring a person under 18 for prostitution.

THE COURT: Procuring a person under 18 for prostitution.

MS. GAFFNEY: Right.

THE COURT: How old was she?

MS. GAFFNEY: It appears the first time they met she was either 16 or 17, then for the remainder of their relationship she was probably 17.

THE COURT: How long was their relationship?

MS. GAFFNEY: She met, she gave him approximately 15 massages, including with sexual contact, and ultimately when she is 17 had intercourse with him.

THE COURT: She is a child.

MS. MUSUMECI: Your Honor, I would note that under SORA it is clear that prostitution offenses are only registrable when in fact by clear and convincing evidence the women or victim is 17, is under 17.

THE COURT: Well, she met him at 16, he procured her at 16 from what I read.

MS. MUSUMECI: There is evidence we challenged.

THE COURT: He plead guilty to that, didn't he?

MS. MUSUMECI: He plead guilty to under 18, which is the law in Florida, which is a different standard than what the law is in New York. And there is no evidence, there is no clear and convincing evidence as to her specific age at the time of the specific conduct.

THE COURT: Well, the DA just told me she was most likely 17, she just said it on the record.

MS. MUSUMECI: Your Honor, we agree that the evidence is that she was 17 on the one occasion she had

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consensual intercourse with him and 17 is not registrable or criminal under New York law.

And the prostitution aspect of having intercourse with a 17 year old is not registrable conduct.

THE COURT: Why does he have to register here?

MS. GAFFNEY: Because it is a register able offense in Florida, New York State board of examiners --

THE COURT: Recognizes it.

MS. GAFFNEY: Recognizes it, yes.

THE COURT: I have had many cases like that where it was not registrable here but it was in the state where the person came from and New York recognized that.

MS. MUSUMECI: Your Honor, we are not saying that he should not register. Mr. Epstein has already registered and recognizes his duty to register.

THE COURT: I am glad of that, very glad of that.

I am sorry he may have to come here every 90 days.

He can give up his New York home if he does not want to come every 90 days.

Anything else?

I rely on the board.

MS. MUSUMECI: Your Honor, we would reserve our right to appeal Your Honor's ruling.

THE COURT: Of course, do so.

MS. GAFFNEY: For the record, Your Honor, he is

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2 Appendixes Recd

May 11

To be Argued By:
JAY P. LEFKOWITZ

New York County Clerk's Index No. 30129/2010

New York Supreme Court

APPELLATE DIVISION—FIRST DEPARTMENT

PEOPLE OF THE STATE OF NEW YORK,

Respondent,

—against—

JEFFREY E. EPSTEIN,

Defendant-Appellant.

BRIEF FOR DEFENDANT-APPELLANT

JAY P. LEFKOWITZ
SANDRA LYNN MUSUMECI
KIRKLAND & ELLIS LLP
601 Lexington Avenue
New York, New York 10022
[redacted]

Attorneys for Defendant-Appellant

REPRODUCED ON RECYCLED PAPER

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Prince, Richardson on Evidence § 3-205 (Farrell 11th ed.) 19

Sex Offender Registration Act: Risk Assessment Guidelines and Commentary, Commentary (2006) 22, 31, 41

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PRELIMINARY STATEMENT

Appellant Jeffrey E. Epstein seeks to vacate the final decision and order of the New York Supreme Court, Criminal Term, New York County, determining him to be a Level 3 sex offender, without designation, under New York's Sexual Offender Registration Act (SORA), Correction Law Article 6-C, based on a 2008 Florida conviction by plea of guilty to Procuring a Person Under 18 for Prostitution, Fla. Stat. § 796.03, and Felony Solicitation of Prostitution, Fla. Stat. § 796.07(2)(f), for which Appellant was sentenced to consecutive terms of 12 months and 6 months incarceration, followed by 12 months of Community Control. (Pickholz, J. at SORA hearing). Appellant seeks to vacate the Order because the Court's risk level determination was not supported by clear and convincing evidence, was based on improper considerations, and was made without affording the parties an opportunity to present evidence concerning disputed relevant issues. More specifically, in making its determination, the Court summarily adopted the recommendation of the Board of Examiners of Sex Offenders (the "Board"), notwithstanding the position of the District Attorney's Office that the Board's recommendation was legally infirm

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and not supported by provable evidence. Additionally, the Court issued a facially defective Order that fails to set forth findings of fact and conclusions of law, as required by law. Accordingly, the Order determining Appellant to be a Level 3 offender should be vacated, and Appellant's risk level should be recalculated based solely on those factors that may be properly considered under SORA and which are proven by clear and convincing evidence.

QUESTIONS PRESENTED

1. May the Court determine Appellant's risk level under SORA based on factors that are not proven by clear and convincing evidence?

2. Is the Court entitled to adopt the Board's recommendation in full, without hearing any further evidence, where Appellant disputes numerous unprosecuted allegations contained therein and the District Attorney, as representative of the State, disclaims the Board's recommendation as unreliable, based on allegations that were determined to be not prosecutable, and not provable by clear and convincing evidence?

3. In calculating Appellant's risk level under SORA, may the Court score points for consensual prostitution-related conduct involving

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women who were seventeen years of age or over, particularly where SORA provides that such conduct is only registerable where the person patronized "is in fact less than seventeen years of age," Correction Law § 168-a(2)(a)(i)?

4. Where the Court's Order assigning Appellant a risk level of 3 under SORA does not include any findings of fact or conclusions of law to support a Level 3 determination, must that Order be vacated?

STATEMENT OF FACTS

Defendant-Appellant Jeffrey E. Epstein is a 58-year old financial advisor and philanthropist whose primary residence is in the U.S. Virgin Islands and who also maintains vacation properties in New York and Florida. *See* A.53 (Letter of M. Weinberg of Aug. 16, 2010).[1] Appellant does not live in New York, and since the commission of the Florida offense that forms the basis of this matter, he has not stayed at his New York property for periods of ten days or more at a time. *See* A.53 (Letter of M. Weinberg of Aug. 16, 2010); A.87:21-25, 88:21-89:3_(Tr.).[2]

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[1] References to the Record on appeal are denoted herein as "A." followed by the applicable Appendix number.

[2] References to the transcript of the January 18, 2011 SORA hearing are denoted herein as "Tr." followed by the applicable page and line citation.

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I. The Underlying Offense

On June 30, 2008, Appellant pleaded guilty in the Circuit Court for Palm Beach County, Florida under an Information to the charge of Procuring a Person Under 18 for Prostitution, Fla. Stat. § 796.03, an offense which required him to register under Florida's sexual offender registration statute, Fla. Stat. § 943.0435. *See* A.31 (Information for Procuring Person Under 18 for Prostitution, dated June 26, 2008); A.32 (Guilty Plea, dated June 30, 2008). This single registerable charge was brought in connection with a consensual, commercial arrangement in which Appellant received massages and engaged in sexual conduct with [redacted]., a young woman who was over the age of consent under New York law but just under 18 when the offense in the Information occurred back in 2005. *See* A.53 (Letter from M. Weinberg, dated Aug. 16, 2010, at 1, 3). Appellant concurrently pleaded guilty to an Indictment charging him with one count of Felony Solicitation for Prostitution, Fla. Stat. §§ 796.07(2)(f), (4)(c) -- a solicitation offense which does not include any elements of sexual contact with underage women and which is not registerable under either Florida or New York law. *See* A.26 (2006 Grand Jury Indictment of Felony Solicitation of Prostitution); A.32

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(Guilty Plea, dated June 30, 2008); Fla. Stat. § 943.0435; Correction Law § 168-a(2)(a). Despite an extensive investigation by Florida prosecutors regarding various other complaints alleged against him and reported in police paperwork, Appellant was never charged with any other crimes or prosecuted on allegations made by any other complainants. *See* A.26 (2006 Grand Jury Indictment of Felony Solicitation of Prostitution); A.31 (Information for Procuring Person Under 18 for Prostitution, dated June 26, 2008); A.83:23-84:6, 85:19-86:1, 90:16-91:15, 95:14-18 (Tr.).

As a result of his two concurrent Florida convictions -- the first and only criminal convictions of his life -- Appellant was sentenced to consecutive terms of 12 months and 6 months incarceration in a Palm Beach County Detention Facility, followed by 12 months of Community Control supervision. *See* A.32 (Guilty Plea, dated June 30, 2008); A.34 (Sentence, dated Jun. 30, 2008). Appellant satisfactorily served 13 months of incarceration (during which time he was granted permission to participate in the Sheriff's work release program) and completed a subsequent period of 12 months Community Control (during which the Court trusted him, for business purposes, to travel outside of Florida

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with prior notice and approval by his supervising probation officer) without incident. *See* A.49 (Letter from Florida Department of Corrections, dated Jul. 21, 2010); A.50 (Letter from Palm Beach Sheriff's Office, dated Aug. 12, 2010); A.51 (Letter from J. Goldberger, dated Aug. 12, 2010); A.48 (Order Granting Motion for Travel, dated Dec. 18, 2009); A.53 (Letter from M. Weinberg, dated Aug. 16, 2010, at 4). Appellant has had no subsequent instances of misconduct of any kind. *See* A.53 (Letter from M. Weinberg, dated Aug. 16, 2010, at 1).

II. Sex Offender Registration

As required under Florida law in connection with his conviction for Procuring a Person Under 18 for Prostitution, Fla. Stat. § 796.03, Appellant registered as a sex offender with Florida authorities and was designated at the *lowest* level under that state's sex offender registration act. *See* A.88:6-15 (Tr.); *see also* A.51 (Letter from J. Goldberger, dated Aug. 12, 2010); Fla. Stat. §§ 775.21, 943.0435. Appellant also registered in his home jurisdiction of the U.S. Virgin Islands (where Appellant maintains his primary residence and actually lives), where authorities reviewed Appellant's Florida offenses and

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determined that he is only subject to that jurisdiction's *lowest reporting obligations*. *See* A.88:1-5 (Tr.); *see also* 14 V.I.C. §§ 1722(b), 1724(d), (e).

Although he does not actually reside in New York, before the completion of his term of Community Control, Appellant notified the New York State Division of Criminal Justice Services ("the Division") of his registerable Florida conviction and his ownership of a secondary residence in New York. *See* A.88:21-24 (Tr.). Since May 2010, Appellant has been registered with the Sexual Offender Monitoring Unit (SOMU) of the New York Police Department. *See* A.88:21-89:3 (Tr.).

III. The Board's Recommendation

On or about August 26, 2010, Appellant received notice that a SORA hearing had been scheduled to determine a risk assessment level, accompanied by a copy of the recommendation of the Board. *See* A.67 (Letter from Supreme Court, dated Aug. 26, 2010); A.65 (Recommendation of Board of Examiners of Sex Offenders ("Board Recommendation").). In stark contrast to the other jurisdictions to have considered Appellant's Florida convictions (including Florida), the Board recommended that Appellant be assigned the highest risk level --

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Level 3, representing a high risk of repeat offense -- without further designation.[3] *See* A.67 (Letter from Supreme Court, dated Aug. 26, 2010); A.65 (Board Recommendation); *see also* Correction Law § 168-l(6)(c).

The Board's recommendation included a Risk Assessment Instrument (RAI) that improperly calculated a total risk factor score of 130. *See* A.65 (Board Recommendation). Almost all of the points scored by the Board were based on "Current Offense" factors,[4] including: 10 points for "Use of Violence" (forcible compulsion); 25 points for "Sexual Contact with Victim" (sexual intercourse and deviate sexual intercourse); 30 points for "Number of Victims" (3 or more); 20 points for "Duration of Offense Conduct with Victim" (continuing course of sexual misconduct); and 20 points for "Age of Victim" (11 through 16). *See* A.65 (Board Recommendation). The Board's RAI did not assign Appellant

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[3] SORA requires the Board to recommend an offender's notification level of 1, 2, or 3, pursuant to Correction Law § 168-l(6), and to recommend whether any designations defined in Correction Law § 168-a(7) apply. *See* Correction Law §§ 168-k(2), 168-n(2).

[4] The Board also assessed Appellant 5 points for "Criminal History," even though the Board itself noted that it was assessing points "absent specific information." *See* A.65 (Board Recommendation). Appellant submits that this scoring is unsupported by the Record.

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any points under the "Post-Offense Behavior" and "Release Environment" categories. *See* A.65 (Board Recommendation).

In its "Case Summary," the Board noted that Appellant was convicted of just two Florida sex offenses: (1) Procuring a Person Under 18 for Prostitution, and (2) Felony Solicitation of Prostitution.[5] *See* A.65 (Board Recommendation). The Board then aggregated into just over a single page a host of uncharged allegations made by "numerous females," including "female participants [who] were age 18 or older," regarding "massages and unlawful sexual activity" that allegedly took place at Appellant's Florida residence. *See* A.65 (Board Recommendation). The case summary referred to "vaginal intercourse" and various other forms of sexual contact allegedly taking place without connecting specific females to such allegations, and more significantly, without identifying the age of the participants -- some of whom the Board noted were "age 18 or older" -- specifically at the time of such

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[5] Only one of these charges -- the procurement charge -- is registerable under SORA, and that charge is registerable under SORA only because it is registerable in Florida. *See* Correction Law § 168-a(2)(d)(ii). (Notably, the New York cognate of this offense, Promoting Prostitution in the Third Degree, N.Y. Penal Law § 230.25, is not itself a registerable offense under SORA. *See* Correction Law § 168-a(2).) The charge of Felony Solicitation of Prostitution, Fla. Stat. § 796.07(2)(f), (4)(c) -- which does not include any age-related elements and pertains solely to consensual, commercial conduct -- is not a registerable offense under either Florida or New York law. *See* Fla. Stat. § 943.0435; Correction Law § 168-a(2)(a).

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alleged conduct. *See* A.65 (Board Recommendation). Although Appellant was only convicted of two prostitution-related offenses and was neither charged with nor convicted of any rape, sexual abuse, or violent offenses,[6] the case summary highlighted hearsay-based claims in police paperwork -- namely a probable cause affidavit signed by a Palm Beach Police detective that did not result in any of the charges sought -- involving alleged sexual abuse of underage girls and an alleged forcible rape (which claims were found by the Florida prosecutors to be unreliable to support charges against Appellant), and assessed points against Appellant based on these unprosecuted allegations. *See* A.65 (Board Recommendation).

The Board recognized Appellant's conduct on Community Control as satisfactory and noted that he has no history of substance abuse. *See* A.65 (Board Recommendation). The Board also credited Appellant with accepting responsibility for his actions. *See* A.65 (Board Recommendation).

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[6] The only registerable charge for which Appellant was prosecuted and convicted pertained to consensual, commercial, non-violent interaction with one woman, [redacted]., who was 17 years old (and therefore over the age of consent in New York but not in Florida) at the time of the relevant conduct. *See* A.31 (Information for Procuring Person Under 18 for Prostitution, dated June 26, 2008); A.53 (Letter of M. Weinberg of Aug. 16, 2010, at 1, 3); A.91:20-92:7 (Tr.).

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IV. Pre-Hearing Investigation By the District Attorney

The SORA hearing, originally scheduled for September 15, 2010, was adjourned on consent of the parties until January 18, 2011 to provide the New York District Attorney ("the People"), which represented the State of New York at the SORA hearing, an opportunity to investigate Appellant's Florida convictions and assess the validity of the Board's recommendation. *See* A.81 (Handwritten Notations on Court Jacket); A.89:22-90:8 (Tr.). As part of their investigation, the People were in contact with members of the Palm Beach County State's Attorney's Office to understand the investigation and prosecution of the allegations at issue in this SORA matter. *See* A.83:14-84:19 (Tr.). Based on these interactions with Florida prosecutors, the People determined that they could not rely on the Board's recommendation and the underlying probable cause affidavit (which the Florida prosecutors determined not to be reliable, and which therefore certainly could not satisfy the heightened standard of clear and convincing evidence), and would score Appellant based only on the conduct for which he was actually prosecuted, and not on the

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unprosecuted allegations in the probable cause affidavit cited by the Board. *See* A.83:14-84:19 (Tr.).

Although the People presented Appellant a new SORA risk assessment instrument (RAI) immediately before the SORA hearing itself, scoring Appellant as a Level 1, the People apparently did not present their proposed alternative RAI or any other written submission setting forth their departure from the Board's recommendation to the Court, as no such statement is in the Court's file. *See* Appendix *generally*.

V. SORA Hearing

On January 18, 2011, a SORA hearing was conducted in New York Supreme Court, Criminal Term, New York County, Part 66 before Hon. Ruth Pickholz. *See* A.81 (Handwritten Notations on Court Jacket); A.82 (Tr. *generally*). At the hearing, the People made a record that based on their investigation and contact with the Florida authorities who handled Appellant's prosecution, the probable cause affidavit underlying the Board's recommendation could not be relied upon. *See* A.83:14-18 (Tr.). Specifically, the People informed the Court that many of the women referenced as complainants in the police

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affidavit were not cooperative with Florida prosecutors, and accordingly, the Florida authorities chose not to prosecute any allegations other than those reflected by the two offenses to which Appellant ultimately pleaded guilty. *See* A.84:2-6, 14-19 (Tr.). The People further noted that in light of Florida's decision not to prosecute the majority of the allegations in the affidavit, (and under the SORA statute and guidelines), only the conduct pertaining to the sole registerable crime for which Appellant was charged and to which he pleaded -- Procuring a Person Under 18 for Prostitution, involving a single complainant -- could be proven and should be considered in evaluating Appellant's SORA score. *See* A.85:11-16, 85:24-86:1 (Tr.).

Counsel for Appellant corroborated the record made by the People that the Florida Assistant State Attorney who prosecuted Appellant determined, after a full investigation, that there were "no victims" and that the only crime that could be presented to the grand jury was the single solicitation offense to which Appellant pleaded guilty. *See* A.89:22-90:21, 95:12-18 (Tr.). Appellant disputed many of the allegations contained in the Board's case summary, both with respect to specific facts (such as the suggestion of any forcible compulsion and the

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exact age of complainant [redacted]. at the time of specific conduct) and more broadly by noting that the Board's recommendation was based on police documentation that was not credible and that contained hearsay allegations that the lead sex crimes prosecutor in Florida decided not to prosecute. *See* A.90:9-12, 92:13-21, 95:12-18 (Tr.). Further, Appellant advised the Court that there was sworn testimony from many of the women referenced in the police paperwork and the Board's case summary which expressly disclaimed allegations attributed to them. *See* A.95:19-23 (Tr.).

Notwithstanding the clear record that facts underlying the Board's recommendation were disputed, the Court announced that it was relying on the Board's case summary and adopting the Board's calculation and recommendation in full. *See* A.93:21, 94:6-95:9 (Tr.). The Court did not conduct any factual hearing as to specific claims for which points were assessed. *See* A.82 (Tr. *generally*). The Court scored Appellant for factors such as number of victims, use of violence / forcible compulsion, duration of offense, and sexual intercourse, based on allegations that the People -- as the party bearing the burden of proof -- asserted on the record could not be supported by clear and convincing

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evidence. *See* A.94:7-95:9 (Tr.). Despite the legal and factual position of the People that the Board's recommendation could not be relied on and that allegations concerning all complainants but the one in the Information could not be proven, the Court ruled that it was relying on the Board's recommendation in full and adjudicating Appellant a Level 3 sex offender with no additional designation. *See* A.93:21, 93:25-94:3 (Tr.).

On the record, the Court recited the scoring of the Board in abbreviated form, without identifying any particular facts or allegations to support each factor. *See* A.94:6-95:9 (Tr.). In its written Order, the Court indicated a final risk level determination of Level 3 by merely circling a pre-printed form. *See* A.4 (Order Appealed From, dated Jan. 18, 2011). The Court failed to articulate any findings of fact or conclusions of law, as required under SORA. *See* A.4 (Order Appealed From, dated Jan. 18, 2011); A.82 (Tr. *generally*).

Appellant was served with a copy of the Court's Order on or about January 19, 2011. *See* A.78 (Letter from Supreme Court, dated Jan. 19, 2011). Appellant served a Notice of Entry of the Court's Order on February 9, 2011, and on the same day filed a Notice of Appeal to

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invoke this Court's jurisdiction. *See* A.4 (Order of Appealed From, dated Jan. 18, 2011, with Notice of Entry); A.3 (Appellant's Notice of Appeal, dated Feb. 9, 2011). Appellant now respectfully files this appeal as of right, pursuant to Correction Law §§ 168-k(2), 168-n(2) and CPLR 5513, 5515, to vacate the legally erroneous and factually unsupportable Order and re-calculate Appellant's SORA risk level based solely on those factors that may properly be considered under SORA and that have been proven by clear and convincing evidence.[7]

ARGUMENT

The Court's reliance on allegations that were flatly rejected by the Florida prosecutors who investigated them and which, by the People's own admission, could not be proven by clear and convincing evidence, constitutes clear legal error and a violation of Appellant's due process rights, warranting vacatur of the Court's Order. Specifically, the Court calculated a risk assessment score based on untrustworthy double and

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[7] Appellant asks this Court to render its own findings of fact and conclusions of law -- assigning a risk Level 1 -- based on an appropriate consideration of the undisputed facts in the Record proven by clear and convincing evidence concerning Appellant's conviction. To the extent this Court is unable to issue findings of fact and conclusions of law based on the present Record, Appellant seeks remand to the lower court before a different Justice for a recalculation in which the parties are afforded an opportunity to present evidence regarding contested relevant issues, if necessary. *See* Section II(B), *infra*.

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triple hearsay allegations cited in the Board's recommendation that were squarely rejected as a basis for state prosecution in Florida, were disputed by Appellant, and did not constitute registerable conduct under New York law, all in violation of SORA and its guidelines and Appellant's constitutionally guaranteed right to due process. Moreover, the Court abused its discretion and failed to abide by the guidelines and mandates set forth in SORA, including by improperly considering factors outside the record and issuing a legally deficient Order that fails to set forth the findings of fact and conclusions of law on which the Court's determination was based.

I. THE COURT'S LEVEL 3 DETERMINATION IS NOT SUPPORTED BY CLEAR AND CONVINCING EVIDENCE AS REQUIRED BY SORA AND AS A MATTER OF FEDERAL CONSTITUTIONAL LAW.

The SORA statute sets forth a formal procedure to determine the required level of notification for those individuals convicted of a qualifying out-of-state offense,[8] based on a systematic assessment of the risk of reoffense posed by the particular individual. *See* Correction Law § 168-k. After the Board generates an initial recommendation based on

[8] Appellant's Florida conviction for Procuring a Person Under 18 for Prostitution is a qualifying "sex offense" under SORA solely pursuant to Correction Law § 168-a(2)(d)(ii), which makes an out-of-state offense registerable under SORA if that particular offense is registerable in the jurisdiction where it was committed.

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its review of the out-of-state offense and other factors, the Court has the duty of conducting a hearing to consider the Board's recommendation and other evidence presented in order to reach its own independent determination of an offender's SORA registration level. *See* Correction Law §§ 168-k(2), 168-n(2); *People v. Johnson*, 11 N.Y.3d 416, 421 (2008) (holding that "the Board's duty is to make a recommendation to the sentencing court... and the court, applying a clear and convincing evidence standard, is to make its determination after considering that recommendation, and any other materials properly before it") (internal statutory citation omitted); *see also New York State Bd. of Sex Exam'rs v. Ransom*, 249 A.D.2d 891, 891-92 (4th Dep't 1998) (holding the "Board ... serves only in an advisory capacity ... similar to the role served by a probation department in submitting a sentencing recommendation."); *see also People v. Jimenez*, 178 Misc. 2d 319, 322-23, 679 N.Y.S.2d 510, 513 (Sup. Ct. Kings Cty. 1998) (observing "the Legislature did not intend to place upon the criminal courts of this State a burden to act merely as a regulatory body to confirm the determination of the Board," and noting that a SORA hearing is a "judicial proceeding in which the court must make a *de novo* determination."). Yet the Court's authority

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to determine a SORA risk level is not unfettered; instead, SORA requires the Court to determine an offender's risk level based on an evaluation of evidence in accordance with the guidelines promulgated by the Board. *See* Correction Law §§ 168-k(2), 168-n(2) ("It shall be the duty of the court applying the guidelines established [by the Board under SORA] to determine the level of notification...."). Moreover, the Court's determination must be wholly based on facts that are provable by *clear and convincing evidence*. *See* Correction Law §§ 168-k(2), 168-n(2).

Under New York law, "clear and convincing evidence" is defined as evidence that makes it "'highly probable' that the alleged activity actually occurred." *People v. Dominie*, 42 A.D.3d 589, 590 (3d Dep't 2007); *see also Prince, Richardson on Evidence* § 3-205, at 104 (Farrell 11th ed.). Clear and convincing evidence is "a higher, more demanding standard" than the preponderance standard, *Rossi v. Hartford Fire Ins. Co.*, 103 A.D.2d 771, 771 (2d Dep't 1984), in that it is evidence "that is neither equivocal nor open to opposing presumptions." *Solomon v. State of New York*, 146 A.D.2d 439, 440 (1st Dep't 1989). Under SORA, the "burden of proving the facts supporting the determinations sought by

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clear and convincing evidence" is assigned to the District Attorney, which represents the State in the proceeding. Correction Law §§ 168-k(2), 168-n(2).

In the instant case, the Court did not conduct its own inquiry of relevant facts to determine Appellant's risk level in accordance with the SORA guidelines. Instead, as described further below, the Court improperly adopted a Board recommendation that had been rejected by both the People and Appellant as unreliable. Without any meaningful consideration of other evidence, the Court made its risk assessment determination based on allegations that did not -- and indeed could not, as a matter of law -- constitute clear and convincing evidence. Such a determination was made in contravention of SORA and its guidelines and violated Appellant's federal due process rights under the U.S. Constitution. For these reasons, the Court's determination should be vacated.

A. The People's Investigation Revealed That The Board's Recommendation Could Not Be Proven By Clear and Convincing Evidence.

The People began the SORA hearing by advising the Court that their own investigation and communications with the Florida State

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Attorney's Office that handled Appellant's case revealed that the majority of allegations in the Board's recommendation (and in the police affidavit on which the recommendation was based[9]) were not prosecuted by Florida authorities and could not be proven by other evidence. *See* A.83:14-84:19 (Tr.). In relevant part, the People made the following record:

> I tried to reach -- I reached the authorities in Florida to try to see if they had all the interview notes or other things that we can then subsequently rely on that might be considered clear and convincing evidence, if they had interviewed these women on their own, and they never did. No one was cooperative and they did not go forward on any of the cases and none of them were indicted. So I don't know.

A.85:19-86:1 (Tr.). As explained by the People, Appellant's Florida case was not one where a host of allegations were encompassed within a plea deal, but rather, the only charges that were determined to be

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[9] It bears noting that the police affidavit upon which the Board based its case summary and recommendation appears not even to have been drafted to sustain charges against Appellant, but instead, recited numerous allegations based on double and triple hearsay directed toward filing charges against a defendant named [redacted]. *See* A.6 (Palm Beach Police Department - Probable Cause Affidavit of J. Recarey, dated May 1, 2006). Furthermore, the Florida State Attorney expressly rejected the claims asserted in the police affidavit (which sought to charge [redacted] as an accomplice to Appellant) by determining that there was not sufficient probable cause and *not* charging Appellant with the serious second-degree felony offenses which the affidavit sought to support, to wit, Unlawful Sexual Activity with a Minor, Fla. Stat. § 794.05(1), and Lewd and Lascivious Molestation, Fla. Stat. § 800.04(5).

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prosecutable were the charges for which Appellant was ultimately convicted:

> So it is unlike a situation where everything was indicted and then we get to sort of assess points for all of the victims, if it was part of a plea bargain. They did not actually choose to go forward on any except for the one victim.

A.84:2-6 (Tr.). Given this history, the People advised the Court that it should depart from the Board's recommendation, both as a matter of fact and as a matter of law, in accordance with the SORA guidelines. *See* A.83:14-84:19, 85:11-16, 87:10-12 (Tr.).

The SORA guidelines are intended to provide clear guidance to the Court and the parties with respect to how various potential risk factors should be evaluated, including allegations that have not been prosecuted. While, in general, conduct not directly encompassed by the crime of conviction may be considered in scoring for given factors on the RAI, the SORA guidelines deem, "Points should not be assessed for a factor… unless there is *clear and convincing evidence* of the existence of that factor." *Sex Offender Registration Act: Risk Assessment Guidelines and Commentary*, Commentary (2006), at 5, ¶ 7 (emphasis added). Indeed, in deciding how to evaluate allegations outside of the crime of

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conviction, the SORA guidelines expressly caution, "the fact that an offender was arrested or indicted for an offense is not, by itself, evidence that the offense occurred." *Sex Offender Registration Act: Risk Assessment Guidelines and Commentary*, Commentary (2006), at 5, ¶ 7. More to the point here, the guidelines emphasize, "[T]he fact that an offender was *not* indicted for an offense may be strong evidence that the offense did not occur," amplified with a relevant example:

> For example, where a defendant is indicted for rape in the first degree on the theory that his victim was less than 11 [years old], but not on the theory that he used forcible compulsion, the Board or court should be reluctant to conclude that the offender's conduct involved forcible compulsion.

Sex Offender Registration Act: Risk Assessment Guidelines and Commentary, Commentary (2006), at 5, ¶ 7 (emphasis in original, internal statutory citations omitted).[10]

In other words, SORA and its guidelines clearly prescribe that where allegations were reported to and investigated by law enforcement but not prosecuted (and not encompassed within a broader plea

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[10] Of note, at one point during the SORA proceeding, the Court seemingly dismissed out of hand the SORA guidelines concerning uncharged allegations. *See* A.84:7-13 (Tr.) (Court expressing skepticism toward the Board's guidelines that "if somebody is not indicted it is strong evidence that it did not occur.").

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bargain), they should not be scored on the RAI or factored into a risk determination in the absence of other evidence to corroborate their validity. *See Sex Offender Registration Act: Risk Assessment Guidelines and Commentary*, Commentary (2006), at 5, ¶ 7; *see also People v. Smith*, 66 A.D.3d 981, 983 (2d Dep't 2009) (holding that defendant's alleged use of knife was not proven by clear and convincing evidence and could not be scored against defendant in SORA hearing where testimony about use of knife was presented to grand jury but grand jury did not indict on weapons charge); *People v. Coffey*, 45 A.D.3d 658 (2d Dep't 2007) (holding that it was improper for court to consider allegations concerning a charge that was dismissed in evaluating defendant's SORA risk level); *People v. Arotin*, 19 A.D:3d 845 (3d Dep't 2005) (holding that defendant could not be scored under SORA for deviate sexual intercourse where defendant was not indicted for such an offense and the only evidence of such conduct came from triple hearsay in a police report used by the Board).

Significantly, here, the People did not merely apply the SORA guideline suggesting that uncharged allegations may not be reliable evidence of an offense. Instead, the People had actual information from

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the Florida State Attorney's Office that the complainants referenced by the Board in connection with uncharged claims were not cooperative with authorities, prompting the Florida State Attorney's Office to decide not to pursue charges in connection with those unsupported allegations. *See* A.84:14-19, 85:19-86:1, 86:10-12 (Tr.). Moreover, the People acknowledged that they had no corroborating materials -- such as interview notes, sworn statements, or affidavits -- which would permit them to meet their burden of proving disputed allegations by clear and convincing evidence. *See* A.84:14-19, 85:19-86:1, 86:10-12 (Tr.). As a result, the People advanced the position that the law compelled they take -- advising the Court that the Board's recommendation was wrong and that a Level 3 determination was not supported by the provable evidence.

B. The Court Improperly Relied on the Board's Recommendation Where the Facts Cited Therein Were Disputed and No Further Evidence Was Presented.

Notwithstanding the reasoned, evidence-based disavowal by the People of the Board's recommendation (based on the People's communications with the Florida prosecutor), the SORA Court relied wholesale upon the Board's recommendation. *See* A.93:21, 94:6-95:9

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(Tr.). The Court improperly overlooked the burden of proof statutorily imposed on the People and its own duty to evaluate the evidence, and adopted the Board's recommendation, seemingly as a *per se* matter. *See* A.85:11-18 (Tr.) (the Court opining, without factual basis, that the Board "obviously took [their own guidelines] into consideration" when assessing points for uncharged conduct). Indeed, although the Court cited no specific information to suggest that the Board itself communicated with Florida prosecutors in preparing the case summary, the Court attempted to justify its blind reliance on the Board's recommendation by stating, "I feel the board looked into all of this, made their recommendation, found him to have 130 points and I see no reason to disturb that." A.96:11-13 (Tr.).

While the Court of Appeals has recognized that a Board-generated case summary may constitute "reliable hearsay" upon which the Court may base a SORA risk calculation, the law is equally clear that a Board's case summary is not *per se* reliable, particularly in the face of countervailing evidence. *See People v. Mingo*, 12 N.Y.3d 563, 572-73, (2009) ("Of course, information found in a case summary ... need not always be credited -- it may be rejected when it is unduly speculative or

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its accuracy is undermined by other more compelling evidence"); *see also People v. Mabee*, 69 A.D.3d 820 (2d Dep't 2010) (finding Board's case summary did not constitute clear and convincing evidence to support scoring under SORA where it provided only very limited information pertaining to the particular factor). Indeed, information contained in a Board's case summary does not by itself clear the hurdle of "clear and convincing evidence" -- a higher standard than mere "reliable evidence" -- where the offender disputes the relevant contents of that evidence. *See People v. Judson*, 50 A.D.3d 1242 (3d Dep't 2008) (holding that case summary alone could not satisfy state's burden of proving factors by clear and convincing evidence to support level 3 determination where defendant contested certain factual allegations related to those factors); *cf. People v. Wasley*, 73 A.D.3d 1400, 1401 (3d Dep't 2010) (holding "evidence included in the case summary may provide clear and convincing evidence in determining a defendant's risk assessment level *where defendant did not dispute its contents insofar as relevant.*") (emphasis added); *People v. Curthoys*, 77 A.D.3d 1215, 1216 (3d Dep't 2010) (noting that the "*uncontested* contents of a case summary can satisfy the People's burden of demonstrating . . . clear and convincing

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evidence") (emphasis added). Thus, it certainly follows that a Board's case summary cannot, as a matter of law, constitute the sole requisite "clear and convincing evidence" required to support a SORA determination where the People, as the party representing the Board, also expressly disclaim the reliability of that case summary.

Here, the Board's case summary was based almost entirely on double and triple hearsay allegations described in an affidavit submitted by police to the Florida prosecutor. *See* A.65 (Board Recommendation); A.6 (Palm Beach Police Department - Probable Cause Affidavit of J. Recarey, dated May 1, 2006). The allegations, even when aggregated, were not deemed by the Florida prosecutor who reviewed them to constitute sufficient "probable cause" to warrant the return of a complaint, information, or indictment as to any of the charges that the affidavit sought.[11] And, of course, because the requested charges were never brought, no court ever reviewed or authorized the affidavit's allegations to make a judicial finding of "probable cause" as to any such allegations. Even had the Florida

[11] Although the affidavit considered by the Board was submitted with respect to a defendant other than Appellant, it appears that the allegations in the affidavit were intended to establish probable cause to charge Appellant with Unlawful Sexual Activity with a Minor, Fla. Stat. § 794.05(1), and Lewd and Lascivious Molestation, Fla. Stat. § 800.04(5) -- charges that were never brought.

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prosecutor decided to arrest and charge Appellant based on allegations contained in the affidavit, the mere fact of an arrest or charge is not sufficiently trustworthy by itself to support the assessment of points against Appellant under SORA. *See Sex Offender Registration Act: Risk Assessment Guidelines and Commentary*, Commentary (2006), at 5, ¶ 7 ("the fact that an offender was arrested or indicted for an offense is not, by itself, evidence that the offense occurred"). Such allegations cannot be deemed reliable -- never mind satisfying the elevated standard of clear and convincing evidence -- where, as here, the People had specific information from the Florida prosecutor that Florida made the decision not to pursue such charges based precisely on the insufficiency of the evidence. *See* A.83:23-84:19, 85:19-86:1 (Tr.).

In short, the People directly disputed the reliability of the Board's case summary and recommendation, based on information that was not before the Board following communications with the Florida prosecutor. *See* A.83:14-84:19, 85:11-87:12 (Tr.); *see also* A.65 (Board Recommendation) (noting that Board's assessment was based on review of "inmate's file" and not citing specific contact with Florida authorities). Appellant also disputed the validity of many of the

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allegations contained therein, both generally and with regard to specific allegations. *See* A. 90:9-12, 92:13-21, 95:12-18 (Tr.). Notwithstanding the obvious existence of disputed relevant issues, the Court did not provide the parties with any opportunity to present evidence on contested issues, nor did the Court conduct any factual inquiry on its own.

Even though there was no sufficient evidentiary basis to support the Board's recommendation, the Court announced that it was relying on the Board's case summary and adopting the Board's calculation and SORA determination in full. *See* A.93:21, 96:11-13 (Tr.). Indeed, at one point in adopting the Board's scoring, the Court openly acknowledged that it was assessing points against Appellant in the face of the People's position that the evidence of that factor was "not reliable":

> Number of victims, three or more. He only plead [sic] guilty to one, but apparently there were more than one and I think the People concede that although they say it was not reliable.

A.94:10-13 (Tr.). This reliance on alleged conduct that the People, as the party bearing the burden of proof, expressly stated they could not prove by clear and convincing evidence, was plainly erroneous as a matter of law. *See* Correction Law §§ 168-k(2), 168-n(2) (stating that

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the facts supporting the court's determination shall be supported by clear and convincing evidence). Accordingly, the Court's Level 3 determination, based specifically on unproven alleged conduct, cannot stand, and the Court's Order should be vacated.[12]

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[12] Even if the Court had a lawful evidentiary basis to adopt the Board's case summary in full (which it did not), the case summary does not establish by clear and convincing evidence all of the factors for which points were assessed against Appellant. For example, the facts alleged in the case summary, even if taken as true, do not set forth, by clear and convincing evidence, a continuing course of sexual misconduct, which requires a specific finding of either "(i) two or more acts of sexual contact, at least one of which is an act of sexual intercourse, oral sexual conduct, anal sexual conduct, or aggravated sexual contact, which acts are separated in time by at least 24 hours, or (ii) three or more acts of sexual contact over a period of at least two weeks" with an underage victim. *See Sex Offender Registration Act: Risk Assessment Guidelines and Commentary*, Commentary (2006), at 10 ("Factor 4: Duration of Offense Conduct with Victim"); *see also People v. Redcross*, 54 A.D.3d 1116 (3d Dep't 2008) (holding that continuing course of sexual misconduct was not supported by clear and convincing evidence where record was silent as to dates that incidents of sexual conduct occurred in relation to each other); *People v. Donk*, 39 A.D.3d 1268, 1269 (4th Dep't 2007) (modifying SORA risk assessment where there was not clear and convincing evidence to establish continuing course of sexual misconduct under specific definition set forth by SORA); *People v. Boncic*, 15 Misc. 3d 1139(A), 841 N.Y.S.2d 281 (Sup. Ct. N.Y. Cty. 2007) (holding that there must be a finding of "actual sexual contact" with the underage victim to score for the continuing course of conduct factor under SORA). Here, the case summary only speaks of certain allegations generally and provides no detail regarding the timing of specific alleged acts of sexual contact, the number of times Appellant allegedly engaged in specific acts with individual complainants, or the age of the complainants at the time of the relevant acts. Similarly, the case summary does not establish by clear and convincing evidence several other factors for which points were assessed against Appellant, including the "use of violence" (e.g. case summary provides only conclusory allegations of "forcible rape" without establishing the element of "forcible compulsion"); "sexual contact with victim" (e.g. case summary does not specify the age of each complainant at the time of alleged relevant sexual contact to determine whether each complainant was underage and therefore a "victim"); "number of victims" (same); and "age of victim" (same).

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C. Determining Appellant To Be a Level 3 Offender Based on Factors That Were Not Proven by Clear and Convincing Evidence Violated Appellant's Federal Due Process Rights.

In addition, the Court's assessment of points against Appellant based on allegations that were not and could not be proven by clear and convincing evidence constituted a clear violation of Appellant's federal due process rights.

It is settled as a matter of federal constitutional law that those persons convicted of a sex offense and required to register under a state registration and notification scheme like SORA have a protected liberty interest that entitles them to procedural due process. *See Doe v. Pataki*, 3 F. Supp. 2d 456, 468 (S.D.N.Y. 1998); *see also People v. David W.*, 95 N.Y.2d 130, 138 (2000) (holding that the imposition of a Level 3 SORA determination implicates liberty interests and triggers due process safeguards). Courts evaluating that liberty interest under the procedural due process analysis articulated by the U.S. Supreme Court in *Matthews v. Eldridge*, 424 U.S. 319 (1976) (balancing the private interest affected by state action, the risk of erroneous deprivation of that interest, and the interests of the state) have determined that "the nature of the [sex offender] classification proceeding is serious enough"

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and "carries with it a high risk of error," such that the state must afford an individual facing such a risk classification a constitutionally-mandated minimum level of due process. *Doe*, 3 F. Supp. 2d at 469, 471 (citing *Doe v. Poritz*, 142 N.J. 1, 662 A.2d 367 (1995)). While "the due process protections required for a risk level classification proceeding are not as extensive as those required in a plenary criminal or civil trial," *Id.* at 470, federal due process is only satisfied when a person being assessed under SORA is afforded a "pre-notification hearing accompanied by a comprehensive set of procedural safeguards," including each of the following:

> (1) a judicial determination of his risk level classification [by hearing];
>
> (2) notice of the classification proceeding, sufficiently in advance of the hearing to... prepare a challenge;
>
> (3) notice of the proceeding must contain a statement of [its] purpose and the Board's recommended risk level classification;
>
> (4) an opportunity to retain counsel;
>
> (5) pre-hearing discovery;
>
> (6) the state must prove the facts supporting each risk factor *by clear and convincing evidence*; and
>
> (7) the right to appeal.

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See id. at 471-72 (articulating the above seven procedures as essential to satisfy procedural due process when assigning risk levels under SORA) (emphasis added); *see also People v. Brooks*, 308 A.D.2d 99, 103 (2d Dep't 2003) (same).

This sixth constitutional factor -- the requirement that the State bear the burden of proof and prove the facts supporting each risk factor upon which a risk assessment is based by the elevated standard of clear and convincing evidence -- is of particular significance, in that it is a recognition of the severe injurious impact upon liberty, reputation, and opportunity that an unjustified notification level can have on an offender:

> Because "the possible injury to the individual [registrant] is significantly greater than any possible harm to the state," the registrant, consistent with due process, cannot "be asked to share equally with society the risk of error" . . . . It necessarily follows that the Due Process Clause requires that the state prove its case by clear and convincing evidence in a Megan's Law proceeding.

E.B. v. Verniero, 119 F.3d 1077, 1111 (3d Cir. 1997), *cert. denied*, 522 U.S. 1109 (1998) (citing *Addington v. Texas*, 441 U.S. 418, 427 (1979)); *see also Brooks*, 303 A.D.2d at 105 (observing "a SORA determination

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undeniably has a profound impact on a defendant's liberty interest due to the registration and community notification provisions"). In other words, because a SORA hearing "threaten[s] the individual involved with a significant deprivation of liberty or stigma," due process demands "more than average certainty on the part of the factfinder." *E.B.*, 119 F.3d at 1110-11 (citing *Santosky v. Kramer*, 455 U.S. 745, 756-58 (1982)). Accordingly, "registrants are entitled to have the burden of persuasion placed on the state, with the state obligated to prove the proposed level and manner of notification by clear and convincing evidence." *Doe*, 3 F. Supp. 2d at 471; *see also David W.*, 95 N.Y.2d at 140 (holding "Due process requires that the State bear the burden of proving, at some meaningful time, that a defendant deserves the classification assigned.").

Here, the Court's Level 3 determination, made without regard to the People's presentation and advocacy at the hearing and unsupported by clear and convincing evidence, failed to satisfy these basic constitutional requirements regarding both the allocation of the burden of persuasion (upon the People) and the standard of proof (by clear and convincing evidence) for a SORA hearing. The Court's complete

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reliance on the unsupported, unprosecuted, and disputed hearsay allegations in the Board's case summary to buttress a Level 3 determination violated Appellant's due process rights, as set forth by *Doe v. Pataki*, and accordingly, the Court's Order should be reversed.

II. THE COURT BASED ITS LEVEL 3 DETERMINATION UPON IMPROPER CONSIDERATIONS.

In addition to basing Appellant's risk level determination on uncharged allegations that, both in fact and as a matter of law could not be proven by clear and convincing evidence, the Court improperly assessed Appellant as a Level 3 offender based on additional factors and considerations that should not have weighed into its RAI calculation. Namely, the Court improperly penalized Appellant for conduct that was not scoreable under SORA, even with respect to the complainant from his single registerable crime of conviction. In addition, the record lays bare that the Court allowed personal bias and irrelevant factors outside the record in Appellant's case to influence the Court's SORA determination.

A. The Court Improperly Assessed Points Against Appellant for Conduct That Is Not Scoreable Under SORA.

First, the SORA Court improperly scored Appellant for alleged conduct that is not registerable, and in some cases is not even criminal,

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under New York law with respect to the sole complainant at issue in Appellant's single registerable Florida conviction. For example, the Court adopted the Board's assessment of points for "sexual intercourse," even though the People themselves conceded that the complainant at issue was 17 (and therefore over New York's age of consent) when she allegedly engaged in consensual intercourse with Appellant. *See* A.92:1-7 (Tr.). This scoring for sexual intercourse was in clear contravention to the SORA statute, which states that prostitution offenses are only registerable under SORA where there is clear and convincing evidence that the prostitute was "in fact" under 17 at the time of the alleged sexual conduct. Correction Law § 168-a(2)(a)(i).[13]

Additionally, the Court appears to have scored Appellant 20 points for this same complainant under the "age of victim" factor, even though the People made a record that the complainant was "either 16 or 17" when she met Appellant for the first time. A.92:1-3 (Tr.). The fact that, even in the People's view, the specific age of the complainant when

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[13] Of course, the exact allegations for which the Court assessed points against Appellant are nearly impossible to identify given the Court's failure to articulate findings of fact and conclusions of law supporting its scoring of particular factors. *See* A.4 (Order Appealed From, dated Jan. 18, 2011); A.82 (Tr. *generally*); *see also* Section III, *infra*. Nor did the Board's recommendation tie its scoring to particular facts in its case summary, which lumped a host of facts together in the aggregate. *See* A.65 (Board Recommendation).

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she first met Appellant -- no less when she may have engaged in sexual conduct with him -- could not be ascertained precludes a finding that this element was proven by clear and convincing evidence. *See Solomon v. State of New York*, 146 A.D.2d 439, 440 (1st Dep't 1989) (defining clear and convincing evidence as evidence "that is neither equivocal nor open to opposing presumptions"). Yet the Court disregarded the burden of proof and made clear that it was scoring Appellant for this factor.[14] *See* A.92:13-93:12 (Tr.). These improper assessments of points on the RAI should render the Court's Level 3 determination invalid.

B. The Court Improperly Allowed Personal Feelings and Matters Outside the Record to Influence Its SORA Determination.

Next, the Court abused its discretion by allowing an apparent personal distaste for Appellant, the nature of the crime for which he pleaded guilty and was convicted, and the quantity and nature of unproven, unprosecuted allegations cited in the Board's recommendation to impinge upon the Court's duty to follow the law. The Court demonstrated a remarkable disdain and lack of judicial

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[14] Again, the specific basis upon which the Court scored Appellant for certain factors cannot be ascertained from the legally deficient Order, *see* A.4 (Order Appealed From, dated Jan. 18, 2011), although the Court's comments at the hearing revealed the Court's belief that points should be assessed against Appellant for "procuring" this complainant when "she was either 16 or 17." *See* A.92:1-23 (Tr.).

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objectivity in its response to hearing the District Attorney disavow the reliability of the Board's recommendation, in receiving the arguments of counsel for Appellant, and in rendering its Order as a whole.

First, although the SORA statute clearly contemplates that the District Attorney may depart from the Board's recommendation based upon its own evaluation of the evidence,[15] *see* Correction Law §§ 168-

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[15] For example, SORA expressly provides, "If the district attorney seeks a determination that differs from the recommendation submitted by the board, at least ten days prior to the determination proceeding the district attorney shall provide to the court and the sex offender a statement setting forth the determinations sought by the district attorney together with the reasons for seeking such determinations." Correction Law §§ 168-k(2), 168-n(2). While the more common application of this provision involves the People seeking a higher risk level than the Board, the provision clearly encompasses any deviation from the Board's recommendation, including the People's discretion to recommend a lower risk level. *See, e.g., People v. Ferguson*, 53 A.D.3d 571, 572 (2d Dep't 2008) (holding that 10-day notice requirement applies not only to changes in RAI scoring, but to changes in factual predicates for RAI scoring).

Incidentally, it bears noting that the People failed to comply with these procedural mandates, constituting a further procedural flaw in these proceedings. *See* Correction Law §§ 168-k(2), 168-n(2). While the People provided Appellant with a written alternative RAI immediately prior to the SORA hearing -- and not ten days prior to the hearing, as required by SORA -- it appears that the People failed to submit their RAI to the Court at all. *See* Appendix *generally*. Before rejecting out of hand the People's stance that a Level 3 determination could not be supported by sufficient evidence, the Court should have adjourned the matter to receive and review a written statement of the People's recommended determination and supporting reasons. *See People v. Ferguson*, 53 A.D.3d at 572 (reversing SORA order where defendant and court did not receive proper 10-day notice of People's revised RAI); *cf. People v. Jordan*, 31 A.D.3d 1196, 1196 (4th Dep't 2006) (holding People's failure to provide sufficient notice of revised RAI was cured where Court adjourned matter to allow meaningful opportunity to consider revised RAI). The Court's failure to enforce the procedural mandates of the SORA statute was prejudicial to Appellant, in that the Court did not have sufficient opportunity to

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k(2), 168-n(2), here, the Court rejected the investigation and advocacy of the People. Indeed, the Court went so far as to express "shock" that the People would support a lower risk level determination than that recommended by the Board, almost as a matter of principle. *See* A.86:9 (Tr.). The Court disregarded the detailed evidentiary investigation and careful parsing of allegations that the People undertook in evaluating the Board's recommendation. Ignoring the record at issue concerning Appellant and the evidence pertaining to him, the Court focused instead on the irrelevant facts of some unidentified case completely unrelated to Appellant's:

> I have to tell you, I am a little overwhelmed because I have never seen the prosecutor's office do anything like this. I have never seen it. I had a case with one instance it was a marine who went to a bar, and I wish I had the case before me, but he went to a bar and a 17 year old, he was an adult obviously, he was a Marine, a 17 year old came up to him and one thing lead [sic] to another and he had sex with her and the People would not agree to a downward modification on that.

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understand the compelling reasons for the alternative RAI calculation that the People promoted. *See id.*

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> So I am a little overwhelmed here because I see -- I mean I read everything here, I am just a little overwhelmed that the People are making this application.
>
> I could cite many many, I have done many SORAs much less troubling than this one where the People would never make a downward departure like this.[16]

A.84:21-85:10 (Tr.). Later, when Appellant's counsel disputed that there were any credible -- much less prosecuted -- allegations that Appellant ever used force, the Court again began comparing Appellant's case to the same irrelevant case about "a marine" -- a matter completely unknown to Appellant and having no connection whatsoever to Appellant's case -- seemingly to suggest that Appellant should nevertheless be scored as Level 3 under SORA:

> There was no allegation of force in the marine either, who met a girl in a bar, a young girl 17, there was no force there.

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[16] Notably, the People were not asking the Court to make a downward departure from the RAI calculation, but were advising the Court that the evidence required a recalculation of Appellant's risk level based on the RAI factors. *See Sex Offender Registration Act: Risk Assessment Guidelines and Commentary*, Commentary (2006) at 4-5, ¶¶ 5, 6.

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A.90:13-15 (Tr.).[17] The Court's subjective comparison of Appellant's case to some unidentified, unrelated case was improper and highly irregular, and it clearly interfered with the Court's duty to make an assessment based on the law.

Similarly, in response to an argument by counsel regarding the implications that a Level 3 assignment would have on Appellant, who does not actually reside in New York, the Court abandoned any semblance of judicial objectivity by dismissively suggesting that he should "give up his New York home if he does not want to come every 90 days." A.93:18-19 (Tr.). Rather than giving reasoned consideration to whether Appellant's residence outside of New York might be a relevant factor in its overall risk assessment (such as for a downward departure from an RAI calculation), the Court improperly allowed its judgment to be clouded by apparent personal disdain for Appellant.

Furthermore, the Court's apparent distaste for Appellant has eliminated any likelihood that Appellant will receive a fair redetermination hearing should this matter be remanded back to the

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[17] Significantly, the Court in fact scored 10 points against Appellant for forcible compulsion, despite the parties' agreement that there was no legitimate evidentiary basis to score Appellant for the use of force or violence. *See* A.94:7-8 (Tr.).

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same Justice. Indeed, this Court has recognized that reassignment of a matter to a different Justice following appeal is warranted and appropriate where the apparent impartiality of the lower court has been legitimately questioned, as it most certainly has here. *See, e.g., People v. Rampino*, 55 A.D.3d 348, 349 (1st Dep't 2008) (remanding resentencing matter to a different Justice where the "appearance of fairness and impartiality [was] compromised by the actions of the Justice to whom defendant's application was assigned"); *Fresh Del Monte Produce N.V. v. Eastbrook Caribe*, 40 A.D.3d 415, 421 (1st Dep't 2007) (remanding matter to a different Justice where "a reasonable concern about the appearance of impartiality" had been raised on appeal). Accordingly, should this Court deem remand the only appropriate mechanism for recalculating Appellant's risk assessment level, Appellant respectfully asks that the SORA proceeding be reassigned to a different Justice.

In sum, a court only has discretion to go beyond the factors outlined in the SORA guidelines in evaluating a person's risk level where justified by clear and convincing evidence. *See People v. Sherard*, 73 A.D.3d 537, 537 (1st Dep't 2010) (citing *People v.* [redacted] 854 N.Y.2d

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138 (2008), *lv. denied* 10 N.Y.3d 711, 860 N.Y.S.2d 483 (2008)) (holding that where a court exercises discretion to depart from the evidence-based scoring of an RAI, the court must base such departure on "clear and convincing evidence of aggravating factors to a degree not taken into account" in the RAI); *see also Sex Offender Registration Act: Risk Assessment Guidelines and Commentary*, Commentary (2006) at 4-5, ¶¶ 5, 6. Here, the Court's SORA determination, made in the express absence of clear and convincing evidence, [18] constituted an abuse of discretion, warranting reversal of the Court's Level 3 determination and Order. Moreover, given the Court's demonstrated lack of judicial objectivity toward Appellant, should remand be required, Appellant respectfully requests that this matter be reassigned to a different Justice in the Supreme Court.

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[18] The Court did not -- and could not -- cite any factors within or outside of the Board's consideration, proven by clear and convincing evidence, that would justify a Level 3 determination under RAI scoring or constitute lawful grounds for an upward departure. See A.82 (Tr. *generally*). Instead, the Court fully adopted the Board's calculation, scoring Appellant a presumptive rating of Level 3, without meaningful inquiry into any of the underlying allegations or any consideration of other evidence which could bear upon Appellant's risk level. *See* A.93:21, 94:6-95:9, 96:11-13 (Tr.).

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III. THE COURT'S ORDER DOES NOT COMPLY WITH THE MANDATES OF SORA AND CONSTITUTIONAL DUE PROCESS AND MUST BE VACATED.

Finally, the Court's Order determining Appellant to be a Level 3 sex offender is itself facially defective in numerous regards and should be vacated as legally invalid. In addition, the Court's failure to set forth any factual basis for its Level 3 determination renders the Order constitutionally infirm, warranting reversal on federal due process grounds as well.

SORA provides that it is the "duty of the court" to determine, pursuant to the SORA guidelines, both the "level of notification" required of an offender and whether any designations defined in section 168-a(7) apply. Correction Law §§ 168-k(2), 168-n(2). In addition, SORA mandates that the court "render an order" which sets forth "its determinations and the findings of fact and conclusions of law on which the determinations are based." Correction Law §§ 168-k, 168-n.

Here, the Court's compliance with these requirements fell woefully short. The only order issued by the Court in this matter was a standard boilerplate form where the Court circled a pre-printed number and provided a signature and date. *See* A.4 (Order Appealed From,

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dated Jan. 18, 2011). Indeed, upon close examination of the only "order" in this matter, it appears that the form Order is actually intended to be a cover sheet to accompany a more formal order, with written findings of fact and conclusions of law, upon submission to the Division. *See* A.4 (Order Appealed From, dated Jan. 18, 2011) (stating, "A copy of the order setting forth the risk level and designation determinations, and the findings and conclusions of law on which such determinations are based, shall be submitted to the Division of Criminal Justice Services' Sex Offender Registry Unit by the Court. In addition, please complete and attach this form indicating the offender's risk level and designation to the Court's order."). Yet this legally insufficient Order was served on Appellant following the SORA proceeding and was sent to the Division so that the Level 3 determination could be executed and enforced. *See* A.78 (Letter of Supreme Court, dated Jan. 19, 2011).

The appellate courts have consistently held that cursory, non-specific "findings" issued after SORA hearings -- including the wholesale adoption of a Board recommendation or recitation of RAI factors without further explanation, as the Court offered here -- are

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legally insufficient under SORA. *See, e.g. People v. Strong*, 77 A.D.3d 717, 717-18 (2d Dep't 2010) (reversing SORA order issued without findings of fact and conclusions of law, where court relied on RAI but failed to introduce the RAI in evidence or indicate any evidence relied upon); *People v. Gilbert*, 78 A.D.3d 1584, 1584 (4th Dep't 2010) (holding that the SORA court's conclusory recitation that it reviewed the parties' submissions and was adopting the Board's case summary and recommendation was insufficient to fulfill SORA's statutory mandate); *People v. Miranda*, 24 A.D.3d 909, 910-11 (3d Dep't 2005) (holding that the court's adoption of the Board's RAI scores and "generic listing of factors" failed to "fulfill the statutory mandate" of SORA and precluded "meaningful appellate review of the propriety of the court's risk level assessment").

In addition, the Order in this case is constitutionally deficient, in that the Court's failure to set forth any factual or legal bases for its Level 3 determination falls short of the minimum due process rights guaranteed by the U.S. Constitution. In the landmark case of *Goldberg v. Kelly*, the U.S. Supreme Court held that, in relevant part, to demonstrate compliance with the procedural due process requirement

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that the decision maker's conclusion rest solely on the legal rules and evidence adduced at hearing, "[the] decision maker should state reasons for his determination and indicate evidence he relied on, though his statement need not amount to a full opinion or even formal findings of fact and conclusions of law." *Goldberg v. Kelly*, 397 U.S. 254, 271 (1970) (internal citations omitted).[19] In short, the minimal due process requirement that the order set forth the basis for the court's determination is designed to provide some assurance that the court's conclusion rested on sufficient reliable evidence--which in Appellant's case, it did not.

The utterly deficient Order issued by the Court in this matter itself provides an independent basis for reversal of the Court's Level 3 determination, on both state statutory and federal constitutional grounds.

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[19] SORA, by specifically *requiring* the Court to issue findings of fact and conclusions of law to support its determination, therefore sets forth a higher standard than is required by federal due process. *See* Correction Law §§ 168-k, 168-n (requiring the court to "render an order setting forth its determinations and the findings of fact and conclusions of law on which the determinations are based").

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CONCLUSION

For the reasons stated herein, Appellant Jeffrey E. Epstein respectfully submits that the January 18, 2011 Order of the New York Supreme Court determining Appellant Jeffrey E. Epstein to be a Level 3 sex offender, without designation, should be vacated, and Appellant's SORA level should be recalculated -- either by this Court based on the present record or upon remand to a different Justice in the lower court -- in accordance with the law, based solely on the evidence that can be proven by clear and convincing evidence, to wit, the undisputed conduct encompassed by Appellant's registerable crime of conviction.

February 22, 2011

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The undersigned hereby certifies that:

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SUPREME COURT FOR THE STATE OF NEW YORK
COUNTY OF NEW YORK

PEOPLE OF THE STATE OF NEW YORK, Plaintiff-Respondent, - against - JEFFREY E. EPSTEIN, Defendant-Appellant.	Index No.: 30129-2010 **PRE-ARGUMENT STATEMENT**

1. TITLE OF ACTION: As set forth in caption.

2. FULL NAMES OF ORIGINAL PARTIES AND ANY CHANGE IN THE PARTIES: As set forth in caption. There has been no change in the parties.

3. NAME, ADDRESS, AND TELEPHONE NUMBER OF COUNSEL FOR APPELLANT OR PETITIONER:

Jay P. Lefkowitz, [redacted]
Sandra Lynn Musumeci
KIRKLAND & ELLIS LLP
601 Lexington Avenue
New York, New York 10022-4611
Telephone:
Facsimile: [redacted]

4. NAME, ADDRESS, AND TELEPHONE NUMBER OF COUNSEL FOR RESPONDENT:

Cyrus R. Vance, Jr.
NEW YORK DISTRICT ATTORNEY'S OFFICE
One Hogan Place
New York, NY 10013
Telephone: [redacted]

5. COURT AND COUNTY, OR ADMINISTRATIVE BODY, FROM WHICH APPEAL IS TAKEN: New York Supreme Court (Criminal Term), New York County.

6. THE NATURE AND OBJECT OF THE CAUSE OF ACTION OR SPECIAL PROCEEDING: Sex Offender Registration Act (SORA) hearing, pursuant to Article 6-C of the Correction Law.

7. RESULT REACHED IN THE COURT OF ADMINISTRATIVE BODY BELOW: Supreme Court, New York County, adjudged appellant Jeffrey E. Epstein to be a Level 3 sexual offender, without additional designation.

8. GROUNDS FOR SEEKING REVERSAL, ANNULMENT, OR MODIFICATION: The Court's designation of appellant Jeffrey E. Epstein as a Level 3 sexual offender was an abuse of

discretion and constituted reversible legal error based, in part, on the following: (1) the Court improperly relied on untrustworthy double and triple hearsay contained in the recommendation of the Board of Examiners of Sex Offenders, even though the District Attorney, as the party appearing on behalf of the State, rejected much of the Board's recommendation as not constituting clear and convincing evidence to support a Level 3 designation where such hearsay allegations were rejected as a basis for state prosecution; (2) the Court failed to provide the parties with an opportunity to present evidence on contested issues, as required by statute, and instead relied wholesale upon the recommendation of the Board, over the objection of the District Attorney, without any inquiry; (3) the Court did not apply the guidelines established by the Board, as required by statute; and (4) the Court failed to set forth the findings of fact and conclusions of law on which its determinations in support of a Level 3 designation were based, as required by statute.

9. THERE IS NO RELATED ACTION OR PROCEEDING NOW PENDING IN ANY COURT OF THIS OR ANY OTHER JURISDICTION.

10. THERE IS NO ADDITIONAL APPEAL PENDING IN THIS ACTION.

Dated: February 9, 2011

Jay P. Lefkowitz, P.C.
Sandra Lynn Musumeci

KIRKLAND & ELLIS LLP
601 Lexington Avenue
New York, New York 10022-4611
Telephone: [redacted]
Facsimile:

Attorneys for Defendant-Appellant Jeffrey E. Esptein.

EFTA00232720

March 20, 2011

To whom it may concern:

I served as U.S. Attorney for the Southern District of Florida from 2005 through 2009. Over the past weeks, I have read much regarding Mr. Jeffrey Epstein. Some appears true, some appears distorted. I thought it appropriate to provide some background, with two caveats: (i) under Justice Department guidelines, I cannot discuss privileged internal communications among Department attorneys and (ii) I no longer have access to the original documents, and as the matter is now nearly 4 years old, the precision of memory is reduced.

The Epstein matter was originally presented to the Palm Beach County State Attorney. Palm Beach Police alleged that Epstein unlawfully hired underage high-school females to provide him sexually lewd and erotic massages. Police sought felony charges that would have resulted in a term of imprisonment. According to press reports, however, in 2006 the State Attorney, in part due to concerns regarding the quality of the evidence, agreed to charge Epstein only with one count of aggravated assault with no intent to commit a felony. That charge would have resulted in no jail time, no requirement to register as a sexual offender and no restitution for the underage victims.

Local police were dissatisfied with the State Attorney's conclusions, and requested a federal investigation. Federal authorities received the State's evidence and engaged in additional investigation. Prosecutors weighed the quality of the evidence and the likelihood for success at trial. With a federal case, there were two additional considerations. First, a federal criminal prosecution requires that the crime be more than local; it must have an interstate nexus. Second, as the matter was initially charged by the state, the federal responsibility is, to some extent, to back-stop state authorities to ensure that there is no miscarriage of justice, and not to also prosecute federally that which has already been charged at the state level.

After considering the quality of the evidence and the additional considerations, prosecutors concluded that the state charge was insufficient. In early summer 2007, the prosecutors and agents in this case met with Mr. Epstein's attorney, Roy Black. Mr. Black is perhaps best known for his successful defense of William Kennedy Smith. The prosecutors presented Epstein a choice: plead to more serious state felony charges (that would result in 2 years' imprisonment, registration as a sexual offender, and restitution for the victims) or else prepare for a federal felony trial.

What followed was a year-long assault on the prosecution and the prosecutors. I use the word assault intentionally, as the defense in this case was more aggressive than any which I, or the prosecutors in my office, had previously encountered. Mr. Epstein hired an army of legal superstars: Harvard Professor Alan Dershowitz, former Judge and then Pepperdine Law Dean Kenneth Starr, former Deputy Assistant to the President and then Kirkland & Ellis Partner Jay Lefkowitz, and several others, including prosecutors who had formally worked in the U.S.

Attorney's Office and in the Child Exploitation and Obscenity Section of the Justice Department. Defense attorneys next requested a meeting with me to challenge the prosecution and the terms previously presented by the prosecutors in their meeting with Mr. Black. The prosecution team and I met with defense counsel in Fall 2007, and I reaffirmed the office's position: two years, registration and restitution, or trial.

Over the next several months, the defense team presented argument after argument claiming that felony criminal proceedings against Epstein were unsupported by the evidence and lacked a basis in law, and that the office's insistence on jail-time was motivated by a zeal to overcharge a man merely because he is wealthy. They bolstered their arguments with legal opinions from well-known legal experts. One member of the defense team warned me that the office's excess zeal in forcing a good man to serve time in jail might be the subject of a book if we continued to proceed with this matter. My office systematically considered and rejected each argument, and when we did, my office's decisions were appealed to Washington. As to the warning, I ignored it.

The defense strategy was not limited to legal issues. Defense counsel investigated individual prosecutors and their families, looking for personal peccadilloes that may provide a basis for disqualification. Disqualifying a prosecutor is an effective (though rarely used) strategy, as eliminating the individuals most familiar with the facts and thus most qualified to take a case to trial harms likelihood for success. Defense counsel tried to disqualify at least two prosecutors. I carefully reviewed, and then rejected, these arguments.

Despite this army of attorneys, the office held firm to the terms first presented to Mr. Black in the original meeting. On June 30, 2008, after yet another last minute appeal to Washington D.C. was rejected, Epstein pled guilty in state court. He was to serve 18 months imprisonment, register as a sexual offender for life and provide restitution to the victims.

Some may feel that the prosecution should have been tougher. Evidence that has come to light since 2007 may encourage that view. Many victims have since spoken out, filing detailed statements in civil cases seeking damages. Physical evidence has since been discovered. Had these additional statements and evidence been known, the outcome may have been different. But they were not known to us at the time.

A prosecution decision must be based on admissible facts known at the time. In cases of this type, those are unusually difficult because victims are frightened and often decline to testify or if they do speak, they give contradictory statements. Our judgment in this case, based on the evidence known at the time, was that it was better to have a billionaire serve time in jail, register as a sex offender and pay his victims restitution than risk a trial with a reduced likelihood of success. I supported that judgment then, and based on the state of the law as it then stood and the evidence known at that time, I would support that judgment again.

Epstein's treatment, while in state custody, likewise may encourage the view that the office should have been tougher. Epstein appears to have received highly unusual treatment while in jail. Although the terms of confinement in a state prison are a matter appropriately left to the

State of Florida, and not federal authorities, without doubt, the treatment that he received while in state custody undermined the purpose of a jail sentence.

Some may also believe that the prosecution should have been tougher in retaliation for the defense's tactics. The defense, arguably, often failed to negotiate in good faith. They would obtain concessions as part of a negotiation and agree to proceed, only to change their minds, and appeal the office's position to Washington. The investigations into the family lives of individual prosecutors were, in my opinion, uncalled for, as were the accusations of bias and / or misconduct against individual prosecutors. At times, some prosecutors felt that we should just go to trial, and at times I felt that frustration myself. What was right in the first meeting, however, remained right irrespective of defense tactics. Individuals have a constitutional right to a defense. The aggressive exercise of that right should not be punished, nor should a defense counsel's exercise of their right to appeal a U.S. Attorney to Washington, D.C. Prosecutors must be careful not to allow frustration and anger with defense counsel to influence their judgment.

After the plea, I recall receiving several phone calls. One was from the FBI Special Agent-In-Charge. He called to offer congratulations. He had been at many of the meetings regarding this case. He was aware of the tactics of the defense, and he called to praise our prosecutors for holding firm against the likes of Messrs. Black, Dershowitz, Lefkowitz and Starr. It was a proud moment. I also received calls or communications from Messrs. Dershowitz, Lefkowitz and Starr. I had known all three individuals previously, from my time in law school and at Kirkland & Ellis in the mid 90s. They all sought to make peace. I agreed to talk and meet with each of them after Epstein pled guilty, as I think it important that prosecutors battle defense attorneys in a case and then move on. I have tried, yet I confess that has been difficult to do fully in this case.

The bottom line is this: Mr. Jeffrey Epstein, a billionaire, served time in jail and is now a registered sex offender. He has been required to pay his victims restitution, though restitution clearly cannot compensate for the crime. And we know much more today about his crimes because the victims have come forward to speak out. Some may disagree with the prosecutorial judgments made in this case, but those individuals are not the ones who at the time reviewed the evidence available for trial and assessed the likelihood of success.

Respectfully,

R. Alexander Acosta
Former U.S. Attorney
Sothern District of Florida

S.J. QUINNEY
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[redacted] G. CASSELL
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September 29, 2011

Wifredo A. Ferrer
United States Attorney
Southern District of Florida
99 N.E.4th Street
Miami, FL 33132

Re: Follow-up on Jeffrey Epstein

Dear Mr. Ferrer:

As you know, Brad Edwards and I represent Jane Doe #1 and Jane Doe #2 in their efforts to protect their rights under the Crime Victims' Rights Act. You were nice enough to meet with Jane Doe #1 in December 2010 on that case, and we appreciate that. At the conclusion of that meeting, I also provided you with a letter presenting my grave concerns about possible improper influences being brought to bear on your Office during its negotiation of the Jeffrey Epstein non-prosecution agreement. (For your convenience, I attach a copy of that letter.) It was my understanding that you deemed my allegations serious enough to forward my letter to the Office of Professional Responsibility (OPR) for further investigation, and it was my impression that OPR was going to look into the allegations raised in my letter.

I must say that I was surprised to receive a letter five months later from OPR indicating that my concerns were not being investigated. On May 6, 2011, OPR stated that it was their policy "to refrain from investigating issues or allegations that were, are being, or could have been addressed in the court of litigation, unless a court has made a specific finding of misconduct by a DOJ attorney . . . or there are present other circumstances." OPR stated that my allegations fell into the category of allegations that were being litigated because Jane Doe #1 and Jane Doe #2 were raising these issues in their CVRA case. Accordingly, OPR indicated it was not going to review the allegations that I presented.

I am writing now to request the opportunity to meet with you further and to pass along additional information in support of my concerns. I wanted to follow up with you to make sure that *someone* was looking into my allegations about improper influences affecting your Office's decision to accord Jeffrey Epstein an extraordinarily lenient plea. It may well be that OPR has some policy precluding an investigation. But will your Office then investigate these issues?

I am also writing to alert you to additional information that continues to lead me to believe that something was rotten with the way this case was handled.

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As you may know, [redacted] was a senior prosecutor and supervisor in your Office when the non-prosecution agreement with Jeffrey Epstein was approved. It is our impression that he was directly involved in supervising the Epstein investigation as the former Chief of the Criminal Division of your Office. It has been our understanding for quite some time that he frequently corresponded with Epstein's attorneys, especially Lily [redacted], during the plea discussions, and it is our understanding that he left your Office around the time the non-prosecution agreement was signed.

Our private investigator has recently learned that [redacted] left your office to work at a New York law firm representing white collar criminals. He also learned that [redacted] quite expensive apartment in New York City is located in close proximity to real estate properties (specifically condos) owned by Jeffrey Epstein. The location of [redacted]s apartment, his role during the Epstein negotiations, and his departure immediately after the NPA was signed, leads us to believe that [redacted] and Epstein may have had a business or other relationship either during or after [redacted] time in the Office. If that is the case, then we would appreciate you providing the information that you have in that regard voluntarily, as opposed to us having to conduct formal discovery to get it.

As you also know, Judge Marra has recently ordered discovery to proceed in this case. We obviously would like for that process to go as smoothly as possible and want to avoid becoming involved in true adversary litigation with your Office. On behalf of our clients, we just want to get to the bottom of this, and we feel safe in assuming that you do too at this point.

For all these reasons, I am writing to request another chance to meet with you about our concerns and about making the discovery process go smoothly. Thank you in advance for considering this request. I would be happy to provide any other additional information that would be useful to you.

Sincerely,

Paul G. Cassell

cc: Assistant U.S. Attorney [redacted]

cc: Assistant U.S. Attorney [redacted]

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S.J. QUINNEY
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[redacted] G. CASSELL
Ronald N. Boyce Presidential Professor of Criminal Law
Telephone: [redacted]

December 10, 2010

Wifredo A. Ferrer
United States Attorney
Southern District of Florida
99 N.E.4th Street
Miami, FL 33132

Re: Request for Investigation of Jeffrey Epstein Prosecution

Dear Mr. Ferrer:

I am writing as someone with extensive experience in the federal criminal justice system – as a former Associate Deputy Attorney General, Assistant United States Attorney, federal judge, and currently criminal law professor – to alert you to what seems to be the most suspicious criminal case I have ever encountered. I ask that you investigate whether there were improper influences and actions during your office's criminal investigation of Jeffrey Epstein, particularly regarding the decision to enter into a binding non-prosecution agreement blocking his prosecution for numerous federal sex offenses he committed over many years against more than thirty minor girls.

As I am sure you are well aware, in 2006 your office opened a criminal investigation with the FBI into allegations that for years Jeffrey Epstein sexual abused dozens of minor girls in his West Palm Beach mansion. The FBI soon developed compelling evidence that Epstein had in fact committed numerous federal sex offenses with more than 30 minor girls. And yet, your office ultimately entered into a plea arrangement which allowed Epstein escape with a non-prosecution agreement that ensured he would have no federal criminal liability and would spend no more than 18 months in state jail. For sexual offenses of this magnitude – in a case with more than 30 witnesses providing interlocking testimony, all made automatically admissible by virtue of Fed. R. Evid. 414 – this is an extraordinary outcome.

Why did your office enter into this highly unusual non-prosecution arrangement with Epstein? Suspicion begins with the point that Epstein is a politically-connected billionaire. But that wouldn't be troubling without considerable other evidence that something went terribly wrong with the prosecution for other, improper reasons. Consider the following highly unusual facts:

First, it appears that Epstein was tipped off before the execution of a search warrant at his home. We know that lead state police officers -- Detective Recarey and Police Chief Michael Reiter -- complained that the house was "sanitized" by the time they arrived to serve a search warrant for child pornography. This sanitation was evident by the various computer wires hanging with no computers attached. Housekeeper Janusz Banasiak later testified in a civil

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deposition that Epstein's assistant, [redacted]) and another man (unknown) were instructed to remove, and did in fact remove, multiple computers from Epstein's home shortly before the search warrant was served. The fact that there could well have been a tip off is apparently suspected by federal authorities.

Second, there is evidence that one of the senior prosecutors in your office joined Epstein's payroll shortly after important decisions were made limiting Epstein's criminal liability – and improperly represented people close to Epstein. During the federal investigation of Epstein, [redacted] was a senior Assistant U.S. Attorney in your office. As we understand things, he was a direct supervisor of the line prosecutor handling the case and thus was well aware of details of the Epstein investigation and plea negotiations. We further believe that he was consulted on issues related to the prosecution of Epstein and Epstein's co-conspirators, including specifically issues related to whether Epstein employees and pilots should be prosecuted for their involvement in Epstein's sexual offense. We further believe that he personally and substantially participated in making such decisions about the course of the criminal investigation.

Within months after the non-prosecution agreement was signed by your office, [redacted] left your office and immediately went into private practice as a white collar criminal defense attorney. His office coincidentally happened to be not only in the same building (and on same floor) as Epstein's lead criminal defense counsel, Jack Goldberger, but it was actually located right next door to the Florida Science Foundation -- an Epstein-owned and -run company where Epstein spent his "work release."

While working in this office adjacent to Epstein's, [redacted] undertook the representation of numerous Epstein employees and pilots during the civil cases filed against Epstein by the victims – cases that involved the exact same crimes and exact same evidence being reviewed by the U.S. Attorney's office when he was employed there. Specifically, he represented [redacted] (Epstein's number one co-conspirator who was actually named as such in the NPA), his housekeeper (Louella Ruboyo), his pilots Larry Morrison, Larry Visoski, David Rogers, William Hammond and Robert Roxburgh. (Hammond and Roxburgh were not deposed but the others were.) Our understanding is that his representation of these individuals was paid for, directly or indirectly, by Epstein.

[redacted] was well aware of what evidence your office and federal investigator had collected against Epstein and about the minor girls who were his victims. As a consequence, he knew what evidence the attorneys for the victims were using. He also knew what each of those witnesses had said, if anything, to federal and state investigators during the criminal investigation.

We have been unable to place our fingers on the federal regulations governing such later representation. We do know, however, that such actions appear to be in direct contravention of the Florida ethical rules regarding attorneys who leave government employment. For

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example, Florida R. Prof. Conduct 4-1.11(a) provides "[a] lawyer shall not represent a private client in connection with a matter in which the lawyer participated personally and substantially as a public officer or employee unless the appropriate government agency consents after consultation." Similarly, Florida R. Prof. Conduct 4-1.11(b) provides that "[a] lawyer having information that the lawyer knows is confidential government information about a person acquired when the lawyer was a public officer or employee may not represent a private client whose interests are adverse to that person in a matter in which the information could be used to the material disadvantage of that person." Both these rules appear to have been violated. But entirely apart from the details of ethical rules, the fact that one of your prosecutors was involved in making important decisions about the scope of criminal liability for Epstein and his associates and then – after criminal liability was significantly limited – representing numerous people at Epstein's behalf raises serious questions. At the very least, there is the strong appearance that [redacted] may have attempted to curry favor with Epstein and then reap his reward through favorable employment. At the very worst, there may have been advance discussions – we simply don't know at this point.

Third, Epstein appears to have deliberately kept from victims in the case correspondence with your office and the Justice Department that might have shed light on improper influences. Along with other capable attorneys, I was involved in representing one of Epstein's victims ([redacted]) who filed a federal civil case against Epstein. Suspecting that Epstein may have improperly influenced your office, we immediately served discovery requests on Epstein for all the correspondence with your office regarding the plea negotiations. Eleven months of hard litigation ensued, in which Epstein made every conceivable argument against production. Finally, late in June of this year, his appeals exhausted, Epstein produced the correspondence to us. However, in violation of the court order, he redacted the correspondence so that he provided only emails and other statements *from* your office – not his emails and statements *to* your office. More significantly, even though he was under court order to produce all correspondence between his attorneys and your office, Epstein secretly withheld correspondence by several of his most high-powered attorneys – namely Ken Starr and Lilly [redacted] Sanchez. Epstein settled the case with [redacted] within days after this limited production, and we did not realize the absence of what must have been critical discussions between your office and Starr and Snachez (among others). Epstein's refusal to allow us to see that information raises the suspicion in our minds that there must have been unusual pressures being brought to bear during the plea discussions that would have been revealed had Epstein complied with his production obligations.

Fourth, there appears to have been an unprecedented level of secrecy between your office and the Federal Bureau of Investigation during this case. The FBI was responsible, along with state and local police agencies, for building the case against Epstein. They appear to have developed an overwhelming criminal against him. And yet, when your office signed the non-prosecution agreement with him, it is not clear to us that the FBI was consulted about this decision. Indeed, we have suspicions that the FBI was not informed of this decision until, perhaps, months later.

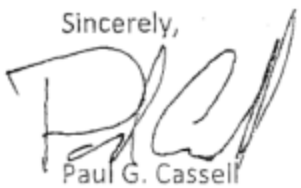
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Supporting this suspicion is our on-going litigation regarding the treatment of the victims in this case. As you know from our draft pleadings that we have discussed with your office, we believe there is compelling evidence that the victims and their attorneys were deceived about the existence of a non-prosecution agreement for months in order to avoid what certainly would have been a firestorm of controversy about such lenient treatment of a repeat sex offender. Our impression from the evidence we have been able to obtain so far is that the FBI was similarly kept in the dark – not consulted about or even told about the NPA. While a certain amount of tension has always existed between federal prosecuting and investigating agencies, not even informing the FBI about the Epstein NPA seems highly unusual.

All of these strange facts -- as well as the facts that we are alleging in our crime victims' litigation – lead us to think that there was something rotten with the way this case was handled. Epstein could have faced years and years in prison for numerous federal sex offenses. And yet he managed to contrive to walk away with no federal time at all (and only minimal state time). We respectfully ask you to investigate through appropriate and independent channels the handling of the Epstein (non)prosecution.

Thank you in advance for considering this request. I would be happy to provide any other additional information that would be useful to you.

Sincerely,



Paul G. Cassell

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March 1, 2011

Wifredo A. Ferrer
United States Attorney
Southern District of Florida
99 N.E.4th Street
Miami, FL 33132

Re: Jane Doe #1 and Jane Doe #2 vs. United States, No. 09-80736

Dear Mr. Ferrer:

We are writing to you personally on behalf of Jane Doe #1 and Jane Doe #2 in one last effort to try and narrow our range of difference in the pending Crime Victims Rights Act case regarding Jeffrey Epstein. We make two requests: First, we are requesting that you agree to our proposal for narrowing the range of disputes between your Office and the victims, Jane Doe #1 and Jane Doe #2. Second, if you are unable to agree to our proposal, we request that you agree not to withhold information in your Office's possession that would support their claims under the Crime Victims Rights Act (CVRA).

By way of background, as you know, we have been attempting to work with your Office for more than two-and-a-half years to reach a stipulated set for facts in this CVRA case that would avoid the need for any public battle between your Office and the victims . Indeed, we reached out to you for a personal meeting to try to avoid a fight, and you were kind enough to meet with Jane Doe #1 and her undersigned attorneys. During that meeting, we expressed our intention to go the extra mile to try and avoid any fight with your Office and to see if there was a way to fight only Jeffrey Epstein the sex offender, rather than the prosecutors who work for you.

Today we had a telephone conference call with two of your attorneys, [redacted] and [redacted], in which they told us that we would not be receiving any cooperation from your Office on our CVRA case and that, in short, we would have to "see you in court." We were also told that your Office was taking the position that it could, and would, withhold from the victims information in your Office's possession that would support their claims under the CVRA. After receiving approval from [redacted] and [redacted] we wanted to write to you personally in one last effort to see if we can narrow our differences on these two issues and avoid a disappointing battle.

Narrowing the Issues in Dispute

During today's conference call, it appeared that there was some confusion from [redacted] and [redacted] as to precisely what the victims were proposing. Our proposal is simply this: that

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your Office and Jane Doe #1 and Jane Doe #2 would stipulate to a set of facts to provide context for the Court while we litigate the legal issue in dispute, that is whether the CVRA applies even though no federal charges were ultimately filed. If your Office prevails on that issue, the victims would obviously have no claim under the CVRA. The victims would then pursue their appellate rights in the Eleventh Circuit. If, however, the victims prevail on that issue, then your Office would take "no position" on the remedy sought by the victims for the violation of their rights afforded them under the Act. Your Office would essentially stand aside and agree not to take any position on the victims' request to set aside the NPA as a remedy for that violation of the victims' rights.

We understood from our meeting with you in December that you wanted to do what you could to help the victims in this case. Yet as we understood [redacted] and [redacted] today, they were taking the position that we would receive no cooperation of any sort from your Office. And we further understood from them that your Office was now going to take the position that even if the victims' congressionally-mandated rights were violated, there is simply no remedy for those violations and thus the victims should have no recourse for the violations.

On behalf of our clients, we want to once again reach out and make sure that your Office wants to move to an adversarial litigation posture on these issues. We simply don't understand why your Office is now going to take a litigating position hostile to ours on issues beyond the legal question of when CVRA rights attached in this case. We appreciate that the Department has institutional concerns about the timing of CVRA rights. But we don't understand why your Office is now going to fight against the victims in their efforts seeking to overturn a NPA that by any measure is unfair. This is not simply our view – the unfairness of the NPA has now attracted comment literally throughout the world, including serving as the basis for an unfavorable portrayal in a recent *Law and Order: Special Victim Episode* and a feature story yesterday in the London-based *Sunday Mail*. We are not asking your Office to join us in our efforts to throw out this unjust agreement. But can't your Office simply stand on the sidelines and let us make our case against Epstein. Fighting a politically well-connected billionaire is difficult enough, without having the weight of the U.S. Attorney's Office for the Southern District of Florida thrown against us too. We respectfully make one last request for you to move forward with our proposal for narrowing differences between us.

Withholding Favorable Evidence

If you feel that your Office must fight us in court on every possible issue, then we are respectfully writing to request that we resolve one issue outside of court: Whether your Office can withhold from the victims evidence in its possession that is favorable to their CVRA case. During our conference call with [redacted] and [redacted] we pointed out that if we were criminal defense attorneys representing criminals, your Office would promptly turn over to us all information in its possession that was helpful to these criminals under the *Brady* and *Giglio* decisions. We asked your Office to extend to the victims the same assistance that it would provide to criminals – i.e., we asked [redacted] and [redacted] to voluntarily provide to us information

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in your Office's possession that was helpful the victims' CVRA case. We were informed that your Office will be taking the position in Court that it can and will withhold from the victims such information, apparently on the theory that victims lack due process or other "discovery" rights under the CVRA.

We believe that the position that your Office can suppress relevant evidence is legally unfounded for four reasons and, in any event, is unsound policy at odds with promises that the Attorney General has made to crime victims and to the public. With regard to the legal problems in this position, first, the CVRA promises victims of crime that they will be "treated with fairness." 18 U.S.C. § 3771(a)(8). The clear intent of Congress in passing this provision was to provide a substantive "due process" right to crime victims. As one of the CVRA's co-sponsors (Senator Kyl) explained, "The broad rights articulated in this section are meant to be rights themselves and are not intended to just be aspirational. One of these rights is the right to be treated with fairness. Of course, fairness includes the notion of *due process*. Too often victims of crime experience a secondary victimization at the hands of the criminal justice system. This provision is intended to direct Government agencies and employees, whether they are in executive or judiciary branches, to treat victims of crime with the respect they deserve." 150 CONG. REC. S4269 (Apr. 22, 2004) (emphasis added).

Because the CVRA extends a "due process" right to crime victims like Jane Doe #1 and Jane Doe #2, victims have a right to fair access to evidence to prove their case. The very foundation of the *Brady* obligation is due process: "[T]he suppression by the prosecution of evidence favorable to an accused . . . violates due process where the evidence is material either to guilt or to punishment." *Brady v. Maryland*, 373 U.S. 83, 87 (1963). It would similarly violate due process for the prosecution to suppress evidence favorable to a crime victim where the evidence is material either to proving a CVRA violation or to the remedy for a violation.

Second, entirely apart from whether the victims have a right to obtain such information, your Office has an affirmative obligation to disclose it to victims. The CVRA directly commands that "[o]fficers and employees of the Department of Justice and other departments and agencies of the United States engaged in the detection, investigation, or prosecution of crime shall make their *best efforts* to see that crime victims are notified of, and accorded, the rights described in [the CVRA]." 18 U.S.C. § 3771(c)(1) (emphasis added).[1] It is simply impossible for

[1] As you can see from this language, the CVRA applies not only to the U.S. Attorney's Office for the Southern District of Florida but also to the relevant office of the FBI. We are "cc'ing" a copy of this letter to the FBI so that they can be informed of our view that they should provide assistance to the victims in this matter as well, rather than join your Office in any effort to withhold evidence. We understand that your Office represents the FBI on these issues, and are happy to continue our discussions with you regarding the FBI obligations in this area. At the appropriate time, however, if we are unable to reach agreement, we would like to have this discussion with a representative of the FBI to see whether they are in accord with your position. It is our understanding that the appropriate person would be the "special agent-in-charge of the division having primary responsibility for conducting the investigation." ATTORNEY GENERAL GUIDELINES FOR VICTIM AND WITNESS ASSISTANCE 11 (May 2005).

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your Office to make its "best efforts" to accord victims their rights while simultaneously withholding evidence that would help them obtain those rights in court.

Third, the attorneys in your Office have duties of candor to the Court that would not permit it to present evidence or testimony that is known to be false. Fla. Bar Rule 4-3.3(a)(4). Allowing the victims access to evidence favorable to their claim will insure compliance with this rule. Similarly, in an ex parte proceeding, a lawyer must inform the court of all material facts known to the lawyer that will enable the court to make an informed decision "whether or not the facts are adverse." Fla. Bar. Rule 4-3.3(d). If your Office is correct that we are not entitled to access to favorable evidence, then the proceedings involving that evidence are essentially ex parte – requiring your Office to make disclosure to the Court. Surely the more appropriate way to proceed is to simply disclose those materials in the first instance to the victims.

Fourth and finally, your Office has previously taken the position that the CVRA petition filed by the victims is covered by the civil rules. If so, then the victims can serve discovery requests as in any other civil cases. The victims can likewise take depositions of witnesses who possess relevant evidence to their claims. Indeed, under Fed. R. Civ. P. 26(a)(1)(A), your Office would be required to automatically produce such information.

For all these reasons, it is our considered opinion that your Office does not have a legally well-founded position to withhold evidence from the victims in this case. Even if the Office did have such a position, however, we are mystified as to why your Office would want to assert such a position. Attorney General Holder has recently publicly discussed the Department's obligations regarding production of exculpatory information to criminals, explaining "We're not here to win cases, but to do justice." *Attorney General Holder Discusses Efforts to Improve Prosecutor Training*, WALL ST. J., Apr. 30, 2010. With all respect, we submit that your Office should seek to do justice not merely for criminals, but also for the victims of those criminals. We therefore respectfully request that you simply provide this information to us as a matter of justice, avoiding the need for us to litigate this question. To avoid burdening your Office, we would be happy to provide a specific list of the information that we believe is material to the victims' CVRA case – a limited amount of information that could be swiftly located by your Office.

Conclusion

We frankly believe we have been very patient on this case and have gone to the extra mile to avoid an unnecessary fight with your Office. But our clients are asking us what the status of their case is, and we have an obligation to proceed diligently. Our first choice is to work something out with you. But if your Office is for some reason unwilling or unable to do that, we believe we have an overwhelming case of clear cut CVRA violations – a case that we will present to the Court.

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As we told [redacted] and [redacted] even though your Office has refused to provide any accommodations to us, we will continue to discuss with them our proposed statement of facts, with the aim of removing information that they believe is damaging to your Office and that we can leave out as unessential to our case. We hope that you will favorably consider our requests in this letter and try to find an approach that will minimize our need to become embroiled in a court dispute between crime victims and the prosecutors who aim to protect them. If we are unable to do so, our intention is to file our "summary judgment" pleadings (which we provided in their entirety to your Office as a courtesy six months ago) on March 18, 2011.

Sincerely,

Bradley J. Edwards P.C.

Paul G. Cassell

Co-Counsel for Jane Doe #1 and Jane Doe #2

Cc:
Special Agent in Charge John V. Gillies
Miami FBI Field Office
16320 NW 2nd Avenue
North Miami Beach, FL 33169

The views expressed in this letter are solely those of its authors.

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[redacted], [redacted] [redacted]. (USAFLS)

From: [redacted] Cassell [redacted]
Sent: Monday, March 07, 2011 5:33 PM
To: [redacted], [redacted] (USAFLS); [redacted], [redacted] [redacted]. (USAFLS)
Cc: Brad Edwards
Subject: Motion to Make Our Pleading Available to the Public - Government Position

Dear [redacted] and [redacted]

We are writing to inquire about the government's position on a motion that we will be filing on March 18 along with our "summary judgment" motion. As you know, the summary judgment motion will contain quotations from e-mails that are under the magistrate judge's order requiring prior notice to the court before they are disclosed. Accordingly, on March 18, we will be filing a full, unredacted summary judgment motion under seal with Judge Marra and, for the public PACER file, a summary judgment motion with quotations from the e-mails redacted.

We will be filing simultaneously a motion for with the court for unsealing of the unredacted motion. We will provide (at least) three ground for unsealing. First, the confidentiality order was only based on an agreement to give advance notice to Epstein before using materials. Once advance notice has been given, there is no basis for confidentiality. Second, there is truly world-wide interest in the handling of the Epstein prosecution, and so our pleading should not remain under seal – instead the public should have access to it so that they can assess how this case was handled. Third, keeping the pleading under seal complicates the ability of Jane Does' attorneys to consult with victims' rights specialist about how best to proceed in the case.

We are writing to determine the Government's position on our motion to unseal the redacted pleading so that we can include that position in our motion. We hope that you will not oppose the motion, which might produce the need for further litigation. As you know, Judge Marra has promptly unsealed other pleadings in this matter when the Government tried to object.

Sincerely,

[redacted] Cassell
Co-Counsel for Jane Doe #1 and Jane Doe #2

[redacted] G. Cassell
Ronald N. Boyce Presidential Professor of Criminal Law
S.J. Quinney College of Law at the University of Utah
332 South 1400 East, Room 101
Salt Lake City, UT 84112-0730
Voice: [redacted]
Fax: [redacted]
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http://www.law.utah.edu/profiles/default.asp?PersonID=57&name=Cassell,Paul

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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
WEST PALM BEACH DIVISION
CASE NO. 08-80119-CIV-MARRA

JANE DOE, et al.,

Plaintiffs,

vs.

JEFFREY EPSTEIN,

Defendant.

WEST PALM BEACH, FLORIDA

JUNE 12, 2009

TRANSCRIPT OF MOTION HEARING
BEFORE THE HONORABLE KENNETH A. MARRA,
UNITED STATES DISTRICT JUDGE

APPEARANCES:

FOR THE PLAINTIFFS:

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Jane Doe 3, 4, 5, 6, 7
[redacted]

ISIDRO M. GARCIA, ESQ.
Garcia Elkins Boehringer
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Jane DOE II [redacted]

RICHARD H. WILLITS, ESQ.
2290 10th Avenue North
Lake Worth, FL 33461
For [redacted]. [redacted]

ROBERT [redacted]. JOSEFSBERG, ESQ.
Podhurst Orseck Josefsberg
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Miami, FL 33130
For Jane Doe 101 [redacted]
(Via telephone)
KATHERINE W. EZELL, ESQ.
Podhurst Orseck Josefsberg
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Miami, FL 33130
For Jane Doe 101 [redacted]

FOR THE DEFENDANT: ROBERT D. CRITTON, JR., ESQ.
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[redacted]

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AS AMICUS CURIAE: [redacted], ESQ.
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For U.S.A. [redacted]

MARTIN G. WEINBERG, ESQ.
20 Park Plaza
Boston MA 02116
(Via telephone) [redacted]
JAY LEFKOWITZ, ESQ.
(Via telephone)

REPORTED BY: LARRY HERR, RPR-RMR-FCRR-AE
Official United States Court Reporter
Federally Certified Realtime Reporter
400 North Miami Avenue, Room 8N09
Miami, FL 33128 [redacted]

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THE COURT: We are here in the various Doe vs. Epstein cases.

May I have counsel state their appearances?

MR. HOROWITZ: Adam Horowitz, counsel for plaintiffs Jane 2 through Jane Doe 7.

THE COURT: Good morning.

MR. EDWARDS: Brad Edwards, counsel for plaintiff Jane Doe.

THE COURT: Good morning.

MR. GARCIA: Good morning, Your Honor. Sid Garcia for Jane Doe II.

THE COURT: Good morning.

MR. WILLITS: Good morning, Your Honor. Richard Willits, here on behalf of the plaintiff [redacted]..

THE COURT: Good morning.

MS. EZELL: Good morning, Your Honor. I'm Katherine Ezell from Podhurst Orseck, here with Amy Adderly and Susan Bennett, and I believe my partner, Bob Josefsberg, is going to appear by telephone.

THE COURT: Mr. Josefsberg, are you there?

MR. JOSEFSBERG: I am, Your Honor.

THE COURT: Good morning.

MR. JOSEFSBERG: Good morning.

THE COURT: All right. Do we have all the plaintiffs stated their appearances? Okay.

Defense?

MR. CRITTON: Your Honor, Robert Critton on behalf of Mr. Epstein, and my partner, Michael Burman.

THE COURT: Good morning.

MR. GOLDBERGER: Good morning, Your Honor. Jack Goldberger on behalf of Mr. Epstein.

THE COURT: I see we have some representatives from the United States Attorney's Office here.

MS. [redacted]: Good morning, Your Honor. [redacted] for the U.S. Attorney's office.

THE COURT: Good morning.

Who else do we have on the phone?

MR. CRITTON: Your Honor, we have two members of the defense team are on the phone, also.

THE COURT: Who do we have on the phone?

MR. WEINBERG: Martin Weinberg. Good morning, Your Honor.

MR. LEFKOWITZ: Jay Lefkowitz. Good morning, Your Honor.

THE COURT: Good morning.

I scheduled this hearing for very limited issues which, as you all know, there's been a motion by Mr. Epstein to stay the civil proceedings against him. The one issue I have concern about is Mr. Epstein's contention or assertion that by defending against the allegations in the civil proceedings, he

may expose himself to an allegation by the United States in the non-prosecution agreement that he's violated that agreement and therefore would subject himself to potential federal charges.

I had asked for some briefing on this. I asked the United States to present its position to me. And I received the Government's written response, which I frankly didn't find very helpful. And I still am not sure I understand what the Government's position is on it.

So first let me hear from Mr. Epstein's attorneys as to what do you believe the concern is. I don't believe the non-prosecution agreement has ever been filed in this Court; am I correct?

MR. CRITTON: To my knowledge, Your Honor, it has not.

THE COURT: So I don't believe I've ever seen the entire agreement. I've seen portions of it.

MR. EDWARDS: Your Honor, I believe that it was filed under Jane Doe 1 and 2 vs. United States of America, case under seal in your court.

THE COURT: Okay.

MR. EDWARDS: In a separate case.

THE COURT: In that case, okay. Was it actually filed in that case?

MR. EDWARDS: I filed it under seal.

THE COURT: In any event, what's Mr. Epstein's concern about if you defend the civil actions, you're going to expose

yourself to a claim for a breach by the United States of the non-prosecution agreement?

MR. CRITTON: Robert Critton.

Your Honor, our position on this case is, I'd say is somewhat different. When this issue originally came before the Court, as you are aware prior to my firm's involvement in the case, there was a motion filed on behalf of Mr. Epstein seeking a stay. And I think it was in Jane Doe 102 and then subsequently Jane Doe 2 through 5 because all of those cases were filed on or about the same time.

And at that time the Court looked at the issue and it was based upon a statutory provision at that time. And the Court said I don't find that it's applicable, or for whatever reason I think the Court said I don't consider that to be a pending proceeding or a proceeding at that particular time.

In that same order, which was in Jane Doe 2, I believe it's -- not I believe, I know it's docket entry 33, the Court also went on to talk about at that particular point in time dealt with the issue of the discretionary stay.

And the Court said at that time, I'm paraphrasing, but the Court also does not believe a discretionary stay is warranted. And what the Court went on to say is that if defendant does not breach the agreement, then he should have no concerns regarding his Fifth Amendment right against self-incrimination.

The fact that the U.S. Attorney or other law enforcement officials may object to some discovery in these civil cases is not in and of itself a reason to stay the civil litigation, so that any such issue shall be resolved as they arise in the course of the litigation.

And I would respectfully submit to the Court that the position that the Government has taken in its most recent filings changes the playing field dramatically. Because what the Government in essence has said as distinct from the U.S. saying is, well, we object to some discovery, or we may object to some discovery in the civil cases.

What they have, in essence, said is if you take some action, Mr. Epstein, that we believe unilaterally, and this is on pages 13 and 14 of their pleading or of their response memo to the Court's inquiry, they say if Mr. Epstein breaches the agreement. They said it's basically like a contract, and if one side breaches, the other side can sue.

In this instance what the Government will do is if we believe that Mr. Epstein has breached the agreement, we'll indict him. We will indict him. And his remedy under that circumstance, which is an incredible and catastrophic catch 22 is, we'll indict him and then he can move to dismiss. That's a great option.

In this particular instance my mandate in defending -- and that's a dramatic change in the Government's position,

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because the Government is not saying, and the Court was pretty specific in what you asked the Government for in its response is, in essence, and it's the same question in a more limited fashion you're posing today is whether Mr. Epstein's defense of the civil action violates the NPA agreement, the non-prosecution agreement, between the U.S. and Mr. Epstein.

And the Government refuses to answer that question. They won't come out and say, yes, it will, or no, it won't. What they're doing is they want to sit on the sideline, and as their papers suggest is, they want us to lay in wait and that if, in fact, they believe he violates a provision of the NPA as it relates to the defense of this case or these multitude of cases, then they can come in and indict him -- no notice, no opportunity to cure.

We don't think that's what the NPA says, but that's certainly what their papers say. We'll indict him, no notice, no opportunity to cure. We will indict him, and his remedy under that circumstance is that he can move to dismiss the indictment.

Well, that's great except Mr. Epstein, his mandate to me and I know his mandate to his criminal lawyers, is: Make certain I don't do anything, in particular in these civil cases that would in any way suggest that I am in willful violation of the NPA.

Now, in the Court's prior ruling in the docket entry

33, certainly some aspects of the NPA are within Mr. Epstein's control. There's no question about that. But aspects that relate to the defense of these cases, either in terms of the civil lawyers who are defending these, I think there's 12 or 13 pending cases in front of you, there's another four cases in the state court, is the risk is substantial, it's real, and it presents a chilling effect for the civil lawyers in moving forward to determine whether or not we're taking some action that in some way may be a violation of the NPA.

And the Government's, again, refusal or non-position with regard to past acts that have been taken in the civil case with regard to the defense or future acts that we may take with regard to these contested litigation casts an extraordinary cloud of doubt and uncertainty and fear that the defense of these cases could jeopardize Mr. Epstein and put him in the irreparable position of violating the NPA and then subsequently being indicted.

In this particular instance, again, Mr. Epstein has no intention of willfully violating the NPA, but it's of great concern to him. And I'd say with the position that the Government has taken, no notice, no cure period, no opportunity to discuss. Again, we think that's not what the NPA provides, it's not what the deal was between the two contracting parties, the United States and Mr. Epstein. But that's clearly what their papers say under the circumstances, and it would create

this irreparable harm to Mr. Epstein under the circumstances.

In essence, we're left with a catch 22 in defending the civil cases. We have a mandate to take no action, to take any action which may be deemed to be a violation of the NPA, either in the past or in the future, which would in any way risk Mr. Epstein being indicted by the United States.

He has the clear risk of an indictment based upon the papers that the Government filed. It's real, it's not remote, and it's not speculative. It chills the action of the defense in this instance of both Mr. Epstein and his attorneys in trying to defend these cases and decide under the circumstances can we do this, can we take this position with regard to depositions, can we take this legal position with regard to motions to dismiss, with regard to responses, with regard to replies?

And we send out paper discovery. Is this in some way if we contact someone who may be an associate of these individuals as part of our investigation, is that potentially in any way a violation of the NPA? Again, we don't think so.

And, obviously, again, my direction has been from my client: Don't take any action that would result in me being indicted under the NPA. Well, that's great. But, generally, civil lawyers or civil lawyers in defending a personal injury case or a tort case, which is exactly what these are, and from a practical standpoint, we use various tools to do discovery.

They're standard. They're specific. They're very temporary. Very typical.

But in this instance, as the Court knows, things are not typical with regard to this case in any way, shape or form. We can't even serve subpoenaes, there's objections and there's -- we can't even serve objections to third parties so we can obtain documents unless we have to filter it through the plaintiffs' attorneys. They won't allow us to use their clients' names, even in a subpoena that would never be filed in the court.

How do we do a deposition of a third party? We wanted to take the deposition of Jane Doe 4. Well, who is she? Well, we can't tell you that. Well, who's the defendant? Well, we can't tell you that because nobody wants anybody to know anything about the case. They want to present it strictly through rose-colored glasses.

And in this particular instance, we simply can't defend this case or take certain action with the spector hanging over us that, in fact, the Government may deem it to be a violation of the NPA, because very clearly in their response papers, they don't say. They say we don't take the position, and then they take a substantial position is we think there's not all that substantial factors that would entitle him to a stay.

Except for the one major issue which the Court posed

in the question is, is can he defend these cases? That's what I really want to know. Can he defend these cases and, in essence, what he has done in the past or what his defense team has done in the past and what they're going to do in the future, can you give him, Epstein, assurances that the Government under this situation, whatever he does, based on advice of counsel, that that cannot be a willful violation of the NPA, which they can -- they, the U.S. -- can then turn around and say that's a violation of the agreement and, therefore, we're going to go proceed to indict you under the circumstances.

Our position is, Your Honor, is that the U.S. has now cavalierly suggested that, as they did in picking up on the court's docket entry or prior order, is, look, compliance with the NPA is solely up to Mr. Epstein. In this type of balance of equities, it doesn't speak in favor of a stay.

Well, that's great. And maybe that was the position back in '08, on August 5th of '08, when the issue came up in front of the Court with regard to the initial stay.

But the Government's papers under these circumstances suggested a very different set of circumstances. Their own unilateral, which is the issue that we argued in the motion for stay, is that the Government's position is that we can unilaterally indict this man if we think he's breached the NPA.

We don't think that's right, but we have no buffer

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between us and the Government. They'll say, and as the Court knows, the Government has substantial power. The Government does what it wants. Most of the time hopefully they're right. Sometimes they make mistakes.

But in this particular instance, my client has rights. We think that there's notice provisions, we think there's cure provisions under the NPA. That's not what their paper says under the circumstances.

And what we'd like to know from the Government, and maybe the answer is basically what the Court asks is, let the Government come forward today and say, based on the knowledge that we have, or as of today's date, June 12th, 2009, we, the Government, agree that there is no set of circumstances, not that we're not aware of, but as of today's date, there is nothing that exists that would be a violation of the NPA.

THE COURT: Well, that's way beyond what I'm interested in. I don't know what Mr. Epstein may have done outside the context of defending this case that may constitute a violation. And if he has done something outside the context of defending this case that's a violation, I don't care. That's between the United States and Mr. Epstein.

I'm only concerned about whether anything he does in defending these civil actions is going to be a violation of the non-prosecution agreement. If he has done something else, it's none of my business, and I don't care, and I'm not going to

even ask the Government to give you an assurance that he hasn't done anything that might have violated the agreement up till today. I'm only interested in defending these civil actions.

MR. CRITTON: Then I would respectfully submit to the Court that the Government be asked in that limited context, are they as of today, whether there were or not, but as of today is there anything that has been done or will you take the position, the United States, that any position that Mr. Epstein has taken with regard to defending these civil cases is in any way a violation of the NPA?

THE COURT: Well, I'm not sure what they're going to say, but that might -- that cures the problem up to this point. But then we have to deal with what's going to happen from here on in. And that's another issue that we have to deal with.

So I understand your position.

But has anyone suggested to you on behalf of the United States that there is something that you've done in defending this case that they believe may or could be construed as a violation of the non-prosecution agreement? Has anyone pointed to anything that you've done? For example, the fact that you've wanted to take their -- I don't know if you've noticed depositions or not in this case, but if you've sent notice of taking deposition, if you sent requests for production of documents, if you sent interrogatories, if you issued third party subpoenas? Is anything you've done thus far

in the context of this case been brought to your attention as a potential violation?

MR. CRITTON: I have received no notification nor am I aware that we've received any notification of any action that we have taken today. As I suggested to the Court, I don't know when they've done or not. And in their papers they suggested, well, we don't know everything that's gone on in the civil litigation.

But from a practical standpoint, it was a number of comments that were made in their papers is, we can indict, we can see if there's a breach.

Judge, I may have some --

THE COURT: Before you go on.

MR. CRITTON: I'm sorry.

THE COURT: You've focused a great deal on the Government's response to my inquiry as supporting your position that you're in jeopardy. But you've made the suggestion, even before this brief was filed, that defending the case was going to potentially result in an assertion or allegation that you breached the non-prosecution agreement.

So what was it that caused you to make that initial assertion? Because that's what caught my attention, was not -- this brief that the Government has filed was in response to something that you filed initially in your most recent motion for a stay which raised the issue.

So what was it that gave you some concern to even raise the issue that defending this case is going to constitute a breach?

MR. CRITTON: Because there are other instances where counsel other than myself, not in the civil aspects, where allegations have been made and letters have been sent by the United States suggesting that there's been a violation of the NPA. And under those circumstances, some notification was provided.

THE COURT: Did it have anything to do with defending the civil actions?

MR. CRITTON: It did not.

THE COURT: So then why was that issue raised by you in the first instance?

MR. CRITTON: Because of the prospect that the defendant could take, that the U.S. would take the position under the circumstances that a position that we took with regard to the contested litigation may well impact, that the Government may have a very different view of what the interpretation of the agreement is.

And as an example is a number of the parties, and I know the Court doesn't want to get into a discussion, the issue is, is under 2255 is that from the defendant's perspective the deal that was cut on that, it was a very specific deal. It dealt with both consensual and contested litigation. It dealt

with a secret list of individuals who we had no idea who was on the list, and a commitment that he would under certain circumstances be required to pay a minimum amount of damages, which our position is under 2255 based upon the statute that was in effect at the time, a $50,000 as to anyone who wanted -- who came forward who was on the list and met certain criteria.

The position that now has been asserted by a number of the plaintiffs under the circumstances, and it's been pled, and actually a number of the complainants is, is Epstein agreed, and they cite to a letter that was sent by Ms. [redacted] from the Government, that says he has to plead guilty or he can't contest liability. That may be true under very, very limited or specific circumstances.

But what the plaintiffs have done in a number of the cases, and these are pending motions, is they've said is, well, we think [redacted]. cases is a good example, they've pled 30 separate counts of 2255 alleged violations. And they're saying under the circumstances is, therefore, we have 2255 violations, there's 30 of them, so 30 times 150, or should be, or whether it's 150, that's the amount of money that we want, so maybe $15 million, or whatever the number is.

Some of the other plaintiffs' lawyers have been even more creative. They've said is, well, we'll agree that it's only one cause of action but that each number of violations; that is, if 20 alleged incidents occurred, that we would

consider to be, or that we will argue are violations, then we can take 20 times the 50, or the 150, depending on which statute is applicable.

So the Government under that set of circumstance could say, and, again, this is one of the reasons that we raised it, they could say, look, our deal with you was that you couldn't contest liability, that you were waiving liability, or your ability to contest an enumerated offense under 2255.

Again, part of the deal was as to an enumerated offense. Okay. Well, what's that mean? What did he plead to? Well, he really didn't plead to anything, which is another issue associated with the 2255. But if the Government comes in and says, no, wait a minute, our position was, is that you're stuck with 2255 and the language within the NPA. And, therefore, whether it's an offense or whether it's multiple offenses or violations or each one represents an individual cause of action, if the Government takes the position that's adverse to what we think the clear reading of the agreement was under those circumstances, they could claim a violation.

And as a result -- and that's one of the reasons we put -- that was the most glaring one to us, so we raised that issue. And then when the Government's response came with regard to, is we can just proceed to indict if we think that there's been a breach of the agreement.

That puts us at substantial risk and chills our

ability to move forward. Thank you, Your Honor.

THE COURT: Thank you. Who wants to be heard from the plaintiffs first?

Is there any plaintiff's attorney who is contending that the defense of these civil actions by Mr. Epstein is going to constitute a breach of the non-prosecution agreement?

MR. JOSEFSBERG: Your Honor, this is Bob Josefsberg. May I speak?

THE COURT: Yes, sir.

MR. JOSEFSBERG: We're not quite confident that any breaches of any agreement, which were third-party beneficiaries, should be resolved by you. We're not saying it shouldn't. But we have not raised any breach of agreement. We think that is between the United States and Mr. Epstein.

What I find incredulous and disingenuous is that Mr. Epstein is saying that he wants a stay because he may be forced into taking actions in the defense of this case that would violate the agreement.

And let me make our position clear on that. If he wants to move to take depositions, interrogatories, production, and they are according to your rulings appropriate, not invasive of the privacy of someone, and they are relevant, then I don't know how those could in any way be violations of the agreement.

What I find hypocritical is that there are two parts

to the agreement that I am a beneficiary of. One of them is that he has agreed that on any action brought in the 2255, he will admit to liability.

And I received on May 26 a motion to dismiss, which we're prepared to respond to and disagree with, but totally contesting liability, saying that the statute doesn't apply because the girls are no longer minors and saying, and this is the great one, saying that the predicate of the conviction under 2255 has not been satisfied.

Now, the understanding that I have is the agreement between the Government and Mr. Epstein was that the Government desired to see these victims made whole, and wanted them to be in the same position as if Mr. Epstein had been prosecuted and pled or convicted. And they would be able to have the predicate of that criminal conviction, which just as a matter of liability would just be introduced as proof that he's done this.

They, under the agreement, are supposed to admit to liability on limited something that's under 2255. He has filed, but since there is no conviction, there can be no civil suit under 2255, with which we disagree. But it is totally in opposite of the NPA.

The second part is there are many young ladies, and this perhaps he can use this to his great advantage, who are humiliated about this entire situation. Some of them won't

come forward.

We were appointed by Judge [redacted] as a Special Master to represent these young ladies. And some of them don't even want to file suit. They don't even want to be known as Jane Doe 103. They don't want any of the risks for these motions that are pending.

And part of the agreement was that if we represented them and they settle, Mr. Epstein would pay our fees. And he has written us as of yesterday that he is under no obligation to pay our fees on settling cases.

Now, those two matters, I believe, may be breaches. But I am not asking this Court at this time to do anything about them. Nor am I telling the Government, I'm not running to the Government and saying indict him because I want you to pressure him to do what he agreed to.

I'm a third-party beneficiary for that agreement, and I may move to enforce certain parts of it. But as far as the issue of staying the litigation, that is the exact opposite of the intent and the letter of the NPA. The purpose of the NPA was so that these 34 young ladies, these victims who have been severely traumatized, may move on with their lives.

And to stay this action would be the exact opposite of the purpose of that agreement and would be horrible psychologically for all of my clients.

THE COURT: Mr. Josefsberg, I understand your

position. And I don't want to argue the merits of whether a stay should or should not be granted.

I'm just trying to understand what the ground rules are going to be if I grant a stay or if I deny a stay. And I've already denied a stay once. I have to decide this current motion, and I just want to know what is going to happen if I deny the stay in terms of Mr. Epstein's exposure under the non-prosecution agreement. That's my concern.

So if you're telling me that you're not going to urge the United States, on behalf of any of your clients, to take the position that he's breached the agreement because he's taking depositions, because he's pursuing discovery, because he's conducting investigations that anyone in any other type of civil litigation might conduct with respect to plaintiffs that are pursuing claims against a defendant, that those typical types of actions, in your judgment, are not breaches of the agreement and that he can go forward and defend the case as any other defendant could defend, and you're not going to run to the United States and say, hey, he's breaching the agreement by taking depositions and he's breaching the agreement by issuing subpoenas to third parties in order to gather information necessary to defend, then I don't have a problem. But if he's going to be accused of breaching the agreement because he sends out a notice of deposition of one of your clients, how is he supposed to defend the case?

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MR. JOSEFSBERG: Your Honor, you're totally correct. He can depose my client. That's not a problem. But the problem is that these are not typical clients and this is not a typical case. He has written in his pleadings that he wants to publish the names of these girls in the newspapers so that other people may come forward to discuss their sexual activities with these different plaintiffs. That's not your typical case. But are rulings that you'll make in this case, and they're not part of the NPA.

As far as my going to the Government is concerned, I find it very uncomfortable for me to use the Government to try to pursue my financial interest in litigation. And I know that Mr. Epstein and his counsel will make much ado about it. So I am not going to be running there.

However, if they start taking depositions regarding liability, I will consider that to be a breach because they're supposed to have admitted liability.

THE COURT: But, again, I don't have the agreement and I don't remember reading the agreement. But what I'm being told is the part of the agreement that admits liability is only as to a 2255 claim, and there are numerous other personal injury tort claims other than 2255 claims.

And there's a limit of damages on the 2255 claim, as I understand it, but I presume that all the plaintiffs are going to seek more than the limited or capped amount of damages in

the non-prosecution agreement as to the other claims.

And so why aren't they entitled to defend and limit the amount of damages that your client is seeking on the non-2255 tort claims?

MR. JOSEFSBERG: Your Honor, you are correct. On non-2255 tort claims, they are permitted to do the defense, whatever is appropriate.

My cases are pure 2255 on which liability under the agreement is supposed to be admitted. Now, as to the amount of damages, there are legal issues that will be before you and under the [redacted]. cases that are getting before you, as to whether it is 50 or 150. That has nothing to do with the NPA.

There are legal issues that are before you as to whether it is per statute, per count or per incident or per plaintiff. Those have nothing to do with the NPA. There is no amount in NPA. Those will be resolved.

Anyone who has brought a case that is outside of 2255, the defense is permitted to contest liability under the NPA. That's no violation.

Under the NPA if someone brought a case under just 2255, Mr. Epstein, if he is to keep his word, cannot contest liability. And there would no need to stay this. Because it is a self-fulfilling agreement. He can contest liability. And as far as the amount of damages, anyone that wants to go over the statutory minimums, of course, he can contest that in any

way that is proper under the Rules of Evidence and your rulings. The NPA has no limitation on his contesting damages above the minimum statutory amount.

The only thing that he has done is in his actions of refusing to pay for settling defendants, and in his saying that he has no liability under 2255, those appear to be contrary to what's in the NPA.

But I'm not in any position right now to claim a breach, and I don't know whether I'd be claiming a breach or enforcing it in front of you, suing him for fees, asking you to have him admit liability, or complaining to the Government. And that's why I'm not that helpful in this situation because I think it's the Government's role.

But I do not waive the right to be a third-party beneficiary because pursuant to my appointment, which was agreed to by Mr. Epstein, I and my clients have certain rights, and we want to enforce them.

But his defending this lawsuit will not in any way be a violation. His getting this lawsuit stayed would be a violation of the spirit of taking care of these girls, and there would be other issues. Like if there is a stay, Your Honor, would he be posting a bond?

THE COURT: We don't need to talk about those issues. That's not my concern.

MR. JOSEFSBERG: I agree, Your Honor, we don't.

THE COURT: That's not my concern. So, again, I just want to make sure that if the cases go forward and if Mr. Epstein defends the case as someone ordinarily would defend a case that's being prosecuted against him or her, that that in and of itself is not going to cause him to be subject to criminal prosecution.

MR. JOSEFSBERG: I agree, Your Honor.

THE COURT: Any other plaintiff's counsel want to chime in?

MR. WILLITS: Richard Willits on behalf of [redacted].. I would join, to weigh in on what Mr. Josefsberg said.

MR. JOSEFSBERG: Your Honor, I could not hear.

THE COURT: We'll get him to a microphone. Mr. Willits is speaking.

MR. WILLITS: On behalf of my client, [redacted]., we join in what Mr. Josefsberg said, and we also want to point out something to the Court.

First, we want to make a representation to the Court, we have no intention of complaining to the U.S. Attorney's Office, never had that intention, don't have that intention in the future, but, of course, subject to what occurs in the future.

I want to point out to the Court that Mr. Epstein went into this situation with his eyes wide open, represented by counsel, knowing that civil suits had to be coming. If he

didn't know it, his lawyers knew it.

He appears to be having second thoughts now about he could have negotiated this way or he could have negotiated that way with the U.S. Attorney's Office. And they want to impose their second thoughts on the innocent plaintiffs. We don't think that's fair. We think it's in the nature of invited error, if there was any error whatsoever.

Thank you.

THE COURT: You agree he should be able to take the ordinary steps that a defendant in a civil action can take and not be concerned about having to be prosecuted?

MR. WILLITS: Of course. And we say the same thing Mr. Josefsberg said. It's all subject to your rulings and the direction of this Court as to what is proper and what is not proper. And we're prepared to abide by the rulings of this Court, and we have no intention of running to the State's Attorney.

THE COURT: The U.S. Attorney?

MR. WILLITS: I'm sorry. The U.S. Attorney.

THE COURT: Mr. Garcia.

MR. GARCIA: Thank you, Your Honor.

If I may briefly, I think perhaps defense counsel forgot about this, but on pages 17 and 19 of my memorandum of law in opposition to the motion to dismiss, I did make reference to the non-prosecution agreement, and I did say that

the contesting of the jurisdiction of this Court was a potential breach of the non-prosecution agreement.

So my client happens to have, and they have filed with the Court a copy of her state court complaint, given the fact that the non-prosecution agreement limits the non-contesting of jurisdiction to claims exclusively brought under the federal statute.

I'm going to go ahead and withdraw those contentions on pages 17 and 19 of my memo of law because it doesn't apply to my case. So to the extent that I raised this issue with defense counsel and the Court, I'm going to withdraw that aspect of it.

THE COURT: Can you file something in writing on that point with the Court?

MR. GARCIA: Yes.

THE COURT: What do you say about this issue that we're here on today?

MR. GARCIA: I think that the problem that I have with it is that this non-prosecution agreement is being used by defense counsel for the exact opposite purpose that it was intended. My perception of this thing, and I wasn't around, is that Mr. Epstein essentially bought his way out of a criminal prosecution, which is wonderful for the victims in a way, and wonderful for him, too.

Now he's trying to use the non-prosecution agreement

as a shield against the plaintiffs that he was supposed to make restitution for.

And, certainly, he can take my client's depo. He's done extensive discovery in the state court case -- very intrusive, I might add. And we don't care, because we can win this case with the prosecution agreement or without the prosecution agreement. We are ready to go forward.

THE COURT: You're not going to assert to the United States Government that what he's doing in defending the case is a violation for which he should be further prosecuted?

MR. GARCIA: Absolutely not.

THE COURT: Anyone else for the plaintiffs?

MR. HOROWITZ: Judge, Adam Horowitz, counsel for plaintiffs Jane Doe 2 through 7.

I just wanted to address a point that I think you've articulated it. I just want to make sure it's crystal clear, which is that we can't paint a broad brush for all of the cases.

The provision relating to Mr. Epstein being unable to contest liability pertains only to those plaintiffs who have chosen as their sole remedy the federal statute. My clients, Jane Doe 2 through 7, have elected to bring additional causes of action, and it's for that reason we were silent when you said does anyone here find Mr. Epstein to be in breach of the non-prosecution agreement. That provision, as we understand

it, it doesn't relate to our clients.

THE COURT: Okay. But, again, you're in agreement with everyone else so far that's spoken on behalf of a plaintiff that defending the case in the normal course of conducting discovery and filing motions would not be a breach?

MR. HOROWITZ: Subject to your rulings, of course, yes.

THE COURT: Thank you.

Anyone else have anything to say from the plaintiffs?

Ms. [redacted], if you would be so kind as to maybe help us out. I appreciate the fact that you're here, and I know you're not a party to these cases and under no obligation to respond to my inquiries. But as I indicated, it would be helpful for me to understand the Government's position.

MS. [redacted]: Thank you, Your Honor. And we, of course, are always happy to try to help the Court as much as possible. But we are not a party to any of these lawsuits, and in some ways we are at a disadvantage because we don't have access. My access is limited to what's on Pacer. So I don't really know what positions Mr. Epstein may have taken either in correspondence or in discovery responses that aren't filed in the case file.

But your first order was really just what do you think about a stay, and then the second order related to this hearing and asked a much more specific question, which is whether we

believe that Mr. Epstein's defense was a breach of the agreement.

And I've tried to review as many of the pleadings as possible. As you know, they're extremely voluminous. And I haven't been through all of them. But we do believe that there has been a breach in the filing that Mr. Josefsberg referred to, and contrary to Mr. Critton, we do understand that we have an obligation to provide notice, and we are providing notice to Mr. Epstein today.

The pleading that we found to be in breach -- the non-prosecution agreement, sought to do one thing, which was to place the victims in the same position they would have been if Mr. Epstein had been convicted of the federal offenses for which he was investigated.

And that if he had been federally prosecuted and convicted, the victims would have been entitled to restitution, regardless of how long ago the crimes were committed, regardless of how old they were at the time, and how old they are today, or at the time of the conviction.

And it also would have made them eligible for damages under 2255.

And so our idea was, our hope was that we could set up a system that would allow these victims to get that restitution without having to go through what civil litigation will expose them to.

You have a number of girls who were very hesitant about even speaking to authorities about this because of the trauma that they have suffered and about the embarrassment that they were afraid would be brought upon themselves and upon their families.

So we did through the non-prosecution agreement tried to protect their rights while also protecting their privacy. So, pursuant to the non-prosecution agreement -- on the other hand, we weren't trying to hand them a jackpot or a key to a bank. It was solely to sort of put them in that same position.

So we developed this language that said if -- that provided for an attorney to represent them. Most of the victims, as you know from the pleadings, come from not wealthy circumstances, may not have known any attorneys who would be in a position to help them.

So we went through the Special Master procedure that resulted in the appointment of Mr. Josefsberg, and the goal was that they would be able to try to negotiate with Mr. Epstein for a fair amount of restitution/damages. And if Mr. Epstein took the position, which apparently he has, which is that the $50,000 or $150,000 floor under 2255 also would be a cap. That if they were to proceed to file suit in Federal Court to get fair damages under 2255, Mr. Epstein would admit liability, but he, of course, could fight the damages portion, which means that, of course, he would be entitled to depositions; of

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course, he would be entitled to take discovery, and we don't believe that any of that violates the non-prosecution agreement.

The issue with the pleading that he filed, the motion to dismiss the case, I believe it's Jane Doe 101, represented by Mr. Josefsberg, is that that is a case that was filed exclusively under 18 U.S.C., Section 2255. She met that requirement. Mr. Epstein is moving to dismiss it, not on the basis of damages, he is saying that he cannot be held liable under 2255 because he was not convicted of an offense.

The reason why he was not convicted of an offense is because he entered into the non-prosecution agreement. So that we do believe is a breach.

The issue really that was raised in the motion to stay and that I addressed in our response to the motion to stay is that Mr. Epstein's -- Mr. Epstein wants to stay the litigation in order to leave, in order to sort of attack the cases of the victims whether they are fully within the non-prosecution or not, non-prosecution agreement or not, and leave the Government without a remedy if he does, in fact, breach those terms. And that is why we opposed the stay.

THE COURT: I'm not sure what you mean by that last statement.

MS. [redacted]: Well, because this issue related to the motion to dismiss on Mr. Josefsberg's client came up after

we had filed that response. And what we said in the response to the motion to stay is that the reason why he wants to stay the litigation is so that the non-prosecution agreement terminates based on a period of time, as he puts it. And then afterwards he would be able to come in here and make all of these arguments that clearly violate the non-prosecution agreement but we would be without remedy.

THE COURT: But you're not taking the position that other than possibly doing something in litigation which is a violation of an express provision of the non-prosecution agreement, any other discovery, motion practice, investigations that someone would ordinarily do in the course of defending a civil case would constitute a violation of the agreement?

MS. [redacted]: No, Your Honor. I mean, civil litigation is civil litigation, and being able to take discovery is part of what civil litigation is about. And while there may be, for example, if someone were to try to subpoena the Government, we would obviously resist under statutory reasons, all that sort of stuff. But, no, Mr. Epstein is entitled to take the deposition of a plaintiff and to subpoena records, etc.

THE COURT: And even if he seeks discovery from a Government agency, you have the right to resist it under the rules of procedure but that would not constitute a violation, again unless there's a provision in the prosecution agreement

that says I can't do this?

MS. [redacted]: Correct.

THE COURT: That's your position?

MS. [redacted]: Yes.

THE COURT: Thank you.

MS. [redacted]: Thank you, Your Honor.

THE COURT: Mr. Critton, did you want to add anything?

MR. CRITTON: Yes, sir. Just a few responses to some of the issues that have been raised.

The most glaring, at least from our perspective, is both Mr. Josefsberg's comments that he believes that there's a violation of the NPA as well as Ms. [redacted] with regard to Jane Doe 101.

Mr. Josefsberg, while he was the attorney rep who was selected by Judge [redacted] to represent a number of individuals, alleged victims that may have been on the list, he represents many of them. And the type of response that was filed in 101 would probably be very similar to what we will file if he files -- and he filed 102 as well. But if he files 103, 104 and 105, or whatever number he files, we may well take that same legal position in our motions and in our response or in reply.

And what we've been, in essence, told today is we consider that to be a violation of the NPA under the circumstances.

102 is a perfect example that he filed is, we have e-mails going back and forth between the Government and my clients' attorneys at the time that suggested that 102 probably doesn't even fit within the statute of limitations.

So under Mr. Josefsberg's argument is as well, we've only brought a 2255 claim. We don't care whether she's within or is outside the statute of limitations. Because she was on the list and under the circumstances, he has to admit liability, which we contest is under that set of circumstances you're stuck with it. You can fight damages if you can, but she's a real person and you can't raise statute of limitations.

The other point that kind of strikes out is there's probably a difference. And I'm happy to provide a copy of the NPA or a redacted portion of the NPA which deals with the civil issues, which are paragraphs 7, 8, 9 and 10, and the entire addenda in camera for the Court to look at, if plaintiff's counsel and the Government, I guess, really, because they're not a party, is if they have no objection because they all have access based on a prior court order to the non-prosecution agreement.

So I'm happy to provide that to the Court today and show it to counsel so that the Court can review that.

But our position with regard to the 2255 claims is that -- there were two types of claims that could be filed, one was consensual litigation, the second was contested litigation.

And under the consensual, in essence, which Mr. Epstein did, is he's offered $50,000 of the statutory minimum for that time period to all of those individuals.

THE COURT: Can I interrupt you a second?

MR. CRITTON: Yes, sir.

THE COURT: I'm not here, and I don't believe it's my role to decide whether or not there is or is not a breach of the agreement. I'm just trying to understand what the Government's position is regarding your defending these cases.

Now, I'm just saying this as an example. If, for example, in the non-prosecution agreement there was a provision that said explicitly: Jeffrey Epstein shall not move to dismiss any claim brought under 2255 by any victim no matter how long ago the allegations or the acts took place, period.

If that was in the agreement and you filed a motion to dismiss by someone who brought a claim, it might sound like it might be a violation.

MR. CRITTON: I agree.

THE COURT: So you would know that when you filed your motion because it was right there for you to read.

And so to stay the case because I want to do something that the contract expressly prohibits me from doing, so stay the case until the agreement expires so then I can do something that the agreement said I couldn't do so you won't be in fear of prosecuting, I'm not sure that that is what I'm concerned

about.

I'm concerned about discovery, investigation, motion practice, that's not prohibited by a provision of the agreement. If there's something that's prohibited by the agreement that you, knowing what the agreement says, go ahead and do, anyway, I guess that's a risk you're going to have to take. If there's a legitimate dispute about it, I guess some arbiter is going to decide whether it's a breach or not.

But, again, that's something you and Mr. Burman, Mr. Goldberger, and you are all very good lawyers, and he's got a whole list of lawyers representing him, and you've got the agreement and you're going to make legal decisions on how to proceed, and you're going to have to go and make your own decisions.

I'm concerned about things that aren't in the agreement, that aren't covered, that you're going to be accused of violating because, again, you take depositions, you send out subpoenas, you file motions that are not prohibited by the agreement. And that's what I'm concerned about.

MR. CRITTON: And I understand that, Your Honor.

But at the same time, it's as if the lawyers and the clients, based upon our interpretation of the agreement, and, believe me, we would not have filed 101, the motion to dismiss, but for believing that there was a good faith basis to do that under the circumstances.

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And now, in essence, we're being accused not only by -- not accused, but it's been suggested that there's a breach of the NPA, not only by Mr. Josefsberg on behalf of 101, but as well Ms. [redacted] on behalf of the United States.

That's the perfect example. They're basically saying we think you violated. We may send you notice under the circumstances. So does that mean that on 101 we have to back off of it because we think in good faith that it's a motion and is that something that this Court ultimately will rule?

THE COURT: I don't know that I'm the one who is going to make that decision. Again, that's not the kind of thing that I was concerned about. I was more concerned about the normal, ordinary course of conducting and defending a case that would not otherwise expressly be covered under the agreement, that you're going to then have someone say, ah, he's sent a notice of deposition, he's harassing the plaintiffs. I don't know if there's a no contact provision in the agreement or no harassment type of provision in the agreement. Ah, this is a breach because you sent discovery, or he's issuing subpoenas to third parties trying to find out about these victims' backgrounds, he's breaching the agreement.

Those are the kind of things that I was worried about.

MR. CRITTON: The concern that we have is as part of doing this general civil litigation, it's not just the discovery process. And I understand the issues that the Court

has raised.

But part of it is that often cases are disposed of either on a summary basis or certainly legal issues that come before the Court during the course of the case, just like in a criminal case. That's clearly part of the, I'd say the defense of the case under the circumstances; and if, in fact, an individual can't legally bring a cause of action for certain reasons, such as has been suggested in 101, and may be suggested in 102 when that pleading is filed, that certainly is a position that puts my client at risk.

As another example that I use with [redacted]., that they filed this 30-count complaint. Now, they have the state court claims as well. But they, in essence, have said they filed another pleading with the Court that says depending on what the Court rules, in essence, on whether we can file multiple claims or one cause of action with multiple violations, we may dump the state court claims and, therefore, we'll just ride along on that. That's a very different --

Mr. Epstein would never have entered into, nor would his attorneys have allowed him to enter into that agreement under those circumstances where he had this unlimited liability. That clearly was never envisioned by any of the defendants -- by the defendant or any of his lawyers under the circumstances.

And if that's claimed to be a violation, either by the

attorneys; i.e., he's not recapitulating on liability under the 2255, and that's all we have now. That's our exclusive remedy.

And the Government says, yeah, that's right, that's a violation of the NPA. It again chills us from moving forward, filing the necessary motion papers and taking legal positions that may put my client at risk for violating the NPA and then creating the irreparable harm of, after having been in jail, after having pled guilty to the state court counts, after registering on release as a sex offender, he's complied and done everything, taken extraordinary efforts to comply with the NPA, puts him at substantial risk. And that's what our worry is moving forward.

MR. JOSEFSBERG: Your Honor, may I be heard. May I make three comments? It will take less than a minute.

THE COURT: Yes, sir.

MR. JOSEFSBERG: Mr. Critton refers to the alleged victims. I want you to know that our position is that pursuant to the NPA they're not alleged victims. They are actual, real victims, admitted victims.

Secondly, he argues about the statute of limitations on 102. I know that you don't want to hear about that, and I'm not going to comment about it. But please don't take our lack of argument about this as being we agree with anything.

Last and most important, we totally agree with Mr. Critton in his suggestion that he hand you a copy of the

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NPA. I think that many of the questions you asked will be answered when you read the NPA, and I think it's very unfair of everyone who is sitting in front of you who have the NPA to be discussing with you whether it's being breached, whether there should be a stay when you're not that familiar with it.

If we would give you a copy of it, I think it would be much more helpful in making your ruling.

THE COURT: Maybe Judge Colvat will resolve this issue for me.

MR. JOSEFSBERG: Even if he doesn't, Your Honor, I believe we are allowed to show it to you.

THE COURT: I'll tell you what: I'll wait for Judge Colvat to rule, and then if he rules that it should remain sealed, then I'll consider whether or not I want to have it submitted to me in camera.

Anything else, Mr. Josefsberg?

MR. JOSEFSBERG: No. I thank you on behalf of myself and the other counsel on the phone for permitting us to appear by phone.

THE COURT: All right. Anyone else have anything they want to add?

MR. EDWARDS: Brad Edwards on behalf of Jane Doe.

I only had one issue here, and when I read your motion that you wanted to hear on the narrow issue of just defense in the civil actions filed against him violates the

non-prosecution agreement, I was expecting that we were going to hear something from the Government similar to the affidavit that was filed by Mr. Epstein's attorneys wherein he indicates as of the day of this affidavit attached to the motion to stay, the U.S. Attorney's Office has taken the position that Epstein has breached the non-prosecution agreement and it names specifically investigation by Epstein of this plaintiff and other plaintiffs, Epstein's contesting damages in this action. Epstein, or his legal representatives, making statements to the press. And we didn't hear any of those things.

So that's what I was expecting that the U.S. Attorney's Office was going to expound on and say, yes, we've made some communications to Epstein. He's violating.

What we're hearing right now, today, just so that I'm clear, and I think the Court is clear now, is that the non-prosecution agreement is what it is. There have been no violations, but for maybe what Mr. Josefsberg brought up.

But there are very few restrictions on Mr. Epstein. He went into this eyes wide open. And whether or not I agree with the agreement, how it came to be in the first place, is neither here nor there.

But there have been no violations or breaches up to this point. And his affidavit that was filed, I'm just troubled by where it even came from. I mean, it's making specific allegations that the U.S. Attorney's Office is

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threatening a breach, and this is part of the motion to stay, which we're all battling here.

So I just wanted to indicate to the Court or remind the Court that there have been specific allegations made, the United States Attorney's Office is making these allegations of breach, which we haven't heard any of the evidence of.

Thank you.

THE COURT: All right.

Ms. [redacted], did you want to respond to that suggestion that there were other allegations of breach besides the one that you've just mentioned today?

MS. [redacted]: No, Your Honor.

THE COURT: Thank you. I appreciate your giving me the information, which I think has been very helpful today, and I'll try and get an order out as soon as possible.

[Court adjourned at 11:10 a.m.].

C E R T I F I C A T E

I hereby certify that the foregoing is an accurate transcription of proceedings in the above-entitled matter.

s/Larry Herr

_____ _____

DATE LARRY HERR, RPR-CM-RMR-FCRSC

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S.J. QUINNEY
COLLEGE OF LAW
THE UNIVERSITY OF UTAH

[redacted] G. CASSELL
Ronald N. Boyce Presidential Professor of Criminal Law
Telephone: 801-585-5202
casselljp@law.utah.edu

December 10, 2010

Wifredo A. Ferrer
United States Attorney
Southern District of Florida
99 N.E.4th Street
Miami, FL 33132

Re: Request for Investigation of Jeffrey Epstein Prosecution

Dear Mr. Ferrer:

I am writing as someone with extensive experience in the federal criminal justice system – as a former Associate Deputy Attorney General, Assistant United States Attorney, federal judge, and currently criminal law professor – to alert you to what seems to be the most suspicious criminal case I have ever encountered. I ask that you investigate whether there were improper influences and actions during your office's criminal investigation of Jeffrey Epstein, particularly regarding the decision to enter into a binding non-prosecution agreement blocking his prosecution for numerous federal sex offenses he committed over many years against more than thirty minor girls.

As I am sure you are well aware, in 2006 your office opened a criminal investigation with the FBI into allegations that for years Jeffrey Epstein sexual abused dozens of minor girls in his West Palm Beach mansion. The FBI soon developed compelling evidence that Epstein had in fact committed numerous federal sex offenses with more than 30 minor girls. And yet, your office ultimately entered into a plea arrangement which allowed Epstein escape with a non-prosecution agreement that ensured he would have no federal criminal liability and would spend no more than 18 months in state jail. For sexual offenses of this magnitude – in a case with more than 30 witnesses providing interlocking testimony, all made automatically admissible by virtue of Fed. R. Evid. 414 – this is an extraordinary outcome.

Why did your office enter into this highly unusual non-prosecution arrangement with Epstein? Suspicion begins with the point that Epstein is a politically-connected billionaire. But that wouldn't be troubling without considerable other evidence that something went terribly wrong with the prosecution for other, improper reasons. Consider the following highly unusual facts:

First, it appears that Epstein was tipped off before the execution of a search warrant at his home. We know that lead state police officers -- Detective Recarey and Police Chief Michael Reiter -- complained that the house was "sanitized" by the time they arrived to serve a search warrant for child pornography. This sanitation was evident by the various computer wires hanging with no computers attached. Housekeeper Janusz Banasiak later testified in a civil

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deposition that Epstein's assistant, [redacted]) and another man (unknown) were instructed to remove, and did in fact remove, multiple computers from Epstein's home shortly before the search warrant was served. The fact that there could well have been a tip off is apparently suspected by federal authorities.

Second, there is evidence that one of the senior prosecutors in your office joined Epstein's payroll shortly after important decisions were made limiting Epstein's criminal liability – and improperly represented people close to Epstein. During the federal investigation of Epstein, [redacted] was a senior Assistant U.S. Attorney in your office. As we understand things, he was a direct supervisor of the line prosecutor handling the case and thus was well aware of details of the Epstein investigation and plea negotiations. We further believe that he was consulted on issues related to the prosecution of Epstein and Epstein's co-conspirators, including specifically issues related to whether Epstein employees and pilots should be prosecuted for their involvement in Epstein's sexual offense. We further believe that he personally and substantially participated in making such decisions about the course of the criminal investigation.

Within months after the non-prosecution agreement was signed by your office, [redacted] left your office and immediately went into private practice as a white collar criminal defense attorney. His office coincidentally happened to be not only in the same building (and on same floor) as Epstein's lead criminal defense counsel, Jack Goldberger, but it was actually located right next door to the Florida Science Foundation -- an Epstein-owned and -run company where Epstein spent his "work release."

While working in this office adjacent to Epstein's, [redacted] undertook the representation of numerous Epstein employees and pilots during the civil cases filed against Epstein by the victims – cases that involved the exact same crimes and exact same evidence being reviewed by the U.S. Attorney's office when he was employed there. Specifically, he represented [redacted] (Epstein's number one co-conspirator who was actually named as such in the NPA), his housekeeper (Louella Ruboyo), his pilots Larry Morrison, Larry Visoski, David Rogers, William Hammond and Robert Roxburgh. (Hammond and Roxburgh were not deposed but the others were.) Our understanding is that his representation of these individuals was paid for, directly or indirectly, by Epstein.

[redacted] was well aware of what evidence your office and federal investigator had collected against Epstein and about the minor girls who were his victims. As a consequence, he knew what evidence the attorneys for the victims were using. He also knew what each of those witnesses had said, if anything, to federal and state investigators during the criminal investigation.

We have been unable to place our fingers on the federal regulations governing such later representation. We do know, however, that such actions appear to be in direct contravention of the Florida ethical rules regarding attorneys who leave government employment. For

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example, Florida R. Prof. Conduct 4-1.11(a) provides "[a] lawyer shall not represent a private client in connection with a matter in which the lawyer participated personally and substantially as a public officer or employee unless the appropriate government agency consents after consultation." Similarly, Florida R. Prof. Conduct 4-1.11(b) provides that "[a] lawyer having information that the lawyer knows is confidential government information about a person acquired when the lawyer was a public officer or employee may not represent a private client whose interests are adverse to that person in a matter in which the information could be used to the material disadvantage of that person." Both these rules appear to have been violated. But entirely apart from the details of ethical rules, the fact that one of your prosecutors was involved in making important decisions about the scope of criminal liability for Epstein and his associates and then – after criminal liability was significantly limited – representing numerous people at Epstein's behalf raises serious questions. At the very least, there is the strong appearance that [redacted] may have attempted to curry favor with Epstein and then reap his reward through favorable employment. At the very worst, there may have been advance discussions – we simply don't know at this point.

Third, Epstein appears to have deliberately kept from victims in the case correspondence with your office and the Justice Department that might have shed light on improper influences. Along with other capable attorneys, I was involved in representing one of Epstein's victims [redacted] who filed a federal civil case against Epstein. Suspecting that Epstein may have improperly influenced your office, we immediately served discovery requests on Epstein for all the correspondence with your office regarding the plea negotiations. Eleven months of hard litigation ensued, in which Epstein made every conceivable argument against production. Finally, late in June of this year, his appeals exhausted, Epstein produced the correspondence to us. However, in violation of the court order, he redacted the correspondence so that he provided only emails and other statements *from* your office – not his emails and statements *to* your office. More significantly, even though he was under court order to produce all correspondence between his attorneys and your office, Epstein secretly withheld correspondence by several of his most high-powered attorneys – namely Ken Starr and Lilly [redacted] Sanchez. Epstein settled the case with [redacted] within days after this limited production, and we did not realize the absence of what must have been critical discussions between your office and Starr and Snachez (among others). Epstein's refusal to allow us to see that information raises the suspicion in our minds that there must have been unusual pressures being brought to bear during the plea discussions that would have been revealed had Epstein complied with his production obligations.

Fourth, there appears to have been an unprecedented level of secrecy between your office and the Federal Bureau of Investigation during this case. The FBI was responsible, along with state and local police agencies, for building the case against Epstein. They appear to have developed an overwhelming criminal against him. And yet, when your office signed the non-prosecution agreement with him, it is not clear to us that the FBI was consulted about this decision. Indeed, we have suspicions that the FBI was not informed of this decision until, perhaps, months later.

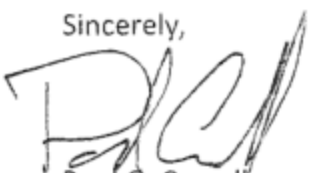
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Supporting this suspicion is our on-going litigation regarding the treatment of the victims in this case. As you know from our draft pleadings that we have discussed with your office, we believe there is compelling evidence that the victims and their attorneys were deceived about the existence of a non-prosecution agreement for months in order to avoid what certainly would have been a firestorm of controversy about such lenient treatment of a repeat sex offender. Our impression from the evidence we have been able to obtain so far is that the FBI was similarly kept in the dark – not consulted about or even told about the NPA. While a certain amount of tension has always existed between federal prosecuting and investigating agencies, not even informing the FBI about the Epstein NPA seems highly unusual.

All of these strange facts -- as well as the facts that we are alleging in our crime victims' litigation – lead us to think that there was something rotten with the way this case was handled. Epstein could have faced years and years in prison for numerous federal sex offenses. And yet he managed to contrive to walk away with no federal time at all (and only minimal state time). We respectfully ask you to investigate through appropriate and independent channels the handling of the Epstein (non)prosecution.

Thank you in advance for considering this request. I would be happy to provide any other additional information that would be useful to you.

Sincerely,



Paul G. Cassell

EFTA00232790

Work Release Notification

EFTA00232791

U.S. Department of Justice

United States Attorney
Southern District of Florida

500 South Australian Ave., Suite 400
West Palm Beach, FL 33401
(561) 820-8711
Facsimile: [redacted]

December 5, 2008

VIA ELECTRONIC MAIL
Brad Edwards, Esq.
2028 Harrison Street, Suite 202
Hollywood, Florida 33020

Re: **Jeffrey Epstein/**[redacted] **and** [redacted]
Notification of Work Release

Dear Mr. Edwards:

By virtue of this letter, the United States Attorney's Office for the Southern District of Florida asks that you provide the following notice to your clients, [redacted] and [redacted] The U.S. Attorney's Office has learned that Jeffrey Epstein has applied to participate in the Palm Beach County Sheriff's Office's ("PBSO") work release program, and PBSO has granted that application. Mr. Epstein is reportedly working for The Florida Science Foundation at 250 South Australian Avenue, Suite 1404, West Palm Beach, FL 33401. After work each day, Mr. Epstein returns to the Palm Beach County Stockade. While outside the Stockade, Mr. Epstein is electronically monitored via a GPS system and an ankle bracelet. Pursuant to the work release rules, Mr. Epstein is to go directly from the Stockade to his office, remain at the office throughout the work day, and then return directly to the Stockade.

We regret that we were unable to inform your client of these developments prior to Mr. Epstein's release, but our Office was never notified of Mr. Epstein's application, and we only learned of his release more than six weeks after he began participating in the program. Should you or your client have any questions regarding the work release program, please direct your inquiries to Captain David Sleeth, Palm Beach Sheriff's Office, [redacted].

Sincerely,

R. Alexander Acosta
United States Attorney

By: [redacted]
Assistant U.S. Attorney

U.S. Department of Justice

United States Attorney
Southern District of Florida

500 South Australian Ave., Suite 400
West Palm Beach, FL 33401
[redacted]
Facsimile: [redacted]

December 11, 2008

VIA HAND DELIVERY
Captain David Sleeth
Palm Beach Sheriff's Office
Corrections Division
3228 Gun Club Road
West Palm Beach, FL 33406

Re: **Work Release Application of Jeffrey Epstein**

Dear Captain Sleeth:

The U.S. Attorney's Office recently learned that Inmate Jeffrey Epstein applied for and was approved for participation in the Palm Beach Sheriff's Office's ("PBSO") work release program. Through a request for public records, I have received a copy of Mr. Epstein's work release file. After doing some internet research of public records and making a few telephone calls, I discovered some inaccuracies and omissions in Mr. Epstein's file that I wanted to bring to your attention. During a recent meeting, Roy Black, one of Mr. Epstein's attorneys, invited us to share our concerns with PBSO.

Eligibility for Participation

I understand that Mr. Epstein would be ineligible for participation in the work release program if he committed three violations of F.S.S. 796 within the past five years. Mr. Epstein has been charged with and convicted of a felony violation of F.S.S. 796.07. In order to be convicted of a felony violation of that statute, one must commit "a third or subsequent violation." In other words, Mr. Epstein has committed at least three violations of Section 796.07, and in his "Alternative Custody Program Placement Synopsis," Mr. Epstein's charges are described as "Recommit: Prostitution."

In addition to those three violations, Mr. Epstein also has been convicted of violating F.S.S. 796.03, procuring a person under the age of 18 for prostitution. Throughout his

paperwork, this violation is referred to simply as "prostitution." The charge is not a solicitation of prostitution charge, it is a procurement of a minor to engage in prostitution. Florida courts have defined the offense as "inducing a victim to engage in sexual activity" for money and "persuading, inducing, or prevailing upon a person to do something sexual" for financial gain. In other words, the statute addresses the recruiting of minors who have not previously been involved in prostitution to engage in sexual activity for commercial gain to a recruiter or "pimp"/"madame." The Florida Legislature has acknowledged the significant difference between solicitation under F.S.S. 796.07 and procurement of minors under F.S.S. 796.03 by requiring persons convicted of violating F.S.S. 796.03 to register as sex offenders. The distinction may be meaningful to the victims of Mr. Epstein's offenses, who could feel that they are being stigmatized as "prostitutes."

Inaccuracies and Omission in Work Release Application and Related Documents

Throughout the records related to Mr. Epstein's work release placement, he is alternatively referred to as working for "The Florida Science Foundation" or "self-employed," and Mr. Epstein lists his salary as $250,000. Mr. Epstein describes himself as "returning to work" and "eligible for re-employment" at The Florida Science Foundation. Please be advised that the only W-2 that Mr. Epstein provided is from Financial Trust Company, Inc., which shows that Mr. Epstein was employed in the U.S. Virgin Islands at a salary of $180,785.62, not $250,000.

Mr. Epstein provided to you no documentation regarding his pre-incarceration employment with "The Florida Science Foundation" or its corporate alter-ego, "The C.O.U.Q. Foundation, Inc." As you will see, the Foundation, its offices, and Mr. Epstein's purported job schedule were all created on the eve of Mr. Epstein's incarceration in order to provide him with a basis for seeking work release.

The Florida Science Foundation was not registered with the State of Florida and had no office space or telephone number until after Mr. Epstein was already incarcerated. The application filed with the State of Florida and signed under penalty of perjury by Richard Kahn lists Mr. Kahn's and the Foundation's telephone number as "[redacted]." That is the telephone number of Atterbury, Goldberger and Weiss–one of the law firms representing Mr. Epstein. Richard Kahn is a partner at the law firm of Sullivan and Cromwell in New York and has no association with the Atterbury firm.

Checking public records available on the internet, I located the IRS returns of "The C.O.U.Q. Foundation, Inc." for fiscal years 1999 through 2006 (which covers the period

through 2/28/07).[1] These sworn filings show that Mr. Epstein worked for the Foundation for only one hour per week and earned no compensation. (See page 6 of each return.) All of these returns were signed under penalty of perjury by either Mr. Epstein or Darren Indyke, who is listed in Mr. Epstein's work release file as Mr. Epstein's "supervisor." Mr. Epstein's representations concerning his prior work duties and salary may violate the salary and employment verification requirements of C.O.P. #926.01(V)(C)(7) and (8).

In response to your requirement of "a detailed work schedule," Mr. Indyke has provided the following two sentences:

> [Mr. Epstein's] duties will require him to work six days a week, Monday through Saturday, at the Foundation's office located at 250 S. Australian Avenue, Suite 1404, West Palm Beach, Florida from the hours of 8:00 A.M. to 8:00 P.M.
>
> As President of the Foundation, Mr. Epstein will be responsible for the general oversight and management of the Foundation, and particularly, to seek out, evaluate and determine worthy charitable causes to which the Foundation may make contributions.

Mr. Indyke did not disclose that Mr. Epstein only worked one hour per week prior to his incarceration and has provided no explanation of why Mr. Epstein could perform these duties in one hour per week before he was incarcerated but now needs to spend 72 hours each week to do the same job. Again, this appears to be inconsistent with C.O.P. #926.01(V)(C)(7).

Mr. Indyke has signed the "Alternative Custody Unit Program Agreement" as Mr. Epstein's "employer." In that Agreement, Mr. Indyke promises to "notify the Alternative

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[1]The returns are available online at the following public websites:
FY2006: http://www.guidestar.org/FinDocuments/2007/133/996/2007-133996471-0391c8db-F.pdf
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FY2003: http://www.guidestar.org/FinDocuments/2004/133/996/2004-133996471-1-F.pdf
FY 2002: http://www.guidestar.org/FinDocuments/2003/133/996/2003-133996471-1-F.pdf
FY2001: http://www.guidestar.org/FinDocuments/2002/133/996/2002-133996471-1-F.pdf
FY2000: http://www.guidestar.org/FinDocuments/2001/133/996/2001-133996471-1-F.pdf
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Custody Unit immediately if the Participant: (1) Fails to appear for work at the scheduled time; and (2) Leaves the place of employment prior to the scheduled time." Both in this form and in Mr. Indyke's letter in support of Mr. Epstein's application, Mr. Indyke neglects to inform the Sheriff's Office of two significant facts. First, Mr. Indyke lives and works in the New York metropolitan area. He likely will not be present at Mr. Epstein's workplace, so he may not know if Mr. Epstein "fails to appear for work" or "leaves the place of employment." In that event, Mr. Indyke also will not be able to supervise Mr. Epstein's actual work to determine whether he is truly doing the work of The Florida Science Foundation.[2] Second, Mr. Indyke does not "employ" Mr. Epstein. Instead, Mr. Epstein "employs" Mr. Indyke. Mr. Epstein is the President and founder of The Florida Science Foundation and Mr. Indyke is its Vice President. More importantly, Mr. Epstein is also the founder and President of the Financial Trust Company, his for-profit corporation. Mr. Indyke is Mr. Epstein's subordinate at that entity as well.

One of Mr. Epstein's attorneys has suggested that Mr. Epstein is using his time on work release to manage investments resulting in investment income of millions of dollars. If that is true, then Mr. Epstein is acting outside of the scope of his employment with The Florida Science Foundation. Instead, that would be in keeping with Mr. Epstein's work for his for-profit corporation, which would inure to the benefit of Mr. Indyke. Because that work would result in a financial benefit to him, and because he is Mr. Epstein's subordinate at that corporation, Mr. Indyke may be reluctant to inform the Sheriff's Office of this violation of the terms of Mr. Epstein's Work Release contract.

The "references" listed by Mr. Epstein all appear to have the same conflict of interest. Mr. Epstein did not list any past or present co-workers, supervisors, or clients. Instead, he has listed four attorneys who are currently retained–and paid–by Mr. Epstein. Their attorney-client privilege obligations might further restrain them from notifying the Sheriff's Office if Mr. Epstein was not abiding by the work release rules.

As I previously mentioned to Colonel Gauger, the decision regarding work release is completely within the discretion of the Sheriff's Office. The purpose of this letter is simply to provide you with information concerning Mr. Epstein's offenses and his work situation. Judge Pucillo, who conducted the change of plea and sentencing, heard the factual proffer and imposed Mr. Epstein's sentence. She has not been consulted regarding Mr. Epstein's

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[2]On the application for registration of the Florida Science Foundation with Florida's Department of State, Mr. Indyke lists his true address in Livingston, New Jersey.

application for work release. I understand that Judge McSorley's standing order states that she "takes no position with respect to the eligibility of any inmate sentenced in this Division unless specifically stated at time of sentencing." Because of her absence, Judge McSorley did not conduct the sentencing and, therefore, did not have the opportunity to weigh any objections to work release at that hearing. It is unclear whether Judge Pucillo was aware of Judge McSorley's standing order when she imposed sentence. In utilizing your discretion, you may or may not choose to consult with the appropriate judge on this matter.

Request for Notification

As I had previously asked of Colonel Gauger, I would appreciate if you would keep me informed of any changes to Mr. Epstein's release status so that I may fulfill my obligations to keep the victims identified through the federal investigation informed of Mr. Epstein's status. I have informed all of the known victims of Mr. Epstein of the change in his incarceration status and that you are the contact person if they have any questions. Some may ask that their locations be amongst the "Exclusionary Zones" programmed into Mr. Epstein's GPS unit. If you need their addresses, please let me know.

Please feel free to contact me with any questions or concerns.

Sincerely,

R. Alexander Acosta
United States Attorney

By: [redacted]
Assistant United States Attorney

cc: Colonel Michael Gauger
[redacted] Chief, Northern Division I

14/11/08 Ltr to PBSO re work release

EFTA00232798

U.S. Department of Justice

United States Attorney
Southern District of Florida

500 South Australian Ave., Suite 400
West Palm Beach, FL 33401
[redacted]
Facsimile: [redacted]

December 11, 2008

VIA HAND DELIVERY
Captain David Sleeth
Palm Beach Sheriff's Office
Corrections Division
3228 Gun Club Road
West Palm Beach, FL 33406

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FY2001: http://www.guidestar.org/FinDocuments/2002/133/996/2002-133996471-1-F.pdf
FY2000: http://www.guidestar.org/FinDocuments/2001/133/996/2001-133996471-1-F.pdf
FY1999: http://www.guidestar.org/FinDocuments/2000/133/996/2000-133996471-1-F.pdf
FY1998: http://www.guidestar.org/FinDocuments/1999/133/996/1999-133996471-1-F.pdf

Custody Unit immediately if the Participant: (1) Fails to appear for work at the scheduled time; and (2) Leaves the place of employment prior to the scheduled time." Both in this form and in Mr. Indyke's letter in support of Mr. Epstein's application, Mr. Indyke neglects to inform the Sheriff's Office of two significant facts. First, Mr. Indyke lives and works in the New York metropolitan area. He likely will not be present at Mr. Epstein's workplace, so he may not know if Mr. Epstein "fails to appear for work" or "leaves the place of employment." In that event, Mr. Indyke also will not be able to supervise Mr. Epstein's actual work to determine whether he is truly doing the work of The Florida Science Foundation.[2] Second, Mr. Indyke does not "employ" Mr. Epstein. Instead, Mr. Epstein "employs" Mr. Indyke. Mr. Epstein is the President and founder of The Florida Science Foundation and Mr. Indyke is its Vice President. More importantly, Mr. Epstein is also the founder and President of the Financial Trust Company, his for-profit corporation. Mr. Indyke is Mr. Epstein's subordinate at that entity as well.

One of Mr. Epstein's attorneys has suggested that Mr. Epstein is using his time on work release to manage investments resulting in investment income of millions of dollars. If that is true, then Mr. Epstein is acting outside of the scope of his employment with The Florida Science Foundation. Instead, that would be in keeping with Mr. Epstein's work for his for-profit corporation, which would inure to the benefit of Mr. Indyke. Because that work would result in a financial benefit to him, and because he is Mr. Epstein's subordinate at that corporation, Mr. Indyke may be reluctant to inform the Sheriff's Office of this violation of the terms of Mr. Epstein's Work Release contract.

The "references" listed by Mr. Epstein all appear to have the same conflict of interest. Mr. Epstein did not list any past or present co-workers, supervisors, or clients. Instead, he has listed four attorneys who are currently retained–and paid–by Mr. Epstein. Their attorney-client privilege obligations might further restrain them from notifying the Sheriff's Office if Mr. Epstein was not abiding by the work release rules.

As I previously mentioned to Colonel Gauger, the decision regarding work release is completely within the discretion of the Sheriff's Office. The purpose of this letter is simply to provide you with information concerning Mr. Epstein's offenses and his work situation. Judge Pucillo, who conducted the change of plea and sentencing, heard the factual proffer and imposed Mr. Epstein's sentence. She has not been consulted regarding Mr. Epstein's

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[2]On the application for registration of the Florida Science Foundation with Florida's Department of State, Mr. Indyke lists his true address in Livingston, New Jersey.

application for work release. I understand that Judge McSorley's standing order states that she "takes no position with respect to the eligibility of any inmate sentenced in this Division unless specifically stated at time of sentencing." Because of her absence, Judge McSorley did not conduct the sentencing and, therefore, did not have the opportunity to weigh any objections to work release at that hearing. It is unclear whether Judge Pucillo was aware of Judge McSorley's standing order when she imposed sentence. In utilizing your discretion, you may or may not choose to consult with the appropriate judge on this matter.

Request for Notification

As I had previously asked of Colonel Gauger, I would appreciate if you would keep me informed of any changes to Mr. Epstein's release status so that I may fulfill my obligations to keep the victims identified through the federal investigation informed of Mr. Epstein's status. I have informed all of the known victims of Mr. Epstein of the change in his incarceration status and that you are the contact person if they have any questions. Some may ask that their locations be amongst the "Exclusionary Zones" programmed into Mr. Epstein's GPS unit. If you need their addresses, please let me know.

Please feel free to contact me with any questions or concerns.

Sincerely,

R. Alexander Acosta
United States Attorney

By: [redacted]
Assistant United States Attorney

cc: Colonel Michael Gauger
[redacted], Chief, Northern Division I

FBI

PALM BEACH COUNTY RA

JEFFREY E. EPSTEIN

31E-MM

DOJ Reports

Case No. . . . : 1-05-000368
SPECIAL NOTES : DO NOT RELEASE Occur From Date: 1/27/05 0000
Occur To Date : 1/27/05 0000 Report Date . : 3/14/05 1600
Day Of Week . : Thursday
Common/Location: 358 EL BRILLO WY
City . . . . . : PALM BEACH, FL
Location Type : RESIDENCE-SINGLE FAMILY
Beat Assignment: DETECTIVE BUREAU Map Reference : 10
Dept Class . . : SEXUAL BATTERY Report Officer : PAGAN, MICHELE
Case Status . : OPEN / ACTIVE Case Status Dt : 3/14/05
Supervisory Dt.: TRYLCH, JEFFREY 3/14/05
Entry Date . . : OREGERO, LAURA 4/06/05
Names? . . . . : Property? . . :
Vehicles? . . : Offenses? . . :
Narrative? . . : Related Cases? :

********* V E H I C L E I N F O R M A T I O N # 1 **********
Case number . : 1-05-000368 Category . . . :
State Veh Type : Year . . . . . : 0
Make . . . . . : Model . . . . :
Model Name . . : Permit Number :
Style . . . . : Color - Top . :
Color - Bottom : License # . . :
VIN . . . . . : Stolen value . : 0
Disposition . : Insured . . . :
Insured by . . : Keys in car . :
Vehicle locked : Lein holder . :
Date recovered : 0/00/00 Recovery value : 0
Street number :
City . . . . . :
Recovery code : NCIC number . :
Be On Look Out?:

********* P E R S O N R E P O R T I N G I N F O - # 1 *********
Case Number . : 1-05-000368 Last Name . . : [redacted]
Street Number : [redacted]
City . . . . . : WEST PALM BEACH, FL 33412
Birth Date/Age : [redacted] Employer? . . :
Occupation . . : Oper Lic No. . : [redacted] FL
Home Phone No. : [redacted] Race . . . . . : White
Sex . . . . . : Female Height . . . . : 0
Weight . . . . : 0 Other Phone Nbr:

********** S U S P E C T / A R R E S T E E I N F O R M A T I O N - # 1 **
Case Number . : 1-05-000368 Prompt valid in: [redacted]
Street Number : [redacted]
City . . . . . : ROYAL PALM BEACH, FL 334121460
Birth Date . . : [redacted] 18 Maximum Age . : 18
Employer? . . : Occupation . . :
Oper Lic No. . : [redacted] FL Home Phone No. :
Other Phone Nbr: Race . . . . . : White
Sex . . . . . : Female Minimum Height : 0
Minimum Weight : 0 Maximum Height : 0

Case No. . . . : 1-05-000368 (Continued)

Maximum Weight	: 0	Misc. ID# . .	:
Aliases? . . .	:	MO/Crime Spec?	:
Hair Color . .	:	Hair Length .	:
Hair Style . .	:	Eye Color . .	:
Glasses . . .	:	Complexion . .	:
Facial Hair .	:	Build	:
Teeth	:	Speech	:
Hat	:	Coat	:
Shirt	:	Pants	:
Shoes	:	Body Marks #1	:
Body Marks #2	:	Body Marks #3	:
Body Marks #4	:	Status	: STILL SUSPECT
Arrest Case No.	:	Additional UCR?	:

********** S U S P E C T / A R R E S T E E I N F O R M A T I O N - # 2 **

Case Number .	: 1-05-000368	Prompt valid in:	[redacted]
Street Number	: 358 EL BRILLO WY		
City	: PALM BEACH, FL 000033480		
Birth Date . .	: [redacted] 25	Maximum Age .	: 25
Employer? . .	:	Occupation . .	: PERSONAL ASST/EPSTEIN
Oper Lic No. .	: [redacted]	Home Phone No.	: [redacted]
Other Phone Nbr	: 561/000-0000	Race	: White
Sex	: Female	Minimum Height	: 0
Minimum Weight	: 0	Maximum Height	: 0
Maximum Weight	: 0	Misc. ID# . .	:
Aliases? . . .	:	MO/Crime Spec?	:
Hair Color . .	:	Hair Length .	:
Hair Style . .	:	Eye Color . .	:
Glasses . . .	:	Complexion . .	:
Facial Hair .	:	Build	:
Teeth	:	Speech	:
Hat	:	Coat	:
Shirt	:	Pants	:
Shoes	:	Body Marks #1	:
Body Marks #2	:	Body Marks #3	:
Body Marks #4	:	Status	: STILL SUSPECT
Arrest Case No.	:	Additional UCR?	:

********** S U S P E C T / A R R E S T E E I N F O R M A T I O N - # 3 **

Case Number .	: 1-05-000368	Prompt valid in:	EPSTEIN, JEFFREY
Street Number	: 358 EL BRILLO WY		
City	: PALM BEACH, FL 000033480		
Birth Date . .	: [redacted] 52	Maximum Age .	: 52
Employer? . .	:	Occupation . .	:
Oper Lic No. .	: [redacted] FL	Home Phone No.	:
Other Phone Nbr	:	Race	: White
Sex	: Male	Minimum Height	: 0
Minimum Weight	: 0	Maximum Height	: 0
Maximum Weight	: 0	Misc. ID# . .	:
Aliases? . . .	:	MO/Crime Spec?	:
Hair Color . .	:	Hair Length .	:
Hair Style . .	:	Eye Color . .	:

Case No. . . . : 1-05-000368 (Continued)

Glasses . . . :		Complexion . . :	
Facial Hair . :		Build . . . . :	
Teeth . . . . :		Speech . . . . :	
Hat . . . . . :		Coat . . . . . :	
Shirt . . . . :		Pants . . . . . :	
Shoes . . . . :		Body Marks #1 :	
Body Marks #2 :		Body Marks #3 :	
Body Marks #4 :		Status . . . . :	STILL SUSPECT
Arrest Case No.:		Additional UCR?:	

********** V I C T I M I N F O R M A T I O N - # 1 **********

Case Number . :	1-05-000368		
Prompt valid in:	[redacted]		
Street Number :	[redacted]		
City . . . . . :	WEST PALM BEACH, FL 33412		
Birth Date/Age :	[redacted]	Employer? . . :	
Occupation . . :	STUDENT	Oper Lic No. . :	
Home Phone No. :	561/[redacted]	Race . . . . . :	White
Sex . . . . . :	Female	Height . . . . :	0
Weight . . . . :	0	Misc. ID# . . :	
Be On Look Out?:		Other Phone Nbr:	
Victim Type . :	JUVENILE	Residency Type :	
Residency Sts :		File Charges . :	
Car Identify . :		Victim Sobriety:	
Injury Extent :		Injury Type 1 :	
Injury Type 2 :		Hospital ID . :	
Med Treatment :		Phys First Name:	
Phys Last Name :			

********** V I C T I M I N F O R M A T I O N - # 2 **********

Case Number . :	1-05-000368	Prompt valid in:	[redacted]
Street Number :			
City . . . . . :	PALM BEACH, FL 000033480		
Birth Date/Age :	[redacted]	Employer? . . :	
Occupation . . :		Oper Lic No. . :	
Home Phone No. :	[redacted]	Race . . . . . :	White
Sex . . . . . :	Female	Height . . . . :	0
Weight . . . . :	0	Misc. ID# . . :	
Be On Look Out?:		Other Phone Nbr:	[redacted]
Victim Type . :	ADULT	Residency Type :	
Residency Sts :		File Charges . :	
Can Identify . :		Victim Sobriety:	
Injury Extent :		Injury Type 1 :	
Injury Type 2 :		Hospital ID . :	
Med Treatment :		Phys First Name:	
Phys Last Name :			

********** V I C T I M I N F O R M A T I O N - # 3 **********

Case Number . :	1-05-000368	Prompt valid in:	[redacted]
Street Number :			
City . . . . . :	PALM BEACH, FL 000033480		
Birth Date/Age :	[redacted]	Employer? . . :	

Case No. . . . : 1-05-000368 (Continued)
Occupation . . :
Home Phone No. : [redacted]
Sex . . . . . : Female
Weight . . . . : 0
Be On Look Out?:
Victim Type . : JUVENILE
Residency Sts :
Can Identify . :
Injury Extent :
Injury Type 2 :
Med Treatment :
Phys Last Name :
Oper Lic No. . :
Race . . . . . : White
Height . . . . : 0
Misc. ID# . . :
Other Phone Nbr: [redacted]
Residency Type :
File Charges . :
Victim Sobriety:
Injury Type 1 :
Hospital ID . :
Phys First Name:

********** V I C T I M I N F O R M A T I O N - # 4 **********
Case Number . : 1-05-000368
Street Number :
City . . . . . : PALM BEACH, FL 000033480
Birth Date/Age : [redacted]
Occupation . . :
Home Phone No. : [redacted]
Sex . . . . . : Female
Weight . . . . : 0
Be On Look Out?:
Victim Type . : JUVENILE
Residency Sts :
Can Identify . :
Injury Extent :
Injury Type 2 :
Med Treatment :
Phys Last Name :
Prompt valid in: [redacted]
Employer? . . :
Oper Lic No. . :
Race . . . . . : White
Height . . . . : 0
Misc. ID# . . :
Other Phone Nbr: [redacted]
Residency Type :
File Charges . :
Victim Sobriety:
Injury Type 1 :
Hospital ID . :
Phys First Name:

********** V I C T I M I N F O R M A T I O N - # 5 **********
Case Number . : 1-05-000368
Street Number :
City . . . . . : PALM BEACH, FL 000033480
Birth Date/Age : [redacted]
Occupation . . :
Home Phone No. : [redacted]
Sex . . . . . : Female
Weight . . . . : 0
Be On Look Out?:
Victim Type . : ADULT
Residency Sts :
Can Identify . :
Injury Extent :
Injury Type 2 :
Med Treatment :
Phys Last Name :
Prompt valid in: [redacted]
Employer? . . :
Oper Lic No. . :
Race . . . . . : White
Height . . . . : 0
Misc. ID# . . :
Other Phone Nbr: [redacted]
Residency Type :
File Charges . :
Victim Sobriety:
Injury Type 1 :
Hospital ID . :
Phys First Name:

** ********** V I C T I M I N F O R M A T I O N - # 6 **********
Case Number . : 1-05-000368
Prompt valid in: [redacted]

Case No. . . . : 1-05-000368 (Continued)
Street Number :
City . . . . . : PALM BEACH, FL 000033480
Birth Date/Age : [redacted] Employer? . . :
Occupation . . : Oper Lic No. . :
Home Phone No. : [redacted] Race . . . . . : White
Sex . . . . . : Female Height . . . . : 0
Weight . . . . : 0 Misc. ID# . . :
Be On Look Out?: Other Phone Nbr: [redacted]
Victim Type . : JUVENILE Residency Type :
Residency Sts : File Charges . :
Can Identify . : Victim Sobriety:
Injury Extent : Injury Type 1 :
Injury Type 2 : Hospital ID . :
Med Treatment : Phys First Name:
Phys Last Name :

********** V I C T I M I N F O R M A T I O N - # 7 **********
Case Number . : 1-05-000368 Prompt valid in: [redacted]
Street Number :
City . . . . . : PALM BEACH, FL 000033480
Birth Date/Age : [redacted] Employer? . . :
Occupation . . : Oper Lic No. . :
Home Phone No. : [redacted] Race . . . . . : White
Sex . . . . . : Female Height . . . . : 0
Weight . . . . : 0 Misc. ID# . . :
Be On Look Out?: Other Phone Nbr: [redacted]
Victim Type . : JUVENILE Residency Type :
Residency Sts : File Charges . :
Can Identify . : Victim Sobriety:
Injury Extent : Injury Type 1 :
Injury Type 2 : Hospital ID . :
Med Treatment : Phys First Name:
Phys Last Name :

********** V I C T I M I N F O R M A T I O N - # 8 **********
Case Number . : 1-05-000368 Prompt valid in: [redacted]
Street Number :
City . . . . . : PALM BEACH, FL 000033480
Birth Date/Age : [redacted] Employer? . . :
Occupation . . : Oper Lic No. . :
Home Phone No. : [redacted] Race . . . . . : White
Sex . . . . . : Female Height . . . . : 0
Weight . . . . : 0 Misc. ID# . . :
Be On Look Out?: Other Phone Nbr: [redacted]
Victim Type . : JUVENILE Residency Type :
Residency Sts : File Charges . :
Can Identify . : Victim Sobriety:
Injury Extent : Injury Type 1 :
Injury Type 2 : Hospital ID . :
Med Treatment : Phys First Name:
Phys Last Name :

********** V I C T I M I N F O R M A T I O N - # 9 **********

Case No. . . . : 1-05-000368 (Continued)
Case Number . : 1-05-000368 Prompt valid in: [redacted]
Street Number :
City . . . . . : PALM BEACH, FL 000033480
Birth Date/Age : [redacted] Employer? . . :
Occupation . . : Oper Lic No. . :
Home Phone No. : [redacted] Race . . . . . : White
Sex . . . . . : Female Height . . . . : 0
Weight . . . . : 0 Misc. ID# . . :
Be On Look Out?: Other Phone Nbr: [redacted]
Victim Type . : JUVENILE Residency Type :
Residency Sts : File Charges . :
Can Identify . : Victim Sobriety:
Injury Extent : Injury Type 1 :
Injury Type 2 : Hospital ID . :
Med Treatment : Phys First Name:
Phys Last Name :

********** V I C T I M I N F O R M A T I O N - # 10 **********
Case Number . : 1-05-000368
Prompt valid in: [redacted]
Street Number :
City . . . . . : PALM BEACH, FL 000033480
Birth Date/Age : [redacted] Employer? . . :
Occupation . . : Oper Lic No. . :
Home Phone No. : [redacted] Race . . . . . : White
Sex . . . . . : Female Height . . . . : 0
Weight . . . . : 0 Misc. ID# . . :
Be On Look Out?: Other Phone Nbr: [redacted]
Victim Type . : JUVENILE Residency Type :
Residency Sts : File Charges . :
Can Identify . : Victim Sobriety:
Injury Extent : Injury Type 1 :
Injury Type 2 : Hospital ID . :
Med Treatment : Phys First Name:
Phys Last Name :

********** V I C T I M I N F O R M A T I O N - # 11 **********
Case Number . : 1-05-000368 Prompt valid in: [redacted]
Street Number :
City . . . . . : PALM BEACH, FL 000033480
Birth Date/Age : [redacted] Employer? . . :
Occupation . . : Oper Lic No. . :
Home Phone No. : [redacted] Race . . . . . : White
Sex . . . . . : Female Height . . . . : 0
Weight . . . . : 0 Misc. ID# . . :
Be On Look Out?: Other Phone Nbr: [redacted]
Victim Type . : ADULT Residency Type :
Residency Sts : File Charges . :
Can Identify . : Victim Sobriety:
Injury Extent : Injury Type 1 :
Injury Type 2 : Hospital ID . :
Med Treatment : Phys First Name:

Case No. . . . : 1-05-000368 (Continued)
Phys Last Name :

********** V I C T I M I N F O R M A T I O N - # 12 **********
Case Number . : 1-05-000368 Prompt valid in: [redacted]
Street Number :
City . . . . . : PALM BEACH, FL 000033480
Birth Date/Age : [redacted] Employer? . . :
Occupation . . : Oper Lic No. . :
Home Phone No. : [redacted] Race . . . . . : White
Sex . . . . . : Female Height . . . . : 0
Weight . . . . : 0 Misc. ID# . . :
Be On Look Out?: Other Phone Nbr: [redacted]
Victim Type . : ADULT Residency Type :
Residency Sts : File Charges . :
Can Identify . : Victim Sobriety:
Injury Extent : Injury Type 1 :
Injury Type 2 : Hospital ID . :
Med Treatment : Phys First Name:
Phys Last Name :

********** V I C T I M I N F O R M A T I O N - # 13 **********
Case Number . : 1-05-000368 Prompt valid in: [redacted]
Street Number :
City . . . . . : PALM BEACH, FL 000033480
Birth Date/Age : [redacted] Employer? . . :
Occupation . . : Oper Lic No. . :
Home Phone No. : [redacted] Race . . . . . : White
Sex . . . . . : Female Height . . . . : 0
Weight . . . . : 0 Misc. ID# . . :
Be On Look Out?: Other Phone Nbr: [redacted]
Victim Type . : JUVENILE Residency Type :
Residency Sts : File Charges . :
Can Identify . : Victim Sobriety:
Injury Extent : Injury Type 1 :
Injury Type 2 : Hospital ID . :
Med Treatment : Phys First Name:
Phys Last Name :

********** V I C T I M I N F O R M A T I O N - # 14 **********
Case Number . : 1-05-000368 Prompt valid in: [redacted]
Street Number :
City . . . . . : PALM BEACH, FL 000033480
Birth Date/Age : [redacted] Employer? . . :
Occupation . . : Oper Lic No. . :
Home Phone No. : 561/000-0000 Race . . . . . : White
Sex . . . . . : Female Height . . . . : 0
Weight . . . . : 0 Misc. ID# . . :
Be On Look Out?: Other Phone Nbr: [redacted]
Victim Type . : JUVENILE Residency Type :
Residency Sts : File Charges . :
Can Identify . : Victim Sobriety:
Injury Extent : Injury Type 1 :

Case No. . . . : 1-05-000368 (Continued)
Injury Type 2 : Hospital ID . :
Med Treatment : Phys First Name:
Phys Last Name :

********** V I C T I M I N F O R M A T I O N - # 15 **********
Case Number . : 1-05-000368 Prompt valid in: [redacted], [redacted] [redacted]
Street Number :
City . . . . . : PALM BEACH, FL 000033480
Birth Date/Age : [redacted] Employer? . . :
Occupation . . : Oper Lic No. . :
Home Phone No. : [redacted] Race . . . . . : White
Sex . . . . . : Female Height . . . . : 0
Weight . . . . : 0 Misc. ID# . . :
Be On Look Out?: Other Phone Nbr: [redacted]
Victim Type . : ADULT Residency Type :
Residency Sts : File Charges . :
Can Identify . : Victim Sobriety:
Injury Extent : Injury Type 1 :
Injury Type 2 : Hospital ID . :
Med Treatment : Phys First Name:
Phys Last Name :

********** V I C T I M I N F O R M A T I O N - # 16 **********
Case Number . : 1-05-000368 Prompt valid in: [redacted], [redacted] [redacted]
Street Number :
City . . . . . : PALM BEACH, FL 000033480
Birth Date/Age : [redacted] Employer? . . :
Occupation . . : Oper Lic No. . :
Home Phone No. : [redacted] Race . . . . . : White
Sex . . . . . : Female Height . . . . : 0
Weight . . . . : 0 Misc. ID# . . :
Be On Look Out?: Other Phone Nbr: [redacted]
Victim Type . : JUVENILE Residency Type :
Residency Sts : File Charges . :
Can Identify . : Victim Sobriety:
Injury Extent : Injury Type 1 :
Injury Type 2 : Hospital ID . :
Med Treatment : Phys First Name:
Phys Last Name :

********** V I C T I M I N F O R M A T I O N - # 17 **********
Case Number . : 1-05-000368 Prompt valid in: [redacted], [redacted] [redacted]
Street Number :
City . . . . . : PALM BEACH, FL 000033480
Birth Date/Age : [redacted] Employer? . . :
Occupation . . : Oper Lic No. . :
Home Phone No. : [redacted] Race . . . . . : White
Sex . . . . . : Female Height . . . . : 0
Weight . . . . : 0 Misc. ID# . . :
Be Look Out?: Other Phone Nbr: [redacted]
Victim Type . : JUVENILE Residency Type :
Residency Sts : File Charges . :

Case No. . . . : 1-05-000368 (Continued)
Can Identify . :
Injury Extent :
Injury Type 2 :
Med Treatment :
Phys Last Name :
Victim Sobriety:
Injury Type 1 :
Hospital ID . :
Phys First Name:

********* O T H E R P E R S O N I N F O R M A T I O N - # 1 *********
Case Number . : 1-05-000368
Street Number : [redacted]
City . . . . . : WEST PALM BEACH, FL 33411
Birth Date/Age : [redacted]
Occupation . . : STUDENT
Home Phone No. : 561/[redacted]
Sex . . . . . : Female
Weight . . . . : 0
Other Phone Nbr:
Last Name . . : [redacted]
Employer? . . :
Oper Lic No. . :
Race . . . . . : White
Height . . . . : 0
Person Type . : OTHER PERSON

********* O T H E R P E R S O N I N F O R M A T I O N - # 2 *********
Case Number . : 1-05-000368
Street Number : 358 EL BRILLO WY
City . . . . . : PALM BEACH, FL 000033480
Birth Date/Age : [redacted]
Occupation . . :
Hor Phone No. :
Sex . . . . . : Female
Weight . . . . : 0
Other Phone Nbr:
Last Name . . : [redacted]
Employer? . . :
Oper Lic No. . : [redacted] FL
Race . . . . . : White
Height . . . . : 510
Person Type . : OTHER PERSON

********* O T H E R P E R S O N I N F O R M A T I O N - # 3 *********
Case Number . : 1-05-000368
Street Number : [redacted]
City . . . . . : ROYAL PALM BEACH, FL 33411
Birth Date/Age : [redacted]
Occupation . . :
Home Phone No. : 561/[redacted]
Sex . . . . . : Female
Weight . . . . : 0
Other Phone Nbr: [redacted]
Last Name . . : [redacted]
Employer? . . :
Oper Lic No. . :
Race . . . . . : White
Height . . . . : 0
Person Type . : OTHER PERSON

********* O T H E R P E R S O N I N F O R M A T I O N - # 4 *********
Case Number . : 1-05-000368
Street Number : [redacted]
City . . . . . : ROYAL PALM BEACH, FL 33411
Birth Date/Age : [redacted]
Occupation . . : PAINTER
Home Phone No. : 561[redacted]
Sex . . . . . : Male
Weight . . . . : 0
Other Phone Nbr:
Last Name . . : [redacted]
Employer? . . :
Oper Lic No. . :
Race . . . . . : White
Height . . . . : 0
Person Type . : OTHER PERSON

********* O T H E R P E R S O N I N F O R M A T I O N - # 5 *********
Case Number . : 1-05-000368
Last Name . . : [redacted]

Case No. . . . : 1-05-000368 (Continued)
Street Number :
City . . . . . :
Birth Date/Age : 0/00/0000 0 Employer? . . :
Occupation . . : FAMILY THERAPIST Oper Lic No. . :
Home Phone No. : [redacted] Race . . . . . : White
Sex . . . . . : Female Height . . . . : 0
Weight . . . . : 0 Person Type . : OTHER PERSON
Other Phone Nbr: [redacted]

EMPLOYER INFORMATION
Case Number . : 1-05-000368
Employer Name : PBC DIVISON OF YOUTH AFFAIRS
Address . . . : 4200 N AUSTRALIAN AV
City/State/Zip : WEST PALM BEACH, FL 33407
Phone Number . : [redacted]

********* O T H E R P E R S O N I N F O R M A T I O N - # 6 *********
Case Number . : 1-05-000368 Last Name . . : [redacted]
Street Number : [redacted]
City . . . . . : WELLINGTON, FL 33414
Birth Date/Age : [redacted] Employer? . . :
Occupation . . : STUDENT Oper Lic No. . :
Home Phone No. : 561/[redacted] Race . . . . . : White
Sex . . . . . : Male Height . . . . : 0
Weight . . . . : 0 Person Type . : OTHER PERSON
Other Phone Nbr:

EMPLOYER INFORMATION
Case Number . : 1-05-000368 Employer Name : [redacted] SCHOOL
Address . . . : 4900 SUMMIT BV
City/State/Zip : WEST PALM BEACH, FL 33415
Phone Number . :

********* O T H E R P E R S O N I N F O R M A T I O N - # 7 *********
Case Number . : 1-05-000368 Last Name . . : [redacted]
Street Number : [redacted]
City . . . . . : WEST PALM BEACH, FL 33412
Birth Date/Age : 0/00/0000 0 Employer? . . :
Occupation . . : Oper Lic No. . :
Home Phone No. : [redacted] Race . . . . . : White
Sex . . . . . : Male Height . . . . : 0
Weight . . . . : 0 Person Type . : OTHER PERSON
Other Phone Nbr:

********* O T H E R P E R S O N I N F O R M A T I O N - # 8 *********
Case Number . : 1-05-000368 Last Name . . : [redacted]
Street Number : [redacted]
City . . . . . : WEST PALM BEACH, FL 33411
Birth Date/Age : 0/00/0000 0 Employer? . . :
Occupation . . : Oper Lic No. . :
Home Phone No. : 561[redacted] Race . . . . . :
Sex . . . . . : Female Height . . . . : 0

Cas No. . . . : 1-05-000368 (Continued)
Weight . . . . : 0 Person Type . : OTHER PERSON
Other Phone Nbr:

********* O T H E R P E R S O N I N F O R M A T I O N - # 9 *********
Case Number . : 1-05-000368 Last Name . . : [redacted]
Street Number : [redacted]
City . . . . . : WEST PALM BEACH, FL 33417
Birth Date/Age : [redacted] Employer? . . :
Occupation . . : Oper Lic No. . : [redacted] FL
Home Phone No. : [redacted] Race . . . . . : White
Sex . . . . . : Female Height . . . . : 0
Weight . . . . : 0 Person Type . : OTHER PERSON
Other Phone Nbr: [redacted]

**************************** N A R R A T I V E # 1 ****************************
Original Report LO Reported By: PAGAN, MICHELE D. 9/20/05
Entered By.: [redacted], LAURA D. 9/20/05

On 03/14/2005, I received a call from a woman who did not wish to identify herself (later identified as [redacted]. She stated that her fourteen year old step daughter (later identified as [redacted] possibly may have been molested in Palm Beach by a wealthy man. According to [redacted] she learned of the possible molestation by a third party. She explained that she had received a call from the mother of her stepdaughter's friend. The mother claimed to have overheard a conversation between her daughter and a male friend; they were talking about [redacted] The conversation was about how [redacted] had met with a 45-year-old man and had sex with him and was paid for it. I advised [redacted] that I would like to meet with her to obtain a more detailed statement and facts. [redacted] stated she did not know what to do and had to discuss the matter with her husband. At this point [redacted] did not provide me with a call back number or any other information. She stated that she would contact me once she had spoken with her husband and [redacted] mother.

On 03/14/2005 received a call from Mr. & Mrs. [redacted] They stated it was all right to speak to their daughter [redacted] via cell phone 561 [redacted] Her mother [redacted] had been made aware of the case. They agreed to meet me at the police department later this date. (561)[redacted]

On 03/14/2005, Mr. [redacted] accompanied by his wife [redacted] came to the Palm Beach Police Department where they advised me that they believed their fourteen year old daughter may have had some type of sexual relationship with an older male who resided in Palm Beach. Neither knew the suspect's name or address. Both stated that their daughter did not talk to them about the incident, nor would she admit to it.

Daniel [redacted] identified his daughter as [redacted] w/f, DOB [redacted]; resides with her biological mother [redacted] at [redacted] RPB, 33411, (561) [redacted] is a [redacted],

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her sister [redacted] resides with Mr. [redacted] Both [redacted] and [redacted] are currently attending [redacted] vocational school, which is an involuntary admitted juvenile educational facility. [redacted] stays at the facility during the week and comes home on the weekend. According to [redacted] she was admitted to the school because of disciplinary problems that recently escalated. The facility also coordinates with the families to provide one on one as well as family counseling.

According to Mrs. [redacted] she believes the incident occurred on Sunday, Feb 6, 2005. A friend of [redacted] s, named [redacted] picked her up at their house and left. They believe [redacted] initiated the relationship with the older gentleman, though they do not have any proof. [redacted] lives close by with her mother. Mrs. [redacted] further explained that [redacted] was introduced to [redacted] by [redacted] a boy she was dating (goes to [redacted], plays baseball). Mrs. [redacted] continued that on Sunday, [redacted] picked up [redacted] and drove to Palm Beach where they met the man. Supposedly, the man has a lot of money and often has young girls come over to his house. [redacted] offers these girls a way to make fast cash. The man starts with a massage. If he likes them, he keeps them around and does more. The [redacted] did not have any information on [redacted] other than she lives on [redacted] the last house on right side (north side).

Mrs. [redacted] talked of a conversation that she had with [redacted] the mother of [redacted] a former friend of [redacted] She found it strange that they were no longer friends until she received the call from her mother telling her of the conversation she overheard between [redacted] and a boy named [redacted]

Mrs. [redacted] told me of an incident that occurred on 02/09/2005. [redacted] got into a fight at school (Royal Palm HS). Mrs. Brown Assistant Principal, found over $300.00 in [redacted] s purse. [redacted] gave different explanations for the large sum of money. Initially the school administration thought it was drug related but then dismissed the claim. Since that day, [redacted] did not return to school; she ran away Thursday, 02/10th or Friday 02/11 and returned to her mother's house later that night after midnight. It was not until after [redacted] received the call from [redacted] mother, [redacted], that she learned [redacted] was the girl that got into the fight with [redacted] The fight was instigated when [redacted] accused [redacted] of being a prostitute.

[redacted] who has legal joint custody of his daughter [redacted] signed the affidavit of prosecution indicating he wished to prosecute against the inappropriate sexual behavior with his fourteen-year-old daughter.

Mr. [redacted] stated that he had no objections with our agency speaking with his daughter [redacted] about the incident. Mr. [redacted] stated that [redacted] mother [redacted] is aware of the allegations and also was willing to cooperate. According to Mrs. [redacted] she does not believe her daughter had any additional contact with the suspect as she was with

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her mother and then placed into [redacted].

I contacted the School Board Police who provided me the information for Sable Palm, also known as [redacted] Family Center 840 - 4540. 4200 N Australian Avenue, West Palm Beach, Florida. Checking the school board records for [redacted] and [redacted] there was no disciplinary record found. I was advised if no disciplinary action was taken for a fight, such as an expulsion or detention, the incident may not have been recorded. This was at the discretion of the individual school security and principal.

03/15/2005, I called the Palm Beach County Sheriff's Office and left a message for PBSP Sgt. Chris Keen, Child Abuse Unit.

On 03/15/2005, I went to [redacted]/Sable Palm where I met with white female [redacted] Also present was [redacted], [redacted] therapist. During an audiotaped interview, I spoke with [redacted] about the allegations that were made. [redacted] initially denied anything had happened, only admitting to going with [redacted] (later identified as [redacted] to Palm Beach to pick up money [redacted] was owed. [redacted] identified [redacted] as the cousin of her former boyfriend [redacted] She ultimately admitted to knowing that [redacted] worked for a wealthy man and possibly did sexual favors for him. She also admitted that [redacted] had offered her an opportunity to make money.

[redacted] identified [redacted] boss as a white male named "Jeff" who lived in Palm Beach (later positively identified as Jeffrey Epstein). [redacted] explained that she was first approached by [redacted] to go with her to Jeff's house, when they were at [redacted] house. According to [redacted] she was not sure exactly what was going on with [redacted] but agreed to go with her. [redacted] ([redacted] boyfriend) became angry when he heard [redacted] inviting [redacted] to accompany her. [redacted] believed it was to pick up money the man owed [redacted] [redacted] stated [redacted] told her that she would pick her up at her house on Sunday. [redacted] was not sure of the exact dates but knew it was a Sunday. According to [redacted] along with an unknown, possibly Hispanic female, picked her up at her father's house on 76th Lane. [redacted] told her father that they were going shopping. It was later confirmed by [redacted] that [redacted] picked his daughter up. According to Mr. [redacted] drove a pick up truck.

[redacted] drove S. [redacted] along with the unknown female to Palm Beach. Sometime on the way there, a conversation occurred between [redacted] and [redacted] whereby [redacted] told [redacted] that if Jeff asked her ([redacted] age, she should say she was eighteen.

[redacted] recalled that Jeff's house was on a dead end street. All three girls walked up a driveway, past what appeared to be a small guard/security room. In fact, [redacted] recalled a male approaching them asking what they wanted. [redacted] stated they were there to see Jeff. The male allowed them to continue walking up to the house.

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[redacted] stated the man told them that Epstein was not there but was expected back. He allowed them to enter the house, via the kitchen. He offered them something to drink while they waited inside. Shortly after, Epstein and a woman, described as white with blond hair entered the kitchen. [redacted] believed the woman was Epstein's Assistant. [redacted] added that the woman did not seem friendly and kept her responses short and direct. Epstein introduced himself to [redacted] as Jeff . [redacted] got the impression that Epstein and [redacted] friend knew each other. [redacted] described Epstein as being approximately forty-five years old, a long face, and bushy eyebrows, with graying hair.

[redacted] and Epstein left the kitchen leaving [redacted] and [redacted] friend alone in the kitchen. They returned a short time later. They all spoke briefly in the kitchen. While speaking to me, [redacted] became upset and started to cry. [redacted] stated the woman instructed her to follow her upstairs, which she did. According to [redacted] the woman led her to a room that had a massage table in it. The woman started to fix up the room, putting the covers on the table and taking lotions out. She then told [redacted] that Epstein would be up in a second. The woman left the room, and soon after, Epstein walked in and told [redacted] to take off her clothes. As [redacted] was telling me what had happened, she looked away from me, and with a pointed finger, repeatedly pressed it into her thigh. [redacted] stated he was stern when he told her to take off her clothes. [redacted] said she did not know what to do as she was the only one there. [redacted] took off her shirt leaving her bra on. Epstein, dressed in a towel told her to take off everything. [redacted] stated she removed her pants leaving her thong panties on. Epstein then instructed her to give him a massage pointing to a specific lotion for her to use. Epstein laid on the table, face down. As [redacted] began to give Epstein the massage, he told her to get on his back. [redacted] stated she straddled herself on Epstein's back. [redacted] stated her exposed buttocks were touching Epstein s bare buttocks. As [redacted] was giving Epstein the massage, he turned around, and wacked off ([redacted] later explained that wacking off was masturbating). [redacted] stated she was disgusted by Epstein's actions but did not say anything. According to [redacted] Epstein told her that she "had a really hot body." Epstein excused himself and went to the bathroom where she believed he masturbated again. Epstein returned to the room and told [redacted] that he was done and gave her three hundred dollars. They went back down stairs where they met [redacted] Epstein said good-bye and they left. [redacted] asked [redacted] how did it go and asked what did she ([redacted] do. When [redacted] told [redacted] that Epstein asked for a massage, [redacted] allegedly stated "I know." [redacted] stated they then went shopping. [redacted] stated [redacted] also got paid, but that she did not know why since she was confident that [redacted] did not do anything.

[redacted] described Epstein's house as a two story pink house with a Cadillac Escalade parked in the driveway. There were gates leading into the property. From the kitchen, [redacted] recalled walking up a flight of stairs, lined with photographs, to a room. Upon entering

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the room there was a large bathroom to the right. [redacted] recalled a hot pink and green sofa in the room. There was a door on each side of the sofa. [redacted] recalled there being a mural of a naked woman in the room, as well as several photographs of naked women on a shelf.

[redacted] stated Epstein did not change in front of her but did take off his towel, exposing himself. [redacted] recalled Epstein being hairy especially on his chest. Epstein also had a hairline that continued to his buttocks. [redacted] admitted to seeing his penis. I asked [redacted] if she knew what being circumcised meant and she stated no. [redacted] then said that she thought Epstein was on steroids because he was a "really built guy and his wee wee was very tiny." [redacted] would explain that when she stated "wee wee" she meant penis. [redacted] stated Epstein exposed himself when he took his towel off, placing it on the floor as he laid down on the table.

[redacted] said Epstein was specific in his instruction to her on how to massage, telling her to go clockwise, etc. [redacted] recalled that Epstein got up from the table and went to the bathroom where she heard him making, what she believed to be sexual type of noises. (moaning) He then returned to the room where he again laid down on the table. Epstein then turned over and instructed [redacted] to massage his boobs. As she did this, Epstein continued to make moaning noises.

[redacted] resumed massaging his chest area. [redacted] was now standing on the ground. Epstein turned to his side, and with the towel on the ground started to rub his penis in an up and down motion. [redacted] stated Epstein held on to the small of her back as she massaged his chest, back and shoulder area. [redacted] recalled Epstein ejaculating because he had to use the towel to wipe himself as he got off the table. [redacted] also recalled Epstein having a noticeable freckle on his chest.

Epstein then left the room and [redacted] got dressed. She went back downstairs where she met [redacted] and the unknown white female. [redacted] admitted to getting paid three hundred dollars in cash from Epstein. Before they left, Epstein asked [redacted] to leave her phone number. As they were leaving the house, [redacted] asked [redacted] what had happened and how much she was paid. [redacted] stated [redacted] seemed upset or jealous when she told her that she received three hundred dollars. [redacted] stated received only two hundred dollars that day. [redacted] stated that she believed [redacted] was paid two hundred dollars for bringing her.

[redacted] told [redacted] that if they do this every Saturday, they could be rich; [redacted] agreed. They then went shopping, though she is not sure where. Possibly at TJ Maxx or Marshall's. [redacted] stated she never saw [redacted] again as she got into a fight at school. She had not spoken with [redacted] either as her mother took away her cell phone.

I asked [redacted] if she was aware of any video equipment while she was in the room. She stated no.

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[redacted] stated she was afraid that [redacted] would retaliate against her or her family if she ever went to the police regarding the incident. [redacted] stated that her father's vehicle was recently vandalized. [redacted] admitted to telling [redacted] what had happened with Epstein. According to [redacted] [redacted] became angry and upset, punching a hole in the wall. [redacted] guessed that it was [redacted] who told [redacted] about the incident, and now there were rumors in school about [redacted] and what she did with Epstein.

I then talked to [redacted] about truth and lying. We talked about the color sweater she was wearing. [redacted] denied having sexual intercourse with Epstein. She denied touching his penis. [redacted] again admitted to observing Epstein masturbate.

[redacted] agreed to cooperating with the police department in placing a phone call to [redacted] in a controlled setting. I met with Ms. [redacted] and advised her of the families' as well as [redacted] willingness to cooperate with this investigation. Copies of this interview were placed into evidence.

I made contact with [redacted] mother of [redacted] I advised her briefly of my investigation. She was aware of the incident and stated that she overheard a portion of a conversation that her daughter was having with a boy named [redacted] stated that it was her opinion that both girls liked [redacted] recalled hearing her daughter calling [redacted] a whore. [redacted] admitted that she did not listen to the entire conversation but did confront her daughter about it later. [redacted] told her mother that something to the effect that [redacted] had slept with an older man for money. [redacted] stated that she would not object to me speaking with her daughter. It was [redacted] s belief that everyone in the school may have known about this because of the fight that her daughter [redacted] and [redacted] had gotten into. I reminded [redacted] that this was an ongoing investigation and requested she not discuss the fact that I had contacted her. She agreed.

On 03/16/2005, PBSO Sgt. Chris Keen left a message that he was returning my call. I spoke with Keen and discussed the case with him and inquired if he had any open allegations or cases where the suspect resided in Palm Beach. Keen stated he was unaware of any. Keen offered any assistance if needed. Keen stated it was his experience that due to the age of the parties involved, it would be difficult to interview them and expect the investigation to remain confidential.

Because of the time delay, there was no need for the victim to be taken to a medical facility for a physical for the purpose of obtaining evidence. There was also no need to take her to CPT as she was already in a juvenile facility, with an assigned therapist, in which coordinating a day and time to obtain a statement could be made.

On 03/17/2005, I queried Jeffery Epstein on the internet and obtained

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a photo of Epstein to be used in a photo line up. I met with [redacted] at which time she viewed the photo line up. She immediately recognized Epstein and pointed to him (Position #5). [redacted] signed the photo line up under Epstein's picture. This signed line up was placed into evidence.

On 03/18/2005, I met with [redacted] at her residence for the purpose of placing a controlled call to [redacted] spoke with [redacted] and asked if she could arrange another meeting with Jeff. [redacted] stated that she would have to call him and make the arrangements. A copy of this conversation was placed into evidence.

03/19/2005, I spoke with [redacted] and was advised that [redacted] left the state to visit with her aunt and uncle. [redacted] is scheduled to return to Florida on 03/27/2005

03/21/2005, I coordinated with PB BSF Unit and OCVAN to initiate surveillance on 358 El Brillo.

03/21/2005, Coordinated with Det. Lee regarding trash pulls from 358 El Brillo. On this same date I called [redacted] to schedule an appointment to speak with [redacted] She stated the school guidance counselor was reluctant to have police presence at the school. I assured her that I would respond to the school in civilian clothes and an unmarked vehicle.

[redacted] called me back and advised that I did not need to make an appointment to see [redacted]

I received a return phone call from [redacted] stating that [redacted] would be attending the family therapy sessions with [redacted]

I received messages from [redacted]

I conducted a computer query on Epstein. The results of this query indicated the most recent driver's license on file for Epstein was for the state of Florida, which had expired.

A cross reference of Epstein s residence, 358 El Brillo, Palm Beach, revealed the following affiliated names: [redacted] w/f, dob [redacted], Mark L. Epstein, w/m dob [redacted], & Ghislaine N. Maxwell, uk/f, dob [redacted]. A computer query for both returned no history.

On 03/23/2005, I spoke with [redacted] cell phone wk [redacted] I requested that she not discuss the incident with anyone including her daughter [redacted] as I did not want the investigation compromised. I was told at this time, that [redacted] and [redacted] have not been getting along due to the fact that [redacted] has decided to continue living with her father.

On 03/29/2005, I placed telephone calls to both the [redacted] and [redacted] residences requesting to speak with them regarding the

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investigation. I received return phone calls from Mrs. [redacted] and Mrs. [redacted] and advised them that I would be contacting [redacted] family therapist to coordinate a time to meet with [redacted]. This was at the request of both [redacted] and Mrs. [redacted] that [redacted] strict classroom and therapy schedule be disrupted as little as possible. I also updated them to the investigation thus far. Both [redacted] and [redacted] stated they had no objection to my meeting with [redacted]. In speaking with Ms. [redacted] she identified the cell phone number of [redacted] as being the phone assigned to [redacted] Ms. [redacted] had no objections and provided consent to giving it to the police department for the use of placing controlled phone calls from it. [redacted] stated the phone had been taken away from [redacted] as part of her punishment for not doing well in school. According to [redacted] used to be an excellent student, but in the past two months has become irritable, verbally abusive to the family and has run away. [redacted] stated her daughter's recent behavior is the opposite of what she normally is. [redacted] stated they are going through family therapy sessions with the school but none of this had come up. Arrangements were made for Det. Captain Gudger to retrieve the cell phone from [redacted] at her place of employment.

I called [redacted] Family Center, [redacted] and requested to speak with Ms. [redacted]. Upon speaking with Ms. [redacted] she advised me that she was in the middle of therapy sessions and would call me back once the sessions were completed. Ms. [redacted] stated the sessions should be concluded by 7:00 PM. At approximately 8:00PM I had called Ms. [redacted] at which time I left a message on her voice mail requesting a return phone call. I spoke with Ms. [redacted] and advised her that I did not meet with her daughter and that I would again attempt to coordinate a time with the counselor so as not to disrupt [redacted] s school schedule. [redacted] had no objections. Shortly after speaking with Ms. [redacted] I received a call from Ms. [redacted]. I explained the situation and requested a time to meet with [redacted] [redacted] reviewed [redacted] s schedule and advised that [redacted] would be available after 3:00PM.

On 03/30/2005, I met with Ms. [redacted] and [redacted] at [redacted] Family Center. I reminded [redacted] of her conversation with [redacted] During this time [redacted] initiated a conversation with me in which she admitted that she was not telling me everything that had happened during the time she was alone with Epstein. According to [redacted], while she and Epstein were alone on the second floor, Epstein used a purple vibrator to massage her vaginal area. [redacted] stated there was no penetration as the vibrator was on top of her underwear. I asked [redacted] if Epstein ever asked her age and she stated he had. [redacted] stated she told him she was eighteen. When Epstein asked what school she was in, [redacted] responded she was in the twelfth grade at Wellington. During the course of this incident, [redacted] stated Epstein told her that [redacted] had worked for him for years.

We then continued with the controlled call to [redacted] At approximately 3:35pm [redacted] from her cell phone, made a call to [redacted] s home, [redacted] [redacted] was not home. [redacted] was told

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that [redacted] was at working a double and could be reached on her cell phone, [redacted] W/F, [redacted] is employed at The Olive Garden Restaurant, located on Forest Hills Blvd in Wellington.

[redacted] called [redacted] During the conversation between [redacted] and [redacted] asked [redacted] what happened, stating that she had heard rumors that [redacted] was going to press charges. [redacted] asked if they, meaning [redacted] parents, knew about Jeffery. [redacted] claimed to have heard that [redacted] father had found out about Jeffrey. [redacted] told [redacted] that they (her parents) did not know anything about Epstein. [redacted] told [redacted] that Epstein needed someone to work tomorrow and asked if she was available. [redacted] stated she would call Epstein and then call [redacted] back.

During the course of these conversations with [redacted] she would at times appear to be articulate and well spoken. She would then start to act in an immature manner, by looking around, not paying attention, drawing on a paper. [redacted] would offer me a high five whenever she claimed to have told me the truth in the details of the afternoon at Epstein's house. [redacted] would sit in the chair, with her knees propped up to her chest as she admitted that she did not tell me the all the details of her encounter with Epstein during our first meeting. As a means of positive reinforcement I would high five [redacted]

On 03/31/2005, subpoena requests for T-Mobile Wireless (561) [redacted] and Cingular Wireless, (561) [redacted] ([redacted] and [redacted] phone numbers) were drafted.

On 04/01/2005, I met with members of PB BSF Unit for the purpose of conducting surveillance on 358 El Brillo. Cross-reference supplement.

On 04/01/2005, I met with Det. Krauel of the Palm Beach Police Department who provided me a copy of the concealed weapons permit for Mr. Epstein. It revealed Epstein had a valid permit. There was no current photo attached to the renewal notice.

On this same date I queried various different web sites for a possible identification of the purple item retrieved from the trash pull from 358 El Brillo. The item was similar in description as the one described by [redacted] and used by Epstein.

I made contact with Spicygear.com and spoke with the owner John. I emailed a photograph of the item for his opinion. He identified the items as a Jelly Anal Wand of some sort. The item is easily available at sex shops in South Florida.

04/06/2005, I conducted business queries into Epstein utilizing the internet. I located articles relating to financial reports. There was no local history.

On 04/01/2005 - 04/03/2005, with the assistance of BSF, there was

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continued surveillance on the property.

On 04/04/2005, I obtained a copy of voice mail messages, dated 03/31 and 04/01 from [redacted] to [redacted] A female identifying herself as [redacted] states that she could pick [redacted] up to take her to Epstein's house for an eleven o clock appointment. A copy of this was placed into evidence.

On 04/05/2005, a trash pull was conducted at 358 El Brillo by Det. Lee and me. There were several messages written on various forms of papers. There was a message from [redacted] indicating [redacted] 11:00. The following was additional information obtained from trash retrieved from 358 El Brillo: Jean Luc 6:20 AM; David [redacted]; [redacted]; 881-8116;655-0995; [redacted] 1x; fuliias Friday 5:[redacted]; [redacted] & [redacted] a message receipt dated 4/4 1:05- [redacted] She is looking to speak to you .; 9[redacted]

On 04/06/2005, I faxed subpoena requests to SA [redacted] office for Epstein, [redacted] and [redacted] s phone records. (Phone numbers (561)[redacted] (561)[redacted] (561)[redacted] & (561) [redacted]

On 04/06/2005, I called [redacted] School, [redacted], ext 311, and spoke with Principal Rick [redacted] He confirmed that they had a student by the name of [redacted] Bryan. He requested a written request prior to releasing any additional information. On this same date I faxed [redacted] a request for student and parent information on [redacted] I advised [redacted] that due to this being an open investigation he was not to discuss the matter with anyone.

On 04/08/2005, I received a message from [redacted] providing me the following information: [redacted] w/m DOB [redacted] Wellington, Florida, 33414. Parents name: [redacted]

Det. Lee provided me with trash obtained from 358 El Brillo for 04/06 04/07/05. The following information was retrieved: Jet Aviation [redacted] itinerary, indicating a departure date of 04/05/2005 at 4:00 PM with an arrival in New York City of 6:15PM. Flight crew captain David Rodgers, co-captain, Larry Visoski, flight engineer Larry Morrison. Call sign N908JE; a note stating Bye J. thank you [redacted] hand written notes & messages 11-Glenn, 12:30 chicken, [redacted] Big Screen x8, [redacted] Monday after school?; left message for [redacted] W.; [redacted] works 4-9 Monday and Tuesday, leaves school @ 11:30 AM; [redacted] will be here tomorrow @ 10:30 Am; Mrs. Business 654-6699 [redacted];833-4533. There was no trash for 04/08/05.

04/22/05 received the results of a subpoena request from Bellsouth for 561-[redacted]. The results only provided subscriber information. I contacted Alice Grant Investigative Subpoena Compliance Center who stated the request was not complete and the results would be sent to

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me as soon as the query was finished.

Cross-referencing the names [redacted] and [redacted] as well as phone numbers, which were obtained from message notes via trash pulls, I identified the before mentioned individuals as being acquainted with someone at 358 El Brillo. [redacted] DOB [redacted] FL DL #[redacted] and [redacted] DOB [redacted] FL [redacted] are both above the legal age of consent.

On 05/03/2005, I spoke with [redacted] and updated her on the investigation. [redacted] stated that [redacted] was doing well in the school. Her contact with the outside is limited as they do not have access to the phones. [redacted] comes home on the weekends and she is not allowed to go anywhere alone.

On 05/11/2005, I made arrangements to meet with [redacted] and [redacted]

On Thursday, 05/12/05, I spoke with [redacted] regarding the case. They will be moving to GA in July 2005. They will be very busy over the next few weeks but would be available via phone. Will coordinate a date to meet to discuss the matter further.

During this week I conducted surveillance at Epstein s residence and at the airport, but there was nothing to indicate that Epstein was in town.

Due to conflicting appointments, rescheduled until 06/02/2005, to meet with Ms. [redacted]

I also spoke with [redacted] and updated her to the investigation.

On 06/02/2005, I met with [redacted] and [redacted] Sandborn advised that she could be reached via her cell phone until she is able to provide me with her new contact information.

I also received a message from [redacted] Attempted call back but the line was busy.

June 14, 2005, I received information that Epstein's plane was at Jet Aviation. I spoke with Det. Lee regarding surveillance.

I called the Olive Garden and asked for [redacted] I was advised she was not working today. This would indicate that [redacted] was still employed there.

On 07/07/2005, I faxed subpoena requests to SA [redacted] office for Epstein, [redacted] and [redacted] s phone records. (Phone numbers ([redacted] The original subpoena requests only provided subscriber and billing information.

On 07/20/2005, conducted a trash pull arranged by Ofc. Lee. Inside there were misc. papers with phone numbers and names. There were

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misc. female hygiene products in the trash. Based on a prior Auto Track report done on 358 El Brillo, a possible subject residing at the residence is [redacted] fit the description provided by officers who had conducted surveillance in the area of a female seen entering and leaving the residence.

On 07/21/05, I received the Duces Tecum dated 07/18/05, which was clerked by ASO

On 07/26/2005, I received the results of Bell South Subpoena.

On 08/04/05, I received DHL Express from T mobile with the results of the query.

I spoke with [redacted] who confirmed that [redacted] was still living out of state. It appeared that all was going well.

I left a message for [redacted] at [redacted]

On 08/08/2005, I received the results of Cingular cell phone subpoena.

During the week of 09/08/2005, I checked 358 El Brillo and the Palm Beach International Airport but there was no direct indication that Epstein was in town.

On 09/08/2005, I reviewed the case notes of this file, as the case will be turned over to Det. Recarey.

On 09/11/2005, while on patrol, I conducted a check at Epstein's residence and found that it still had the hurricane shutters on. On a drive by the Palm Beach International Airport later that afternoon, I did not observe Epstein's plane.

On 09/14/2005, I conducted a check at the Palm Beach International Airport but did not see Epstein s plane.

On 09/19/2005, I spoke with [redacted] to keep her updated and to find out if there was any change of address or phone numbers for [redacted] I was told no. I left a message for [redacted] at 67[redacted]

********** N A R R A T I V E # 2 **********

NA Reported By: RECAREY, JOSEPH 9/21/05
Entered By.: ALTOMARO, NICKIE A. 9/21/05

On September 19, 2005, I met with Officer Pagan and received the information pertaining to this case. Members of the Burglary Strike Force had previously been conducting surveillance on both Epstein and [redacted] Officer Munyan was assigned to monitor the Epstein home and Sgt Sorge and Officer Minot were assigned to monitor [redacted] Both teams provided a surveillance log that will be placed into the

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attachment file.

Det. Dawson was assigned to relieve Officer Munyan at 4:00 pm; he informed me that at approximately 8:00 pm, Epstein had left for the airport and his private jet was sitting on the tarmac. Epstein's private vehicle drove to the jet and unloaded packages into the jet. It appeared that Epstein left the county at this time. Surveillance will continue to determine when Epstein will return.

Inv Continues.

********** N A R R A T I V E # 3 **********

NA Reported By: PARKINSON, GREGORY A. 9/23/05
Entered By.: ALTOMARO, NICKIE A. 9/23/05

On Friday, September 23, 2005 at approximately 1:45 p.m., I began to copy a tape micro cassette, under case number 05-368 and property number 05-243, tape number 1. I placed the tape in the telex copy-et, series 2 machine and began to go through the copying process. Approximately 1/2 through the tape, the tape wrapped around the spindle and became locked and stretched the tape. I examined it and determined that it was in the best interest to leave it as it is as a prior copy had been made and turned over to Sergeant Frick. I immediately took the tape to Sergeant Frick and allowed him to examine it and then obtained the copy from him and Detective Recarey and brought the copy of the tape down and made a copy for him based on that. The tape was placed back in the original container and is retained in the evidence bag under the previously mentioned property number of 05-243. It is not advisable to attempt to copy this tape as further damage could result to the recorded material and there is an existing copy anyway.

********** N A R R A T I V E # 4 **********

NA Reported By: PARKINSON, GREGORY A. 9/26/05
Entered By.: ALTOMARO, NICKIE A. 9/26/05

On 3-24-05 at 11:00 pm, a copy of tape 2 (case number 05-294) had been made for Det. Pagan by Evidence Specialist [redacted]. The copy was turned over to Detective Recarey.

On Friday, 09-23-05 at approimately 2:15 pm, I was in the process of reproducing audio tapes (micro and standard) to standard size when it was discovered, in the test review process, that tape number 2 was blank. I notified Sgt. Frick and Det. Recarey. I was informed that they had a prior copy and I could use it to make a master tape. I did so and when reviewing and signing the evidence sheet, I noticed Evidence Specialist Badger had written "#2 is blank."

I obtained that copy from Det. Recarey and made a new copy on a standard size tape. The new copy was placed in the evidence bag under

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property number 05-294 with the blank tape.

********** N A R R A T I V E # 5 **********
NA Reported By: RECAREY, JOSEPH 9/26/05
Entered By.: ALTOMARO, NICKIE A. 9/28/05

Copies of the tapes that were submitted into evidence were requested. Additionally, trash pulls were started on September 21, 2005. Sgt. Szarszewski made telephone contact with Tony Higgins, Supervisor of the Sanitation Department, and requested that trash be collected at the Epstein House located at 358 El Brillo in Palm Beach. Sgt Szarszewski met with Sanitation worker, Jeff Williams and observed him enter the property at 358 El Brillo. Shortly thereafter, Williams exited the property and placed the three white trash bags in the empty well in the rear of the truck. Williams then drove away where he met with Sgt. Szarszewski who removed the bags from the well and placed them into one large black trash bag. The bag was returned to the Police Station where I was waiting for him. Upon his arrival, we inspected the bags where several notes and papers were found. These notes contained names of girls with times. Additionally, there was a note from [redacted] and [redacted] to Jeffrey Epstein on a notepad, which stated,"For a good time call [redacted] and [redacted] at [redacted]." Also, there was another telephone number on the note [redacted] Also found was a written note, which stated, [redacted] can not come at 7 p.m. tomorrow because of soccer. These items were written on notepads that contain Jeffrey Epstein on the bottom of the notes. These items were placed into evidence for future follow up. I requested subpoenas for subscriber information on the telephone numbers listed above on the note from [redacted] and [redacted] The cellular telephones [redacted] and [redacted] are both assigned to Cingular Cellular Service. Other notes were found within the trash on Jeffrey Epstein pad, papers that contained telephone numbers. One note had "[redacted] with [redacted] written on it. This cellular number is assigned to Cingular Cellular Service. Another sheet had written [redacted] which is assigned to Bell South Telecommunications. The subpoenas were picked up and submitted to Cingular and Bell South Telecommunication for subscriber information.

On September 22, 2005, I was informed by Sgt. Szarszewski that there would be no trash pick up as it was recycle pick up day. A request for copies of the micro and standard size cassettes were requested from crime scene to familiarize myself with the interviews conducted.

On September 23, 2005, the tapes were received and I began to become familiar with the interviews that were conducted. Det. Krauel had met with Town of Palm Beach Sanitation worker, Jeff Williams and observed him enter the property of 358 El Brillo. Shortly thereafter, Williams exited the property and placed the three white trash bags in the empty well in the rear of the truck. Williams then drove away where he met with Det. Krauel who removed the bags from the well and placed them into one large black trash bag. The bag was returned to the Police Station where I was waiting for him. Upon his arrival, we inspected

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the bags where several notes and papers were found. The notes will be inspected for future use. The items collected were placed into evidence.

It became evident that some of the recordings were recorded with background noise and some interference. The calls most affected were the control phone calls from the victim to the suspect [redacted] [redacted] I obtained the graphic equalizer and discovered that the calls are able to be legible with the use of the equalizer by lowering the background noise and increasing voice gain. I also learned that a tape was broken during the coping of the tape. I returned the copy of the tape marked Property Number 05-243 to have it recopied to have an original in evidence and a working copy with the file.

Upon researching the file, it was discovered that the suspect, [redacted] cellular calls were subpoenaed incorrectly. The suspect telephone number wa[redacted] and the original request was for [redacted]. I requested the information through Cingular Cellular Service from February 2005 through the present. The purpose was to have a record of [redacted] making calls to victim, Jeffrey Epstein and the frequency of calls. The request was submitted to the State Attorney's Office.

Investigation Continues....

********** N A R R A T I V E # 6 **********

NA Reported By: KRAUEL, CURTIS D. 10/06/05
Entered By.: ALTOMARO, NICKIE A. 10/06/05

On or about September 23, 2005 at approximately 0915 hours, I responded to 358 El Brillo and met with PB Sanitation worker Jeff Williams. Williams had been previously notified to assist in trash pulls at the residence of Jeffrey Epstein, 358 El Brillo, Palm Beach, Florida. I observed Williams enter the driveway of 358 El Brillo and remove several plastic bags of trash and place the contents into the back of an empty sanitation truck.

I then followed Williams to a predetermined location and seized the trash from the truck. The trash was transported to the Palm Beach Police Department where I began sifting through its contents. There was a total of 4 white in color plastic bags and each contained documentation and correspondence for 358 El Brillo and Jeffrey Epstein. All documents of evidentiary value were removed and turned over to Det. Recarey for follow-up.

On or about September 26, 2005 at approximately 0900 hours, I responded to 358 El Brillo and met with PB Sanitation worker Jessie Jones. Jones had been previously notified to assist in trash pulls at the residence of Jeffrey Epstein, 358 El Brillo, Palm Beach, Florida. I observed Jones enter the driveway of 358 El Brillo, where no trash was located within the receptacles. I left the area without incident

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and notified Det. Recarey to that affect.

On or about September 27, 2005 at approximately 0915 hours, I responded to 358 El Brillo and met with PB Sanitation worker Jesse Jones. I observed Jones enter the driveway of 358 El Brillo and remove one plastic bag of trash and place it in the back of an empty sanitation truck.

I then followed Jones to a predetermined location and seized the trash from the truck. The trash was transported to the Palm Beach Police Department where I began sifting through its contents. There was a total of 1 white in color plastic bag which contained correspondence for 358 El Brillo. All documents of evidentiary value were removed and turned over to Det. Recarey for follow-up.

On or about Monday October 3, 2005 at approximately 0915 hours, I responded to 358 El Brillo and met with PB Sanitation worker Jeff Williams. I observed Williams enter the driveway of 358 El Brillo and remove several plastic bags of trash and place the contents into the back of an empty sanitation truck.

I then followed Williams to a predetermined location and seized the trash from the truck. The trash was transported to the Palm Beach Police Department where I began sifting through its contents. There was a total of 7 white in color plastic bags with a red tie and 1 black in color bag which contained 2 white in color plastic bags with a red tie. Each of the bags contained documentation and correspondence for 358 El Brillo and Jeffrey Epstein. Inside of one of the white in color bags, I located a broken piece of a hard plastic or clear acrylic stick, which was shaped with small ridges. This device is commonly used as a sexual toy which is inserted into the vagina or anus for stimulation. This item, along with all documents of evidentiary value were removed and turned over to Det. Recarey for follow-up.

On or about Tuesday October 4, 2005 at approximately 0928 hours, I responded to 358 El Brillo and met with PB Sanitation worker Jeff Williams. I observed Williams enter the driveway of 358 El Brillo and remove several plastic bags of trash and place the contents into the side well of the sanitation truck. This side of the truck is separate from the rear of the truck and does not come into contact with other trash.

I then followed Williams to a predetermined location and seized the trash from the truck. The trash was transported to the Palm Beach Police Department where I began sifting through its contents. There was a total of 2 white in color plastic bags which were tied at the top. Each of the bags contained documentation and correspondence for 358 El Brillo and Jeffrey Epstein. All documents of evidentiary value were removed and turned over to Det. Recarey for follow-up.

On or about Wednesday October 5, 2005 at approximately 0928 hours, I

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responded to 358 El Brillo and met with PB Sanitation worker Jeff Williams. I observed Williams enter the driveway of 358 El Brillo and remove several plastic bags of trash and place the contents into the bed of the sanitation truck.

I then followed Williams to a predetermined location and seized the trash from the truck. The trash was transported to the Palm Beach Police Department where I began sifting through its contents, with the assistance of Det. Recarey. There were a total of 2 bags, one of which was white in color and tied in a knot at the top, and the other was a black in color bag, which contained two white in color trash bags along with loose debris. Each of the bags contained documentation and correspondence for 358 El Brillo and Jeffrey Epstein. All documents of evidentiary value were removed and turned over to Det. Recarey for follow-up.

********** N A R R A T I V E # 7 **********

NA Reported By: RECAREY, JOSEPH 10/07/05
Entered By.: ALTOMARO, NICKIE A. 10/07/05

I met with Det. Krauel and requested further assistance to maintain trash collections at Epstein's residence at 358 El Brillo Road. On October 3, 2005, at approximately 10:30 am, I was contacted by Sgt. Frick to respond to the Palm Beach Police Station. Det. Krauel had observed Jeff Epstein riding his bicycle on South County Road. Upon my arrival, I met with Sgt Frick who advised, as Epstein was currently in Town; we interview [redacted] [redacted] as to her involvement with Epstein and the girls that are brought to his house. As we were to interview [redacted] in the county, (outside of our jurisdiction), I contacted the State Attorney s Office Investigation Division, and made contact with Assistant Supervisor Investigator Carlos Ortiz. I requested assistance to interview [redacted] as the interview may occur in the county. Supervisor Ortiz assigned Investigator Mike Waites to assist us at the location and interview of [redacted]

Det. Dicks had responded to the address of [redacted] and viewed her vehicle parked in the driveway. [redacted] vehicle a red Plymouth Neon baring Florida Tag of [redacted] was parked in the driveway of [redacted] in Loxahatchee. Sgt Frick and I responded to 120th Ave and awaited the arrival of Investigator Mike Waites. Upon his arrival, he was briefed that should she wish to be interviewed within her home he would be needed. However, should [redacted] agree to return to the police station for further questioning, he would not be needed. Sgt. Frick and I knocked on the door and met with [redacted] was told that we were investigating a claim involving Jeffrey Epstein of El Brillo in Palm Beach. [redacted] was asked if she wanted to accompany us back to the police station for further questioning. She was also told that at the conclusion of the interview she would be returned home. She agreed and wished to change her clothes prior to accompanying us back to the police station. At the conclusion of her changing clothes, she advised she was ready to go. I thanked Inv. Waites and advised she was going to voluntarily return to the police station.

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Upon [redacted] s entry in the unmarked Detective vehicle, I placed a tape recorder within the vehicle to record any conversations within the vehicle. During the ride back to the police station, [redacted] advised she is attending Palm Beach Community College at the Palm Beach Gardens Campus and is majoring in journalism.

Upon our arrival at the police station, [redacted] was brought to the interview room in the Detective Bureau. I explained to [redacted] that I appreciated her willingness to assist us and informed her that should she desire to leave at any time she may do so. I further explained the interview room door is only closed for privacy. [redacted] stated she understood. During the taped sworn interview, [redacted] was asked how she came in contact with Epstein. [redacted] stated back when she turned 17 years of age she was approached by a friend [redacted] in the Canopy Beach Resort in Rivera Beach. [redacted] was asked if she wanted to make money.

She was told she would have to provide a massage and should make $200.00. [redacted] thought about the offer and agreed to meet with Jeffrey. [redacted] (Unknown last name) and [redacted] (Unknown last name) picked her up and she was taken to Epstein's house. Upon her arrival at the house, she was introduced to Epstein in the kitchen of the house. She was also introduced to a white female known to her as [redacted]. She was led upstairs to the main bedroom known to her as Jeff Epstein s bedroom. [redacted] arranged the massage table and covered the table with a sheet. She brought out the massage oils and laid them next to the massage bed. [redacted] then left the room and informed her Jeff would be in a minute. Jeff entered the bedroom wearing only a towel. He lay on the table onto his stomach and picked massage oil for [redacted] to rub on him. During the massage, [redacted] stated, He tried to touch me and I stopped him. I asked how he tried to touch her. He grabbed her buttocks and she felt uncomfortable. [redacted] also stated Epstein has a vibrator, which is large and white in color. [redacted] told Epstein, I'll massage you but I don't want to be touched. [redacted] stated she performed the massage naked. At the conclusion of the massage, Epstein paid [redacted] $200.00 for the massage. He explained, I know you re not comfortable, but I'll pay you if you bring some girls. He told her the younger the better. [redacted] stated she once tried to bring a 23-year-old female and Epstein stated that the female was too old. [redacted] was asked how many girls she brought in total to Epstein. [redacted] stated six that she can remember. [redacted] stated she brought [redacted] and the victim in this case.

I asked [redacted] which one was the youngest. [redacted] advised the victim was the youngest. [redacted] stated every girl she brought knew what to expect when they arrived. They were told they would provide a massage, possibly naked, and some touching. I asked her if the victim was aware. She stated every girl she brought knew what to expect. She explained she knew the victim wanted to make money. She approached the victim and explained about going to work for Jeff. The

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victim agreed and arrangements were made to bring the victim to Epstein's house on a weekend. [redacted] stated that she and [redacted] (later identified as [redacted] [redacted] picked up the victim at the victim s house. They traveled to Epstein's House and entered through the kitchen door. They met with the house chef and Epstein s assistant [redacted]. The victim was introduced to Epstein while they were in the kitchen area. [redacted] led the victim upstairs and Epstein went upstairs. When the massage was over, the victim returned to the kitchen area. [redacted] stated she was paid $200.00 for bring the victim to Epstein's. [redacted] stated the victim told her she was paid $300.00 for the massage. Back in the vehicle, [redacted] asked the victim what happened. The victim told her about the massage and then they went shopping. [redacted] stated the victim was the last person she brought to Epstein. She further stated that she had changed her cellular number to avoid being contacted by [redacted]. She continued that when Epstein announces to his assistant that he is traveling to Palm Beach, [redacted] would contact [redacted] to arrange girls for Epstein. [redacted], later identified as [redacted] Date of Birth [redacted], had told [redacted] that Jeff likes to have his fun with the girls.

[redacted] stated that once her parents discovered that she was visiting Epstein, they disapproved of the encounters with him and she stopped. [redacted] further stated that [redacted] still tries to call the house and leaves messages. With the assistance of [redacted] we were able to identify [redacted] and [redacted] DOB [redacted]

Sgt Frick entered the room and explained that based on her own statements, she had implicated herself with bringing underage girls to Epstein's house. [redacted] was aware of what she had stated and wished to assist further in hopes to receive a lesser charge. [redacted] provided cellular telephone numbers for the girls she had mentioned previously. Additionally, she also provided possible addresses and areas in which they lived. As [redacted] was being taken home in the vehicle, a tape recorder was placed within the vehicle to record any conversations within the vehicle. During the drive back to her home, [redacted] made the comment I m like a Heidi Fliess. (Hollywood Madam who sent girls to clients for sexual favors in California). [redacted] was dropped off at her house without incident.

Sgt Frick and I went to [redacted] in Loxahatchee, Florida in an attempt to speak with [redacted] We met with Mrs. [redacted] ([redacted] s Mother) at the front door. We explained the ongoing investigation and felt that [redacted] may have additional information as we had information that she had worked for Jeff. Mrs. [redacted] introduced us to her husband and allowed us entry into the home. We sat in the dinning room and met with [redacted] Date of Birth [redacted]. As she was under the age of eighteen, Mrs. [redacted] was advised we would be speaking with her. She expressed, if her daughter had information she wanted to assist. As we interviewed [redacted] she denied having any inappropriate encounters with Jeff (Epstein). She stated she had gone to Jeff s

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House with [redacted] approximately eight months ago and sat in the kitchen with the house chef but nothing happened. As the parents were present during the interview, we felt that [redacted] was withholding information from us. She made several comments as to she has put the entire incident behind her. I left my direct telephone number and advised should she wish to speak with me again to telephone me. Sgt Frick and I thanked Mrs. [redacted] for her time and left the area. She stated she would ask her again after we left as to what happened at Epstein s house. I informed her that [redacted] had my telephone number and hopefully she would call.

Sgt Frick and I then attempted contact with [redacted] at [redacted] in Loxahatchee. We met with [redacted] who stated [redacted] was her daughter. [redacted] was at the Wellington Mall and was not home. We explained the ongoing investigation and felt the [redacted] may have additional information as we had information that she had worked for Jeff. We left our phone numbers and asked her to telephone me upon her daughter's return. We then left the area.

On October 4, 2005, at approximately, 8:05 am, Sgt Frick had retrieved a voice mail message from [redacted] She stated she had spoken with her daughter and she had information as to what occurred at Jeff s house. I contacted [redacted] who stated her daughter was in the shower at the moment and would be traveling back to Orlando to attend College. I informed her I would be en route to her home in Loxahatchee. Det. Dawson and I drove to the [redacted] home and met with [redacted] and [redacted] During a sworn taped statement, [redacted] stated she was taken to the house by [redacted] She was told she could make money working for Jeff. She was told she would have to provide a massage to Jeff. [redacted] stated upon her arrival to the house she was brought to the kitchen area by [redacted]

They met with the house chef and [redacted] stayed in the kitchen. She was introduced to [redacted], Jeff's assistant and was brought upstairs to the mater bedroom. [redacted] prepared the room and massage table for a massage. Epstein entered the room and she provided a massage. [redacted] stated she kept her clothes on during the massage. She stated sometime during the massage Epstein grabbed her buttocks and pulled her close to him. [redacted] said she was wierded out by the incident involving Jeff. At the conclusion of the massage, she was paid $200.00 for the massage. I asked [redacted] if she has any formal training in massages to which she replied no. I asked her if [redacted] received any monies for taking her to perform the massage. [redacted] stated [redacted] also received money for taking her there. [redacted] stated she went with [redacted] and another girl, [redacted] to Jeff's house once. [redacted] stated she waited in the kitchen with [redacted] while [redacted] was taken upstairs by [redacted]. [redacted] stated she only did the massage once, as she was wierded out by the whole experience. At the conclusion of the interview and the tape was stopped, I was informed that [redacted] had attempted to reach [redacted] via cell phone. A voice mail message on October 4, 2005 at 10:59 am, revealed a female voice who identified herself as [redacted] who requested her to call her back reference the

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police questioning. This voice mail message was recorded onto a micro cassette. [redacted] provided the incoming telephone number as [redacted]. [redacted] stated she inadvertently told [redacted] about the police investigation because [redacted] had called her to tell her about how she just received a rental car from Jeff Epstein. [redacted] had called her to tell her that she was given a rental car, a 2005 Silver Nissan Sentra, to utilize to visit family and visit Jeff. [redacted] asked her what was going on at the house that the police would be asking questions. [redacted] stated [redacted] then called Jeff and [redacted] and asked what was going on reference the ongoing police investigation. According to [redacted] has since then been trying to contact her to ask about the police questions. I instructed [redacted] not to contact [redacted] and do not provide any more information to [redacted] as she would notify Jeff Epstein and [redacted] what was transpiring.

Investigation Continues...

********** N A R R A T I V E # 8 **********

NA Reported By: LEE, LA'MONT 10/07/05
Entered By.: ALTOMARO, NICKIE A. 10/07/05

On March 30, 2005, I was asked by Sgt. Daniel Szarszewski to begin conducting surveillance and trash pulls reference Detective Pagan conducting a criminal investigation involving Jeffrey Epstein. I was advised that Epstein was possibly engaging in sexual contact with young females.

On March 30, 2005, I made contact with Town of Palm Beach Sanitation Office Supervisor Tony Higgins and requested trash pulls for 358 El Brillo Way to begin on March 31, 2005.

On March 31, 2005 at 9:20 a.m., I responded to the area of 358 El Brillo Way and met with Town of Palm Beach sanitation employee, Jeffrey Williams. I observed Williams enter the driveway of 358 El Brillo Way, collect the trash bags from Epstein's property and place the contents into an empty sanitation truck. I followed Williams to a nearby area, were he turned over seventeen white plastic trash bags, which were collected from Epstein's property.

I took the trash bags to the sanitation department were I sifted through its contents. I collected mail correspondence from Armani Exchange addressed to [redacted] Jeffrey E. Epstein notepaper with [redacted] (561[redacted], an important message notepaper addressed to J.E dated 03/29/05 at 8:15 p.m. reference Peggy Seagal, U.S Airways boarding pass copy for passenger, Janusz Banasiak, Montgomery County, Maryland Health Department food service ID NO#40820 for Janusz Banasiak and Ghislaine Maxwell notepaper with names and phone numbers. Photocopies of the trash collected were attached with the supplement. Detective Pagan was advised of the contents that were collected for evidentiary value.

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On March 31, 2005, Sgt. Daniel Szarszewski requested that I set up a surveillance vehicle on El Brillo Way and conduct video surveillance of the front exterior of Epstein's residence. At 3:00 p.m., I set up a surveillance vehicle equipped with a video monitoring device. The surveillance vehicle was parked on El Brillo Way approximately fifty feet east of Epstein's driveway. The purpose of the video surveillance was to gather investigative intelligence by monitoring and recording all vehicle and pedestrian traffic entering and leaving Epstein's property.

The video surveillance tapes were changed daily with a new Maxell T-160 VHS tape. Video surveillance was established for Epstein s from March 31, 2005 through April 05, 2005. On April 05, 2005, video surveillance was concluded. I reviewed the video tapes and advised Detective Pagan the surveillance videos yielded no evidentiary value.

On April 01, 2005 at 9:30 a.m., I responded to the area of 358 El Brillo Way to meet with Town of Palm Beach sanitation employee, Jessie Jones. While parked in the area of 358 El Brillo Way waiting to collect Epstein s trash, I observed a white female, who I recognized as [redacted] from her Florida driver's license photograph. I made no contact with [redacted]. While parked in the area, I also observed Epstein s GMC Yukon truck leave the property as well as other vehicles arrive and park across the street from the property. The occupants of these vehicles appeared to be housekeepers, maintenance men, and gardeners.

At 9:38 a.m., I met with Town of Palm Beach sanitation employee, Jessie Jones. I observed Jones enter the driveway of 358 El Brillo Way and collect the trash from Epstein s property. I followed Jessie to a predetermined area at which time I collected the trash bags from the sanitation truck. I transported the trash bags to the sanitation department, where I sifted through its contents. I collected mail correspondences addressed to Jeffrey Epstein, automotive records and personal documents for Janusz Banasiak and Beata Banasiak as well as Jeffrey Epstein notepaper with the names and appointment times for [redacted] and [redacted] No last names or other personal information was written on the notepaper.

While sifting through Epstein s trash, I also collected a three-inch purple finger size object, which had a broken end. The object appeared to be a broke piece from a sexual toy similar to a (Cyclone Vibrator) possibly used for rectal gratification. The sexual object was photographed for Detective Pagan, packaged in a biohazard evidence bag (possible body fluids) and secured as investigative evidence. All items collected from Epstein s trash were turned over to Detective Pagan for evidentiary purposes.

On April 05, 2005 at 9:18 a.m., I met with Town of Palm Beach sanitation employee, Jessie Jones. I observed Jones enter the driveway of 358 El Brillo Way and collect the trash from Epstein s property. I followed Jessie to a predetermined area at which time I

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collected the trash bags from the sanitation truck. I transported the trash bags to the sanitation department, where I sifted through its contents. I collected mail correspondences addressed to Jeffrey Epstein as well as notepaper (Important Message) with names and telephone numbers. The following are items collected from Epstein s trash.

[redacted] [redacted]
blank piece of white paper [redacted]
black paper [redacted]
black paper [redacted]
David ([redacted])
MSN Hotmail web page with email address ([redacted])

The following items were documented for Detective Pagan s investigation for evidentiary purposes.

On April 06, 08, 11, 12, 13, 15, 2005, at approximately 9:30 a.m, I met with Town of Palm Beach sanitation employees. I observed the employee enter the driveway of 358 El Brillo Way and collect the trash from Epstein's property. I followed the employee to a predetermined area at which time I collected the trash bags from the sanitation truck. I transported the trash bags to the sanitation department, where I sifted through its contents.

All of the documents collected from Epstein's trash during my assistance were turned over to Detective Pagan for evidentiary purposes.

On June 14, 2005, Detective [redacted] Pagan contacted me and advised that the airplane belonging to Jeffrey Epstein of 358 El Brillo Way was parked at the Palm Beach International Airport.

Detective Pagan requested that I begin trash pulls for the purpose of gathering evidence and intelligence.

I made contact with Town of Palm Beach Sanitation Office Supervisor Tony Higgins and requested trash pulls for 358 El Brillo Way to begin on June 15, 2005.

On June 15, 2005, I met with a sanitation employee. I observed the employee enter the driveway of 358 El Brillo Way and collect the trash from Epstein s property. I followed the employee to a predetermined area at which time I collected the trash bags from the sanitation truck. I transported the trash bags to the sanitation department, where I sifted through its contents. The trash yielded negative results and no evidence was collected.

No further trash was collected throughout the week due to the fact that Epstein s security gates remained closed throughout the week; therefore, the sanitation employees were unable to gain access onto the property for collection of the trash.

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All evidence and intelligence gathered by this officer has been turned over to the detective bureau and no further action has been taken by this officer.

End of supplement.

********** N A R R A T I V E # 9 **********

NA Reported By: RECAREY, JOSEPH 10/07/05
Entered By.: ALTOMARO, NICKIE A. 10/10/05

On October 4, 2005, I made telephone contact with [redacted] who had left several messages on voice mail. During the message, she advised she was not completely truthful when we met in person but would like to speak with me to advise what had happened. She further advised she did not want to speak of this incident in front of her mother. At approximately 15:48 pm, I made telephone contact with [redacted] at [redacted]. During a taped recorded statement, [redacted] stated the following: Approximately a year ago, when she was sixteen years of age, [redacted] took her to Jeff's house twice. The first time she went, [redacted] drove to the house. They entered through the kitchen area where she was introduced to [redacted] and Jeff. She was taken upstairs to a bedroom by [redacted] who set the room up with a massage bed and brought out the oils to use. Jeff then entered the room wearing a towel. He lay on the table and picked out a lotion for [redacted] to rub on him. At one point during the massage, he tried to remove her shirt at which point she became very upset and discontinued the massage. Both [redacted] and Jeffrey had a verbal disagreement at which time she left without being paid. She met with [redacted] who was sitting in the kitchen and told her let's go. [redacted] advised she received no money for that day. [redacted] also said that [redacted] had told her if she was uncomfortable with what was going on, to let him know and he'll stop. She knew that the more you do the more you are paid.

Several weeks later, [redacted] advised she agreed to be taken a second time by [redacted]. Once they arrived at the residence, [redacted] sat in the kitchen and [redacted] took her upstairs to the master bedroom again. [redacted] set the room up with a massage bed and brought out the oils to use. Jeff then entered the room wearing a towel. He lay on the table and picked out a lotion for [redacted] to rub on him. At one point during the massage, he tried to touch her buttocks. As [redacted] was wearing tight jeans and had a tight belt on Jeff was unable to touch her buttocks. Jeff then rolled onto his back during the massage; he attempted to touch her breasts. [redacted] then became upset again and told him she didn't want to be touched. [redacted] discontinued the massage and was paid $200.00. [redacted] then went downstairs where [redacted] was waiting for her. She told [redacted] she wanted to leave. [redacted] said she never returned to the house. [redacted] stated she is aware that her friend, [redacted] was also at the house and had a problem with Jeff. She provided a telephone number

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for [redacted] The interview was concluded and the micro cassettes were turn in as evidence.

On October 5, 2005, I researched the incoming telephone number that had left [redacted] a message. The telephone number, [redacted] was assigned to ATT/Cingular Cellular service. I prepared a subpoena request and faxed the request to the State Attorney s Office. Information requested was subscriber information as well as all incoming and outgoing calls for the months of September and October 2005.

I later researched [redacted] and discovered she resides in Royal Palm Beach. Det. Dawson and I drove to Royal Palm Beach and met with [redacted] at her residence [redacted] in Royal Palm Beach.

[redacted] agreed to speak with us in the kitchen area. During a sworn taped statement, [redacted] stated the following: On or about November 2004, she was approached by [redacted] and asked if she wanted to make money. She agreed and was told she would provide a massage to wealthy man in Palm Beach. [redacted] picked her up and drove her to a house in Palm Beach. She was brought into the kitchen area of the house. She further stated that [redacted] ([redacted] and [redacted] ([redacted] went with them. They were brought into the kitchen where she was introduced to Jeff and other females. [redacted] stated she was introduced to a helper of Jeff; the female was described as white female (unknown name), with blond hair. She stated that the assistant was familiar with [redacted] The assistant set up the massage table and put out lotions to be used. She told [redacted] Jeff would available in a minute. Jeff entered the room wearing only a towel. Jeff lay on the massage table and picked a lotion to rub on his thighs and back. [redacted] further stated that during the massage Jeff asked her to remove her clothes. She complied and removed her pants and blouse. [redacted] didn't remember if she had removed her bra but feels that she did. [redacted] was certain that she stayed in her thong underwear. [redacted] continued the massage and at one point she straddled him to massage his back, which touched his buttocks with hers. [redacted] was instructed to return to the ground at which time Jeff turned to have his chest rubbed. [redacted] advised it was at this time she is sure he was masturbating. [redacted] did not want to look at his penis area because she was uncomfortable. Jeff removed a large white vibrator and turned it on. [redacted] stated he began rubbing the vibrator over her thong underwear on her vaginal area. Shortly thereafter, Jeff ejaculated and removed himself from the table. He walked over to where the shower was and opened the glass door. She waited as he was taking a shower in her direct view. When I asked [redacted] how old she was when this occurred, she stated she had just turned seventeen. At the conclusion of the shower, [redacted] was paid either $350.00 or $400.00. She stated she wasn't sure, but knows it was close to $400.00. At the conclusion of the interview, [redacted] stated she never returned to provide a massage for Jeff. She advised she was ashamed and uncomfortable with the situation.

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Det. Dawson and I then left the area and responded to the [redacted] High School where [redacted] and all the above-mentioned girls had attended. I met with School Police Officer, Off Williams. I explained I was looking for a previous student who attended [redacted] High School. I inquired about [redacted] I further explained that I was working a case in which most of the girls I have interviewed are either witnesses or victims and felt that [redacted] may be one as well. Officer Williams researched his previous student records and found [redacted] She attended the same year and graduated in the same year as the other girls. I was provided the last known address of [redacted]

At approximately 2:10 pm, Det. Dawson and I met with [redacted] at her residence, [redacted] in Royal Palm Beach. As [redacted] was only seventeen years of age, I had notified her mother, Mrs. [redacted] that she would be interviewed reference an ongoing investigation in Palm Beach. I assured her that her daughter was not a suspect. I explained the possibility of her being either a witness or victim. Mrs. [redacted] advised she wanted [redacted] to cooperate and consented to the interview. During a sworn taped statement, [redacted] stated the following: at the age of sixteen, during the month of September 2004, she was approached by [redacted] for a chance to make money. [redacted] was friends with the friends of [redacted] and knew the same people. [redacted] had been previously told by her friends what [redacted] did for Jeff. [redacted] called a person known to [redacted] as [redacted] and scheduled the appointment. [redacted] picked [redacted] up and drove her to Palm Beach to a street called Brillo Way. They drove to the end of the street and entered a large driveway. They entered the kitchen area of the house and met with Jeff. [redacted] was introduced to Jeff. [redacted] led [redacted] upstairs to the main bedroom area and set up the room with a massage table and set out the oils. [redacted] dimmed the lights and turned on soft music. [redacted] exited the room and Jeff entered the room wearing only a towel. Jeff picked oils and instructed her to rub his legs, under his buttocks, back and chest area. Jeff asked her to get comfortable. [redacted] advised she did not remove her clothes. She was wearing tight jeans and a cropped tank top exposing her belly area. During the massage, Jeff removed his towel. As [redacted] rubbed his chest area, Jeff attempted to reach down her pants through the buttocks area, however was unable to due to the tightness of the jeans and a tight belt. [redacted] advised Jeff began to masturbate as she rubbed his chest. Jeff moaned as she rubbed his chest. She observed he was continuing to masturbate and attempted to reach up her tank top and touch her breasts. [redacted] pulled back and Jeff stopped. However, he kept masturbating until he climaxed. He cleaned himself with the towel he was previously wearing. I asked [redacted] if she knew the difference between circumcised and not circumcised. She explained she knew and advised Jeff was circumcised. [redacted] was paid $200.00 for the massage and left the area. She met with [redacted] who was waiting in the kitchen area and left the house.

[redacted] then explained she never provided another massage for Jeff. She did however, go to the house with [redacted] and [redacted] ([redacted] as they

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took another friend of [redacted] [redacted] advised she was present when [redacted] went to work for Jeff. She advised she rode over and sat in the kitchen area with [redacted] to wait for [redacted] [redacted] advised that while they waited for [redacted] the house chef prepared lunch for them, as it was almost lunchtime. As [redacted] was finished with the massage, they left the area. I asked [redacted] if [redacted] ever told what would be expected of her when she provided a massage. [redacted] stated yes, [redacted] told her that a massage would be expected possibly naked and possibly some touching involved. [redacted] has no formal training in providing massages.

[redacted] spoke about a third and last time she went to Jeff's house. [redacted] drove another girl, [redacted] who is [redacted] friend, to Jeff's house. [redacted] stated she knew that [redacted] had made money providing girls for Jeff and she wanted to do the same. [redacted] took them in the kitchen area of the house and introduced [redacted] to [redacted]. [redacted] and [redacted] took [redacted] upstairs to the main bedroom. [redacted] advised she doesn t know what happened as [redacted] did not speak about what happened in the room. [redacted] received $100.00 from [redacted] for going with her to Jeff s house and recommending [redacted] was unable to remember [redacted] s telephone number. The interview was concluded and we left the area.

Investigation Continues...

********** N A R R A T I V E # 10 **********

NA Reported By: RECAREY, JOSEPH 10/09/05
Entered By.: ALTOMARO, NICKIE A. 10/10/05

On October 6, 2005, Det. Dawson and I went to Lynn University located in Boca Raton. We met with Dean of Students, [redacted] Turner. I explained to Mr. Turner that we were investigating a crime within the Town of Palm Beach and felt that a student, [redacted] [redacted] may have information. Turner confirmed that [redacted] is a student and currently on the soccer team for Lynn University. She was in computer class at the time of our arrival. Turner sent a security guard to locate [redacted] in class and bring her to the office. Mr. Turner allowed us to interview [redacted] in an empty conference room.

At 11:45 am I met with [redacted] [redacted] and explained to her why we there to interview her. She advised she was aware of the ongoing investigation. [redacted] stated she had previously spoken with [redacted] [redacted] who told her she was interviewed by detectives. During a sworn taped statement, [redacted] stated she knew that [redacted] [redacted] worked for Jeff in Palm Beach. [redacted] advised she has been there many times for massages. I asked her if she had formal training in providing massages, [redacted] stated she did not. [redacted] advised she was told what was expected of her by providing massages and would have to remove clothing but if she felt uncomfortable just to say so and Jeff would stop pushing the issue. [redacted] began providing massages and advised she kept her clothes on. She considered Jeff a pervert who kept

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pushing to go further and further. [redacted] explained she would keep telling him she had a boyfriend and that it would not be right to her boyfriend. It wasn t until recently [redacted] admitted to removing her clothes and staying in her thong underwear to provide a massage. [redacted] explained Jeff wanted to be rubbed on his back and recently he began turning over to have her rub his chest as he masturbated. He would try to touch her breasts as she rubbed his chest. [redacted] stated, Jeff would try to get away with more and more on each massage. Originally, [redacted] drove her to the house for the original massage. [redacted] left [redacted] her cell phone number and every time Jeff would come into town, [redacted] would call her for an appointment. Each time she went, [redacted] would meet her at the kitchen door area. She would bring her upstairs and prepare the massage table. [redacted] advised Jeff would ask her questions about herself. He knew she was a soccer player and would be attending Lynn University. I asked [redacted] if he knew her real age, [redacted] stated Jeff didn t care. The most recent massage she provided was on October 1, 2005. During the massage she asked Jeff if she could borrow one of his vehicles to visit her family and boyfriend in Orlando. Jeff had told she could borrow one of his vehicles but later stated he would rent her a car. She continued with the massage as Jeff grabbed her buttocks and caressed the buttocks cheeks. I asked [redacted] if she was wearing undergarments to which she replied her thong underwear. Once he tried to touch her breasts she would pull away from him and he would stop. [redacted] was asked if he ever used a vibrator on her. [redacted] was aware of the vibrator but advised she never would allow him to use the vibrator on her. She described the vibrator as a large white vibrator with a huge head on the tip of the vibrator. She stated he kept the vibrator in a closet near the massage table. [redacted] advised she had been doing the massage for approximately two years, which meant she would have started doing massages for Jeff at the age of sixteen.

[redacted] stated she was contacted by [redacted] on October 3, 2005. [redacted] had informed her that Jeff had rented her a new Nissan Sentra and she should come by the house to pick it up. [redacted] informed [redacted] she would have the car for a month. [redacted] stated Jeff knew her car was not working properly and had missed appointments in the past because of her car being inoperable. [redacted] explained the car is currently parked next to the Gym field. I asked her if she ever took any one to the house. [redacted] explained she took [redacted] [redacted] a friend of hers who has returned to Orlando to attend college. I asked she ever allowed another female in the room. [redacted] advised no one was brought into the room with her. At the conclusion of the interview, Det. Dawson and I went to the Gym area and located the Silver Nissan Sentra bearing Florida tag [redacted]. The vehicle is registered to Dollar rent a car out of the Palm Beach International Airport.

Telephone contact was made with [redacted] the victim's mother, at [redacted] I explained to her that I was following up on this case and provided a complete update on the case.

Investigation Continues.

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********** N A R R A T I V E # 11 **********
NA Reported By: RECAREY, JOSEPH 10/21/05
Entered By.: ALTOMARO, NICKIE A. 10/21/05

On October 10, 2005, at approximately 2:30 p.m., I made telephone contact with [redacted] During a taped conversation, [redacted] was told of an ongoing investigation in which I felt she had information pertaining to Jeffrey Epstein. [redacted] explained she met Epstein when she was just sixteen years of age. She was approached by [redacted] a friend who also had previously gone to Epstein's house for massages. [redacted] advised she was working at the Wellington Mall when she was approached. [redacted] told her that she would have to provide a massage to Epstein and she would have to perform this massage naked. [redacted] thought about the offer and stated she could make $200.00 for only 30 minutes of work. She agreed to perform the massage and [redacted] set the appointment for her that same day. [redacted] remembered it was a weekend as she only worked at the mall on the weekends. [redacted] took her to the house where she was introduced to [redacted], Jeff Epstein's assistant. [redacted] took her upstairs to a master bedroom. [redacted] explained that as she was walking up the stairs she observed several photographs of naked women along the walls and tables of the house. [redacted] further explained that she was brought into the bedroom where [redacted] prepared the room by setting up the massage table and provided the oils for her to rub on Epstein.

Epstein entered the room and introduced himself. Epstein lay on the table and told her to get comfortable. [redacted] could not remember if he was naked or if he entered the room with a towel. [redacted] stated she provided the massage wearing only her panties. She continued rubbing his legs, thighs and feet. [redacted] advised he turned over onto his back. She continued to rub his legs with the oils. Epstein touched her breasts and began to masturbate. I asked [redacted] if she knew what circumcised and un-circumcised meant. [redacted] stated circumcised is when the penis has no foreskin and the head of the penis is visible. [redacted] said Epstein is circumcised. [redacted] began to cry on the telephone and stated she had been to his house hundreds of times over a two-year period. She claimed to have made thousands of dollars during her visits. [redacted] stated she could not remember how many times exactly she went to Epstein's home but said it was a lot.

[redacted] became more upset, crying hysterically and stated she was paid and instructed to have sex with Epstein's assistant, [redacted] by Epstein. Epstein continued to watch them have sex and masturbated himself as they had sex with each other. She further stated that things escalated further and further. Epstein used sexual toys such as vibrators, rubber penises and strap-on penises on [redacted] Additionally, [redacted] stated he performed oral sex on her numerous times. She claimed he (Epstein) put his fingers inside her vagina while he masturbated in an attempt to make her climax. [redacted] could not continue and wanted some time to regain her composure. I explained to [redacted] to take her time. After taking several minutes to regain her composure I

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explained that I would travel to meet with her in person as I felt she had additional information to provide. I met with Sgt. Frick and explained the importance to meet with [redacted] in person. Sgt. Frick agreed and made arraignments for Det. Dawson and I to meet with [redacted] in Jacksonville, Florida.

On October 11, 2005, at 4:10 p.m., Det. Dawson and I met with [redacted] and her friend, [redacted] at [redacted] in Jacksonville, Florida. [redacted] wanted to have [redacted] present for support. I explained to her that I did not have a problem as long as she wanted [redacted] present during the interview. [redacted] stated she wanted her present. I explained that as [redacted] was present she was not allowed to comment or ask any questions during the interview. She was only there to comfort [redacted] should the interview upset her.

During a sworn taped statement, [redacted] explained how everything began. She said she was brought through the kitchen area where she met [redacted] for the first time. She was led to the master bedroom, Epstein s room. [redacted] explained that as she was walking up the stairs she observed several photographs of naked women along the walls and tables of the house. [redacted] further explained that she was brought into the bedroom, where [redacted] prepared the room by setting up the massage table and provided the oils for her to rub on Epstein. [redacted] explained she remembered the steam room area, which contained two large showers. Epstein entered the room from the steam room area and introduced himself. Epstein lay on the table and told her to get comfortable. [redacted] removed her skirt and kept her shirt on. She could not remember if he was naked or if he entered the room with a towel. Epstein then instructed her to remove her shirt. [redacted] removed her shirt and remembered she was not wearing a bra. [redacted] stated she provided the massage wearing only her panties. She continued rubbing his legs, thighs and feet. [redacted] advised he turned over onto his back. She continued to rub his legs with the oils. Epstein touched her breasts and began to masturbate. Epstein ejaculated which meant the massage was over. At the conclusion of the massage, [redacted] was paid $200.00. They walked together downstairs where [redacted] and [redacted] were waiting. [redacted] stated [redacted] received an unknown amount of money for taking her to Epstein. Epstein instructed to leave her cellular telephone number so that he could contact her when he is in town.

[redacted] explained that she continued to go to Epstein s house and became a regular at the house. She could not provide an exact number but claimed she had been their hundreds of times. She claimed sexual activities did not occur every time she was there. There were times she went to dinners and parties with Epstein. [redacted] explained that things began to escalate more than the massage. The encounters included bringing in his assistant, [redacted] [redacted] explained Epstein had purchased her from her family in Yugoslavia. Epstein bragged he brought her into the United States to be his Yugoslavian sex slave. [redacted] advised he was naked in the bedroom, she entered and removed her clothing. [redacted] entered the room from the steam room area already naked. He instructed [redacted] to perform oral sex on

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[redacted]. [redacted] refused to perform that act. Epstein offered her an additional $200.00 for her to perform oral sex on [redacted] for five minutes. [redacted] agreed to perform the oral sex for the additional $200.00. [redacted] explained that Epstein would masturbate while he watched them perform sexual acts.

Things continued to escalate by purchasing sex toys. [redacted] stated she had massagers, vibrators and strap on rubber penises used on her. Each time something new was introduced additional monies were produced and offered for [redacted] to allow the acts to happen. [redacted] was adamant that she performs all these acts but there was an understanding with Epstein that no vaginal penetration would occur with his penis. [redacted] explained that Epstein's penis was deformed. [redacted] explained that his penis was oval shaped. She claimed when Epstein's penis was erect, it was thick toward the bottom but was thin and small toward the head portion. She called it egg-shaped.

[redacted] continued that the sexual encounters with [redacted] Epstein and her became a ritual. [redacted] would arrive at the house and walk herself upstairs, where [redacted] and Epstein were waiting. [redacted] would remove her clothing and join them on the bed. [redacted] explained [redacted] and she would begin by kissing and touching each other. [redacted] explained sex toys were brought into the bed by either Epstein or [redacted] and they would begin using the toys on each other. Epstein would perform oral sex on either person depending who was on top during the intercourse. [redacted] explanation revealed they were in a missionary position.

[redacted] advised one day, ([redacted] was unable to state and exact date when this incident occurred), she came to the house after [redacted] had informed her that Epstein had arrived. She arrived at the house and went upstairs to the master bedroom. [redacted] advised she immediately removed her clothing, as [redacted] and Epstein were already naked in the bedroom. [redacted] explained that [redacted] and she had a sexual encounter to include kissing, touching and oral sex. [redacted] remembered that she climaxed and was removing her self from the massage table. [redacted] asked for a sheet of paper and drew the massage table in the master bathroom and where Epstein, [redacted] and she were. Epstein turned [redacted] on to her stomach on the massage bed and inserted his penis into her vagina. [redacted] stated Epstein began to pump his penis in her vagina. [redacted] became upset over this. She said her head was being held against the bed forcibly, as he continued to pump inside her. She screamed no, and Epstein stopped. She told him that she did not want to have his penis inside of her. Epstein apologized for his actions and subsequently paid her a thousand dollars for that visit. Additionally, shortly thereafter, Epstein gave [redacted] a 2005 Doge Neon, blue in color for her personal use.

[redacted] advised there were times that she was so sore when she left Epstein's house. [redacted] advised she was ripped, torn, in her vagina area. [redacted] advised she had difficulty walking to the car after leaving the house because she was so sore. [redacted] advised that other

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than that one time, when Epstein inserted his penis inside her vagina, there was no other penile intercourse.

[redacted] provided names of girls that she knew of that have gone to Epstein's house. [redacted] provided the name of [redacted] and feels she still may be going to the house to massage Epstein. According to [redacted] "[redacted] is still sucking his dick."

When asked if she had been recently contacted by anyone of the house, [redacted] advised she received an email from [redacted], from [redacted], which is her email account. The email was just a hello, how are you doing type of email. There had been no other contact from the house. The interview was concluded and [redacted] left the area. The tapes and drawing were submitted into evidence.

Investigation continues...

********** N A R R A T I V E # 12 **********

NA Reported By: RECAREY, JOSEPH 11/01/05
Entered By.: ALTOMARO, NICKIE A. 11/07/05

On October 12, 2005, Det. Dawson and I traveled to the Orlando area and made telephone contact with [redacted] [redacted] [redacted] agreed to meet with us as we were in the Orlando area. [redacted] provided directions to her apartment. Det. Dawson and I met with [redacted] who stated, during a sworn taped statement that nothing happened between her and Epstein. [redacted] appeared nervous during the interview. I assured her that I had spoken with other people who advised differently. [redacted] stated she only went a couple of times and provided a massage to Epstein. She stated she was brought to the Epstein house in March of 2005. [redacted] [redacted] brought her to work. [redacted] has no formal training in providing massages. [redacted] stated she provided a massage, fully clothed for $200.00. As I sensed hesitancy in her answers, I asked [redacted] if she had been contacted by anyone from the house. [redacted] stated she was interviewed already by an investigator for Epstein. He met with her on October 8, 2005, at a Roadhouse in Orlando. He identified himself as [redacted] and inquired about the police investigation and left his telephone number [redacted] for additional contact. [redacted] provided no additional information, as it appeared her responses were almost scripted. We left the area and returned to Palm Beach Police Department.

Based on the information acquired during the interviews, a search warrant was prepared for entry at the Epstein home. On October 18, 2005, I met with Judge Laura Johnson who reviewed the warrant request. She found there was sufficient probable cause and signed the warrant request. On October 20, 2005, at approximately 9:36 am, members of the Palm Beach Police Investigations Unit executed the search warrant at 358 El Brillo in Palm Beach. Members of the Investigations Unit included Capt Gudger, Sgt Frick, Det. Dicks, Det. Dawson, Det. Melnichok, Det. Sandman, Det. Krauel, the crime scene unit and myself.

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As we entered onto the property, we encountered the house manager, Janusz Banasiak who was in the guest portion of the house. The guesthouse section had open doors and no forced entry was made. I made contact with Banasiak, Date of Birth [redacted] Fl DL [redacted] and informed him of the search warrant for the premises. The members of the Police Department entered the residence and announced we had a search warrant. A safety search was done and members exited the home. I read the search warrant to Banasiak as Mgr Parkinson videotaped the search warrant execution. Several interior decorators were located on the property. I spoke with Mark Zeff, of [redacted] in New York. Mr. Zeff stated he is the designer for Mr. Epstein's homes. He advised he was contacted in March of 2005 to do a complete overhaul on the house. He advised he was on the phone with Mr. Epstein when officers announced the search warrant. Mr. Epstein was then made aware of the search warrant. Mr. Zeff advised, his contact with Epstein is strictly business and he has never witnessed Epstein with any girls except for his assistants, [redacted] or [redacted]

I then interviewed Daniel Estes, of [redacted] in New York. Mr. Estes stated he has worked for Zeff for seven years. He advised he personally worked on the New York and Palm Beach home for Mr. Epstein. He has previously met with [redacted] and [redacted], Epstein's assistants in New York and in Florida. Estes stated they travel with Epstein everywhere he goes.

I interviewed [redacted] of [redacted] Jersey City, New Jersey. [redacted] stated she just arrived from Scotland and has worked with Zeff for only one month. She stated she has never met Epstein and has not seen him. The interview was then concluded.

I then spoke with Douglas Schoettle of [redacted] in New York City. Schoettle stated he has been Epstein's Architect for seven years. He further stated he deals with Epstein's assistants and speaks with Epstein on the phone. Schoettle stated he mainly speaks with [redacted], Epstein s main assistant, who travels with Epstein. Schoettle stated he only has contact with Epstein when his services are needed.

At approximately 10:30 am, I was informed that the videotaping was concluded. I entered the residence and located two covert (hidden) cameras. The first camera was a covert wall clock in the garage area. I traced the wire behind the clock and removed the RCA wire and unplugged the camera. The other covert camera was located within a desk clock beside Epstein's desk. I traced the wire behind the clock and unplugged the RCA wire. I could not locate another camera. I then began with the search of the residence for the specified evidence.

My search consisted of the second floor. Det. Krauel and I began in the master bedroom area where several items were located. They were

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marked to be retrieved by the evidence custodian. In the master desk with Epstein's notepads marked Jeffrey Epstein we located a high school transcript from [redacted] High School for [redacted] Also in the room, was the dresser /armoire where we located a bottle of peach flavored Joy Jelly (Sexual Lubricant). Additionally, there were several photographs of young naked teenage girls within the closet, which was consistent with what the witnesses said. The massage table was also located within the master bedroom. Video tapes were located beside the television, which were also collected. An itemized list of the property and locations was prepared on the property receipts. At approximately 2:55 pm, the house was secured; the exit of the residence was videotaped. Upon our exit of the property, I encountered Atty. Guy Fronstein who advised he was representing Mr. Epstein. He provided a business card and provided his assistance with the investigation.

Due to Hurricane Wilma, which struck South Florida causing massive power outages, the courthouse was closed due to the lack of power. I was previously told that the Chief Judge had extended the filing deadlines due to the hurricane and the Courthouse being closed. On October 27, and 28, 2005 the courthouse was closed and I could not file the search warrant and inventory at the clerk's office. On October 31, 2005, I responded to the courthouse and filed the paperwork along with an order to seal, signed by Judge Johnson, to deny any release of any paperwork on this case.

INV CONTINUES..

********** N A R R A T I V E # 13 **********

NA Reported By: PARKINSON, GREGORY A. 10/20/05
Entered By.: ALTOMARO, NICKIE A. 11/07/05

On October 20, 2005, at approximately 8:30 a.m., Thursday morning, I was advised by Captain Gudger that a search warrant would be executed and that I was to assemble the Crime Scene Investigative Team and stand by the south side of the building ready to go. I designated Evidence Specialist [redacted] to handle the inventory return, the documentation of the property receipts and the collection and bagging of the evidence at the scene. I further instructed CSI Kim Pavlik, ID # 8807, to accompany us and perform the role of photographing the scene and the items that may be taken into custody by the affiant, Detective Joseph Recarey, ID # 7915.

My responsibility was to go through from the reading of the warrant to the final exit from the residence and perform a video recording of the reading of the warrant, the initial walk through of the residence showing the current condition and then finally a walk through of the residence at the time of the police exit.

We started out towards the residence, which was located at 358 El Brillo and arrived at approximately 9:33 a.m. The search was conducted, items were collected by Evidence Specialists Badger,

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photographed by CSI Pavlik and then videotaped by myself. The search was concluded at approximately 3:05 p.m. whereupon Detective Recarey and I were the last two officers in the house. Upon securing the residence we met with the gentleman who identified himself to Detective Recarey as the lawyer for the defendant and he was informed that the residence was secured and that copies of the inventory return had been left on the first floor table of the personal assistant's office.

Detective Recarey and I returned to Police Headquarters and secured for the day.

********** N A R R A T I V E # 14 **********

NA Reported By: DAWSON, MICHAEL C. 11/07/05
Entered By.: ALTOMARO, NICKIE A. 11/07/05

On October 20, 2005, I assisted Defective Recarey in the execution of a search warrant at 358 El Brillo Way, Palm Beach, Florida, 33480.

Upon the announcement of the search warrant, immediate contact was made with three white males who came out of the house or surrounding structures. Those males were identified as Janusz Banasiak, Daniel Estes, and Mark Zeff. As other members of the police department cleared the home, I kept watch over these three males. Once the house was cleared, those males were turned over to Detective Recarey.

Detective Dicks and I were assigned to assist in the search of the main house, the cabana and the servant's quarters. We started in the garage. All areas of the garage were searched to include four vehicles. These vehicles were three black Mercedes Benz cars registered to Jeffrey Epstein. The fourth vehicle was a Harley Davidson motorcycle, green in color, registered to Jeffrey Epstein. Nothing was recovered from the garage.

A towel closet and pantry located off the kitchen were searched and yielded negative results.

The kitchen was searched and taken into evidence was a phone message book that was located near a house phone.

North of the kitchen was an office room which contained a computer. The room had a closet that contained a locked gun locker. The combination was entered by Banasiak in the presence of Sgt. Frick and the safe was opened. Items were taken from the room. See the completed property receipt for a detailed list.

A green bathroom located on the first floor was searched and nothing was taken.

A closet located just west of the green bathroom was searched. Two massage tables were located in the closet along with a photo of a nude

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female from the waist up. See the property receipt for details.

I searched two bedrooms and their adjoining bathrooms, which were located on the second floor on the East side of the house. In the Northeast bedroom closet I found adult sex toys called Twin Torpedoes. Soap made in the shape of a penis and vagina were also found in these upstair bedrooms. See the property receipt for details.

I searched the pool cabana located on the South side of the pool. Photos were taken from the wall. See the property receipt for details.

I assisted in the search of Banasiak's living quarters. Numerous CD s along with a message book was seized. See the property receipt for details.

********** N A R R A T I V E # 15 **********

NA Reported By: RECAREY, JOSEPH 11/08/05
Entered By.: ALTOMARO, NICKIE A. 11/08/05

On November 1, 2005, I was contacted by Atty. Gus Fronstin, who advised he was willing to assist with the investigation. Atty. Fronstin advised he would try to have his client, Jeffrey Epstein available to be interviewed. I explained I would be interested in conducting an interview with his client as well as other employees that are employed within the house. Atty. Fronstin advised he would return my call once he received confirmation on the interviews.

On November 6, 2005, I attempted contact with [redacted] at her residence. I left a business card for her to return my call. Upon returning to the police department, I had received a telephone call from [redacted] I returned her call at [redacted] and spoke with [redacted] She made arrangements to respond to the station to provide an interview. At approximately 3:30 pm, she arrived at the Palm Beach Police Station with her boyfriend. Her boyfriend was allowed to sit in the lobby area while Ms. [redacted] was interviewed.

I took Ms [redacted] to the Detective Bureau Interview room. I closed the door for privacy and explained to her that I appreciated her coming to the police station for the interview. During the sworn taped statement, she advised she was at Jeffrey Epstein s house one time. Approximately two months ago, she was approached by a girl, [redacted] who was dating her roommate, to make some quick money. [redacted] advised she was in need to make some quick cash to make the rent that month. She agreed to go to the house. She had been told by [redacted] that the massage would have to be done in her underwear. She advised [redacted] drove with her and brought her into the house. They walked into the kitchen area and took the stairs upstairs. [redacted] further stated she was brought into a master bedroom area. She advised she recalled seeing portraits of naked women throughout the room. A massage table was already out near the sauna/shower area in the master bedroom. Epstein entered the room wearing only a towel and

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introduced himself as Jeff. [redacted] advised she recalled she and [redacted] removed their clothing down to their panties, Epstein lay on his stomach area and they provided a massage on his legs and feet area. I asked [redacted] if she had any formal massage training and she replied no. [redacted] advised she was topless and the panties she wore were the boy shorts lace panties. She and [redacted] continued the massage until the last ten minutes of the massage, Epstein, told [redacted] to leave the room so that [redacted] could finish the massage.

[redacted] got dressed and Epstein turned over onto his back. Epstein then removed the towel, which had been around his waist. Epstein laid there naked and requested that [redacted] rub his chest area. [redacted] stated as she did this, Epstein, began masturbating as she rubbed his chest. [redacted] stated he pulled down her boy short panties and he produced a large white vibrator with a large head. She stated it was within a drawer in his master bathroom. He rubbed the vibrator on her vagina area. [redacted] advised he never penetrated her vagina with the vibrator.

He continued to rub her vagina with the vibrator as he continued to masturbate. [redacted] stated she was very uncomfortable during the incident but knew it was almost over. Epstein climaxed and started to remove himself from the table. He wiped himself with the towel he had on previously and went into the shower area. [redacted] got dressed and met with [redacted] in the kitchen area. Epstein came into the kitchen and provided [redacted] $200.00 for bringing [redacted] and paid $200.00 to [redacted] for providing the massage. [redacted] was told to leave her telephone number with [redacted], his assistant for future contact. [redacted] provided her cellular telephone number for future contact. [redacted] was asked if she was recently contacted about this investigation by anyone from the Epstein organization. She replied she was called but it was for work. She stated she was called by [redacted] for her to return to work for Epstein. [redacted] stated work is the term used by [redacted] to provide the massage in underwear. [redacted] advised she declined, as she was not comfortable in providing that type of work. The interview was concluded and the videotape was placed into evidence.

Investigation Continues..

********** N A R R A T I V E # 16 **********

NA Reported By: RECAREY, JOSEPH 11/10/05
Entered By.: ALTOMARO, NICKIE A. 11/10/05

On November 7, 2005, I made telephone contact with [redacted] who advised she would be able to meet with me at her home. Det. [redacted] and I traveled to her home in Royal Palm Beach and made contact with [redacted] During a sworn taped statement, [redacted] stated she met Jeffrey Epstein through [redacted] would approach females who wished to work for him. [redacted] stated she was asked to work for him but declined. [redacted] explained that work means give massages. She was asked about any formal training in providing massages to which she said no. [redacted] said she accompanied [redacted] and other females

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who were taken to Epstein s house to provide massages. [redacted] further stated she had been to the house approximately 4 or 5 times in the past year. She accompanied [redacted] with [redacted] the 14-year-old victim, and [redacted] Each time the girls were taken over, they were previously told they would have to provide a massage, possibly naked. It was also told that should Epstein require them to do anything extra and they were not comfortable just to tell him and he would stop. [redacted] stated [redacted] received $200.00 for each girl she brought over to massage Jeffrey Epstein. When I asked which girl appeared to be the youngest, she replied, the victim, as she stated she was fifteen years old at the most; she looked really young. [redacted] further stated each time she went to the house, she sat in the kitchen and waited with [redacted] until the massage was over. She further stated that the cook would make lunch or a snack for them as they waited. I asked her if there was anything that caught her attention within the home. [redacted] stated there were a lot of naked girls in photographs throughout the house. The interview was concluded and the tape was turned into evidence.

Investigation Continues..

********** N A R R A T I V E # 17 **********

NA Reported By: RECAREY, JOSEPH 11/10/05
Entered By.: ALTOMARO, NICKIE A. 11/10/05

Det. Dawson and I attempted contact with [redacted] in Royal Palm Beach. I left my business card at her front door. Ms [redacted] returned my call and arranged a meeting with me at the Palm Beach Police Department for November 8, 2005. At approximately 2:00pm, [redacted] arrived at the Palm Beach Police Department. She was brought into the interview room and the door was closed for privacy. She was told that I appreciated her coming to the police station for questioning regarding an on going investigation. She was told that I was investigating a crime involving Jeffrey Epstein and knew, based on the investigation, that she had encounters with him in the past. During a sworn taped statement, [redacted] stated she had met Epstein approximately two years ago. She was first introduced to Epstein by [redacted] approached her about working for Epstein and providing a massage to him for $200.00. The arrangements were made and as [redacted] could not take her the day the arrangements were made, [redacted] took [redacted] also attended [redacted] High School and was familiar with Epstein.

[redacted] recalled she was brought there and entered through the back kitchen door. She had met with an assistant [redacted] and another assistant [redacted]. [redacted] brought her upstairs as she observed several photographs of naked females throughout the house. [redacted] stated Epstein came in the room, wearing only a towel, and laid on the table. [redacted] stated he picked out the oils he wanted her to use and requested she remove her clothing to provide the massage. [redacted] stated that on the first massage she provided she did not remove her

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clothing. [redacted] stated she had returned several times after that. Each time she returned more things happened. [redacted] stated that the same thing would happen. Epstein would walk into the master bedroom/bathroom area wearing only a towel. He would masturbate as she provided a massage. [redacted] stated she was unsure if he climaxed as he masturbated under the towel. Additionally she never looked blow his waist. She claimed that Epstein would convince her to remove her clothes. She eventually removed her clothes and stayed in her thong panties. On occasion, Epstein would use a massager/vibrator, which she described as white in color with a large head, on her. Every time she provided a massage he would masturbate. [redacted] added she has no formal training in providing a massage. [redacted] stated she brought two females during her visits to provide massages. [redacted] stated she brought a girl named [redacted] and [redacted] [redacted] from Royal Palm Beach High School. [redacted] stated she received $200.00 for each girl she brought. Additionally, [redacted] was given $200.00 for taking her in the very beginning. The interview was concluded and the tape was placed into evidence.

Investigation continues...

********** N A R R A T I V E # 18 **********

NA Reported By: RECAREY, JOSEPH 11/13/05
Entered By.: ALTOMARO, NICKIE A. 11/14/05

On November 8, 2005, I made telephone contact with [redacted] [redacted] W/F, [redacted], at her residence. [redacted] responded to the police station for an interview reference an ongoing investigation. At approximately 2:30 pm, she arrived at the Palm Beach Police Station and was brought into the interview room for the interview. The door was closed for privacy and she was told that I appreciated her cooperation in this case. During a sworn taped statement, [redacted] stated she had met Jeffrey Epstein approximately one year ago. She was approached by a subject known to her as [redacted] [redacted] [redacted] had asked her if she wanted to make money providing massages to Epstein. [redacted] had heard that several girls from [redacted] High School were doing this and making money. She agreed and was taken to the house by [redacted] [redacted] had introduced her to [redacted] and Epstein and brought her upstairs to a master bedroom and Master bathroom where a massage table was prepared and the proper oils were taken out. [redacted] left the room and waited downstairs for [redacted] [redacted] stated Epstein entered the room wearing a towel and she provided a massage wearing only her thong panties. [redacted] advised Epstein had masturbated every time she provided a massage. She stated Epstein continued to masturbate until he climaxed; once that occurred the massage was over. She felt the whole situation was weird but she advised she was paid $200.00 for providing the massage. She also stated [redacted] received $200.00 for bring [redacted] to Epstein.

[redacted] stated she had gone a total of 15 times to his residence to provide a massage and things had escalated from just providing a

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massage. Epstein began touching her on her buttocks and grabbed her closer to him as he masturbated. Epstein also grabbed her breasts and fondled her breast with his hands as she provided the massage. [redacted] stated on one occasion, he offered extra monies to have vaginal intercourse. She stated this all occurred on the massage table. [redacted] stated Epstein penetrated her vagina with his penis and began having intercourse with her until he reached the point of climax. Epstein removed his penis from her vagina and climaxed onto the massage table. [redacted] received $350.00 for her massage. I asked her if she had any formal training in providing massages, [redacted] stated she did not.

[redacted] continued to state on one other occasion, Epstein introduced his assistant, [redacted] into the massage. [redacted] was brought into room with [redacted] to provide a massage. Epstein had them kiss and fondle each other around the breasts and buttocks as they provided a massage to Epstein. Epstein, watched and masturbated as this occurred. On other occasions, Epstein introduced the large white vibrator/massager during the massage. Epstein stroked the vibrator/massager on [redacted]s vagina as she provided the massage.

[redacted] stated the last time she spoke with anyone at the house, was with [redacted] during the weekend of October 2 or 3, 2005. [redacted] stated she had brought two people to the Epstein house. She provided the names of [redacted] [redacted] and [redacted] (unknown last name). It should noted, [redacted] had been previously identified as [redacted] [redacted] and had been previously interviewed. The interview was concluded and the videotape was placed into evidence via the locker system.

On November 9, 2005, Sgt Frick and I traveled to 6791 Fairway Lakes Drive in Boynton Beach, Florida in hopes to interview Juan Alessi, the former houseman of Epstein's home. As no one was home, a business card was left for him to return my call. We then traveled to 11349 SW 86th Lane in Miami in hopes to interview Alfredo Rodriguez, a former house man of Epstein. We did not locate them at home. I left a business card for him to return my call.

We then traveled to Lynn University and met with Dean of Students, Mr. Turner. We requested to speak with [redacted] [redacted] [redacted] was re interviewed, as she still was in possession of the rental car that Epstein had acquired for her. [redacted] stated that [redacted] Epstein's assistant, had called her on her cellular telephone and informed her that rental was extended for her. [redacted] stated she had paid an additional $625.00 for her to keep the rental an extra month. [redacted] was asked if she had any additional contact with either Epstein or anyone from his organization. [redacted] stated she did not, other than the telephone call informing her that she could keep the car for an extra month. [redacted] did not provide any additional information.

On November 10, 2005, at approximately 9:47 am, Alfredo Rodriguez had telephoned reference my business card found on his door. Rodriguez stated he had worked with Epstein for approximately six months after

[redacted] No. . . . : 1-05-000368 (Continued)

the previous houseman left. Rodriguez stated that it was his responsibility to keep the identity of the masseuses private. Mr. Epstein had a massage in the morning and one in the afternoon. Mr. Rodriguez stated he would rather speak about this in private. He advised he would come to the police station to speak with me. Rodriguez stated he would return my call on Monday, November 14, 2005.

I then made telephone contact with Juan Alessi. He advised he found my card on his door and wanted to know what I needed to speak with him about. I explained to Alessi that I was conducting an investigation on his former employer, Mr. Epstein. Alessi stated he would return my call shortly as he was in the middle of a project at his home. I received a telephone call from Attorney Donald Morrell from [redacted]. Mr. Morrell stated he represented Mr. Alessi and did not want me speaking with his client. I then made telephone contact with the State Attorney s Office and confirmed that subpoenas would be issued to the former employees to assist in the investigation.

I then made telephone contact with Attorney Guy Fronstin, attorney for Mr. Epstein. I explained to Mr. Fronstin that I would like to speak with Mr. Epstein. He stated Mr. Epstein is not in residence in Florida at this time and would check with him to ascertain if he could be here by Wednesday November 16, 2005 for an interview. Mr. Fronstin stated he would return my call should Mr. Epstein decide to come in to the police station for an interview.

Investigation continues.

********** N A R R A T I V E # 19 **********

NA Reported By: RECAREY, JOSEPH 11/15/05
Entered By.: ALTOMARO, NICKIE A. 11/16/05

On November 14, 2005, Det. Sandman and I traveled to [redacted] in Loxahatchee, Florida and spoke with [redacted] She was told of the ongoing investigation involving Epstein. [redacted] advised she had gone to the house on several occasions. During a sworn taped statement, she advised she started going to the house approximately one year ago and was brought by [redacted] (Unknown last name). [redacted] stated [redacted] brought her into the house and she was introduced to a girl named [redacted]. Once she met her, [redacted] brought her upstairs into a master bedroom bathroom. [redacted] stated she met Jeffrey in the bathroom. He lay on the table and picked the massage oils. She provided the massage, as he lay naked on the massage bed. She stated she rubbed his calves and back area. Upon the end of the massage, Epstein removed himself from the massage table and paid her $300.00 for the massage.

[redacted] stated she had only been at the house approximately five or six times. [redacted] said each time she went to the house she was notified by [redacted]h, Epstein's assistant, that Epstein was in town and would like her to work. [redacted] stated she returned to the house and was again led upstairs by [redacted]h. She provided the massage, clothed.

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[redacted] advised it wasn't really weird until later on. [redacted] was asked if she ever removed her clothing to provide a massage. [redacted] stated it was not until the third time she went that she removed her clothing. [redacted] stated she was notified by [redacted] that Epstein wanted her to come to work. She arrived at the house and was led upstairs by [redacted]. She started providing the massage when Epstein asked her to remove her clothing. [redacted] removed her pants, shirt and bra. She stayed in her thong panties and continued rubbing Epstein. Epstein turned over onto his back and she rubbed his chest area. [redacted] stated she knew he was masturbating himself as she providing the massage. [redacted] stated she believed he climaxed based on his breathing. She did not want to view either the climax or the fact that he was masturbating. [redacted] stated once the breathing relaxed he got up and told her to get dressed. She was paid $300.00 for her services.

[redacted] stated on the last time she went to provide a massage, she was notified by [redacted] to come to the house and work. [redacted] stated she was now dating her current boyfriend and did not feel comfortable going. She recalled it was approximately January 2005. She said she went, already thinking that this would be the last time. She went upstairs and went into the master bathroom. She met with Epstein, who was wearing only a towel as he entered the room to lie on the table. [redacted] stated Epstein caught her looking at the clock on several occasions. Epstein asked her if she was in a hurry. [redacted] stated her boyfriend was in the car waiting for her. [redacted] further stated that Epstein got upset, as she wasn't enjoying the massage. She told him that she didn't want to continue and she would not be back. Epstein told her to leave as she was ruining his massage. I asked her if she had any contact with Epstein's organization, she stated she received $200.00 from Western Union in Royal Palm Beach and Okeechobee Blvd as a Christmas gift. [redacted] advised she had no formal training in provide any massages. [redacted] also stated she was sixteen years old when she first went to Epstein's house.

At approximately 4:22 pm, I made telephone contact with [redacted] at [redacted] She agreed to meet with me at a public place. I suggested she come to the police station for an interview. [redacted] did not want to meet at the police station. I recommended we meet at the Palm Beach Gardens Mall in the food court area. She agreed and an appointment was made for November 15, 2005 at 5:00 pm at the food court.

Investigations Continue.

********** N A R R A T I V E # 20 **********

NA Reported By: [redacted], [redacted] R. 11/16/05
Entered By.: [redacted], [redacted] A. 11/17/05

On 10/20/2005, I assisted executing a search warrant at 358 El Brillo Way in the Town of Palm Beach, Palm Beach County Florida under the direction of affiant Detective [redacted].

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Detective Melnichok and I searched the pantry room that is west next to the kitchen. This room had all white cabinets with a dark grey and black counter top. We did not find anything in this room.

We searched the yellow and blue room that is west next to the pantry room. This room had a very large statue of man with a bow. Taken into evidence from this room were nine photographs in frames of various women.

We searched the main entrance foyer that is to the north of the yellow and blue room. This room contained two bamboo chairs and ottomans with cushions. It also contained a round table with numerous books.

We searched another blue room that is west of the foyer. This room had a stereo system and book shelves that were from the floor to the ceiling. Taken into evidence from this room were eight photographs in frames of various women and/or Epstein, the owner of the residence.

We searched the room to the west of the blue room that has sliding glass doors that lead out to the pool. In this room in a dresser were two DVD's and two VCR tapes. These items were taken into evidence.

We searched a 2004 black Chevy Suburban bearing Florida tag X99-EGL, registered to Jeffrey Epstein DOB [redacted], which was located on the east side of the driveway facing south. I found a Thrifty rental agreement between the passenger seat and the middle console. The name on the rental agreement was [redacted] from [redacted] Palm Beach Gardens, Florida 33410. The phone number on the rental agreement was [redacted] The vehicle rented was a white 2005 Chrysler Sebring bearing Florida tag [redacted]. The vehicle was rented on 9/25/05 at 17:58 hours and was returned on 9/26/05 at 16:52 hours. The last four numbers of the credit card used are [redacted] Detective Melnichok found a piece of paper in the middle console that said I used the cash in here to fill up the tank and was signed by [redacted]

I searched the 2005 black Cadillac Escalade ESV bearing Florida tag Q29-9GT, registered to Jeffrey Epstein dob [redacted], which was located on the west side of the driveway facing south. I did not find anything in this vehicle.

All of the items that were taken into evidence were photographed in the place they were located and then turned over to crime scene.

*** ********** N A R R A T I V E # 21 **********
NA Reported By: RECAREY, JOSEPH 11/17/05
Entered By.: ALTOMARO, NICKIE A. 11/17/05

Case No. . . . : 1-05-000368 (Continued)

On November 15, 2005, Det. Sandman and I traveled to [redacted] in Royal Palm Beach. We met with [redacted] a seventeen-year old juvenile who was not in school this day due to a cold from which she was suffering. [redacted] was told that I needed to speak with her in reference to an ongoing investigation involving a subject she would know as Jeffrey Epstein. Prior to speaking with her, I explained that because of the fact that she is a minor, I needed to speak with her parents prior to speaking with her. She telephoned her father, Mr. [redacted] on his cell phone and explained to him that Det. Sandman and I were there to speak with her. I spoke with Mr. [redacted] on the telephone and informed him I needed to speak with his daughter in reference to an ongoing investigation. Mr. [redacted] advised he had no problem with us speaking with his daughter.

During a sworn taped statement, [redacted] stated she met Jeffrey Epstein over a year ago. She was sixteen years of age and was approached by [redacted] who informed her that she could make monies providing a massage to Epstein for $200.00. [redacted] had informed her that she would have to provide this massage topless. [redacted] made the arrangements with Epstein and his assistants and took [redacted] to the house. [redacted] stated [redacted] and she entered through a glass door that led into a kitchen. [redacted] took her upstairs, to a master bedroom and master bathroom. She recalled the bathroom had a large pink couch, sauna and matching shower. Epstein entered into the room wearing only a towel. [redacted] and [redacted] removed their clothing remaining only in thong underwear. She further stated that Epstein lay on his chest on the table. Epstein selected which oils to use for the massage. Both [redacted] and [redacted] provided the massage on his legs, back and feet. Forty minutes into the massage, Epstein turned over onto his back and requested [redacted] wait downstairs in the kitchen area for [redacted] Epstein instructed [redacted] to finish the massage. As [redacted] got dressed, [redacted] starting rubbing his chest. [redacted] left the room, and Epstein began masturbating himself as [redacted] rubbed Epstein s chest. [redacted] stated he continued masturbating until he climaxed on the towel he was wearing. When asked if he had removed the towel she stated he turned the towel around so that the opening would allow him to expose himself. After he cleaned himself off with the towel, he instructed [redacted] the massage was done and to get dressed and met with him downstairs. [redacted] got dressed and met with Epstein in the kitchen area. She was paid $200.00 dollars for providing the massage. [redacted] stated she was aware that [redacted] also received monies for the same thing.

The second time she went to the house she was again approached by [redacted] asked if she wanted to return to the house to provide another massage; [redacted] agreed and the arrangements were made by [redacted] for her to return to the house. [redacted] stated [redacted] drove her to the house and knocked on the same glass door that leads to the kitchen area. They were allowed entry into the house by one of the staff members. [redacted] led her upstairs to the master bedroom and

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master bathroom area. [redacted] left [redacted] this time to do the massage alone. Epstein entered the room again wearing only a towel. [redacted] began removing her clothing as she did the last time she was at the house. Epstein instructed her to get naked. He lay on the table on his stomach as [redacted] began massaging his legs and back.

As [redacted] finished with Epstein's back and legs, Epstein then turned over onto his back. [redacted] started to rub his chest and he began masturbating himself. As [redacted] rubbed his chest, Epstein leaned over and produced a massager/vibrator. He turned it on and began rubbing [redacted] s vagina and masturbating himself at the same time. [redacted] stated she continued to rub his chest as this was occurring. She described the vibrator/massager as large, grey with a large head. Epstein rubbed her vagina for approximately two to three minutes with the massager/vibrator. He then removed the vibrator from her vaginal area and concentrated on masturbating himself. [redacted] stated he climaxed onto the towel again and informed her that the massage was done. [redacted] got dressed and met with [redacted] who was waiting in the kitchen area. She received $200.00 for the massage. [redacted] said she never returned to the house and had no desire to return to the house. [redacted] was asked if she received any formal massage training. She advised she had no formal training. [redacted] was asked if Epstein knew her real age. [redacted] stated he knew as he asked her questions about herself and high school. He was aware she attended and is still attending [redacted] High School.

The interview was concluded. I suggested [redacted] inform her parents of what occurred at the Epstein house. [redacted] stated she would tell her father as he was unaware this had occurred. I left my business card for any questions they may have. We left the area and returned to the police station. The tape was placed into evidence.

Investigation Continues.

********** N A R R A T I V E # 22 **********

NA Reported By: RECAREY, JOSEPH 11/17/05
Entered By.: ALTOMARO, NICKIE A. 11/17/05

On November 15, 2005, Officer Munyan and I responded to the Palm Beach Gardens Mall food court section to meet with [redacted]. At approximately 5:10 p.m., [redacted] arrived and met with us at the food court. [redacted] provided a sworn taped statement in which she stated she had been at the Epstein house over fifty times. She began going to Epstein's house when she turned eighteen years old. [redacted] was asked if she knew of the on-going investigation. [redacted] stated she was aware there was an investigation as she had been told by other girls that were interviewed. Additionally, she has had several telephone conversations with Epstein's assistants as to what had been going on during the investigation.

I asked [redacted] how she was introduced to Epstein. [redacted] stated she did not want to disclose who brought her to the house but she would

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respond to any other questions. When I asked her what happened at the house, [redacted] stated everything happened. It all began with the massages. Each time she went more things happened. She would massage Epstein and he would masturbate and climax. She stated things escalated from there. She provided oral sex on Epstein and he provided oral sex on her. She stated he would also use a massager/vibrator on her vagina to stimulate her as she massaged him. He introduced his assistant [redacted] to have vaginal intercourse with [redacted] She stated [redacted] would utilize a strap-on (synthetic penis) to have intercourse with her. She was told to masturbate herself as Epstein and [redacted] had sexual intercourse. All this was done at Epstein's direction.

[redacted] could not provide exact dates as she had been to the house so many times. [redacted] stated Epstein inserted his fingers in her vagina to stimulate her as she massaged him. When I asked her if there had been any vaginal intercourse with Epstein, she stated she did not have sex with him. She did admit having sex with [redacted], his assistant. [redacted] stated not every time she went involved sexual favors. Sometimes she would just talk with him and get paid. I asked her how much she was paid each time she went to Epstein s residence. [redacted] stated she got paid $300.00 every time she went to the house. She was told to bring other girls to him to provide massages. [redacted] declined stating that she does what she does and did not want to introduce anyone else to do what she does. [redacted] stated she had never received any formal training in providing massages.

I showed [redacted] a photo line up in which [redacted] was placed in position six. She reviewed the six photographs and immediately identified [redacted] as the person with whom she had intercourse. Additionally, it was the same person she watched have intercourse with Epstein. She signed the photo line-up under [redacted] s photo as the person she identified. We then left the mall and returned to the police station. The photo line up and tape were placed in to evidence.

Investigation Continues...

********** N A R R A T I V E # 23 **********

NA Reported By: RECAREY, JOSEPH 11/29/05
Entered By.: ALTOMARO, NICKIE A. 12/01/05

On November 17, 2005, I received a phone message from Atty. Guy Fronstin who advised to call his cellular phone reference his client Jeffrey Epstein. I telephoned his cell phone and left a message for him to return my call. I did not receive a call back on Thursday, November 17, 2005. On Friday, November 18 2005, I retrieved another voice mail from my work phone from Mr. Fronstin advising he would not produce his client Jeffrey Epstein for any statement. Fronstin stated he had spoken with ASA Lana Belohlavek and expressed Mr. Epstein has a passion for massages. I called ASA Lana Belohlavek and confirmed that

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Fronstin had telephoned her reference this case. Although nothing was discussed, Mr. Fronstin did advise her that Epstein is very passionate about massages.

I also spoke with ASA Daliah Weiss reference the previous employees, Juan and Maria Alessi. She advised that they had been served through a subpoena process server. They were both scheduled to appear on Monday November 21, 2005 at 12:00 p.m.

On November 21, 2005, I met with ASA Weiss, Atty. Donnie Murrell and Juan and Maria Alessi at the State Attorney Office. ASA Weiss had requested a court reporter to be present to take the statement of the Alessi s. I spoke with Maria Alessi, in the presence of her attorney, Donnie Murrell. She advised she had worked for Epstein for eight years, from the period of 1994 through 2002. She advised she had never had any direct conversations with him. She stated it was her husband who spoke directly with Epstein. Her work consisted of doing house cleaning, shopping and other preparations when Epstein would arrive in town. Alessi stated the preparations consisted of preparing the house and bathrooms for his arrival. She advised she did view several masseuses that arrived at the house. She advised that two or three girls would come during a day and provide the massages. The girls that arrived looked young in age. Mrs. Alessi did not know any of the girls personally and were always different. She was told that when Epstein was in residence he did not want to encounter the Alessis during his stay in Palm Beach.

I then spoke with Mr. Alessi in the presence of his attorney, Donnie Murrell. Mr. Alessi stated that he was employed for eleven years with Mr. Epstein. He originally was hired as a part time employee and then moved up into a full time position. His duties included everything. Alessi stated he was the house manager, driver and house maintenance person. It was his responsibility to prepare the house for Epstein s arrival. When asked about cooks or assistants, Alessi stated they traveled with Epstein on his private plane. He remembered dealing with his girlfriend, Ms. Maxwell originally and then dealt with Epstein directly.

I asked Mr. Alessi about massages that occurred within the home. Mr. Alessi stated Mr. Epstein had up to three massages a day. Each masseuse that visited the house was different. Alessi stated that towards the end of his employment, the masseuses were younger and younger. When asked how young, Mr. Alessi stated they appeared to be sixteen or seventeen years of age at the most. The massages would occur in Epstein's bedroom or bathroom. There were times he recalled that he would set up the massage tables either in Epstein s bedroom or in his bathroom. I asked if there were things going on other than a massage. Alessi stated that there were times towards the end of his employment that he would have to wash off a massager/vibrator and a long rubber penis, which were in the sink after the massage. Additionally, he stated the bed would almost always have to be made after the massage. Alessi was never privy to what went on during the

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massages.

He was asked if he remembered any names of the girls that massaged Epstein. He tried to remember and was unable to provide any exact names of any girls. Alessi was asked about any contact with anyone from the Epstein organization. Alessi said he did speak with Mr. Epstein shortly after my initial contact with him to find out what was going on. Alessi also stated that approximately on November 11, 2005, he was contacted by a private investigator from the Law Office of Roy Black. The investigator had called him to meet with him to ascertain what he was going to tell the police. Alessi stated they met at the Carrabba s Restaurant in Boynton Beach and discussed the same questions I was asking him. I informed Mr. Alessi and Mr. Morrell that as this is an ongoing investigation and anything we discuss should be confidential. They both acknowledged the fact that the information would be kept confidential. It should be noted that a court reporter was present during the interviews and would be providing a copy of the statements to me when they become available.

On November 21, 2005, I received a voice mail from Mr. Fronstin who advised he would not be making Mr. Epstein available for any statements. He did have some words that he wanted to relay on behalf of Mr. Epstein. I telephoned his office and left a message for him to return my call.

On November 29, 2005, I received a call back from Mr. Fronstin who left a voice mail after hours on November 28, 2005, advising he would return my call during normal business hours to speak with me reference the case on November 29, 2005.

********** N A R R A T I V E # 24 **********

NA Reported By: RECAREY, JOSEPH 11/29/05
Entered By.: ALTOMARO, [redacted] A. 12/01/05

On November 29, 2005, at approximately 2:30 p.m. I received a telephone call on the department issued cell phone. Mr. Fronstin stated he was calling to relay information that Mr. Epstein wished he could relay. Mr. Fronstin stated that he would not allow Mr. Epstein to speak with me at this time. He further stated that Mr. Epstein is very passionate about massages. He continued that Mr. Epstein had allegedly donated over $100,000 to the Ballet of Florida for massages. The massages are therapeutic and spiritually sound for him that is why he has had many massages. Mr. Fronstin stated he appreciated the way the investigation has not been leaked out into the media. I explained to Mr. Fronstin that it is as important to protect the innocent if the allegations are not substantiated. Mr. Fronstin was told of the allegations that the private investigators assigned to the case have been portraying themselves as police officers. Additionally, I explained that my cell phone had been called by the private investigators. Mr. Fronstin advised he was not aware of that and advised they were under the direction of Attorney Roy Black in

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Miami. Mr. Fronstin further stated Epstein had originally called Mr. Dershorwitz in Boston, who recommended Roy Black in Miami, who asked Mr. Fronstin to assist. I informed him that if and when any charges would be presented I would notify him. The call was then terminated.

Investigation continues.

********** N A R R A T I V E # 25 **********

NA Reported By: RECAREY, JOSEPH 12/15/05
Entered By.: ALTOMARO, NICKIE A. 12/16/05

A review of the telephone message books, which were obtained during the search warrant, was conducted in which various messages from different dates were made to Jeffrey Epstein. The telephone message books have a duplicate copy (Carbon Copy) which, once a phone message is written into the book, the top copy is then torn on the perforated edge and the carbon copy is left in the book. First names of girls, dates and telephone numbers were on the copy of the messages. I recognized various numbers and names of girls that had already been interviewed. The body of the messages was time of the day that they called for confirmation of "work." Other names and telephone numbers were located in which the body of the messages were, "I have girls for him" or "I have 2 girls for him." These messages were taken by [redacted] for Jeffrey Epstein. Based on the context of the body of the messages, I requested subpoenas for subscriber information on the telephone numbers and the time frame involved. Copies of the messages were made for evidentiary purposes.

I obtained [redacted] High School yearbooks for 2005, 2004 and 2003. I first reviewed the 2005 yearbook and located most of the girls I had spoken with. Additionally, I located [redacted] Based on the corrected name spelling, I was able to locate her to her residence in Loxahatchee. On December 8, 2005, Det. Caristo and I responded to [redacted] in Loxahatchee. I located [redacted] at her home. She advised she is attending [redacted] High and is participating in the early release program so she can maintain her part time job. As she is still a minor, I left my business card to have her mother return my call to request an interview with her daughter. We then left the area.

I also had previously researched the telephone number for "[redacted] and telephone number [redacted] A subpoena had been issued for the information on [redacted]. The telephone number was registered to [redacted] of [redacted]. A query of [redacted] revealed that she is the daughter of [redacted] and is currently residing at [redacted] in West Palm Beach. Det. Caristo and I attempted contact with [redacted] with negative results. I left my business card on her front door requesting she return my call. We then responded to [redacted] in West Palm Beach. I also attempted contact with Mr. [redacted] with negative results. I left my business card for him to return my call.

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On December 9, 2005, I received a telephone call from [redacted], [redacted] mother, who was made aware of the on going investigation in Palm Beach. [redacted] advised she was told of everything that occurred at Epstein's house involving Epstein and his staff. She advised she would allow me to question her daughter about what occurred and would cooperate with the investigation. [redacted] provided me with [redacted] cellular telephone number to schedule an appointment for an official interview. I telephoned her cellular telephone and made a tentative appointment for Monday, December 12, 2005.

I then received a telephone call from [redacted] father of [redacted] who stated he found the business card on his door. I explained that I was conducting an investigation and needed to speak with [redacted] as she may have information that could assist in the investigation. Mr. [redacted] stated that his daughter no longer resides with him and has her own trailer in another trailer park. He advised he would tell her to call me.

On December 12, 2005, due to a conflict with schedules, arrangements were made to meet with [redacted] on Tuesday, December 13, 2005 at 5:00 pm. On December 13, 2005, Det. Dawson and I traveled to Loxahatchee and met with [redacted] During a sworn taped statement, [redacted] stated that when she was sixteen years old, she was taken to Epstein's house to provide a massage for money. [redacted] stated it was before Christmas last year when [redacted] approached her and asked if she needed to make money for Christmas; [redacted] stated she did and agreed to provide a massage for money. [redacted] made arrangements to take [redacted] to the house and drove [redacted] to the house to "work." [redacted] stated she could not remember the street name but would be able to drive to the street. They drove to the last house on the street and pulled in the last house on left side. They walked up the driveway and entered through a side gate which led to a kitchen door. They knocked on the door and were encountered by an employee who [redacted] described as a "Spanish looking lady." They informed her that they were expected. They were then encountered by a white female with long blond hair. [redacted] was unable to remember the name of the white female with blond hair but knew she was Epstein's assistant. She was led upstairs by the white female who explained that there would be lotions out already and Epstein would choose the lotion he wanted her to use. She was led through a spiral staircase which led to a master bedroom and bathroom. The massage table was already set up in the bathroom. [redacted] described the bathroom as a large spacious bathroom with a steam room and shower beside it with a sink to the right. [redacted] was introduced to Jeff who was on the phone when she entered. Jeff was wearing a white towel and lay on his stomach so that [redacted] may massage his feet and calves. [redacted] started the massage with the massage oil Jeff chose and rubbed his feet and calves. Jeff got off the phone and requested she massage his back as well. [redacted] began rubbing his back and got to the small of his back. During the rubbing of his back Jeff asked her to get comfortable. He

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requested she remove her pants and shirt. [redacted] removed her shirt and pulled her pants off. [redacted] stayed in her bra and thong panties. As she finished the small of the back, Jeff then turned onto his back. He instructed she rub his chest and pinch his nipples. As she began to rub his chest, Jeff asked her questions about herself. [redacted] remembered telling him she attended Royal Palm Beach High School. Jeff asked her if she was sexually active. Before [redacted] could answer, he also asked what sexual positions does she enjoy. [redacted] stated she was shy didn't like talking about those things. She continued rubbing his chest. Epstein reached up and unsnapped her bra from the front. [redacted] explained the bra she used had a front snapping device. Epstein rubbed her breasts and asked her if she like having her breasts rubbed. [redacted] said "no, I don't like that." Epstein then removed his towel and lay on the bed naked exposing his penis to [redacted] He began touching his penis and masturbated as he touched her breasts. [redacted] explained Jeff then touched her vagina area by rubbing her vagina with his fingers on the outside of her thong panties. [redacted] tensed up and stated Jeff was aware that she was uncomfortable.

[redacted] stated that Jeff told her , "Relax, I'm not going inside." She further explained Jeff commented to her how beautiful and sexy she was. Jeff then moved her thong panties to one side and now was stroking her clitoris. [redacted] said "Jeff commented how hard my clit was." He then inserted two fingers in her vagina and was stroking her within her vagina. She tried pulling back to pull out his fingers from within her vagina. Jeff removed his fingers from within her vagina and apologized for putting his fingers inside her. During this time he kept his hand on her vagina area rubbing her vagina. [redacted] stated he rubbed her real hard as he was masturbating. [redacted] said he climaxed onto the towel he had been previously wearing and got up from the table. Jeff told her there was $200.00 dollars for her on the dresser within the master bathroom. Jeff also told her that there was an additional $100.00 that was to be given to [redacted] for bringing her there to massage him. Jeff told her to leave her telephone number with his assistant as he wanted to see her again. Jeff stated his assistant would contact her to work again soon.

I asked her if she ever received any formal massage training to which [redacted] stated she did not. [redacted] stated it was the only time she ever went to work for Jeff and knew what happened to her was wrong. She stated she no longer speaks to [redacted] because she was upset that [redacted] took her there. She further stated that she had never been contacted for any additional work. The interview was terminated and we left the area.

Investigation Continues...

********** N A R R A T I V E # 26 **********
NA Reported By: DICKS, ALLEN C. 12/18/05
Entered By.: ALTOMARO, NICKIE A. 12/19/05

Case No. . . . : 1-05-000368 (Continued)

On 102005 at approx 0930hrs I assisted with the execution of a search warrant at 358 El Brillo Ave, Palm Beach.

Initially I was assigned to enter the residence and conduct a sweep of the premises for safety purposes. I then accompanied CSEU tech Pavlik while she photographed the exterior of the house. Once this was complete I was assigned to search certain areas of the house with Det. Dawson as part of the search warrant.

We began in the garage, searching three Mercedes Benz vehicles, a Harley Davidson motorcycle and adjacent closets in the garage. Nothing of evidentiary value was located.

We then searched two closets off the kitchen area on the east side. These can best be described as pantry or storage closets. Nothing of evidentiary value was obtained.

A small office with adjoining bath was then searched. In the bath area I located a phone message book with recent messages. This item was seized as evidence. Please note this bath and shower area are not used as designed but are storage areas containing a variety of items to include a gun safe in the shower and assorted household items.

We then searched a bath area and closet at the base of the main stairs in the foyer. Inside the closet two massage tables were located as well as partial nude female photographs. These items were later seized as evidence. Nothing of evidentiary value was noted in the bathroom.

We then searched two bedrooms upstairs on the east side of the residence. Located in the bath room of the south bedroom was penis shaped soap. Located in the bedroom of the northern bedroom was penis and vagina shaped soap as well as an adult sex toy. These items were seized as evidence.

We then searched the pool cabana located in the south west corner of the property. Several photographs of nude females were seized as evidence.

I was then assigned to stand by with a person I believe was Douglas Schoettle. Mr. Schoettle was in the residence at the beginning of the search warrant. He was present during the warrant service and subsequent search. I stood by with him until the search was completed and I departed the residence. I had no conversation with him regarding the reason for our presence.

Regarding seized evidence, all items were photographed in place and then collected by CSEU personnel.

This concludes my involvement in this case.

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********** N A R R A T I V E # 27 **********
NA Reported By: KRAUEL, CURTIS D. 12/21/05
Entered By.: ALTOMARO, NICKIE A. 12/21/05

On Thursday, October 20, 2005 at approximately 0936 hours, I assisted in the execution of a search warrant located at 358 El Brillo Way, Palm Beach, Florida, residence of Jeffrey Epstein. I was instructed by Case Agent Det. Joseph Recarey, to secure all computer and media related material from the residence.

Upon my arrival I was directed by Det. Recarey to a room designated as the Kitchen Staff Office. I observed a, Silver in color, CPU with the left side cover removed, exposing the CPU s hardware sitting on floor next to a glass type desk. The CPU had no discernable identifiers or features indicating a make or model. This CPU was powered off with the power cord not plugged in. The keyboard and mouse were atop the CPU. It should be noted that the CPU was not connected to a monitor, printer, or other media device. On the back Panel of the CPU, I observed an A/V card with RCA jacks attached. This type of hardware would allow audio and video to be downloaded onto the CPU s hard disk. The ends of the RCA jacks were unattached at the time of the search and no external camera was located within this room.

The CPU was located on the right side of a desk that held a flat panel LCD screen. The desk also held another keyboard and mouse, indicative of a second computer; however, no other computer was found. It appeared as though a second computer had been recently removed as the cables ends from the monitor, keyboard and mouse were in the same area. A further search of the room revealed no media storage devices, i.e. CD s, Floppy Disks, Zip Disks, etc. This type of media is commonly stored in an area where computers are placed, yet no media was found.

After completing a search of this room, I secured the CPU and turned all items over to the Evidence Custodian for future forensic analysis via a property receipt.

I was then directed by Det. Recarey to a room designated as the Garden Room, where I observed a wooden desk facing west. The desk held a flat screen LCD monitor, keyboard, mouse, media card reader and printer; however, no CPU was located. All of the cables were removed from an area where a computer had once been. A search of the desk area revealed no signs of any media devices.

Det. Recarey directed me to a third location designated as the Cabana room, which is detached from the residence and located just south of the pool. In the South East corner of the room, I observed an office type setting, with an L-shaped desk holding a flat screen LCD monitor, keyboard, mouse and printer; however, no CPU was located. All of the cables were removed from an area where a computer had once been. A search of the desk area revealed no signs of any media devices.

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Det. Recarey directed me to a second detached structure located on the South East corner of the property. This area of this structure was assigned with single letters to identify a particular part of the room. In the office area, designated as Room B, I observed a powered on Dell Dimension 2350, attached to an LCD flat panel monitor. The screen displayed an open Microsoft Internet Explorer browser with URL address of http://home.bellsouth.net/. I observed no other active windows in the Start panel window and photographed screen. The power cord was removed from the back of the Dell CPU and I disconnected the cable modem to prevent remote access. At that time, the Dell CPU, marked with Serial Number 6WTVN21, was secured and turned over the evidence custodian for future forensic analysis via property receipt. I also located several media related items within Room B, which were recorded onto a property receipt and turned over the Evidence Custodians.

I then responded to a Bedroom designated as Room F, where I observed a white in color CPU marked Premio. The Premio CPU was in a computer desk which held a white CRT monitor, both of which were powered on. The CRT monitor displayed a message from Norton Antivirus software, warning of an expired subscription. I observed no other active windows in the Start panel window and photographed screen. I removed the power cable from the back of the Premio CPU and shutdown all other media. The Premio CPU, marked with Serial Number 2000091078, was secured and turned over the evidence custodian for future forensic analysis via property receipt. I also located several media related items within Room F, which were recorded onto a property receipt and turned over the Evidence Custodians.

This concluded my participation in the search of the residence.

********** N A R R A T I V E # 28 **********
NA Reported By: RECAREY, JOSEPH 12/21/05
Entered By.: ALTOMARO, NICKIE A. 12/21/05

On December 20, 2005, I contacted ASA Daliah Weiss in an attempt to subpoena the Epstein former houseman, Alfredo Rodriguez. Rodriguez, who resides in Miami, had eluded the process servers previously and was not served the investigative subpoena. A telephone message was left as she is not available during the week of 12/19/2005. I made contact with State Attorney Inv Theresa Wyatt and requested the same via telephone message.

I then researched the victim's [redacted] cellular telephone subpoena data which had been received from a previous subpoena request. I analyzed the records which depict several calls from [redacted] [redacted] The telephone calls start on February 6, 2005 at 12:49 pm.; the same day which the victim and the victim's father stated the incident occurred at Epstein s house. The first incoming call was from [redacted] residence at [redacted] The second incoming call from [redacted]

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cellular phone [redacted] occurred at 1:02 pm. The call durations were one minute or less. The time frame was within thirteen minutes apart. It should be noted that [redacted] s residence was in close proximity to the victim's. The next call occurred at 5:50 pm when the victim telephoned [redacted] s residence. Several calls were made after the above mentioned calls both incoming and outgoing to [redacted] Further analysis showed no telephone calls to either [redacted] cellular telephone or [redacted] residence were registered prior to February 6, 2005.

Additionally, I also conducted an analysis on the telephone calls from [redacted]. The subscriber information confirmed that the number is registered to [redacted] A Lavery from Hialeah, Florida. The address was crossed referenced to the Office of Kiraly and Riley Private Investigators. I researched the web page www.rileykiraly.com which also showed various cases in which they assisted. I also located another web site under www.coralspringssparklandrotary.org in which Mr. Riley attended a Miami Rotary meeting and confirmed Atty. Roy Black is among his clientele.

The telephone calls revealed Lavery had telephone contact with [redacted] and [redacted] either just after I attempted to interview them, or just prior. A background was conducted on Lavery which revealed he holds a current Private Investigator License. A criminal arrest record revealed he had been previously arrested for possession of cocaine and solicitation of prostitution.

I also researched the girls using www.myspace.com. This web site is a new social networking service that allows members to create unique personal profiles online in order to find and communicate with old and new friends. The site allows one to establish your own myspace.com page and decorate the page any way one wishes. I found the following people have myspace sites: [redacted] and [redacted]

I received a Cingular Wireless packet which contained a CD which contained the results of the subpoena request for verbatim calls on [redacted]. An analysis will be conducted in the near future on the phone numbers called.

Investigation Continues.

********** N A R R A T I V E # 29 **********

NA Reported By: RECAREY, JOSEPH 12/27/05
Entered By.: ALTOMARO, NICKIE A. 12/29/05

Upon doing research on the message books recovered in the search warrant, I located the identity of "[redacted] The telephone number [redacted] was registered to [redacted] She currently is seventeen years old and is attending the Palm Beach Mall Academy. I

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responded to 1801 Palm Beach Lakes Boulevard, also known as the Palm Beach Mall. I located the Simon Youth Foundation. I located [redacted] inside the foundation and informed her that I was investigating a case against Jeffrey Epstein and knew she had been at the house. [redacted] started to cry and advised she had put that part of her life behind her. I explained that although she is seventeen years old I needed to inform her parents that she would be interviewed. She provided her home telephone number. I attempted contact and left voice mail messages at the house to speak with her parents.

Det. Caristo and I then located [redacted] at her residence located at [redacted] in West Palm Beach. I attempted to interview her about Jeffrey Epstein. She advised she is so in love with Jeff Epstein and would do anything for him. She further explained that she would not speak with us about him either negative or positive. She asked us to leave her property. I informed her that although she did not wish to speak with us, I had sufficient information at this point in the investigation to know she was at Epstein's house and provided girls to Epstein to work. I also explained that prior to our arrival at her residence I had telephone contact with her father, [redacted] who was told she would be interviewed. [redacted] is currently seventeen years old and as a juvenile, parental notification would be required. We then left the area and returned to the police station.

While at the police station, I left another telephone message for [redacted] parents. I began an analysis of [redacted] Cellular telephone. The telephone number [redacted] is assigned to [redacted] and the financially responsible party is Jeffrey Epstein of 457 Madison Ave. in New York City, New York. The time frame which was subpoenaed was September 2005, through October 2005. There were eighty seven pages of calls made either to the cell phone or from the cell phone. The local (561) numbers were analyzed. A spread sheet was prepared and placed into the attachment file of who was called.

The unknown numbers were researched using FoneFinder.com and subpoenas were requested to determine subscriber information. This was done to identify additional victims or witnesses. The analysis revealed that [redacted] had called the victim/witnesses frequently when Epstein was in the Town of Palm Beach to "work." This confirms what the girls interviewed had previously stated. [redacted] would notify them when Epstein was in town and their willingness to "work." The CD was placed into evidence.

Investigation Continues.

** ********** N A R R A T I V E # 30 **********
NA Reported By: RECAREY, JOSEPH 1/03/06
Entered By.: ALTOMARO, NICKIE A. 1/03/06

On December 29, 2005, I received a facsimile from National Compliance

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Center from Cingular Wireless for telephone number 561-[redacted] This was the telephone number for [redacted] during the time frame when the victim, [redacted] was brought to the Epstein house to "work." An analysis of the phone records, of all incoming and outgoing calls, showed that on February 6, 2005, the day the victim, [redacted] was brought to the house, [redacted] first called [redacted], Epstein's assistant, at [redacted] at 12:50 pm (EST). The next call was made to Epstein's house in Palm Beach, at 12:52 pm (EST). The following call was made to the victim, [redacted] at 1:01 pm (EST) and at 1:02 pm (EST). This confirms the information provided by the victim and victim's father. I photo copied the records and enlarged the page 8 of 10 to show the calls made by [redacted] on February 6, 2005.

To this date, I have not heard from [redacted]s parents. I will attempt to establish contact with them during the evening hours. I received a package from Atty. Guy Fronstin, which was hand delivered at the police station. Within the package, was a letter from Alan Dershowitz, and two www.myspace.com profiles. The profiles were that of [redacted] and [redacted] MySpace.com is a social networking service that allows members to create unique personal profiles online in order to find and communicate with old and new friends. This package was in response to a previous meeting in which Mr. Dershowitz called to assist in the investigation in providing any additional witnesses such as house employees who have been reluctant to speak with law enforcement.

I reviewed the profiles Mr. Dershowitz enclosed. [redacted] who designed her blog to be "[redacted] Fucking [redacted] " still attends Royal Palm Beach High School, sends and receives messages from friends which contain some profanity. Upon reviewing her friends' comments section from Myspace, most of her good friends sent messages to establish contact and invite her to go out.

I then reviewed [redacted] web blog which was provided by Mr. Dershowitz. Ms. [redacted] designed her blog to be "PimpJuice." Her blog states that her interests include music, theater and weed (Marijuana). I reviewed her packet in which [redacted] declares her love for her live-in boyfriend. She also describes using marijuana with her boyfriend [redacted]

The letter Mr. Dershowitz sent advised he was looking into the allegation that one of the private investigators used by the private attorneys of Epstein, attempted to impersonate or state that they were police officers from Palm Beach. Mr. Dershowitz advised that the investigators used to interview [redacted] had "quite a distinct speech impediment", did not claim to be nor did they impersonate themselves as a police officer. This package was sent to both ASA Lana Belohlavic and ASA Daliah Weiss at the State Attorney's Office.

I made telephone contact with ASA Weiss to confirm she received the package and request an interview with [redacted] and Janusz Banasiak. She advised she would assist in attempting to

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contact Mr. Dershowitz.

On January 3, 2006, I received a telephone call from ASA Weiss who informed me that she made telephone contact with Mr. Dershowitz. She had requested the employees be available the week of January 3, 2006. Mr. Dershowitz informed her that the assistants are out of the country and would require additional time to locate them and make them available.

Investigation Continues.

********** N A R R A T I V E # 31 **********

NA Reported By: MINOT, LORI S. 1/03/06
Entered By.: ALTOMARO, NICKIE A. 1/03/06

On Thursday, 03/31/05, I started conducting surveillance at 358 El Brillo. At this point I observed at 1155 hours, a Tan Altima bearing FL tag [redacted] in Roadway, Black SL bearing FL tag [redacted] in drive, Tan Honda Civic bearing FL tag [redacted] in Roadway, Black Chevy Suburban in driveway and a Black Caddy Escalade in driveway. At 1325 Hours I observed Tan Honda Civic [redacted] in roadway, Black Chevy Suburban in driveway, Black Caddy Escalade in drive and a White Kia car bearing FL tag [redacted] At 1615 hours I observed a Tan Honda Civic, [redacted] in roadway, Black Chevy Suburban in drive, Black Caddy Escalade in driveway and a White Kia car [redacted] in roadway.

On Friday, 04/01/05, I continued surveillance at 358 El Brillo. At 1130 hours I observed a Tan Honda Civic bearing FL tag [redacted] in roadway, Black Caddy Escalade in driveway and a Tan unknown make/model bearing FL tag [redacted] in roadway. At 1227 hours, I observed a Tan Honda Civic [redacted] in roadway, Black Caddy Escalade in driveway and a Black Chevy SUV located behind the Escalade. At 1345 hours, I observed a Tan Honda Civic [redacted] in roadway and a Black Chevy SUV in driveway. At 1558 hours, I observed a Tan Honda Civic [redacted] in roadway, Black Chevy SUV in driveway, Black Caddy Escalade in driveway and a dark unknown model/make car parked in garage.

On Saturday, 04/02/05, I continued surveillance at 358 El Brillo. At 0713 hours, I observed a Red Explorer bearing FL tag [redacted] in roadway and a Black Caddy Escalade in driveway. At 0814 hours, I observed a Red Explorer [redacted] in roadway, Black Caddy Escalade in driveway and a Tan Honda Civic [redacted] At 0952 hours, I observed a Red Explorer [redacted] in roadway, Black Caddy Escalade in driveway, Tan Honda Civic [redacted] in roadway and also a Grey unknown make/model with a B.M in trunk retrieving landscaping tools.

At 1155 hours, I observed a Grey Camaro bearing FL tag [redacted] parking in the roadway in front of 358 El Brillo. A W/F, blond hair, teens to early 20's, thin and tall wearing a white tank top and short blue jean shorts, exited the vehicle and walked to the rear of the house. I also observed a Red Explorer [redacted] in roadway, Tan Honda Civic [redacted] in roadway and a Black Caddy Escalade in driveway. At 1310 hours, I

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observed a Red Explorer W/F driver leaving the area, Tan subcompact on roadway and a Red Neon bearing FL tag [redacted] Then observed 3 W/Fs, approximately 16 to 18 years of age jogging. All 3 females ran into the driveway. There were 2 with blond hair and one brown hair.

On Sunday, 04/03/05, I continued surveillance at 358 El Brillo. At 0719 hours I observed a Tan Honda Civic [redacted] in roadway and a Black Caddy Escalade. At 0934 hours, I observed a Tan Honda Civic [redacted] in roadway and a Black Caddy Escalade in driveway. At 1057 hours I observed only the Tan Honda Civic [redacted]

On Tuesday, 04/05/05, I continued surveillance at 358 El Brillo. At 1052 hours, I observed a Red Explorer [redacted] in roadway, a Green Explorer, bearing FL tag [redacted] in roadway, a Grey Altima bearing FL tag [redacted] in roadway, White Ford Truck [redacted] in roadway, Black Mercedes in driveway being washed by a B/M and an unknown dark car parked in the garage. At 1059 hours a Blue Chevy Suburban drove to the house of 358 El Brillo and parked in the driveway. At 1119 hours, I observed the White Fort Truck [redacted] leave the area and the drive was the pool man.

At 1126 hours, I observed a Grey unknown make/model car park in roadway. W/M got out of the car and walked to a house on the south side of El Brillo. At 1406 hours, I observed a Red Explorer parked on roadway and a large white box truck parked behind the surveillance suburban.

********** N A R R A T I V E # 32 **********

NA Reported By: BATES, MICHAEL J. 1/03/06
Entered By.: ALTOMARO, NICKIE A. 1/03/06

On 03/31/05, at approximately 1500 hours while conducting surveillance at 358 El Brillo, I observed a Black Cadillac Escalade, unknown tag, a Black Chevrolet Suburban, unknown tag, a Black Mercedes S600 FL tag U90BQL parked in the east driveway next to the 3-car garage. There was a Tan Honda Civic FL tag [redacted] parked on the street in front of the residence.

At approximately 1700 hours, I observed the Black Suburban, Black Escalade, Black Mercedes and Tan Honda Civic parked in the same place. At 1750 hours, there was no change in vehicles. At 1840 hours, I observed the Black Escalade, Black Suburban and Black Mercedes along with a Silver Hyundai Accent FL tag [redacted] all parked in the east driveway and a Red Ford Explorer FL tag [redacted] parked on the street in front of the residence.

At 2000 hours, I observed the Black Escalade, Black Suburban parked in the ease driveway and the Red Explorer and Tan Civic parked on the street.

On Friday, 04/01/05 at approximately 1700 hours, I observed the Black

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Escalade and Black Suburban parked in the east driveway and the Tan Honda Civic parked on the street in front of the residence. At 1820 hours, I observed the Suburban and Civic in the same place and a Gold Chevrolet Camaro FL tag [redacted] parked on the street in front of the residence. At 2250 there was no change. At 2330, I observed the Black Escalade parked in the driveway and the Red Explorer parked on the street in front of the residence.

On Saturday, 04/02/05 at approximately 1700 hours, I observed a Black Escalade, unknown tag, parked in the driveway and a Tan Honda Civic FL tag [redacted] parked in the street in front of the residence. At 1805 hours the Escalade and Civic were in the same position and the Black Mercedes FL tag [redacted] was also parked in the east driveway. At 1920 hours the Escalade and Civic were the only vehicles and both were in the same position. At 2030 hours and 2145 hours there were no vehicles observed.

At 2115 hours, I observed a Black Mercedes, 4-door parked in the east driveway FL tag [redacted]. At 2300 hours, 2350 hours and 0045 hours, the Black Mercedes was the only vehicle observed.

********** N A R R A T I V E # 33 **********

NA Reported By: RECAREY, JOSEPH 1/05/06
Entered By.: ALTOMARO, NICKIE A. 1/05/06

I made contact with Mr. [redacted]ton [redacted] father of [redacted] who was told that I wished to interview his daughter. Mr. [redacted] stated he was aware and had spoken with his daughter about the incident. He stated that his daughter had previously told him that she was hired to model lingerie at a Palm Beach mansion. Mr. [redacted] stated he knew nothing else about what she did when she went to "work." Mr. [redacted] advised he would cooperate with the investigation and make his daughter available for interviews. I asked if she was available for an interview, [redacted] stated she was not at home at the moment. I informed him I would make contact with her at a later time. Mr. [redacted] expressed his interest in the resolution in this matter as he stated this information has affected his daughter emotionally.

On January 4, 2005, I acquired the subpoenas from the State Attorney's Office for Cingular Wireless, Metro PCS, Verizon, Bell South Telecommunications and Sprint for the unknown telephone numbers from [redacted] cellular telephone. The subpoenas were sent to the respective telephone carriers for subscriber information.

I received a telephone call from State Attorney's Office, who informed me that the former houseman for Jeffrey Epstein, Alfredo Rodriguez, was present at the State Attorney's Office for an interview. Rodriguez was issued an investigative subpoena for an interview on the on-goings at Epstein's house during his employ. I responded to the State Attorney's Office and encountered Mr. Rodriguez waiting in the lobby. I brought Mr. Rodriguez to the interview room.

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During a sworn taped statement, Mr. Rodriguez stated he was employed by Jeffrey Epstein for approximately six months. He was referred by associates and his employment lasted the months of November 2004 through May 2005. His responsibilities as house manager included being the butler, chauffer, chef, houseman, run errands for Mr. Epstein and provide for Epstein's guests. Rodriguez advised he had very limited contact with Mr. Epstein. If Rodriguez needed to relay a message to Mr. Epstein, he would have to notify Epstein's secretary "Leslie" in New York City, who would then notify Epstein's personal assistant, [redacted], who would relay the message to Epstein. Rodriguez stated Epstein did not want to see or hear the staff when he was in residence.

I asked Rodriguez if Epstein received many guests during his stay in Palm Beach. Rodriguez advised he had many guests. I asked specifically about masseuses coming to the house. Rodriguez stated he would have two massages a day. Epstein would have one massage in the morning and one massage in the afternoon everyday he was in residence. Rodriguez stated he would be informed to expect someone and make them comfortable until either [redacted] or Epstein would meet with them.

Rodriguez stated once the masseuses would arrive, he would allow them entry into the kitchen area and offer them something to drink or eat. They would then be encountered by either [redacted] or Epstein. They would be taken upstairs to provide the massage. I asked Rodriguez if any of the masseuses appeared young in age. He advised he didn't ask their ages but felt they were very young. Rodriguez stated they ate like his own daughter who is in high school. Rodriguez stated they would eat tons of cereal and drink milk all the time. Rodriguez stated the girls that would come appeared to be too young to be masseuses. He stated one time under Epstein's direction, he delivered a dozen roses to [redacted] High School for one of the girls that came to provide a massage. He knew the girls were still in high school and were of high school age. I asked Rodriguez about the massages. He felt there was a lot more going on than just massages. He would clean Mr. Epstein's bedroom after the alleged massages and would discover massager/vibrators and sex toys scattered on the floor. He also said he would wipe down the vibrators and sex toys and put them away in an armoire. He described the armoire as a small wood armoire which was on the wall close to Epstein's bed.

Epstein ordered Rodriguez to go to the Dollar rent a car and rent a car for the same girl he brought the roses to, so that she could drive her self to Epstein's house without incident. Rodriguez said the girl always needed rides to and from the house. Rodriguez referred himself as a "human ATM machine" and was ordered by Epstein to maintain a minimum balance of $2,000 dollars on him at all times. When a girl would come by the house and Mr. Epstein was either not in residence or was not at home at the time, Rodriguez was to provide the girl (masseuse) several hundred dollars for their time and to notify Epstein the amount they were given. Epstein also ordered Rodriguez to

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purchase several gifts and provide them as tips to the girls. I asked what kind of gifts. Rodriguez stated he purchased IPODS, jewelry, anything the girls would want.

Rodriguez stated the amount of girls that came to the house was approximately fifteen. Each of the girls knew each other and all seemed to know at [redacted] High School who Mr. Epstein was. When asked to identify these girls, Rodriguez stated he could not at the moment but knew he wrote their names down on a journal he kept during his employ with Mr. Epstein. He kept a journal in the event he needed to explain either to Mr. Epstein or his assistants what was done at the house or who visited the house as he stated he was in-charge of Mr. Epstein's personal security while in Palm Beach. I informed him I would need to view this journal to which he stated he would research the book and contact me to provide the book. The interview was concluded and left the area. I returned back to the police station where the micro cassette was placed into evidence. At approximately 7:20 pm, I was notified Rodriguez located the journal and would call me on January 5, 2005 to provide the journal.

Investigation Continuesàà

********** N A R R A T I V E # 34 **********

NA Reported By: RECAREY, JOSEPH 1/09/06
Entered By.: ALTOMARO, NICKIE A. 1/10/06

On January 5, 2006, I attempted to meet with Alfredo Rodriguez to recover the folder or journal in which he kept the notes that were given to him during his employ with Mr. Jeffrey Epstein. He kept this folder to justify what he did during his employ should the need arise to justify what occurred with the monies he had to keep or any questions as to the petty cash he withdrew from the household account from the bank. At approximately 10:00 pm, I attempted contact with Mr. Rodriguez and discovered he was assisting his wife at her place of employment and would not be able to meet with me. Mr. Rodriguez stated he would meet with me on January 6, 2006, in Broward County, in the morning hours.

On January 6, 2006, at approximately 9:00 am, I received a telephone call from Mr. Rodriguez who advised he had the file in hand and would be traveling northbound to meet with me in Broward County. At 10:50 am, I met with Alfredo Rodriguez at the parking lot of Bank of America in Boca Raton on Yamato Road and Military Trail (known as the Polo Center). Rodriguez produced a green folder which contained documents, a note with Mr. Epstein's stationary with direction to deliver a bucket of roses to [redacted] High School after [redacted] ([redacted] high school drama performance. Also in that same note was direction to rent a car for [redacted] ([redacted] and direction to extend the rental contract. I returned to the Palm Beach Police Station and placed the folder into evidence.

I received a fax from Verizon from the subpoena request sent on

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01-04-06, for telephone number [redacted]. The phone number is registered to Dr Perry Bard, from West Palm Beach. Dr. Bard is a chiropractor and has an office located 4275 Okeechobee Blvd in West Palm Beach. The cellular number is Dr Bard's personal cellular number.

On January 9, 2006, Det. Caristo and I traveled to [redacted] in Palm Beach Gardens in an attempt to locate [redacted] who had been previously seen on the property and identified through her Florida Drivers License and Florida license Plate. A business card was left for her to return my call. We then traveled to the Simon Youth Foundation and located [redacted] agreed to speak with us and in a private room within the school provided us a taped statement.

During the statement, [redacted] advised that when she was fifteen or sixteen years of age, she was taken to Jeffrey Epstein's house by her associate, [redacted] stated this occurred late May 2004 or early June 2004. She was told she could model lingerie for money for a wealthy Palm Beacher. She remembered they traveled by yellow cab from their residence in West Palm Beach to Epstein's house. She remembered encountering Epstein at the front door during the evening hours.

He introduced himself and brought them into the kitchen so that the chef could prepare something for them to eat. After having a meal, [redacted] and Epstein brought [redacted] upstairs to a master bedroom which had a large bathroom. She observed a large style shower, sauna and there was a large massage bed also in the bathroom. Epstein entered a room within the bathroom and came out wearing only a towel. [redacted] said they would provide a massage on his feet. [redacted] asked why they are doing this. [redacted] told her this was part of the routine and told her to rub his legs and calves. Epstein had told [redacted] to get comfortable. [redacted] continued rubbing Epstein's calves and feet. At Epstein's direction, [redacted] then left the room leaving [redacted] there by herself. Epstein told [redacted] to get comfortable. [redacted] removed her blouse and pants and stayed in her panties. [redacted] stated she was not wearing a bra. She believed she was wearing thong panties. Epstein turned over onto his back and began touching her. Epstein touched her breasts and began touching her in her vagina area. Epstein instructed her to rub his chest and rub his nipples. [redacted] stated the touching consisted over the panties on the first time; he stroked her vagina but stayed on top of the panties. During the first massage, she stated Epstein was stroking her and began masturbating himself at the same time. He put his hands under the towel and appeared as to masturbate himself however she never saw his penis. She continued rubbing his chest until he grabbed her and pulled her closer to him. He appeared to have climaxed because after he pulled her closer to him the massage was over. Epstein had told her that there was two hundred dollars for her on the dresser. He told her that she could not tell anyone what happened at the house or bad things could happen. [redacted] stated she went to Epstein's house three

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or four times total. [redacted] was very scared and felt very nervous. She knew because of Epstein's money he was powerful. After the massage, Epstein ordered his houseman at the time to drive the girls home. The employee was to drop off the girls at their house and watch them go inside their house.

[redacted] could not remember who the houseman was. She stated Epstein and his assistant [redacted] would call her at her father's house to arrange for her to come and "work." She advised each time she returned to the house, Epstein would do the same thing. [redacted] stated it was a routine with Epstein. She would rub his feet and calves. He would then turn over and begin to touch her on her vagina area. The only difference was that it was done without panties. Epstein's fingers would stroke her vagina area as he would masturbate and finally climax and the massage would be over. She was paid $200.00 each time she went. Each time she went she was reminded not to speak of what happened at the house and that she would be contacted again. She began to purposely miss the calls when either [redacted] or Epstein would call her. She once brought a friend, "[redacted] unknown last name, to work for Epstein. She was paid $200.00 for bringing [redacted] [redacted] stated she no longer retuned to work for Epstein. She also stated that she wanted to notify the police of what happened at the house. [redacted] stated she was scared of what could have happened to her or her family if she notified authorities.

On January 10, 2006, I received the results from the subpoena from BellSouth Telecommunications for telephone number 561-[redacted] The number is assigned to Mr. [redacted], [redacted] father in Palm Beach Gardens. I also received the results from Western Union which confirmed the money order sent to [redacted] from Jeffrey Epstein in New York City. The "wire" was sent by Jeffrey Epstein of 457 Madison Ave in New York City on December 23, 2004 at 12:05 pm. The amount of $222.00 was charged to Epstein's credit card so that [redacted] could receive $200.00 in Royal Palm Beach. The twenty-two dollars was for processing and local fees to send the money via Western Union. A copy of the check presented to [redacted] was also attached to the receipt of the wire. This confirmed what [redacted] advised she received as a Christmas bonus from Epstein.

Investigation continues.

********** N A R R A T I V E # 35 **********

NA Reported By: RECAREY, JOSEPH 1/10/06
Entered By.: ALTOMARO, NICKIE A. 1/10/06

I received and reviewed the Cingular Wireless results from the subpoena requests for subscriber information for telephone numbers [redacted], [redacted] and [redacted]. The first number, [redacted], is assigned to Janusz Banasiak in care of Jeffrey Epstein of 457 Madison Ave in New York City. Banasiak is the current houseman/house manager for 358 El Brillo Way in Palm Beach, Fl 33480. The second number, [redacted], is assigned to [redacted] of

Case No : 1-05-000368 (Continued)

[redacted] in West Palm Beach. Research conducted on [redacted] revealed she is a licensed Massage therapist with a Florida conditional/active license number [redacted]. [redacted] had been previously arrested for battery / unwanted touching and DUI. Requests for copies of the reports involving the arrests were requested from the Palm Beach County Sheriff's Office. The last number [redacted] is assigned to [redacted] Rofrano of 9850 Alt A1A in Palm Beach Gardens. Research on Mr. Rofrano, revealed that he is a Florida Chiropractic Physician.

Vehicles that were previously documented on the property while surveillance was being conducted were researched. I determined a tan Chevrolet Camaro, bearing Florida license [redacted] was seen on the property in which a young white female was seen entering the Epstein property. Research was conducted which revealed that the vehicle is registered to [redacted] of Lake Worth. Mr. [redacted] has two daughters, [redacted] and [redacted] is currently residing in Connecticut and [redacted] is residing with her father in Lake Worth. Research on [redacted] revealed she was recently involved in a traffic stop in Lake Clarke Shores in [redacted]. A request to discover any information from the stop was requested.

I spoke with ASA Daliah Weiss who informed me that Janusz Banasiak will be available for an interview tomorrow at the State Attorney's Office in West Palm Beach at 1:30 pm. I informed her that I would be at her office for the interview.

********** N A R R A T I V E # 36 **********

NA Reported By: RECAREY, JOSEPH 1/23/06
Entered By.: ALTOMARO, NICKIE A. 1/23/06

On January 19, 2006, Det. Caristo and I met with [redacted] at [redacted] in Palm Beach Gardens. [redacted] was identified as a licensed massage therapist who had previously been seen on Epstein's property when physical surveillance was done. [redacted] was told of the on going investigation and I felt she may have information pertaining to the case. During a sworn taped statement, [redacted] stated she met Epstein three years ago when Ghaline Maxwell approached her while she was attending Palm Beach Atlantic College to work around Epstein's house. Maxwell had told her that they needed some girls to work at the house to answer phones and run errands. [redacted] accepted the job and began working at Epstein's house on El Brillo in Palm Beach. [redacted] stated it was a part time job during the time she went to Palm Beach Atlantic College. She continued going to Epstein's house and would be notified when Epstein would travel to Palm Beach. [redacted] advised she would be notified by Maxwell, Epstein or [redacted], his assistant, when he would travel to Palm Beach. [redacted] stated she began providing massages to Epstein before she became a massage therapist. She continued giving massages not only to Epstein but to [redacted] and [redacted] his assistant. [redacted] was asked about what occurred during the massages. [redacted] stated as she was twenty

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three years old when she met Epstein, anything that happened was between two consenting adults. I explained to her that she was not in any trouble however as part of this investigation, I needed to ask certain questions. [redacted] stated that there were times that Epstein would ask her to perform during the massage. He would instruct her to rub his nipples as he masturbated himself. [redacted] stated she felt "grossed" about the behavior but as she was getting paid, she just continued. [redacted] also advised she would on occasion perform the massages naked. Epstein would on occasion, utilize the vibrator/massager on her vagina area when she performed the massages. Sjoberg explained that Epstein never exposed himself to her as he maintained himself covered under the towel he would be wearing. When Epstein would masturbate he would be covered.

I asked if [redacted] ever received any gifts, or any gratuities from Epstein. [redacted] advised aside from being paid well, she advised Epstein took care of her tuition from Palm Beach Atlantic College. She received a rental car for a week when her scooter broke down.

Additionally she received other gifts from Epstein. Epstein also recommended her to another client who resides at Breakers Row in Palm Beach. The client she was referred to was "Glenn" unknown last name, and his wife, who she provided a massages to. The statement was concluded and placed into evidence upon our return to the Palm Beach Police Department.

While at the police station, I researched Florida tag [redacted] which was also previously seen on the property when there was physical surveillance being done at the property. The vehicle is registered to [redacted] of Lake Worth, Florida. Researching Mr. [redacted] and the vehicle revealed that his daughter, [redacted] had been driving the vehicle and was cited for unlawful speed in Lake Clark Shores. The vehicle is a tan, Chevrolet Camaro, 2-door. I researched [redacted] date of birth, [redacted] resides at [redacted] in Lake Worth. [redacted] has a my space page called [redacted] In her web page, shows various photos of [redacted] photographed at a beach. An interview is forthcoming.

A review of the video disks which was extracted at the Palm Beach County Sheriff's Office Computer Crime Unit revealed that only one hidden camera was functional at the time. Several images of Epstein working at his office were seen. Additional footage of [redacted] and [redacted] was seen. There was other footage of females seen. The identity of the females is unknown at this time, until such time as I meet with certain females to show the video footage to confirm if, in fact, it is them on the video. At this time it appears that [redacted] and [redacted] are seen sitting with Epstein beside his desk in the evening hours. Due to poor lighting, a direct confirmation cannot be made at this time.

Inv. Continues.

Case No. . . . : 1-05-000368 (Continued)

********** N A R R A T I V E # 37 **********

NA Reported By: RECAREY, JOSEPH 1/30/06
Entered By.: ALTOMARO, NICKIE A. 1/30/06

On January 25, 2006, Det Caristo and I, responded to [redacted] in Lake Worth and met with [redacted] stated last year, when she was seventeen years of age, she met Jeffrey Epstein through her former room mate [redacted] was allegedly dating Epstein at the time. [redacted] and [redacted] had once cohabitated together when they modeled. [redacted] explained [redacted] called her on her telephone and advised her that she was in Palm Beach and requested to see her. [redacted] made arrangements to meet with her at Epstein's house. [redacted] arrived and met Epstein and [redacted] and [redacted] went to the Palm Beach Mall together and went shopping. [redacted] advised that [redacted] and she had received money from Epstein to go to the mall. They visited Victoria's Secret and purchased undergarments from the store utilizing monies given by Epstein. [redacted] advised she purchased one item and [redacted] purchase various items. The money used to purchase the items was the money given by Epstein.

[redacted] and [redacted] continued shopping and having a day together. [redacted] stated [redacted] explained how she and Epstein have been dating each other and he has been paying all of her bills. [redacted] claimed [redacted] advised they met in New York and had been dating ever since. They later returned to Epstein's home and encountered Epstein. He had a brief conversation with [redacted] about her modeling career. He knew of her modeling career from [redacted] He requested to see her modeling portfolio and explained that he could help her with modeling jobs. [redacted] had her book with her to show [redacted] and showed the book to Epstein. He commented negatively about her photographs and portfolio. [redacted] felt uncomfortable with the comments made as she had been working with other professional modeling companies who had offered her work from her photographs. Epstein requested to see what was purchased at the mall. [redacted] took out the undergarments which were purchased. She immediately showed Epstein different sets purchased. Epstein then requested to view what [redacted] purchased. [redacted] was reluctant to show the outfit however since it was Epstein's money that purchased the item, she pulled it out of the bag. Epstein asked her to try it on. [redacted] looked at [redacted] who told her "yeah, try it on." Feeling compelled to try the undergarment outfit on; she went to another room and put on the bra and panty set. She walked out to the living room where they were sitting, and modeled the suit. She then went back into the other room and changed back into her clothes. [redacted] returned into the room and told [redacted] she would be going home. Burns scheduled another day for [redacted] to return for massages with her.

[redacted] stated within that same week, she returned to meet with [redacted] and have a massage. [redacted] had told her that she would be unable to stay with her as she would be going on a bike ride with Epstein. [redacted] explained she could stay at the house and take advantage of the massage.

Case No. . . . : 1-05-000368 (Continued)

[redacted] stated she met with an unknown massage therapist and had the table already set up in a guest room. [redacted] removed her clothing, leaving her panties on, and wrapped herself with a towel for the massage. [redacted] remembered that the door to the guest room was closed but not locked. As the therapist was working her back, the door was opened by Epstein and entered into the room. [redacted] was trying to conceal herself as Epstein was talking to her about his chiropractic session. Epstein told [redacted] turn over onto her back. [redacted] eventually turned over exposing her breasts to Epstein as he applied pressure on her shoulder and her waist. [redacted] stated Epstein "popped" her back. [redacted] removed her self from the table, got dressed and left the house. [redacted] further stated [redacted] had attempted to call her on several occasions to invite her back to Epstein's house to which [redacted] replied "I'm busy." [redacted] advised she has not had contact with either [redacted] or Jeffrey Epstein. It should be noted that her mother, [redacted] was present during the interview. The interview was concluded and we thanked them her for their time.

********** N A R R A T I V E # 38 **********

NA Reported By: RECAREY, JOSEPH 1/31/06
Entered By.: ALTOMARO, NICKIE A. 1/31/06

On January 27, 2006, I made telephone contact with [redacted], at [redacted]. [redacted] is a licensed massage therapist who had frequented the home of Jeffrey Epstein. Ms. [redacted] has been unable to meet with me in Palm Beach County, and because she lives and works in Port St Lucie, a telephone interview was conducted. I explained to Ms. [redacted] that there was an on going investigation involving Jeffrey Epstein.

[redacted] stated she knows Epstein and has been employed by him for approximately three years. Epstein has paid [redacted] to perform Swedish Massages (Deep Tissue) on him and other guests. [redacted] explained that approximately three year ago she met Ghislaine Maxwell and Jeffrey Epstein through a mutual friend. Epstein and Maxwell were looking for a massage therapist. [redacted] stated since that time, she is notified when Epstein is coming to Palm Beach. [redacted] stated she comes to his house and provides the massage or massages. [redacted] explained she has also massaged his guests and assistants. [redacted] continued that she is paid $100.00 and hour for the massage.

I asked [redacted] if anything occurred during the massage that would have made her feel uncomfortable. [redacted] stated she only provided massages and that was it. She never was approached for anything else. I asked if Epstein ever asked her to rub his chest she stated she would not rub his chest as that is not part of her massage. [redacted] explained that she was not Epstein's type. The girls she would see at Epstein's house were very thin, beautiful and without tattoos. [redacted] explained she has several tattoos that are visible. Maxwell and Epstein have commented negatively about her tattoos previously when she has provided massages.

Case No. . . . : 1-05-000368 (Continued)

[redacted] stated she only provided massages for Epstein and his associates and nothing happened during those massages. [redacted] stated as she does Swedish style massages, the patient is usually sore after the massages. I thanked her for her assistance and the interview was concluded at this time.

I received a facsimile from T-Mobile Cellular service on telephone number [redacted], which is assigned to David Rodgers, pilot for Mr. Epstein, who resides in Lake Worth. Rodgers' telephone number was dialed on several occasions by [redacted]. A background on Rodgers indicated he has a valid FAA pilot license First Class for the Southern FAA Region. Rodgers has another historical FAA license for Airline Transport Pilot.

Investigation Continues.

********** N A R R A T I V E # 39 **********

NA Reported By: RECAREY, JOSEPH 2/14/06
Entered By.: ALTOMARO, NICKIE A. 2/16/06

On Friday, February 3, 2006, I had made arrangements to meet with [redacted] at the Palm Beach Police Station. At approximately 1:00pm, [redacted] and her friend, [redacted] arrived at the police station. During an interview with [redacted] she stated she met Epstein when she turned eighteen years old and was brought to Epstein's house to provide a massage. She advised this occurred on May of 2005. She advised [redacted] had informed her if she wanted to provide a massage for $200.00. [redacted] agreed and was brought to Epstein's house to provide a massage. [redacted] stated she had been to the house on many occasions during the massage sessions. [redacted] also stated she would remove her clothing to provide the massage on Epstein. [redacted] advised Epstein would pay her $300.00 to rub his back, legs and chest. During the massages, Epstein would masturbate himself as she rubbed his chest. I asked her if Epstein ever touched her breasts during the massages. [redacted] replied. "Yes." I asked her if Epstein ever touched or massaged her vagina. [redacted] stated he had on several occasions. I asked her if he ever penetrated her with either his penis or any other objects. [redacted] stated that during a massage he inserted his fingers in her vagina as she massaged him. She stated this occurred one time only. [redacted] stated the massage would be over when Epstein would climax onto a towel. I asked [redacted] if she had any formal massage training to which she replied that she did not. [redacted] was then asked if she ever brought anyone to the house to "work." [redacted] stated she brought two people to the house. She advised she received money for bringing people to the house to "work." [redacted] stated she brought a girl named "[redacted] and her friend [redacted] was still waiting for [redacted] in the lobby of the police station. I thanked [redacted] for her time and her cooperation and escorted her to the lobby.

I asked Ms [redacted] if I could speak with her about this investigation. I

Case No. . . . : 1-05-000368 (Continued)

brought her to the interview room and explained to her that I was conducting an investigation on Jeffrey Epstein and felt she may have information pertaining to the investigation. Ms [redacted] identified herself as [redacted] and resides in Wellington, Florida. She advised approximately a year ago she was brought to Epstein's house to provide a massage for money. [redacted] stated she needed to make money and felt it was a quick way to make some money. [redacted] stated she was brought to the house by [redacted] and was introduced to Epstein and his assistant. She was brought to his main bathroom and provided a massage. I asked her if she provided the massage naked. [redacted] stated she did. She rubbed Epstein's legs, back and chest. I asked [redacted] if Epstein touched her during the massage. She advised he did not, however he did masturbate himself as she rubbed his chest. Once he climaxed the massage was over. She was paid her money and left the area. [redacted] advised it occurred one time and she never returned to Epstein's house. The interview was concluded and [redacted] was escorted to the lobby.

I located a telephone number for [redacted] and attempted to contact her on several occasions. I called 561-[redacted] and spoke with Ms. [redacted] who advised she would speak with me in Deerfield Beach where she resides. Due to a scheduling conflict, we were unable to meet. I informed her I would contact her to schedule another appointment to speak with her about this investigation. I have attempted to meet with her and make telephone contact with negative results.

On February 13, 2006, I met with David Rodgers at [redacted] in Lake Worth. Rodgers was identified as Epstein's pilot. I spoke with Rodgers who advised he has been employed with Epstein since 1991. He flies both planes for Epstein depending where he wants to fly to. Rodgers was asked about passengers in the plane he flies. Rodgers stated unless Epstein flew to his island off of St [redacted] there would be no way of knowing who the passengers were. I mentioned a recent flight to Ohio, where Rodgers flew to Ohio to pick up [redacted] Rodgers stated he recalled flying on several occasions and did remember [redacted] Rodgers stated once he is in the cockpit, he does not know who the passengers are. When he prepares the passenger manifests, he lists Epstein and his assistants he knows by name, [redacted] and [redacted]. Rodgers stated he would list either female or male passengers on the manifests only to keep a count on the passengers. Mrs. Rodgers came into the living room and recommended that her husband consult with an attorney. Mr. Rodgers agreed he would speak with the family attorney to inform him of this questioning. I explained to Mr. Rodgers that he was not the suspect in this investigation and ceased all questions. Based on the fact Rodgers could not advise who passengers were in the plane, I then left the area.

I attempted to locate [redacted] at [redacted] in Wellington. I left my business card for her to return my call. On February 14, 2006, at 12:06 pm, I received a call back from Ms. [redacted]

Case No. . . . : 1-05-000368 (Continued)

on my voice mail. Ms [redacted] left her telephone number for a return call 561-[redacted] I left her a message to return call.

Investigation Continues..

********** N A R R A T I V E # 40 **********

NA Reported By: RECAREY, JOSEPH 2/21/06
Entered By.: ALTOMARO, NICKIE A. 2/22/06

On February 15, 2006, I made telephone contact with [redacted] who provided directions to where I could locate her. Det Caristo and I responded to [redacted] in Lake Park to meet with [redacted] Upon my arrival, I met with [redacted] in the parking lot directly behind MAACO Auto Painting. She was advised I was there to speak with her about an ongoing investigation that concerned Jeffrey Epstein in Palm Beach. [redacted] stated she knows Epstein very well and did not want to speak with me about Mr. Epstein. She was very fond of Epstein and did not want to speak with me about anything concerning Jeffrey Epstein. I explained to her that she was seen at the house and I would like to speak with her. She stated she knew there was an investigation and that I had spoken with other people and therefore I should know what happened at Epstein's house. [redacted] ended the conversation and walked back into her boyfriends business, [redacted] Automotive. Det Caristo and I left the area and returned to the police station.

Investigation continues.

********** N A R R A T I V E # 41 **********

NA Reported By: RECAREY, JOSEPH 4/10/06
Entered By.: ALTOMARO, NICKIE A. 4/10/06

A Grand Jury Session was requested during the month of February 2006, in which all the girls that had been interviewed would have been called to testify before the Grand Jury to seek an indictment against Jeffrey Epstein. Due to subsequent meetings with the State Attorney's Office and Defense Attorney Alan Dershowitz the Grand Jury was postponed until a later time. Dershowitz had provided a package of material on the main victims in this case in which they appear on myspace.com and speak about alcohol use and some marijuana use. The State Attorney's Office wanted time to review the material.

I requested additional subpoenas from the State Attorney's Office in which I requested information from Dollar Rent a Car and Jet Aviation. The information requested from Dollar Rent a Car was for the rented vehicle by Alfredo Rodriguez while under the employ of Epstein for one of the victims. The other subpoena requested was for Jet Aviation for dates and times when Epstein's planes were in Palm Beach County.

I continued to research other names that were acquired either from interviews or intelligence gathered during the investigation. I

Case No. . . . : 1-05-000368 (Continued)

located [redacted] in Royal Palm Beach. I responded to [redacted] in Royal Palm Beach. During the interview, [redacted] stated she knew I would be speaking with her. [redacted] stated she was first introduced to Epstein when she turned eighteen years old. [redacted] stated she was sure of her age as it was her senior year in [redacted] High School. She advised she was brought there to make money and was told she would have to provide a massage to this Palm Beach guy. She remembered she met Epstein and his assistant [redacted] in the kitchen area. She stated she was taken by one of her friends, [redacted] She stated she went upstairs with [redacted] while Epstein got ready for the massage. He exited his bathroom naked and [redacted] turned around. Epstein asked her if being naked offended her. [redacted] stated it made her uncomfortable. Epstein then put on a towel and lay on the table. [redacted] stated she rubbed his back and feet. She stated she had no massage training or experience. [redacted] stated during the massage, Epstein attempted to touch her buttocks. [redacted] pulled away as he touched her buttocks. She told him again she was uncomfortable with him touching her. Epstein then cut the massage short and became upset with her. Epstein paid her $200.00 for the massage and told her to leave the house. [redacted] never returned to the house. She did advise of one time she went with [redacted] however she waited in the car for [redacted] as she did not want to go into the house. At the conclusion of [redacted]s visit with Epstein they left the area. [redacted] stated she had heard from other girls that have gone to the house that Epstein now required them to do the massage naked and allow him to touch them in their private areas for monies. The interview was concluded as [redacted] did not have any other information to provide.

I then learned from the original victim, [redacted] the defense attorney had learned of her identity. I spoke with the father of the victim, who stated there has been a private investigator on his house photographing his family and chasing visitors who come to the house. He provided a Florida License of [redacted] This vehicle is registered to Ivan Robles of West Palm Beach. Robles is a private investigator intern who is licensed by the state. I informed the State Attorney's Office of the above information.

I received the Grand Jury subpoenas to be delivered to three victims for a Grand Jury session to be held on April 18, through April 20, 2006.

Investigation continues.

********** N A R R A T I V E # 42 **********

NA Reported By: [redacted] 4/14/06
Entered By.: [redacted] A. 4/18/06

The Grand Jury Subpoenas were personally served to the individuals they were issued to. On April 5, 2006, at approximately 7:30 p.m., I personally served the parents of [redacted] who had informed me that the private investigators were still photographing the family. On April

Case No. . . . : 1-05-000368 (Continued)

10, 2006, at approximately 2:30 p.m., I served [redacted] at her residence in Royal Palm Beach. The subpoena was given to her mother, [redacted]

I learned through one of the victims ([redacted] that she was personally contacted through a source that has maintained contact with Epstein. The source assured [redacted] she would receive monetary compensation for her assistance in not cooperating with law enforcement. [redacted] also stated she was told, "Those who help him will be compensated and those who hurt him will be dealt with." I told [redacted] that tampering with a witness/victim is an arrestable offense and very serious. I asked her who approached her during this encounter. [redacted] originally was reluctant to provide the name of the person who approached her to offer her not to testify because she felt they were still friends.

On April 11, 2006, Det Dawson and I traveled to Tallahassee, Florida and met with the victim, [redacted] [redacted] identified [redacted] W/F, [redacted] as the person who approached her in Royal Palm Beach while she was home during Spring Break in March 2006. [redacted] also stated she did not want to pursue the intimidation charges on [redacted] was concerned that the defense attorney was given a copy of the report as certain things she had told me in confidence were repeated to her by Beal. Prior to our departure, the victim was given a copy of her subpoena for the Grand Jury which was scheduled to commence April 18, 2006.

Upon our return from Tallahassee, I notified the State Attorney's Office of what was told to me. I also notified them that the subpoenas were delivered to the witnesses and they would be calling for arrangements for the date and time needed for the Grand Jury. I spoke with ASA Weiss and informed her of the possible intimidation by the defense.

On April 13, and April 14, 2006 I attempted contact on several occasions with ASA Weiss and ASA Belohlavic to ascertain when the victims needed to report for Grand Jury testimony. Messages were left on their voicemail. On April 17, 2006, during the hours of 9:00 am and 11:30 am, I again left messages for ASA Weiss and ASA Belohlavic for either of them to return my call as I had not heard from the State Attorney's Office as to the time and date of the Grand Jury.

At approximately 12:30 pm, I went to the State Attorney's Office and located ASA Weiss and ASA Belohlavic in their offices. I entered ASA Belohlavic's office who informed me that she was going to return my call. She explained that an offer was made to the defense, Atty Guy Fronstin and Atty Alan Dershowitz. The offer is 1 count of Agg Assault with intent to commit a felony, five years probation, with adjudication withheld. Epstein would have to submit to psychiatric/sexual evaluation and no unsupervised visits with minors. When asked about the all the other victims, ASA Belohlavic stated that was the only offer made as to one victim, [redacted] ASA Belohlavic cell phone rang and went to voice mail. She checked her voice mail and played the message on speaker. The caller identified himself as

Case No. . . . : 1-05-000368 (Continued)

Atty Guy Fronstin and acknowledged the deal made between them. Fronstin stated in the message, he spoke with his client, Jeffrey Epstein, and agreed to the deal. Fronstin asked to call off the grand jury as they would accept this deal. Belohlavic stated a probable cause would be needed to book Epstein in the county jail and would let me know as to when it would be needed. I explained my disapproval of the deal and not being consulted prior to the deal being offered. However I expressed that was only my opinion and the final approval would come from the Chief of Police. She explained to have Chief Reiter call Barry Krisher about the deal. I left the area and returned to the police station where I briefed the Chief about the deal offered.

I checked my voice mail messages and discovered a message from EG, stepmother for the victim [redacted] She was calling because the State Attorney's Office still had not returned any of her calls as to when they are needed for this case. I then called ASA Belohlavic's office and left messages for her to call the victims on this case and explained to them what the State Attorney's Office had done.

On April 17, 2006, at approximately 4:30 pm, State Attorney Investigator Tim Valentine called to officially notify me of the cancellation of the Grand Jury. He requested I contact the victims that had been served to appear, to notify them of the cancellation. I advised Valentine that as this Grand Jury session was called based on the State Attorney's Office decision to have the victims heard by the Grand Jury that I felt it was the States Attorney's Office responsibility to contact the victims and advise them of the reason they were no longer needed.

********** N A R R A T I V E # 43 **********

NA Reported By: RECAREY, JOSEPH 5/04/06
Entered By.: ALTOMARO, NICKIE A. 5/04/06

As I had not received any contact from anyone at the State Attorney's Office, on May 1, 2006, I prepared three arrest warrant requests and submitted them to the State Attorney's Office. The packages were delivered to the Crimes against Children Unit in care of ASA Lana Belohlavek. Jeffrey Epstein's arrest warrant was requested for 4 counts of Unlawful Sexual activity with certain minors and one count of Lewd and Lascivious Molestation. [redacted], Epstein's assistant's, arrest warrant request was for 4 counts of Principal in the 1st degree Unlawful Sexual activity with certain minors and one count of Principal in the 1st degree Lewd and Lascivious Molestation. [redacted] [redacted] arrest warrant request was for Lewd and Lascivious Acts on a victim under 16 years of age. The receipt of delivery was signed and brought back to the records division at the police department.

On May 3, 2006, at approximately 2:54 pm, I received a telephone call from ASA Daliah Weiss on my cellular telephone. ASA Weiss advised she

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has been taken off the Jeffrey Epstein case because her husband is employed with Attorney Jack Goldberger. Attorney Goldberger is the attorney of record for Jeffrey Epstein. His previous attorney, Guy Fronstin, has been fired from representation. ASA Lana Belohlavek has been assigned the case. ASA Weiss stated she can no longer speak about the Epstein case with me. I thanked her for her telephone call. ASA Weiss further stated that ASA Belohlavek would be calling me.

********** N A R R A T I V E # 44 **********

NA Reported By: RECAREY, JOSEPH 5/15/06
Entered By.: ALTOMARO, NICKIE A. 5/15/06

On May 10, 2006, information was received that Epstein's associate, Leslie Wexner, The Limited Inc, CEO's, plane had arrived in West Palm Beach, PBIA. The plane, a Gulfstream 4 bearing a N900LS registration, was on the tarmac at Galaxy Aviation. As Epstein had recently acquired the services of a new attorney, and the fact that Epstein's house is currently under remodeling, it was believed that Epstein may be in Palm Beach. I conducted physical surveillance at the residence, 358 El Brillo Way. I observed a large construction crew conducting remodeling at the house. The contractor, David Norr, was observed driving a Ford Explorer, white in color. The vehicle has a Florida registration of F30QQF. Norr left Epstein's house and traveled north on County Road. Det Caristo and I conducted surveillance on Norr. Norr traveled to several construction sites and checked on certain jobs. Surveillance was discontinued on Norr and Det Caristo and I traveled to Galaxy Aviation. I observed the white plane with a blue stripe along the body and tail of the plane; the tail number was visible on the bottom of the tail, closer to the body of the plane. We maintained visual surveillance on the plane until 4:57 p.m., when a caravan of Cadillac Escalades drove onto the tarmac. We observed several people exit the vehicles and discovered that they were part of the executive team for Limited Inc. The executives were in Palm Beach County for an executive meeting for the day. They arrived in Palm Beach County on May 9, 2006 at 9:30 pm and were scheduled to leave on the 10th at 5:00 pm.

On May 12, 2006, I met with ASA Lana Belohlavek at the State Attorney's Office. She explained that her boss, Barry Krischer, was requesting this case be taken to the Grand Jury again. I explained to her I had requested arrest warrants for Jeffrey Epstein, [redacted], and [redacted] [redacted] I asked that she either issue the warrants or direct file, as so much time has elapsed since the original request to the Grand Jury. I explained that the Palm Beach Police Department had concluded the case in December of 2005 and has been waiting for the case to go forward. Belohlavek stated the original offer was again offered to the new defense attorney. She was waiting for their answer by Friday May 19, 2006. She stated she would advise me of the answer.

********** N A R R A T I V E # 45 **********

NA Reported By: [redacted], [redacted] 6/05/06

Case No. . . . : 1-05-000368 (Continued)
Entered By.: ALTOMARO, NICKIE A. 6/06/06

On May 22, 2006, I received several phone calls throughout the day from Mr. [redacted] who stated he had been followed aggressively by a private investigator. Mr. [redacted] stated that as he drove to and from work and running errands throughout the county, the same vehicle was behind him running other vehicles off the road in an attempt not to lose sight of Mr. [redacted] vehicle.

I explained to him as Mr. Epstein had retained new legal council it was possible it would be new private investigators following him to observe his daily activities. I also explained to him that there was a meeting scheduled with ASA Lana Belohlavek and Attorney Jack Goldberger at Mr. Krischer's office scheduled on June 1, 2006 at 9:00 am. I attempted to call ASA Lana Belohlavek to inform her of the private investigators following Mr. [redacted] however; she was on her vacation during the week of May 22 through May 30 2006.

On May 23, 2006, I received other phone calls from Mr. and Mrs. [redacted] who advised they were able to acquire the private investigators license plate information. The subject following them was again driving very aggressively and caused Mrs. [redacted] to run off the road. Mrs. [redacted] stated the vehicle is a green Chevy Monte Carlo bearing Florida tag [redacted]. The vehicle is registered to Zachary Bechard of Jupiter Florida. Bechard is employed with Candor Investigations from Jupiter, Florida. Bechard is a licensed Private Investigator in the State of Florida.

Since the discovery of the threat made against one of the victims in this case ([redacted] I requested subpoenas for all calls made to and received from [redacted] during the month of March 2006 for her cell phone and home phone. I had confirmed with Florida State University the exact dates of Spring Break for 2006. The Spring Break was from March 4, 2006 through March 12, 2006. I received a subpoena from Sprint/Nextel with all calls made during the month of March 2006. I reviewed the 989 calls made and received during the month of March 2006. I observed on March 7, 2006, [redacted] made and received thirty five calls during that day.

Date	Time	Seconds	In/Out	To/From
7-Mar-06	11:03 AM	492	Outbound	[redacted]
7-Mar-06	11:16 AM	6	Inbound	
-Mar-06	11:22 AM	887.2	Inbound	
Mar-06	11:37 AM	48	Outbound	
Mar-06	11:39 AM	28.2	Inbound	
ar-06	12:02 PM	727.2	Inbound	

table reflects the date of the calls, time of day (EST), duration

Case No. . . . : 1-05-000368 (Continued)

of call in seconds, inbound or outbound calls and calls made to or from [redacted] phone. On March 7, 2006, at 11:03 am, [redacted] made a call to the victim [redacted] which lasted 492 seconds (8 minutes and 2 seconds). The victim then returned the call at 11:16 am which lasted 6 seconds. The victim then made contact with [redacted] at 11:22 am for 877.2 seconds (14 minutes and 6 seconds). These sequences of calls were consistent with what the victim had described to me on the date of the intimidation. Immediately after speaking with the victim, [redacted] makes a call to [redacted], Epstein's assistant, which lasts for forty-eight seconds. A call is then immediately received, a telephone number registered to a Corporation affiliated with Jeffrey Epstein located at 457 Madison Ave in New York. An extensive computer check revealed 457 Madison Ave is a business address in which Epstein has his corporations assigned to. Epstein had corporation attorney, Darren Indyke, register the businesses and register himself as an agent. I also observed Epstein has his El Zorro Ranch Corporation, New York Strategy Group, Ghislaine Corporation, J Epstein and Company and the Financial Strategy Group registered to this same address. Finally, a third call is received by [redacted] at 12:02 pm from the same corporate number which lasts 12 minutes and 1 second. It should be noted that there is no further contact with either the victim during the month of March or April of 2006. I also noted that there was no further contact with [redacted] or Jeffrey Epstein during the remainder of the month of March or April 2006.

On June 1, 2006, ASA Lana Belohlavek telephoned me to inform me of the meeting that occurred with Atty. Jack Goldberger and her reference this case. She advised she would make her determination on whether to file on this case or not by Monday June 5, 2006.

Inv Continues.

********** N A R R A T I V E # 46 **********

NA Reported By: RECAREY, JOSEPH 7/12/06
Entered By.: ALTOMARO, NICKIE A. 7/12/06

On June 29, 2006, I had spoken to ASA [redacted] who informed me that the case would be sent to the Grand Jury for charges. She informed me that the grand jury would convene on July 19, 2006 to hear the Epstein case. [redacted] stated State Attorney Barry Krisher made the determination to go the Grand Jury to hear the case.

On July 12, 2006, I spoke with Mrs. [redacted] mother of the victim, [redacted], who inquired about the status of the case. I explained to her that I was told we would be going to the Grand Jury during the week of July 19, 2006. She stated she had not been contacted as of yet by the State Attorney's Office for any information. I provided her with the telephone numbers to the State Attorney's Office.

Investigation continues...

* * * * * * * * * * * * * * * * * END OF REPORT * * * * * * * * * * * * * * * * *

PALM BEACH POLICE DEPARTMENT
PROPERTY RECEIPT

CONTRIBUTOR'S COPY

PBPD Form #52

☐ PROPERTY	☐ FOUND	☐ DECEASED (Probated)	☐ PERSONAL	☐ CONFISCATED	☐ DESTROY
☒ EVIDENCE	☐ TRIAL	☐ LABORATORY	☐ STOLEN/RECOVERED	☒ OTHER	

INCIDENT/CITATION NUMBER	DATE/TIME RECOVERED	PROPERTY NUMBER (Leave Blank)	BIN NUMBER (Leave Blank)
05-368	02/14/05 1616	05-237	128127

ADDRESS WHERE PROPERTY IMPOUNDED
3228 SOUTH COUNTY ROAD, PB FL 33480 (PBPD)

DISCOVERED BY / D.O.B.	ADDRESS Street City Zip	PHONE NUMBER
PAGAN #2059		
OWNER'S NAME / D.O.B. [redacted]	[redacted]	
SUSPECT'S NAME / D.O.B.		
ADDT'NL SUSPECT / D.O.B.	ADDRESS Street City Zip	PHONE NUMBER

SPECIAL INSTRUCTIONS

FOUND PROPERTY 90 DAYS — CLAIM ☐ NOT CLAIM ☐

ITEM #	QUANTITY	VALUE	DESCRIPTION
1	1		TAPED CONVERSATION - REF INCIDENT REPORT
			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 [signature] ID# 8039 UNIT D1

RECEIVED BY	REASON	DATE/TIME RECEIVED
AIS [illegible]	6	07-15-05 17:06

PALM BEACH POLICE DEPARTMENT
PROPERTY RECEIPT

DETECTIVE BUREAU

PBPD Form #52

☐ PROPERTY	☐ FOUND	☐ DECEASED (Probated)	☐ PERSONAL	☐ CONFISCATED	☐ DESTROY
☒ EVIDENCE	☐ TRIAL	☐ LABORATORY	☐ STOLEN/RECOVERED	☐ OTHER	

INCIDENT/CITATION NUMBER	DATE/TIME RECOVERED	PROPERTY NUMBER (Leave Blank)	BIN NUMBER (Leave Blank)
05-368	03152005	05-243	128137

ADDRESS WHERE PROPERTY IMPOUNDED
4200 N. AUSTRALIAN AVE WEST PALM BEACH FLORIDA 33407

DISCOVERED BY / D.O.B.	ADDRESS Street City Zip	PHONE NUMBER
BIGGIN 5/09	[redacted]	

ADDT'NL. SUSPECT / D.O.B.	ADDRESS Street City Zip	PHONE NUMBER

SPECIAL INSTRUCTIONS

FOUND PROPERTY 90 DAYS — CLAIM ☐ NOT CLAIM ☐

ITEM #	QUANTITY	VALUE	DESCRIPTION
1	1		AUDIO TAPE #1 [redacted]
2	1		AUDIO TAPE #2

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.

MLD 809 D

SIGNATURE ID# UNIT

RECEIVED BY	REASON	DATE/TIME RECEIVED
AB 338	6	03-17-05 0700

LM BEACH POLICE DEPARTME
PROPERTY RECEIPT

CONTRIBUTOR'S COPY

PBPD Form #52

☐ PROPERTY	☐ FOUND	☐ DECEASED (Probated)	☐ PERSONAL	☐ CONFISCATED	☐ DESTROY
☒ EVIDENCE	☐ TRIAL	☐ LABOR[redacted]Y	☐ STOLEN/RECOVERED	☐ OTHER	

INCIDENT/CITATION NUMBER	DATE/TIME RECOVERED	PROPERTY NUMBER (Leave Blank)	BIN NUMBER (Leave Blank)
05-368	03/18/05	05-256	12R127

ADDRESS WHERE PROPERTY IMPOUNDED [redacted]

DISCOVERED BY / D.O.B.	ADDRESS Street City Zip	PHONE NUMBER
PAGAN #2059		
[redacted]	[redacted]	[redacted]
JEFFREY E. EPSTEIN [redacted]	358 EL BRILLO WAY, Palm Beach FL 33480 (SW) UK	
ADDT'NL. SUSPECT / D.O.B [redacted]	ADDRESS Street City Zip	PHONE NUMBER
[redacted]		

[redacted]OPERTY ☐ CLAIM
90 DAYS ☐ NOT CLAIM

ITEM #	QUANTITY	VALUE	DESCRIPTION
1	1		MICRO TAPE - CONVERSATION [redacted] 03/18/05
			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 [signature] ID# 2034 UNIT D1

RECEIVED BY	REASON	DATE/TIME RECEIVED
CASEY	EI	03-22-05 0700

EFTA00232895

LM BEACH POLICE DEPARTME
PROPERTY RECEIPT

DETECTIVE BUREAU

PBPD Form #52

☐ PROPERTY	☐ FOUND	☐ DECEASED (Probated)	☐ PERSONAL	☐ CONFISCATED	☐ DESTROY
☒ EVIDENCE	☐ TRIAL	☐ LABORATORY	☐ STOLEN/RECOVERED	☐ OTHER	

INCIDENT/CITATION NUMBER	DATE/TIME RECOVERED	PROPERTY NUMBER (Leave Blank)	BIN NUMBER (Leave Blank)
05-368	03/18/05 1220 HRS	C5-057	128452

ADDRESS WHERE PROPERTY IMPOUNDED
345 So County Road PB FL 33480

DISCOVERED BY / D.O.B.	ADDRESS Street City Zip	PHONE NUMBER
PAGAN #8059		

[redacted]

ADDT'NL SUSPECT / D.O.B.	ADDRESS Street City Zip	PHONE NUMBER
JEFFREY EPSTEIN 1/20/53	358 EL BRILLO, PB FL 33480	

SPECIAL INSTRUCTIONS

FOUND PROPERTY 90 DAYS — CLAIM ☐ NOT CLAIM ☐

ITEM #	QUANTITY	VALUE	DESCRIPTION
1	1		SIGNED Photo Line up

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 8059 ID# D1 UNIT

RECEIVED BY	REASON	DATE/TIME RECEIVED
[redacted]	6	03-23-05 0700

EFTA00232896

PALM BEACH POLICE DEPARTMENT
PROPERTY RECEIPT

022669
EVIDENCE CUSTODIAN

D Form #52

☐ PROPERTY	☐ FOUND	☐ DECEASED (Probated)	☐ PERSONAL	☐ CONFISCATED	☐ DESTROY
☒ EVIDENCE	☒ TRIAL	☐ [redacted]	☐ STOLEN/RECOVERED	☐ OTHER	

INCIDENT/CITATION NUMBER	DATE/TIME RECOVERED	PROPERTY NUMBER (Leave Blank)	BIN NUMBER (Leave Blank)
05-368	033005 4:00PM	05-294	B 128137

ADDRESS WHERE PROPERTY IMPOUNDED
4200 AUSTRALIAN AVE. WPB FL (HIGHRIDGE FAMILY CENTER)

DISCOVERED BY / D.O.B.	ADDRESS Street City Zip	PHONE NUMBER
PAGAN 8059		
OWNER'S NAME / D.O.B. [redacted]	ADDRESS Street City Zip	PHONE NUMBER
	Zip	PHONE NUMBER
ADDT'NL. SUSPECT / D.O.B.	ADDRESS Street City Zip	PHONE NUMBER

SPECIAL INSTRUCTIONS

FOUND PROPERTY 90 DAYS — CLAIM ☐ NOT CLAIM ☐

ITEM #	QUANTITY	VALUE	DESCRIPTION
1	1		AUDIO TAPE "MAXELL" CONTROL CALL #2 S-H
2	1		MICRO TAPE- [redacted]
			* Note #2 is blank
			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 [signature] ID# 8051 UNIT D1

RECEIVED BY	REASON	DATE/TIME RECEIVED
AB 8338	G	03-31-05 0700
MP 8059	Invest	08 08 05 1000
Paid $220	Return to evidence Rm.	8-16-05 1530
AB 8338 copied	~~both~~ "for Sgt Frick for filing	09-20-05 1445
Mary Parkinson 8717	Copy for Sgt Frick	9-30-05 2:15PM

EFTA00232897

PALM BEACH POLICE DEPARTMENT
PROPERTY RECEIPT

DETECTIVE BUREAU

PBPD Form #52

☐ PROPERTY ☐ FOUND ☐ DECEASED (Probated) ☐ PERSONAL ☐ CONFISCATED ☐ DESTROY

☒ EVIDENCE ☐ TRIAL ☐ LABORATORY ☐ STOLEN/RECOVERED ☐ OTHER

INCIDENT/CITATION NUMBER	DATE/TIME RECOVERED	PROPERTY NUMBER (Leave Blank)	BIN NUMBER (Leave Blank)
05-368	04/04/05	05-313	128148

ADDRESS WHERE PROPERTY IMPOUNDED: 345 SO COUNTY ROADS PB FL 33480

DISCOVERED BY / D.O.B.	ADDRESS Street City Zip	PHONE NUMBER
PAGAN # 6059		
[redacted]		
JAMES [redacted] 1/20/53	358 EL BRAZIL PL PB FL 33480	
ADDT'NL SUSPECT / D.O.B. [redacted]	ADDRESS [redacted]	PHONE NUMBER

PROPERTY 90 DAYS ☐ CLAIM ☐ NOT CLAIM

ITEM #	QUANTITY	VALUE	DESCRIPTION
			(3/31/05, 4/1/05)

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# UNIT

RECEIVED BY	REASON	DATE/TIME RECEIVED
P [redacted] #720	LC	4-4-05 1530

PALM BEACH POLICE DEPARTMENT
PROPERTY RECEIPT

DETECTIVE BUREAU

PBPD Form #52

☐ PROPERTY	☐ FOUND	☐ DECEASED (Probated)	☐ PERSONAL	☐ CONFISCATED	☐ DESTROY
☒ EVIDENCE	☒ TRIAL	☐ LABORATORY	☐ STOLEN/RECOVERED	☐ OTHER	

INCIDENT/CITATION NUMBER	DATE/TIME RECOVERED	PROPERTY NUMBER (Leave Blank)	BIN NUMBER (Leave Blank)
05-316	05/31/05 0915HRS	05-378	12 S 2

ADDRESS WHERE PROPERTY IMPOUNDED: 356 El Brillo Way, PB 33480 / 2nd Floor County Rd

DISCOVERED BY / D.O.B.	ADDRESS (Street / City / Zip)	PHONE NUMBER
PAGAN 8059		
OWNER'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**
EPSTEIN, JEFFREY Jm	358 El Brillo Way, PB FL 33480	
ADDT'NL SUSPECT / D.O.B.	**ADDRESS (Street / City / Zip)**	**PHONE NUMBER**

SPECIAL INSTRUCTIONS

FOUND PROPERTY 90 DAYS — CLAIM ☐ NOT CLAIM ☐

ITEM #	QUANTITY	VALUE	DESCRIPTION
1	1		[redacted]
2	1		
3	1		
4	1		
5	1		

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.

J McNally 8059 01

SIGNATURE ID# UNIT

RECEIVED BY	REASON	DATE/TIME RECEIVED
AB8258	5	04-31-05 1700hrs

EFTA00232899

PALM BEACH POLICE DEPARTMENT
PROPERTY RECEIPT

DETECTIVE BUREAU

PBPD Form #52

☐ PROPERTY	☐ FOUND	☐ DECEASED (Probated)	☐ PERSONAL	☐ CONFISCATED	☐ DESTROY
☒ EVIDENCE	☐ TRIAL	☐ LABORATORY	☐ STOLEN/RECOVERED	☐ OTHER	

INCIDENT/CITATION NUMBER	DATE/TIME RECOVERED	PROPERTY NUMBER (Leave Blank)	BIN NUMBER (Leave Blank)
05-368	04-01-05	05-379	128552

ADDRESS WHERE PROPERTY IMPOUNDED: 306 EL BRAIL Ct. WPB FL 33409 / 245 S. Rosemary Rd

DISCOVERED BY / D.O.B.	ADDRESS Street City Zip	PHONE NUMBER
PAGAN 8059		
OWNER'S NAME / D.O.B.	ADDRESS Street City Zip	PHONE NUMBER
SUSPECT'S NAME / D.O.B. 1-20-82	ADDRESS Street City Zip	PHONE NUMBER
EPSTEIN, JEFFREY [illegible]	SAME AS ABOVE	
ADDT'NL. SUSPECT / D.O.B.	ADDRESS Street City Zip	PHONE NUMBER

SPECIAL INSTRUCTIONS

FOUND PROPERTY 90 DAYS — CLAIM ☐ NOT CLAIM ☐

ITEM #	QUANTITY	VALUE	DESCRIPTION
1	1		[redacted]
2	1		
3	3		

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 [signature] (07) ID# D1 UNIT [redacted]

RECEIVED BY	REASON	DATE/TIME RECEIVED
AB 5378	6	04-21-05 0700hrs

PALM BEACH POLICE DEPARTMENT
PROPERTY RECEIPT

DETECTIVE BUREAU

PBPD Form #52

☐ PROPERTY	☐ FOUND	☐ DECEASED (Probated)	☐ PERSONAL	☐ CONFISCATED	☐ DESTROY
☑ EVIDENCE	☐ TRIAL	☐ LABORATORY	☐ STOLEN/RECOVERED	☐ OTHER	

INCIDENT/CITATION NUMBER	DATE/TIME RECOVERED	PROPERTY NUMBER (Leave Blank)	BIN NUMBER (Leave Blank)
	04-11-05 0915	05-280	126552

ADDRESS WHERE PROPERTY IMPOUNDED

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.	ADDRESS	*Street*	*City*	*Zip*	PHONE NUMBER
ADDT'NL. SUSPECT / D.O.B.	ADDRESS	*Street*	*City*	*Zip*	PHONE NUMBER

SPECIAL INSTRUCTIONS

FOUND PROPERTY 90 DAYS — CLAIM ☐ NOT CLAIM ☐

ITEM #	QUANTITY	VALUE	DESCRIPTION
1	1		[redacted]

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 [redacted] ID# 171 UNIT D1

RECEIVED BY	REASON	DATE/TIME RECEIVED
[redacted]	B	04-21-05 0700

LM BEACH POLICE DEPARTME
PROPERTY RECEIPT

DETECTIVE BUREAU

PBPD Form #52

☐ PROPERTY	☐ FOUND	☐ DECEASED (Probated)	☐ PERSONAL	☐ CONFISCATED	☐ DESTROY
☐ EVIDENCE	☑ TRIAL	☐ LABORATORY	☐ STOLEN/RECOVERED	☐ OTHER	

INCIDENT/CITATION NUMBER	DATE/TIME RECOVERED	PROPERTY NUMBER (Leave Blank)	BIN NUMBER (Leave Blank)
05-367	04-08-05 0115	05-381	128552

ADDRESS WHERE PROPERTY IMPOUNDED
358 EL Brillo Way PB, FL 33480

	ADDRESS Street	City	Zip	PHONE NUMBER
DISCOVERED BY / D.O.B. PAGAN, DET				
OWNER'S NAME / D.O.B.				
SUSPECT'S NAME / D.O.B. [redacted] EPSTEIN, JEFFREY W/M	Same as above			
ADDT'NL. SUSPECT / D.O.B.				

SPECIAL INSTRUCTIONS
PAGE 1 OF 2

FOUND PROPERTY 90 DAYS — CLAIM ☐ NOT CLAIM ☐

ITEM #	QUANTITY	VALUE	DESCRIPTION
1	1		WHITE PAPER - [redacted]
2	1		" Jet Dive [redacted]
3	1		" [redacted]
4	1		" [redacted]
5	1		MESSAGE [redacted]
6a	1		WHITE PAPER
7	1		"
8	1		" "
9	1		" "
10	1		" " - GIRL FROM ST. CROIX,
11	1		MESSAGE - ELAINE
12	1		" JEAN-LUC 4/1/05 (646) 286-7200
13	1		WHITE PAPER - [redacted]
14	1		MESSAGE -
			TOTAL PACKAGE WEI

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# 317 UNIT DI

RECEIVED BY	REASON	DATE/TIME RECEIVED

PALM BEACH POLICE DEPARTMENT
PROPERTY RECEIPT

pg 2 of 2

DETECTIVE BUREAU

PBPD Form #52

☐ PROPERTY	☐ FOUND	☐ DECEASED (Probated)	☐ PERSONAL	☐ CONFISCATED	☐ DESTROY
☒ EVIDENCE	☒ TRIAL	☐ LABORATORY	☐ STOLEN/RECOVERED	■ OTHER	

INCIDENT/CITATION NUMBER	DATE/TIME RECOVERED	PROPERTY NUMBER (Leave Blank)	BIN NUMBER (Leave Blank)
05-368	04-08-05 0915	05 381	128552

ADDRESS WHERE PROPERTY IMPOUNDED
356 EL Brillo Way

DISCOVERED BY / D.O.B.	ADDRESS Street	City	Zip	PHONE NUMBER
PAGAN 9059				
OWNER'S NAME / D.O.B.	ADDRESS Street	City	Zip	PHONE NUMBER
SUSPECT'S NAME / D.O.B.	ADDRESS Street	City	Zip	PHONE NUMBER
ADDT'NL SUSPECT / D.O.B.	ADDRESS Street	■	Zip	PHONE NUMBER

SPECIAL INSTRUCTIONS
PAGE 2 OF 2

FOUND PROPERTY 90 DAYS — CLAIM ☐ NOT CLAIM ☐

ITEM #	QUANTITY	VALUE	DESCRIPTION
15	1		Message Pad [redacted]
16	1		" "
17	1		white paper [redacted]
18	1		" "
■	1		white paper [redacted]
20	1		" "
21	1		" "
22	1		" DENIS Number
23	1		phone # Print out.

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# UNIT

RECEIVED BY	REASON	DATE/TIME RECEIVED
#5378	C	04-21-05 0706

LM BEACH POLICE DEPARTME
PROPERTY RECEIPT

DETECTIVE BUREAU

PBPD Form #52

☐ PROPERTY	☐ FOUND	☐ DECEASED (Probated)	☐ PERSONAL	☐ CONFISCATED	☐ DESTROY
☒ EVIDENCE	☐ TRIAL	☐ LABORATORY	☐ STOLEN/RECOVERED	☐ OTHER	

INCIDENT/CITATION NUMBER	DATE/TIME RECOVERED	PROPERTY NUMBER (Leave Blank)	BIN NUMBER (Leave Blank)
05 3[illegible]	04-11-05 0915 hrs	05-382	128552

ADDRESS WHERE PROPERTY IMPOUNDED
3[illegible] PB FL 3[illegible]

	ADDRESS Street	City	Zip	PHONE NUMBER
DISCOVERED BY / D.O.B. PAGAN [illegible]				
OWNER'S NAME / D.O.B.				
SUSPECT'S NAME / D.O.B. [redacted] EPSTEIN Jeffrey [illegible]/m	3[illegible]			
ADDT'NL. SUSPECT / D.O.B.				

SPECIAL INSTRUCTIONS

FOUND PROPERTY 90 DAYS — CLAIM ☐ NOT CLAIM ☐

ITEM #	QUANTITY	VALUE	DESCRIPTION
1	5		Message Pad sheets
2	1		white paper - [redacted]
3	1		message -
4	1		message -
5	1		"
6	1		
7	1		
8	1		clear plastic stick
			possible broken off object
			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] 951 D1

SIGNATURE ID# UNIT

RECEIVED BY	REASON	DATE/TIME RECEIVED
[illegible]	6	04-21-05 0700 h

PALM BEACH POLICE DEPARTMENT
PROPERTY RECEIPT

DETECTIVE BUREAU

PBPD Form #52

☐ PROPERTY ☐ FOUND ☐ DECEASED (Probated) ☐ PERSONAL ☐ CONFISCATED ☐ DESTROY

☑ EVIDENCE ☑ TRIAL ☐ LABORATORY ☐ STOLEN/RECOVERED ☐ OTHER

INCIDENT/CITATION NUMBER	DATE/TIME RECOVERED	PROPERTY NUMBER (Leave Blank)	BIN NUMBER (Leave Blank)
05-368	04/11/05 0915	05-383	128552

ADDRESS WHERE PROPERTY IMPOUNDED: 358 EL BRILLO WAY PB FL 33412

DISCOVERED BY / D.O.B.: PAGAN 8059	ADDRESS Street City Zip		PHONE NUMBER
OWNER'S NAME / D.O.B.	ADDRESS Street City Zip		PHONE NUMBER
SUSPECT'S NAME / D.O.B. [redacted]	ADDRESS Street City Zip		PHONE NUMBER
ADDT'NL. SUSPECT / D.O.B.	ADDRESS Street City Zip		PHONE NUMBER

SPECIAL INSTRUCTIONS

FOUND PROPERTY 90 DAYS — CLAIM ☐ NOT CLAIM ☐

ITEM #	QUANTITY	VALUE	DESCRIPTION
1	12		WHITE PAPER - EXTRA DOCUMENTS
2	1		[redacted]
3	1		
4	1		
5	1		
6	1		
7	1		
8	1		

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] 1051 DI

SIGNATURE ID# UNIT

RECEIVED BY	REASON	DATE/TIME RECEIVED
AMS 328	E	04-21-05 0700hrs

LM BEACH POLICE DEPARTME
PROPERTY RECEIPT

DETECTIVE BUREAU

PBPD Form #52

☐ PROPERTY	☐ FOUND	☐ DECEASED (Probated)	☐ PERSONAL	☐ CONFISCATED	☐ DESTROY
☒ EVIDENCE	☐ TRIAL	☐ LABORATORY	☐ STOLEN/RECOVERED	☐ OTHER	

INCIDENT/CITATION NUMBER	DATE/TIME RECOVERED	PROPERTY NUMBER (Leave Blank)	BIN NUMBER (Leave Blank)
DF-368	04/12/05 0915	05-384	128552

ADDRESS WHERE PROPERTY IMPOUNDED
350 EL BRILLO WAY PB FL 33480

	ADDRESS Street	City	Zip	PHONE NUMBER
DISCOVERED BY / D.O.B. PAGAN 8059				
OWNER'S NAME / D.O.B.				
SUSPECT'S NAME / D.O.B. [redacted]				
ADDT'NL SUSPECT / D.O.B.				

SPECIAL INSTRUCTIONS

FOUND PROPERTY 90 DAYS — CLAIM ☐ NOT CLAIM ☐

ITEM #	QUANTITY	VALUE	DESCRIPTION
1	1		MESSAGE FROM ADRIANA
2	1		white paper - TATIANA
3	1		" " - [redacted]
4	1		" " - [redacted]
5	1		MESSAGE FROM GEORGE DAWSON
6	1		" " [redacted]
7	1		" " [redacted]
8	1		white paper - COURTNEY WADE
			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.

M. LOPEZ 3091 DI

SIGNATURE ID# UNIT

RECEIVED BY	REASON	DATE/TIME RECEIVED
M 8338	5	04-21-05 0700 hrs

EFTA00232906

PALM BEACH POLICE DEPARTMENT
PROPERTY RECEIPT

DETECTIVE BUREAU

PBPD Form #52

☐ PROPERTY ☐ FOUND ☐ DECEASED (Probated) ☐ PERSONAL ☐ CONFISCATED ☐ DESTROY

☒ EVIDENCE ☒ TRIAL ☐ LABORATORY ☐ STOLEN/RECOVERED ☐ OTHER

INCIDENT/CITATION NUMBER	DATE/TIME RECOVERED	PROPERTY NUMBER (Leave Blank)	BIN NUMBER (Leave Blank)
05-368	04/13/05 9:15	05-385	128552

ADDRESS WHERE PROPERTY IMPOUNDED: 2300 El Bellaco West PB FL 33190

DISCOVERED BY / D.O.B.	ADDRESS Street City Zip	PHONE NUMBER
PAGAN 8059		
OWNER'S NAME / D.O.B.	ADDRESS Street City Zip	PHONE NUMBER
SUSPECT'S NAME / D.O.B. 1-20-53	ADDRESS Street City Zip	PHONE NUMBER
EPSTEIN, Jeffrey M	Same as above	
ADDT'NL SUSPECT / D.O.B.	ADDRESS Street City Zip	PHONE NUMBER

SPECIAL INSTRUCTIONS: 04/13/05

FOUND PROPERTY 90 DAYS — CLAIM ☐ NOT CLAIM ☐

ITEM #	QUANTITY	VALUE	DESCRIPTION
1	1		White paper - (917) 496-0606
2	1		[redacted]
3	1		"
4	1		"
5	1		"
6	4		"

TOTAL PACKAGE WEIGHT

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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 8059 ID# DI UNIT

RECEIVED BY	REASON	DATE/TIME RECEIVED
[illegible]	E	04-21-05 0700

EFTA00232907

LM BEACH POLICE DEPARTME
PROPERTY RECEIPT

DETECTIVE BUREAU

PBPD Form #52

☐ PROPERTY	☐ FOUND	☐ DECEASED (Probated)	☐ PERSONAL	☐ CONFISCATED	☐ DESTROY
☒ EVIDENCE	☑ TRIAL	☐ LABORATORY	☐ STOLEN/RECOVERED	☐ OTHER	

INCIDENT/CITATION NUMBER	DATE/TIME RECOVERED	PROPERTY NUMBER (Leave Blank)	BIN NUMBER (Leave Blank)
05 3LV	04/15/05 0915	05-386	128552

ADDRESS WHERE PROPERTY IMPOUNDED

3244 EL BEVIL LANE PB FL 33480

	ADDRESS Street	City	Zip	PHONE NUMBER
DISCOVERED BY / D.O.B. PAGAN 2059				
OWNER'S NAME / D.O.B.				
SUSPECT'S NAME / D.O.B. 01/20/53 EXSTEIN, JEFFREY EPSTEIN	Same as above			
ADDT'NL. SUSPECT / D.O.B.				

SPECIAL INSTRUCTIONS

FOUND PROPERTY 90 DAYS — CLAIM ☐ NOT CLAIM ☐

ITEM #	QUANTITY	VALUE	DESCRIPTION
1	1		MEDICAL SUPPLIES
2	1		"727" letterhead
3	1		INVOICE #427100
4	1		AMAZON COM: ADRIANA MUCINSKA
5	1		White paper – Jan Luc
6	1		message from [redacted]
7	1		" "
8	1		White paper – [redacted]
9	1		" " – [redacted]
			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 8059 ID# DI UNIT

RECEIVED BY	REASON	DATE/TIME RECEIVED
[illegible]	FE	04-21-05 0700 HRS

EFTA00232908

LM BEACH POLICE DEPARTME
PROPERTY RECEIPT

DETECTIVE BUREAU

PBPD Form #52

☒ PROPERTY	☐ FOUND	☐ DECEASED (Probated)	☐ PERSONAL	☒ CONFISCATED	☐ DESTROY
☐ EVIDENCE	☐ TRIAL	☐ LABORATORY	☐ STOLEN/RECOVERED	☐ OTHER	

INCIDENT/CITATION NUMBER	DATE/TIME RECOVERED	PROPERTY NUMBER (Leave Blank)	BIN NUMBER (Leave Blank)
	07/20/[redacted] 3PM	05-666	129521

ADDRESS WHERE PROPERTY IMPOUNDED: 358 El Brillo Pl Fl 33139

DISCOVERED BY / D.O.B.	ADDRESS Street City Zip	PHONE NUMBER
PAGAN [redacted]		
OWNER'S NAME / D.O.B.	ADDRESS Street City Zip	PHONE NUMBER
SUSPECT'S NAME / D.O.B. [redacted]	ADDRESS Street City Zip	PHONE NUMBER
EPSTEIN, JEFFREY [redacted]	358 El Brillo Pl Fl 33139	
ADDT'NL SUSPECT / D.O.B.	ADDRESS Street City Zip	PHONE NUMBER

SPECIAL INSTRUCTIONS: *hold Do Not Destroy - CONTACT Det PAGAN

FOUND PROPERTY 90 DAYS — CLAIM ☐ NOT CLAIM ☐

ITEM #	QUANTITY	VALUE	DESCRIPTION
1	5		BAGS w/ misc. paper

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.

[Illegible] [redacted] D1

SIGNATURE ID# UNIT

RECEIVED BY	REASON	DATE/TIME RECEIVED
MB 837[redacted]	6	07 22 05 11:00

EFTA00232909

PALM BEACH POLICE DEPARTMENT
PROPERTY RECEIPT

DETECTIVE BUREAU

PBPD Form #52

☐ PROPERTY ☐ FOUND ☐ DECEASED (Probated) ☐ PERSONAL ☐ CONFISCATED ☐ DESTROY

☒ EVIDENCE ☒ TRIAL ☐ LABORATORY ☐ STOLEN/RECOVERED ☐ OTHER

INCIDENT/CITATION NUMBER	DATE/TIME RECOVERED	PROPERTY NUMBER (Leave Blank)	BIN NUMBER (Leave Blank)
05-368	092105 1323	05-874	12 9 1 1

ADDRESS WHERE PROPERTY IMPOUNDED: 345 S. COUNTY ROAD PALM BEACH FL

DISCOVERED BY / D.O.B.	ADDRESS	Street	City	Zip	PHONE NUMBER
DET RECARDEY	PBPD				
OWNER'S NAME / D.O.B.	ADDRESS	Street	City	Zip	PHONE NUMBER
SUSPECT'S NAME / D.O.B. [redacted]	ADDRESS	Street	City	Zip	PHONE NUMBER
EPSTEIN, JEFFREY	358 EL BRILLO		WB		
ADDT'NL. SUSPECT / D.O.B.	ADDRESS	Street	City	Zip	PHONE NUMBER

SPECIAL INSTRUCTIONS

FOUND PROPERTY 90 DAYS — CLAIM ☐ NOT CLAIM ☐

ITEM #	QUANTITY	VALUE	DESCRIPTION
1			MISC DOCUMENTS (FOR [illegible])

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 7415 D2 ID# UNIT

RECEIVED BY	REASON	DATE/TIME RECEIVED
AB 8378	E	09-31-05 1445

PALM BEACH POLICE DEPARTMENT
PROPERTY RECEIPT

DETECTIVE BUREAU

PBPD Form #52

☐ PROPERTY ☐ FOUND ☐ DECEASED (Probated) ☐ PERSONAL ☐ CONFISCATED ☐ DESTROY

☒ EVIDENCE ☒ TRIAL ☐ LABORATORY ☐ STOLEN/RECOVERED ☐ OTHER

INCIDENT/CITATION NUMBER	DATE/TIME RECOVERED	PROPERTY NUMBER (Leave Blank)	BIN NUMBER (Leave Blank)
05-368	092305 1030	05-878	129141

ADDRESS WHERE PROPERTY IMPOUNDED: 345 S COUNTY Rd

	ADDRESS Street	City	Zip	PHONE NUMBER
DISCOVERED BY / D.O.B. RECAREY	PBPD			
OWNER'S NAME / D.O.B.				
SUSPECT'S NAME / D.O.B. EPSTEIN JEFFREY				
ADDT'NL. SUSPECT / D.O.B.				

SPECIAL INSTRUCTIONS

FOUND PROPERTY 90 DAYS — CLAIM ☐ NOT CLAIM ☐

ITEM #	QUANTITY	VALUE	DESCRIPTION
1	1		MISC PAPERWORK (TRASH 092305) VIEWED CONTENTS

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# 791 UNIT D2

RECEIVED BY	REASON	DATE/TIME RECEIVED
P. [illegible] #270	EC	9-23-05 1630

EFTA00232911

PALM BEACH POLICE DEPARTMENT
PROPERTY RECEIPT

DETECTIVE BUREAU

PBPD Form #52

☐ PROPERTY ☐ FOUND ☐ DECEASED (Probated) ☐ PERSONAL ☐ CONFISCATED ☐ DESTROY

☒ EVIDENCE ☒ TRIAL ☐ LABORATORY ☐ STOLEN/RECOVERED ☐ OTHER

INCIDENT/CITATION NUMBER	DATE/TIME RECOVERED	PROPERTY NUMBER (Leave Blank)	BIN NUMBER (Leave Blank)
05-368	092705 1000		129226

ADDRESS WHERE PROPERTY IMPOUNDED: 345 S COUNTY ROAD PALM BEACH FL

DISCOVERED BY / D.O.B.: DET RECARFY	ADDRESS Street City Zip: PBPD		PHONE NUMBER:
OWNER'S NAME / D.O.B.	ADDRESS Street City Zip		PHONE NUMBER
SUSPECT'S NAME / D.O.B.: [redacted] EPSTEIN, JEFF	ADDRESS Street City Zip: 358 EL BRILLO PB		PHONE NUMBER
ADDT'NL. SUSPECT / D.O.B.	ADDRESS Street City Zip		PHONE NUMBER

SPECIAL INSTRUCTIONS

FOUND PROPERTY 90 DAYS — CLAIM ☐ NOT CLAIM ☐

ITEM #	QUANTITY	VALUE	DESCRIPTION
1			2 MAGAZINES, ONE IDENTIFIED FROM MARWELL TAKEN FROM TRASH. (9270S TRASH)

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 7915 ID# DZ UNIT

RECEIVED BY	REASON	DATE/TIME RECEIVED
AB8378	6	09-29-05 0736

EFTA00232912

PALM BEACH POLICE DEPARTMENT
PROPERTY RECEIPT

DETECTIVE BUREAU

PBPD Form #52

☐ PROPERTY ☐ FOUND ☐ DECEASED (Probated) ☐ PERSONAL ☐ CONFISCATED ☐ DESTROY
☐ EVIDENCE ☒ TRIAL ☐ LABORATORY ☐ STOLEN/RECOVERED ☐ OTHER

INCIDENT/CITATION NUMBER	DATE/TIME RECOVERED	PROPERTY NUMBER (Leave Blank)	BIN NUMBER (Leave Blank)
05 368	093005 940A	05 715	179642

ADDRESS WHERE PROPERTY IMPOUNDED: 345 S COUNTY ROAD PALM BEACH

DISCOVERED BY / D.O.B.	ADDRESS Street City Zip	PHONE NUMBER
DET RECALEY	PBPD	
OWNER'S NAME / D.O.B.	ADDRESS Street City Zip	PHONE NUMBER
SUSPECT'S NAME / D.O.B. [redacted] EPSTEIN, JEFFREY	ADDRESS 358 EL BRILLO PB Street City Zip	PHONE NUMBER
ADDT'NL. SUSPECT / D.O.B.	ADDRESS Street City Zip	PHONE NUMBER

SPECIAL INSTRUCTIONS

FOUND PROPERTY 90 DAYS — CLAIM ☐ NOT CLAIM ☐

ITEM #	QUANTITY	VALUE	DESCRIPTION
1	1		PIECE of PAPER WITH ANDREW STEWARTS NAME (TRASH 93005)

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 7915 ID# 02 UNIT

RECEIVED BY	REASON	DATE/TIME RECEIVED
PD 8338	6	093005 1040 EST

EFTA00232913

PALM BEACH POLICE DEPARTMENT
PROPERTY RECEIPT

EVIDENCE CUSTODIAN

PBPD Form #52

☐ PROPERTY	☐ FOUND	☐ DECEASED (Probated)	☐ PERSONAL	☐ CONFISCATED	☐ DESTROY
☒ EVIDENCE	☒ TRIAL	☐ [redacted]	☐ STOLEN/RECOVERED	☐ OTHER	

INCIDENT/CITATION NUMBER	DATE/TIME RECOVERED	PROPERTY NUMBER (Leave Blank)	BIN NUMBER (Leave Blank)
05-368	10-03-05/0915		

ADDRESS WHERE PROPERTY IMPOUNDED: 358 EL BRILLO WAY, PALM BEACH, FL 33480

DISCOVERED BY / D.O.B.: C. KRAUEL 8266	ADDRESS: PBPD (Street / City / Zip)	[redacted]	
OWNER'S NAME / D.O.B.	ADDRESS (Street / City / Zip)	PHONE NUMBER	
SUSPECT'S NAME / D.O.B: [redacted] EPSTEIN, JEFFREY	ADDRESS: 358 El Brillo Way, FL 33480 (Street / City / Zip)	PHONE NUMBER	
ADDT'NL. SUSPECT / D.O.B.	ADDRESS (Street / City / Zip)	PHONE NUMBER	

SPECIAL INSTRUCTIONS

FOUND PROPERTY 90 DAYS — CLAIM ☐ NOT CLAIM ☐

ITEM #	QUANTITY	VALUE	DESCRIPTION
1	1		Clear piece of plastic w/ roundish curves
2			misc. pieces of documentation removed from trash at 358 El Brillo Way

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 [signature] ID# 8266 UNIT V.2

RECEIVED BY	REASON	DATE/TIME RECEIVED

PALM BEACH POLICE DEPARTMENT
PROPERTY RECEIPT

PBPD Form #52 — DETECTIVE BUREAU

☐ PROPERTY	☐ FOUND	☐ DECEASED (Probated)	☐ PERSONAL	☒ CONFISCATED	☐ DESTROY
☒ EVIDENCE	☒ TRIAL	☐ LABORATORY	☐ STOLEN/RECOVERED	☐ OTHER 2 PKGS	

INCIDENT/CITATION NUMBER	DATE/TIME RECOVERED	PROPERTY NUMBER (Leave Blank)	BIN NUMBER (Leave Blank)
05-368	10-3-05 2100	05-929	128719

ADDRESS WHERE PROPERTY IMPOUNDED: 345 Sloan Road Palm Beach 128719: 1-2-4

DISCOVERED BY / D.O.B.	ADDRESS Street City Zip	PHONE NUMBER
DET RECARLEY	PBPD	
OWNER'S NAME / D.O.B.	ADDRESS Street City Zip	PHONE NUMBER
SUSPECT'S NAME / D.O.B. [redacted] EPSTEIN, JEF	ADDRESS Street City Zip: 358 EL BRAIL PB	PHONE NUMBER
ADDT'NL. SUSPECT / D.O.B.	ADDRESS Street City Zip	PHONE NUMBER

SPECIAL INSTRUCTIONS: WHITE COPY

FOUND PROPERTY 90 DAY [redacted] CLAIM ☐ NOT CLAIM ☐

ITEM #	QUANTITY	VALUE	DESCRIPTION
1	1		MAXELL VHS T-160 CASSETTE [redacted]
2	1		SONY MICROCASSETTES (STATEMENT [redacted]
			[redacted]
3	1		SONY MICROCASSETTE [redacted] to STATION)
4	1		SONY MICRO CASSETTE [redacted] to Home)
			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 [signature] 791K D2

ID# UNIT

RECEIVED BY	REASON	DATE/TIME RECEIVED
AB 8938	5	10-4-05 0736

PALM BEACH POLICE DEPARTMENT
PROPERTY RECEIPT

EVIDENCE CUSTODIAN

PBPD Form #52

☐ PROPERTY	☐ FOUND	☐ DECEASED (Probated)	☐ PERSONAL	☐ CONFISCATED	☐ DESTROY
☑ EVIDENCE	☐ TRIAL	☐ LABORATORY	☐ STOLEN/RECOVERED	☐ OTHER	

INCIDENT/CITATION NUMBER	DATE/TIME RECOVERED	PROPERTY NUMBER (Leave Blank)	BIN NUMBER (Leave Blank)
05-368	10-04-05/0928		

ADDRESS WHERE PROPERTY IMPOUNDED: 358 El Brillo Way, Palm Beach, FL 33480

DISCOVERED BY / D.O.B. C Vrabel 82666	ADDRESS	Street	City	Zip	PHONE NUMBER
OWNER'S NAME / D.O.B.	ADDRESS	Street	City	Zip	PHONE NUMBER
SUSPECT'S NAME / D.O.B. [redacted] Epstein, Jeffrey	ADDRESS 358 El Brillo Way, Palm Bch 33480	Street	City	Zip	PHONE NUMBER
ADDT'NL. SUSPECT / D.O.B.	ADDRESS	Street	City	Zip	PHONE NUMBER

SPECIAL INSTRUCTIONS

FOUND PROPERTY 90 DAYS — CLAIM ☐ NOT CLAIM ☐

ITEM #	QUANTITY	VALUE	DESCRIPTION
1			Misc. Pieces of papers/ documentation removed from trash at 358 El Brillo Way
			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 [signature] ID# 82666 UNIT V-22

RECEIVED BY	REASON	DATE/TIME RECEIVED

PALM BEACH POLICE DEPARTMENT
PROPERTY RECEIPT

PBPD Form #52

DETECTIVE BUREAU

☐ PROPERTY ☐ FOUND ☐ DECEASED (Probated) ☐ PERSONAL ☐ CONFISCATED ☐ DESTROY

☒ EVIDENCE ☒ TRIAL ☐ LABORATORY ☐ STOLEN/RECOVERED ☐ OTHER

INCIDENT/CITATION NUMBER	DATE/TIME RECOVERED	PROPERTY NUMBER (Leave Blank)	BIN NUMBER (Leave Blank)
05-368	10-4-05 1617	05-937	128141

ADDRESS WHERE PROPERTY IMPOUNDED: 345 S. COUNTY ROAD PALM BEACH, FL

	ADDRESS Street	City	Zip	PHONE NUMBER
DISCOVERED BY / D.O.B. DET. RECARLEY	PBPD			
OWNER'S NAME / D.O.B.				
SUSPECT'S NAME / D.O.B. EPSTEIN, JEFF [redacted]	358 EL BRILLO	PB		
ADDT'NL. SUSPECT / D.O.B.				

SPECIAL INSTRUCTIONS

FOUND PROPERTY 90 DAYS — CLAIM ☐ NOT CLAIM ☐

ITEM #	QUANTITY	VALUE	DESCRIPTION
1	1		SONY MICROCASSETTE STATEMENT [redacted]
2	1		SONY MICROCASSETTE [redacted]
3	1		SONY MICROCASSETTE VOICE MAIL MESSAGE (WORK)
4	1		SONY MICROCASSETTE follow PHONE CALL [redacted]
			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 795 ID# D2 UNIT

RECEIVED BY	REASON	DATE/TIME RECEIVED
[illegible] 8338	6	10-05-0[redacted] 0730 hrs

EFTA00232917

PALM BEACH POLICE DEPARTMENT
PROPERTY RECEIPT

DETECTIVE BUREAU

PBPD Form #52

☐ PROPERTY	☐ FOUND	☐ DECEASED (Probated)	☐ PERSONAL	☐ CONFISCATED	☐ DESTROY
☒ EVIDENCE	☒ TRIAL	☐ LABORATORY	☐ STOLEN/RECOVERED	☐ OTHER	

INCIDENT/CITATION NUMBER	DATE/TIME RECOVERED	PROPERTY NUMBER (Leave Blank)	BIN NUMBER (Leave Blank)
05-368	10-505 1000	05-941	129542

ADDRESS WHERE PROPERTY IMPOUNDED: 345 S COUNTY ROAD PALM BEACH

DISCOVERED BY / D.O.B.	ADDRESS Street	City	Zip	PHONE NUMBER
DET. RILEY	PBPD			
OWNER'S NAME / D.O.B.	ADDRESS Street	City	Zip	PHONE NUMBER
SUSPECT'S NAME / D.O.B. [redacted] EPSTEIN, JEFFREY	ADDRESS Street 358 EL BRILLO	City	Zip	PHONE NUMBER
ADDT'NL SUSPECT / D.O.B.	ADDRESS Street	City	Zip	PHONE NUMBER

SPECIAL INSTRUCTIONS

FOUND PROPERTY 90 DAYS — CLAIM ☐ NOT CLAIM ☐

ITEM #	QUANTITY	VALUE	DESCRIPTION
1			MISC PAPERWORK (TRASH 10-505)

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 [signature] 7915 ID# D2 UNIT

RECEIVED BY	REASON	DATE/TIME RECEIVED
[illegible]	E	10-05-05 1310 hrs

EFTA00232918

PALM BEACH POLICE DEPARTMENT
PROPERTY RECEIPT

DETECTIVE BUREAU

PBPD Form #52

☐ PROPERTY ☐ FOUND ☐ DECEASED (Probated) ☐ PERSONAL ☐ CONFISCATED ☐ DESTROY

☒ EVIDENCE ☒ TRIAL ☐ LABORATORY ☐ STOLEN/RECOVERED ☐ OTHER

INCIDENT/CITATION NUMBER	DATE/TIME RECOVERED	PROPERTY NUMBER (Leave Blank)	BIN NUMBER (Leave Blank)
05-368	100505 1708	05 1942	128141

ADDRESS WHERE PROPERTY IMPOUNDED: 345 S COUNTY ROAD PALM BEACH

DISCOVERED BY / D.O.B.	ADDRESS	Street	City	Zip	PHONE NUMBER
DET. REURLEY	PBPD				
OWNER'S NAME / D.O.B.	ADDRESS	Street	City	Zip	PHONE NUMBER
SUSPECT'S NAME / D.O.B. [redacted]	ADDRESS	Street	City	Zip	PHONE NUMBER
EPSTEIN, JEF	358	El Brillo			
ADDT'NL SUSPECT / D.O.B.	ADDRESS	Street	City	Zip	PHONE NUMBER

SPECIAL INSTRUCTIONS: Please copy

FOUND PROPERTY 90 DAYS ☐ CLAIM ☐ NOT CLAIM

ITEM #	QUANTITY	VALUE	DESCRIPTION
1	1		SONY MICROCASSETTE Statement
2	1		SONY MICROCASSETTE Statement [redacted]

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 795 D2 ID# UNIT

RECEIVED BY	REASON	DATE/TIME RECEIVED
[illegible]	6	10-06-05 1720 hrs.

EFTA00232919

PALM BEACH POLICE DEPARTMENT
PROPERTY RECEIPT

DETECTIVE BUREAU

PBPD Form #52

☐ PROPERTY ☐ FOUND ☐ DECEASED (Probated) ☐ PERSONAL ☐ CONFISCATED ☐ DESTROY
☒ EVIDENCE ☐ TRIAL ☐ LABORATORY ☐ STOLEN/RECOVERED ☐ OTHER

INCIDENT/CITATION NUMBER	DATE/TIME RECOVERED	PROPERTY NUMBER (Leave Blank)	BIN NUMBER (Leave Blank)
05-368	10-04-05/0928	05-943	129542

ADDRESS WHERE PROPERTY IMPOUNDED: 358 El Brillo Way, Palm Beach, FL 33480

	ADDRESS (Street / City / Zip)	PHONE NUMBER
DISCOVERED BY / D.O.B.: C. Krauel 80266		
OWNER'S NAME / D.O.B.		
SUSPECT'S NAME / D.O.B.: [redacted] Epstein, Jeffrey	358 El Brillo Way, Palm Bch 33480	
ADDT'NL. SUSPECT / D.O.B.		

SPECIAL INSTRUCTIONS

FOUND PROPERTY 90 DAYS — CLAIM ☐ NOT CLAIM ☐

ITEM #	QUANTITY	VALUE	DESCRIPTION
1			MISC. PIECES OF PAPERS/ DOCUMENTATION REMOVED FROM TRASH AT 358 EL BRILLO WAY

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 [signature] ID# 80266 UNIT V.B.

RECEIVED BY	REASON	DATE/TIME RECEIVED
215 6356	E	10-07-05 0726

PALM BEACH POLICE DEPARTMENT
PROPERTY RECEIPT

DETECTIVE BUREAU

PBPD Form #52

☐ PROPERTY ☐ FOUND ☐ DECEASED (Probated) ☐ PERSONAL ☐ CONFISCATED ☐ DESTROY

☒ EVIDENCE ☒ TRIAL ☐ LABORATORY ☐ STOLEN/RECOVERED ☐ OTHER 2 ITEMS

INCIDENT/CITATION NUMBER	DATE/TIME RECOVERED	PROPERTY NUMBER (Leave Blank)	BIN NUMBER (Leave Blank)
05-368	10-03-05/0915	05-944	129731 - #1 129542 - #2

ADDRESS WHERE PROPERTY IMPOUNDED
358 EL BRILLO WAY, PALM BEACH, FL 33480

	ADDRESS (Street / City / Zip)	PHONE NUMBER
DISCOVERED BY / D.O.B. C. KRAUEL 8266	PBPD	[redacted]
OWNER'S NAME / D.O.B.		
SUSPECT'S NAME / D.O.B. EPSTEIN, JEFFREY [redacted]	358 El Brillo Way, FL 33480	
ADDT'NL SUSPECT / D.O.B.		

SPECIAL INSTRUCTIONS

FOUND PROPERTY 90 DAYS — CLAIM ☐ NOT CLAIM ☐

ITEM #	QUANTITY	VALUE	DESCRIPTION
1	1		Clear piece of plastic w/ roundish curves
2			misc pieces of documentation removed from trash at 358 El Brillo Way

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 CDK 8266 ID# V.2 UNIT

RECEIVED BY	REASON	DATE/TIME RECEIVED
[illegible] 8238	Ev	10-03-05 0930

PALM BEACH POLICE DEPARTMENT
PROPERTY RECEIPT

PBPD Form #52

DETECTIVE BUREAU

☐ PROPERTY ☐ FOUND ☐ DECEASED (Probated) ☐ PERSONAL ☐ CONFISCATED ☐ DESTROY
☒ EVIDENCE ☒ TRIAL ☐ LABORATORY ☐ STOLEN/RECOVERED ☐ OTHER

INCIDENT/CITATION NUMBER	DATE/TIME RECOVERED	PROPERTY NUMBER (Leave Blank)	BIN NUMBER (Leave Blank)
05-368	100605 5:12	05-745	128141

ADDRESS WHERE PROPERTY IMPOUNDED: 345 S. COUNTY ROAD PALM BEACH

	ADDRESS (Street / City / Zip)	PHONE NUMBER
DISCOVERED BY / D.O.B.: DET RECARLEY	PBPD	
OWNER'S NAME / D.O.B.		
SUSPECT'S NAME / D.O.B.: EPSTEIN, JEF [redacted]	358 EL BRILLO ROAD	
ADDT'NL SUSPECT / D.O.B.		

SPECIAL INSTRUCTIONS

FOUND PROPERTY 90 DAYS — CLAIM ☐ NOT CLAIM ☐

ITEM #	QUANTITY	VALUE	DESCRIPTION
1	21		SONY MICRO CASSETTES (STATEMENT [redacted]
2	1		[redacted]

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 [signature] 7915 D2

ID# UNIT

RECEIVED BY	REASON	DATE/TIME RECEIVED
MS 8338	5	10-07-05 1730

PALM BEACH POLICE DEPARTMENT
PROPERTY RECEIPT

PBPD Form #52

DETECTIVE BUREAU

☐ PROPERTY ☐ FOUND ☐ DECEASED (Probated) ☐ PERSONAL ☐ CONFISCATED ☐ DESTROY

☒ EVIDENCE ☒ TRIAL ☐ LABORATORY ☐ STOLEN/RECOVERED ☐ OTHER

INCIDENT/CITATION NUMBER	DATE/TIME RECOVERED	PROPERTY NUMBER (Leave Blank)	BIN NUMBER (Leave Blank)
05-368	10/12/05 1700 HRS	05-972	128141

ADDRESS WHERE PROPERTY IMPOUNDED: 345 S. COUNTY ROAD PALM BEACH

	ADDRESS (Street / City / Zip)	PHONE NUMBER
DISCOVERED BY / D.O.B.: DET. TZECARLEY	PBPD	
OWNER'S NAME / D.O.B.		
SUSPECT'S NAME / D.O.B.: EPSTEIN, JEF[redacted]	358 EL Brillo PB	
ADDT'NL. SUSPECT / D.O.B.		

SPECIAL INSTRUCTIONS: "PLEASE COPY"

FOUND PROPERTY 90 DAYS ☐ CLAIM ☐ NOT CLAIM

ITEM #	QUANTITY	VALUE	DESCRIPTION
1	2	0.5	SONY MICROCASSETTES INTERVIEW [redacted]
2	1		
3	1		SONY MICROCASSETTE INTERVIEW WITH [redacted]

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 [signature] 7915 ID# D2 UNIT

RECEIVED BY	REASON	DATE/TIME RECEIVED
4.28738	6	10-13-05 1200 hrs

PALM BEACH POLICE DEPARTMENT
PROPERTY RECEIPT

PBPD Form #52

DETECTIVE BUREAU

☐ PROPERTY	☐ FOUND	☐ DECEASED (Probated)	☐ PERSONAL	☐ CONFISCATED	☐ DESTROY
☑ EVIDENCE	☒ TRIAL	☐ LABORATORY	☐ STOLEN/RECOVERED	☐ OTHER	

INCIDENT/CITATION NUMBER	DATE/TIME RECOVERED	PROPERTY NUMBER (Leave Blank)	BIN NUMBER (Leave Blank)
05368	101805 1140	05-1005	129442

ADDRESS WHERE PROPERTY IMPOUNDED: 345 S. COUNTY ROAD PALM BEACH

	ADDRESS Street	City	Zip	PHONE NUMBER
DISCOVERED BY / D.O.B. KRAUEL	PBPD			
OWNER'S NAME / D.O.B.				
SUSPECT'S NAME / D.O.B. [redacted] EPSTEIN, JEFF	358 EL BRILLO			
ADDT'NL SUSPECT / D.O.B.				

SPECIAL INSTRUCTIONS

FOUND PROPERTY 90 DAYS — CLAIM ☐ NOT CLAIM ☐

ITEM #	QUANTITY	VALUE	DESCRIPTION
1			MISC. WADERWORK (TRASH 101805 DET KRAUEL)

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 7915 ID# D2 UNIT

RECEIVED BY	REASON	DATE/TIME RECEIVED
[illegible]	5	10-19-05 0800 h

EFTA00232924

PALM BEACH POLICE DEPARTMENT
PROPERTY RECEIPT
SEARCH WARRANT RETURN

DETECTIVE BUREAU

PBPD Form #52

☐ PROPERTY	☐ FOUND	☐ DECEASED (Probated)	☑ PERSONAL	☐ CONFISCATED	☐ DESTROY
☐ EVIDENCE	☐ TRIAL	☐ LABORATORY	☐ STOLEN/RECOVERED	☐ OTHER	

INCIDENT/CITATION NUMBER	DATE/TIME RECOVERED	PROPERTY NUMBER (Leave Blank)	BIN NUMBER (Leave Blank)
05 [illegible]	10/20/05	05-1023	129443

ADDRESS WHERE PROPERTY IMPOUNDED: Residence (room off pool) 358 EL-Brillo

	ADDRESS Street	City	Zip	PHONE NUMBER
DISCOVERED BY / D.O.B. Schoeller, Douglas				
OWNER'S NAME / D.O.B.				
SUSPECT'S NAME / D.O.B. 1-20-53 EPSTEIN, JEFFREY	358 EL Brillo			
ADDT'NL. SUSPECT / D.O.B.				

SPECIAL INSTRUCTIONS

FOUND PROPERTY 90 DAYS — CLAIM ☐ NOT CLAIM ☐

ITEM #	QUANTITY	VALUE	DESCRIPTION
1	3		floor plans (house 1st/2nd/Cabana)
			(CAD)

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.

D.A. Schoeller — 10.20.05
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] — 7915 — D2
SIGNATURE — ID# — UNIT

RECEIVED BY	REASON	DATE/TIME RECEIVED
K Pell	diagram of scene	10/20/05 11:45 am

EFTA00232925

PALM BEACH POLICE DEPARTMENT
PROPERTY RECEIPT
SEARCH WARRANT RETURN

PBPD Form #52 — DETECTIVE BUREAU

☐ PROPERTY ☐ FOUND ☐ DECEASED (Probated) ☐ PERSONAL ☐ CONFISCATED ☐ DESTROY
☑ EVIDENCE ☑ TRIAL ☐ LABORATORY ☐ STOLEN/RECOVERED ☐ OTHER

INCIDENT/CITATION NUMBER	DATE/TIME RECOVERED	PROPERTY NUMBER (Leave Blank)	BIN NUMBER (Leave Blank)
05-368	10-20-2005	05-1024	

ADDRESS WHERE PROPERTY IMPOUNDED: 258 EL Brillo

	ADDRESS (Street / City / Zip)	PHONE NUMBER
DISCOVERED BY / D.O.B.		
OWNER / VICTIM'S NAME / D.O.B.		
SUSPECT'S NAME / D.O.B. [redacted] Epstein Jeff	358 EL Brillo	
ADDT'NL. SUSPECT / D.O.B.		

SPECIAL INSTRUCTIONS

FOUND PROPERTY 90 DAYS — CLAIM ☐ NOT CLAIM ☐

ITEM #	QUANTITY	VALUE	DESCRIPTION
1	1		Phone message book (kitchen)
2	2		Phone message book (office off kitch)
3	3		file folder (messages) w/ 2 more files (Purple
4	1		Shredderd Paper office off kitchen
5	11		orange file folder marked "messag[redacted] 11
			* items 2-5 from office off kitchen
6	1	Beige	message table off from closet foyer
7	1	Brown	message table → foyer
8	1		Black Framed Photo of nude girl
9	99		Pictures in frame 1 item #8 from
10	1		↑ from Yellow/Blue room off kitchen
11	8		Photos from office off Pool area
12	2		Photos from table on left → LIVING room off pool area
13	0		Photos table on right →
	1		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 [redacted] 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 7915 ID# D2 UNIT

RECEIVED BY	REASON	DATE/TIME RECEIVED
I, Joseph Recarey, 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 this 21 day of October 2005.	#7915	Joseph A. Bruno

PALM BEACH POLICE DEPARTMENT
PROPERTY RECEIPT
SEARCH WARRANT RETURN

DETECTIVE BUREAU

PBPD Form #52

☐ PROPERTY ☐ FOUND ☐ DECEASED (Probated) ☐ PERSONAL ☐ CONFISCATED ☐ DESTROY

☑ EVIDENCE ☑ TRIAL ☐ LABORATORY ☐ STOLEN/RECOVERED ☐ OTHER Lab

INCIDENT/CITATION NUMBER	DATE/TIME RECOVERED	PROPERTY NUMBER (Leave Blank)	BIN NUMBER (Leave Blank)
05-368	10-20-05	05-1024	

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 Epstein Jeff	ADDRESS 358 El Brillo Street City Zip	PHONE NUMBER
ADDT'NL SUSPECT / D.O.B.	ADDRESS Street City Zip	PHONE NUMBER

SPECIAL INSTRUCTIONS

FOUND PROPERTY 90 DAYS CLAIM ☐ NOT CLAIM ☐

ITEM #	QUANTITY	VALUE	DESCRIPTION
✓13	2	✓	VHS tapes from Credenza on Right By Pool
✓14	2	*	CD's marked Happy Birthday ↑ Credenza Pool (2)
✓15	3		Photos framed from Cabana
✓16	1	✓	message book 1st floor S/W corner (Left Side)
✓17	1	✓	message book (from inside desk)
✓18	3	✓	CD's from desk
✓19	1	*	DVD from desk (items # 13, 17, 20, 21 from 1st floor S.W.)
✓20		unframed	Photos from desk
✓21	2		framed Photos from desk
✓22	2	✓	framed Photos from table in S/W corner office
✓23	3		Soap on Rope (NE Bedroom) (Lab from room)
✓24	2		Tulia Torpedo in Brown box
✓25	2		Soap on Rope (middle Bedroom) Bathroom
✓26	1		Large framed Picture (from foyer into Master Bedroom)
✓			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 7915 ID# D2 UNIT

RECEIVED BY	REASON	DATE/TIME RECEIVED

* The Pool Villa (2nd)

PALM BEACH POLICE DEPARTMENT
PROPERTY RECEIPT
SEARCH WARRANT RETURN

DETECTIVE BUREAU

PBPD Form #52

☐ PROPERTY ☐ FOUND ☐ DECEASED (Probated) ☐ PERSONAL ☐ CONFISCATED ☐ DESTROY
☑ EVIDENCE ☐ TRIAL ☐ LABORATORY ☐ STOLEN/RECOVERED ☐ OTHER lab

INCIDENT/CITATION NUMBER	DATE/TIME RECOVERED	PROPERTY NUMBER (Leave Blank)	BIN NUMBER (Leave Blank)
05-368	10-20-05	06-1024	

ADDRESS WHERE PROPERTY IMPOUNDED: 358 El Brillo

	ADDRESS Street	City	Zip	PHONE NUMBER
DISCOVERED BY / D.O.B.				
OWNER / VICTIM'S NAME / D.O.B.				
SUSPECT'S NAME / D.O.B. [redacted] Epstein Jeff	358 El Brillo			
ADDTNL. SUSPECT / D.O.B.				

SPECIAL INSTRUCTIONS

FOUND PROPERTY 90 DAYS ☐ CLAIM ☐ NOT CLAIM

ITEM #	QUANTITY	VALUE	DESCRIPTION
27	1	NCV	School transcript, [redacted] MASTER BDROOM DESK
28	1	NCV	BOTTLE OF JOY JELLY, MASTER BATHROOM CABOGNZA MASTER BEDROOM (2)
29	3	NCV	VIDEOTAPES "3", SEXIN CITY, LATIN JANINE, I LOVE LESBIANS FOUR, MASTER BATHROOM
30	6	NCV	FRAMED PHOTOS FROM MENS BATHROOM - MASTER BDROOM
31	1	NCV	GREEN MASSAKE TABLE, MEN'S BATHROOM - MASTER BEDROOM
32	1	NCV	THRIFTY RENTAL AGREEMENT FROM CHEVROLET SUBURBAN (COPIED)
33	1	NCV	NOTE FROM JOHANNA FROM CHEVROLET SUBURBAN.
34	UNK	11	CD'S from office of kitchen
35	6		ZIP CD'S from Bookcase RETURN
36	2		8mm Video tapes from Bookcase RETURN
37	4		Compact flash cards from Bookcase RETURN
38	1		flash card from camera on bookcase - RETURN TO OWNER
39	3		ZIP CD's from Bookcase RETURN
40	3		CD's from Bookcase (items 35-40 from Guesthouse) RETURN
			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 7915 D2 ID# UNIT

RECEIVED BY	REASON	DATE/TIME RECEIVED

TH GP IMPOUND

PALM BEACH POLICE DEPARTMENT
PROPERTY RECEIPT
DETECTIVE BUREAU

PBPD Form #52

SEARCH WARRANT RETURN

☐ PROPERTY	☐ FOUND	☐ DECEASED (Probated)	☐ PERSONAL	☐ CONFISCATED	☐ DESTROY
☐ EVIDENCE	☑ TRIAL	☐ LABORATORY	☐ STOLEN/RECOVERED	☐ OTHER	lab

INCIDENT/CITATION NUMBER	DATE/TIME RECOVERED	PROPERTY NUMBER (Leave Blank)	BIN NUMBER (Leave Blank)
05-368	10-20-05	05-1024	

ADDRESS WHERE PROPERTY IMPOUNDED: 358 El Brillo

	ADDRESS Street	City	Zip	PHONE NUMBER
DISCOVERED BY / D.O.B.				
OWNER'S NAME / D.O.B.				
SUSPECT'S NAME / D.O.B. [redacted] Epstein, Jeff	358 El Brillo			
ADDT'NL. SUSPECT / D.O.B.				

SPECIAL INSTRUCTIONS

FOUND PROPERTY 90 DAYS — CLAIM ☐ NOT CLAIM ☐

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 (COPIED)
47	10	✓	Disks in Clear Box RETURN
48	7		ZIP Disks from Guest room RETURN
			Items # 35—48 from Guest bedroom RETURN
49	1		Message book from Guesthouse office RETURN
50	1		message book RETURN
51	2		Compact flash cards from RETURN
52	6		CD's RETURN #49-51 Guesthouse office
53	1		CPU from Guesthouse office RETURN
			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 [signature] ID# 7915 UNIT D2

RECEIVED BY	REASON	DATE/TIME RECEIVED

EFTA00232929

PALM BEACH POLICE DEPARTMENT
PROPERTY RECEIPT
DETECTIVE BUREAU

PBPD Form #52

~~SEARCH WARRANT RETURN~~

☐ PROPERTY	☐ FOUND	☐ DECEASED (Probated)	☐ PERSONAL	☐ CONFISCATED	☐ DESTROY
☒ EVIDENCE	☒ TRIAL	☐ LABORATORY	☐ STOLEN/RECOVERED	☐ OTHER	Lab

INCIDENT/CITATION NUMBER	DATE/TIME RECOVERED	PROPERTY NUMBER (Leave Blank)	BIN NUMBER (Leave Blank)
05-368	10-20-05	05-1024	

ADDRESS WHERE PROPERTY IMPOUNDED: 358 El Brillo Palm Beach

	ADDRESS Street	City	Zip	PHONE NUMBER
DISCOVERED BY / D.O.B.				
OWNER'S NAME / D.O.B.				
SUSPECT'S NAME / D.O.B. 01-20-5 Epstein Jeff	358 El Brillo			
ADDT'NL. SUSPECT / D.O.B.				

SPECIAL INSTRUCTIONS

FOUND PROPERTY 90 DAYS — CLAIM ☐ NOT CLAIM ☐

ITEM #	QUANTITY	VALUE	DESCRIPTION
54	1		Power cord to CPU (#53) RETURN
55	1	*	CPU from office off kitchen RETURN
56	1		Power cord to item #55
57	3		CD's Whm #55-57 from Office off Kitchen Return
58	1	*	Peach message table upstairs RETURN RETURN RETURN
			RETURN
			RETURN
			RETURN
			RETURN RETURN
			RETURN
			TOTAL PACKAGE WEIGHT

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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 7915 D2 ID# UNIT

RECEIVED BY	REASON	DATE/TIME RECEIVED

* To be viewed

PALM BEACH POLICE DEPARTMENT
PROPERTY RECEIPT

S/W RETURN

PBPD Form #52

DETECTIVE BUREAU

☐ PROPERTY	☐ FOUND	☐ DECEASED (Probated)	☐ PERSONAL	☐ CONFISCATED	☐ DESTROY
☒ EVIDENCE	☒ TRIAL	☐ LABORATORY	☐ STOLEN/RECOVERED	☐ OTHER	lab

INCIDENT/CITATION NUMBER	DATE/TIME RECOVERED	PROPERTY NUMBER (Leave Blank)	BIN NUMBER (Leave Blank)
05-	10 2005 1410	05-1024	

ADDRESS WHERE PROPERTY IMPOUNDED: 358 EL Bulio

	ADDRESS Street	City	Zip	PHONE NUMBER
DISCOVERED BY / D.O.B.				
OWNER'S NAME / D.O.B.				
SUSPECT'S NAME / D.O.B. [redacted] EPSTEIN JEFF	358 EL Bulio			
ADDT'NL SUSPECT / D.O.B.				

SPECIAL INSTRUCTIONS

FOUND PROPERTY 90 DAYS — CLAIM ☐ NOT CLAIM ☐

ITEM #	QUANTITY	VALUE	DESCRIPTION
~~ENVP~~	1	*	GREEN PHOTO FRAME WITH NAKED GIRL

RETURN

TOTAL PACKAGE WEIGHT

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SIGNATURE _____ DATE _____

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SIGNATURE [signature] 7915 ID# DZ UNIT

RECEIVED BY	REASON	DATE/TIME RECEIVED
AB #338	6	10-20-05 1500hrs

EFTA00232931

PALM BEACH POLICE DEPARTMENT
PROPERTY RECEIPT

PBPD Form #52

DETECTIVE BUREAU

☐ PROPERTY ☐ FOUND ☐ DECEASED (Probated) ☐ PERSONAL ☐ CONFISCATED ☐ DESTROY

☒ EVIDENCE ☒ TRIAL ☐ LABORATORY ☐ STOLEN/RECOVERED ☐ OTHER

INCIDENT/CITATION NUMBER	DATE/TIME RECOVERED	PROPERTY NUMBER (Leave Blank)	BIN NUMBER (Leave Blank)
05-368	10-11-05 1700	05-1025	129443

ADDRESS WHERE PROPERTY IMPOUNDED: 345 S. COUNTY ROAD

DISCOVERED BY / D.O.B.	ADDRESS Street	City	Zip	PHONE NUMBER
DET. RECARLEY	PBPD			
OWNER'S NAME / D.O.B.	ADDRESS Street	City	Zip	PHONE NUMBER
SUSPECT'S NAME / D.O.B. [redacted]	ADDRESS Street	City	Zip	PHONE NUMBER
EPSTEIN JEFF	358 EL BRILLO			
ADDT'NL. SUSPECT / D.O.B.	ADDRESS Street	City	Zip	PHONE NUMBER

SPECIAL INSTRUCTIONS

FOUND PROPERTY 90 DAYS — CLAIM ☐ NOT CLAIM ☐

ITEM #	QUANTITY	VALUE	DESCRIPTION
1	1		DRAWING BY [redacted]
			TOTAL PACKAGE WEIGHT

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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 _____ 7915 ID# D2 UNIT

RECEIVED BY	REASON	DATE/TIME RECEIVED
AM 8338	6	10-28-05 0730

PALM BEACH POLICE DEPARTMENT
PROPERTY RECEIPT

PBPD Form #52

DETECTIVE BUREAU

☐ PROPERTY	☐ FOUND	☐ DECEASED (Probated)	☐ PERSONAL	☐ CONFISCATED	☐ DESTROY
☒ EVIDENCE	☒ TRIAL	☐ LABORATORY	☐ STOLEN/RECOVERED	☐ OTHER	

INCIDENT/CITATION NUMBER	DATE/TIME RECOVERED	PROPERTY NUMBER (Leave Blank)	BIN NUMBER (Leave Blank)
05-368	10-21-05 10:45	05-1027	129541

ADDRESS WHERE PROPERTY IMPOUNDED: 345 S. COUNTY ROAD

	ADDRESS Street	City	Zip	PHONE NUMBER
DISCOVERED BY / D.O.B. RZAVEL/RECARLEY				
OWNER'S NAME / D.O.B.				
SUSPECT'S NAME / D.O.B. [redacted] EPSTEIN JEF				
ADDT'NL SUSPECT / D.O.B.				

SPECIAL INSTRUCTIONS

FOUND PROPERTY 90 DAYS — CLAIM ☐ NOT CLAIM ☐

ITEM #	QUANTITY	VALUE	DESCRIPTION
1			MISC PHONE MESSAGES FROM TRASH (10-21-05)

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 [signature] ID# 7915 UNIT 02

RECEIVED BY	REASON	DATE/TIME RECEIVED

EFTA00232933

PALM BEACH POLICE DEPARTMENT
PROPERTY RECEIPT

PBPD Form #52

DETECTIVE BUREAU

☐ PROPERTY	☐ FOUND	☐ DECEASED (Probated)	☐ PERSONAL	☐ CONFISCATED	☐ DESTROY
☒ EVIDENCE	☑ TRIAL	☐ LABORATORY	☐ STOLEN/RECOVERED	☐ OTHER	2 PKgs

INCIDENT/CITATION NUMBER	DATE/TIME RECOVERED	PROPERTY NUMBER (Leave Blank)	BIN NUMBER (Leave Blank)
05-368	110405 4:05PM	05-1052	128714-#1

ADDRESS WHERE PROPERTY IMPOUNDED: 345 S COUNTY ROAD PALM BEACH, FL 128141-#2

	ADDRESS (Street / City / Zip)	PHONE NUMBER
DISCOVERED BY / D.O.B.: DET. KECALEV	PBPD	
OWNER'S NAME / D.O.B.		
SUSPECT'S NAME / D.O.B.: [redacted] EPSTEIN, JEFF	358 EL Brillo	
ADDT'NL. SUSPECT / D.O.B.		

SPECIAL INSTRUCTIONS

FOUND PROPERTY 90 DAYS — CLAIM ☐ NOT CLAIM ☐

ITEM #	QUANTITY	VALUE	DESCRIPTION
1	1		MAXELL T160 VIDEOCASSETTE [redacted]
2	1		SONY MICROCASSETTE MC-90 (Phone call)

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
4158738	6	11-07-05 0730hrs

PALM BEACH POLICE DEPARTMENT
PROPERTY RECEIPT

PD Form #52

DETECTIVE BUREAU

☐ PROPERTY	☐ FOUND	☐ DECEASED (Probated)	☐ PERSONAL	☐ CONFISCATED	☐ DESTROY
☒ EVIDENCE	☒ TRIAL	☐ LABORATORY	☐ STOLEN/RECOVERED	☐ OTHER	

INCIDENT/CITATION NUMBER	DATE/TIME RECOVERED	PROPERTY NUMBER (Leave Blank)	BIN NUMBER (Leave Blank)
05-368	110705 1240	05-1064	129542

ADDRESS WHERE PROPERTY IMPOUNDED: 345 S. COUNTY ROAD

	ADDRESS (Street / City / Zip)	PHONE NUMBER
DISCOVERED BY / D.O.B.: DET RECARLEY	PBPD	
OWNER'S NAME / D.O.B.		
SUSPECT'S NAME / D.O.B.: EPSTEIN, JEFF [redacted]	358 EL Brillo / PB / 33480	
ADDT'NL. SUSPECT / D.O.B.		

SPECIAL INSTRUCTIONS

FOUND PROPERTY 90 DAYS — CLAIM ☐ NOT CLAIM ☐

ITEM #	QUANTITY	VALUE	DESCRIPTION
1	1		SONY MICROCASSETTE NC-90 STATEMENT [redacted]
2	3		EMAIL FROM COUNTY of HONOLULU DIV. of MOTOR VEHICLES / DRIVERS LICENSE
			TOTAL PACKAGE WEIGHT

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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 [signature] 7915 ID# D2 UNIT

RECEIVED BY	REASON	DATE/TIME RECEIVED
AB 8378	6	11-08-05 1500 hrs

PALM BEACH POLICE DEPARTMENT
PROPERTY RECEIPT

PD Form #52 — DETECTIVE BUREAU

☐ PROPERTY	☐ FOUND	☐ DECEASED (Probated)	☐ PERSONAL	☐ CONFISCATED	☐ DESTROY
☒ EVIDENCE	☒ TRIAL	☐ LABORATORY	☐ STOLEN/RECOVERED	☐ OTHER	2 Vidios

INCIDENT/CITATION NUMBER	DATE/TIME RECOVERED	PROPERTY NUMBER (Leave Blank)	BIN NUMBER (Leave Blank)
05-368	110805 1521	05-1069	128714

ADDRESS WHERE PROPERTY IMPOUNDED: 345 S COUNTY ROAD PB

	DISCOVERED BY / D.O.B.	ADDRESS (Street / City / Zip)	PHONE NUMBER
	DET. REARDEN	PBPD	
	OWNER'S NAME / D.O.B.	ADDRESS (Street / City / Zip)	PHONE NUMBER
	SUSPECT'S NAME / D.O.B. [redacted]	ADDRESS (Street / City / Zip)	PHONE NUMBER
	FIRSTEIN, JEFF	358 EL Brillo	
	ADDT'NL. SUSPECT / D.O.B.	ADDRESS (Street / City / Zip)	PHONE NUMBER

SPECIAL INSTRUCTIONS

FOUND PROPERTY 90 DAYS — CLAIM ☐ NOT CLAIM ☐

ITEM #	QUANTITY	VALUE	DESCRIPTION
1	1		MAXELL VHS VIDEOCASSETTE
			STATEMENT [redacted]
2	1		MAXELL VHS VIDEO CASSETTE
			STATEMENT [redacted]
			TOTAL PACKAGE WEIGHT

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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 [signature] 7915 ID# D2 UNIT

RECEIVED BY	REASON	DATE/TIME RECEIVED
AB 8337	E	11-09-05 0730

PALM BEACH POLICE DEPARTMENT
PROPERTY RECEIPT

PBPD Form #52

DETECTIVE BUREAU

☐ PROPERTY ☐ FOUND ☐ DECEASED (Probated) ☐ PERSONAL ☐ CONFISCATED ☐ DESTROY

☑ EVIDENCE ☑ TRIAL ☐ LABORATORY ☐ STOLEN/RECOVERED ☐ OTHER

INCIDENT/CITATION NUMBER	DATE/TIME RECOVERED	PROPERTY NUMBER (Leave Blank)	BIN NUMBER (Leave Blank)
05-368	111005 1005	05-1079	#2 128521

ADDRESS WHERE PROPERTY IMPOUNDED: [redacted] S COUNTY ROAD PB

	DISCOVERED BY / D.O.B.	ADDRESS Street City Zip	PHONE NUMBER
	DET RECARLEY		
	OWNER'S NAME / D.O.B.	ADDRESS Street City Zip	PHONE NUMBER
	SUSPECT'S NAME / D.O.B. [redacted] EPSTEIN, Jeff	ADDRESS 358 El Brillo PB	PHONE NUMBER
	ADDT'NL SUSPECT / D.O.B.	ADDRESS Street City Zip	PHONE NUMBER

SPECIAL INSTRUCTIONS: PLEASE DOWNLOAD AND RETURN

FOUND PROPERTY 90 DAYS — CLAIM ☐ NOT CLAIM ☐

ITEM #	QUANTITY	VALUE	DESCRIPTION
1	1		PANASONIC RR-US360 DIGITAL RECORDER ASSIGNED TO DET RECARLEY -
			STATEMENT 1 - ALFREDO RODRIGUEZ W/M 4-12-54
			FOLDER 2 - DET RECARLEY PROVIDING DATE AND TIME OF CALL
			FOLDER 3 - JUAN ALESSI W/M 2-12-50
2	1		CD - (copy of recordings from #1
			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 [signature] 7915 ID# DZ UNIT

RECEIVED BY	REASON	DATE/TIME RECEIVED
AB8338	61	11-10-05 1100 hrs

PALM BEACH POLICE DEPARTMENT
PROPERTY RECEIPT

Joe

DETECTIVE BUREAU

PBPD Form #52

☐ PROPERTY	☐ FOUND	[redacted] (Probated)	☐ PERSONAL	☐ CONFISCATED	☐ DESTROY
☒ EVIDENCE	☒ TRIAL	☐ LABORATORY	☐ STOLEN/RECOVERED	☐ OTHER	2 PHOTOS

INCIDENT/CITATION NUMBER	DATE/TIME RECOVERED	PROPERTY NUMBER (Leave Blank)	BIN NUMBER (Leave Blank)
05-368	10-20-05 9:37AM	05-1080	128141. #1 +3

ADDRESS WHERE PROPERTY IMPOUNDED: 358- EL BRAZIL PB FL — 128714. #2

DISCOVERED BY / D.O.B.	ADDRESS Street City Zip	PHONE NUMBER
PARKINSON	3145 S COUNTY RD	
OWNER'S NAME / D.O.B.	ADDRESS Street City Zip	PHONE NUMBER
SUSPECT'S NAME / D.O.B. [redacted]	ADDRESS Street City Zip	PHONE NUMBER
ESTRADA JOE	358-EL BRAZIL PB	
ADDT'NL SUSPECT / D.O.B.	ADDRESS Street City Zip	PHONE NUMBER

SPECIAL INSTRUCTIONS: #2 SEARCH OF LOCKER FOLLOWED BY COPY

FOUND PROPERTY 90 DAYS — CLAIM ☐ NOT CLAIM ☐

ITEM #	QUANTITY	VALUE	DESCRIPTION
1	2	NCV	DV TAPES LOCKER - CD #1
2	1	NCV	VHS VIDEO TAPE
3	1		A MAGIC BUS Tape VIEWED #2

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 [signature] 8717 — ID# C11 — UNIT 8717

RECEIVED BY	REASON	DATE/TIME RECEIVED
AR 8738	5	11-16-05 1400

EFTA00232938

PALM BEACH POLICE DEPARTMENT
PROPERTY RECEIPT

PBPD Form #52

DETECTIVE BUREAU

☐ PROPERTY ☐ FOUND ☐ DECEASED (Probated) ☐ PERSONAL ☐ CONFISCATED ☐ DESTROY

☒ EVIDENCE ☒ TRIAL ☐ LABORATORY ☐ STOLEN/RECOVERED ☐ OTHER

INCIDENT/CITATION NUMBER	DATE/TIME RECOVERED	PROPERTY NUMBER (Leave Blank)	BIN NUMBER (Leave Blank)
05 368	11-14-05 1628	05-1087	128141

ADDRESS WHERE PROPERTY IMPOUNDED: 345 S COUNTY ROAD PB

	ADDRESS (Street / City / Zip)	PHONE NUMBER
DISCOVERED BY / D.O.B.: DET. RECARLEY		
OWNER'S NAME / D.O.B.:		
SUSPECT'S NAME / D.O.B.: [redacted] EPSTEIN, JEFF	358 EL BRUIL PB	
ADDT'NL. SUSPECT / D.O.B.:		

SPECIAL INSTRUCTIONS

FOUND PROPERTY 90 DAYS — CLAIM ☐ NOT CLAIM ☐

ITEM #	QUANTITY	VALUE	DESCRIPTION
1	1		SONY MICROCASSETTE M-630 STATEMENT [redacted] W/P

TOTAL PACKAGE WEIGHT

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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 [signature] 7915 ID# D2 UNIT

RECEIVED BY	REASON	DATE/TIME RECEIVED
[illegible] 8338	C	11-15-05 [illegible]

EFTA00232939

PALM BEACH POLICE DEPARTMENT
PROPERTY RECEIPT

PBPD Form #52 — DETECTIVE BUREAU

☐ PROPERTY ☐ FOUND ☐ DECEASED (Probated) ☐ PERSONAL ☐ CONFISCATED ☐ DESTROY
☒ EVIDENCE ☒ TRIAL ☐ LABORATORY ☐ STOLEN/RECOVERED ☐ OTHER

INCIDENT/CITATION NUMBER	DATE/TIME RECOVERED	PROPERTY NUMBER (Leave Blank)	BIN NUMBER (Leave Blank)
05-368	11-15-05 1:00PM	05-1090	128141

ADDRESS WHERE PROPERTY IMPOUNDED: 345 S COUNTY ROAD PALM BEACH

	ADDRESS (Street / City / Zip)	PHONE NUMBER
DISCOVERED BY / D.O.B.: DET RECARLEY	PBPD	
OWNER'S NAME / D.O.B.		
SUSPECT'S NAME / D.O.B.: EPSTEIN, JEFF [redacted]	358 EL BRILLO WAY	
ADDT'NL. SUSPECT / D.O.B.		

SPECIAL INSTRUCTIONS: PLEASE COPY

FOUND PROPERTY 90 DAYS — CLAIM ☐ NOT CLAIM ☐

ITEM #	QUANTITY	VALUE	DESCRIPTION
1	1		SONY MICROCASSETTE STATEMENT BY [redacted]

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# 7715 UNIT D2

RECEIVED BY	REASON	DATE/TIME RECEIVED
AS 8338	A	11-15-05 1445

EFTA00232940

PALM BEACH POLICE DEPARTMENT
PROPERTY RECEIPT

PBPD Form #52

DETECTIVE BUREAU

☐ PROPERTY	☐ FOUND	☐ DECEASED (Probated)	☐ PERSONAL	☐ CONFISCATED	☐ DESTROY
☒ EVIDENCE	☒ TRIAL	☐ LABORATORY	☐ STOLEN/RECOVERED	☐ OTHER	

INCIDENT/CITATION NUMBER	DATE/TIME RECOVERED	PROPERTY NUMBER (Leave Blank)	BIN NUMBER (Leave Blank)
05368	111505 1830	C5-1092	129542

ADDRESS WHERE PROPERTY IMPOUNDED: 345 S COUNTY ROAD PALM BEACH

DISCOVERED BY / D.O.B.: DET. RECARLEY	ADDRESS: PBPD	Street	City	Zip	PHONE NUMBER	
OWNER'S NAME / D.O.B.	ADDRESS	Street	City	Zip	PHONE NUMBER	
SUSPECT'S NAME / D.O.B.: [redacted] EPSTEIN, JEFF	ADDRESS: 358 EL BRILLO	Street	City	Zip	PHONE NUMBER	
ADDT'NL. SUSPECT / D.O.B.	ADDRESS	Street	City	Zip	PHONE NUMBER	

SPECIAL INSTRUCTIONS

FOUND PROPERTY 90 DAYS — CLAIM ☐ NOT CLAIM ☐

ITEM #	QUANTITY	VALUE	DESCRIPTION
1	1		SONY MICROCASSETTE STATEMENT [redacted] [redacted]
2	1		PHOTO LINE UP (NADA MARCINKOVA)
			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 [signature] 7915 ID# D2 UNIT

RECEIVED BY	REASON	DATE/TIME RECEIVED
AD 8338	5	11-16-05 0730

PALM BEACH POLICE DEPARTMENT
PROPERTY RECEIPT

PBPD Form #52 — DETECTIVE BUREAU

☐ PROPERTY ☐ FOUND ☐ DECEASED (Probated) ☐ PERSONAL ☐ CONFISCATED ☐ DESTROY
☒ EVIDENCE ☒ TRIAL ☐ LABORATORY ☐ STOLEN/RECOVERED ☐ OTHER

INCIDENT/CITATION NUMBER	DATE/TIME RECOVERED	PROPERTY NUMBER (Leave Blank)	BIN NUMBER (Leave Blank)
05-368	121305 545p	05-R2083A	128141

ADDRESS WHERE PROPERTY IMPOUNDED: 345 S. COUNTY ROAD PB 1203

	ADDRESS (Street / City / Zip)	PHONE NUMBER
DISCOVERED BY / D.O.B.: DET. RECARLEY	PBPD	
OWNER'S NAME / D.O.B.:		
SUSPECT'S NAME / D.O.B.: [redacted] EPSTEIN, Jeff	358 El Brillo	
ADDT'NL. SUSPECT / D.O.B.:		

SPECIAL INSTRUCTIONS: PLEASE COPY ONTO DIAMOND CASSETTE

FOUND PROPERTY 90 DAYS — CLAIM ☐ NOT CLAIM ☐

ITEM #	QUANTITY	VALUE	DESCRIPTION
1	1		SONY MICROCASSETTE (STATEMENT [redacted]
			Note: ~~Recorded~~ Recorded on wrong speed
			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 [signature] 7915 V3 ID# UNIT

RECEIVED BY	REASON	DATE/TIME RECEIVED
AD 8558	6	12-14-[redacted]5 0730hrs

EFTA00232942

PALM BEACH POLICE DEPARTMENT
PROPERTY RECEIPT

DETECTIVE BUREAU

PBPD Form #52

☐ PROPERTY ☐ FOUND ☐ DECEASED (Probated) ☐ PERSONAL ☐ CONFISCATED ☐ DESTROY

☒ EVIDENCE ☒ TRIAL ☐ LABORATORY ☐ STOLEN/RECOVERED ☐ OTHER

INCIDENT/CITATION NUMBER	DATE/TIME RECOVERED	PROPERTY NUMBER (Leave Blank)	BIN NUMBER (Leave Blank)
05-368	4-1-05	05-~~1005~~	128323

ADDRESS WHERE PROPERTY IMPOUNDED: 345 So. County Rd, Palm Beach 1205

DISCOVERED BY / D.O.B.	ADDRESS Street City Zip	PHONE NUMBER
DC Lee	Palm Beach Police	
OWNER'S NAME / D.O.B.	ADDRESS Street City Zip	PHONE NUMBER
SUSPECT'S NAME / D.O.B.	ADDRESS Street City Zip	PHONE NUMBER
Epstein, Jeffrey	358 El Brillo, Palm Beach	
ADDT'NL SUSPECT / D.O.B.	ADDRESS Street City Zip	PHONE NUMBER

SPECIAL INSTRUCTIONS

FOUND PROPERTY 90 DAYS — CLAIM ☐ NOT CLAIM ☐

ITEM #	QUANTITY	VALUE	DESCRIPTION
1	7		MAXELL VHS tapes of surveillance during April 2005 ~~[illegible]~~ A
2	~~81~~		VHS [illegible] B
3	1		VHS 04-02-05
4	1		VHS 04-03-05
5	1		VHS 04-04-05
6	1		VHS 04-5-05
7	1		VHS 06-21/22-05 (1 per Button)

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# UNIT

DC 8537 V3

RECEIVED BY	REASON	DATE/TIME RECEIVED
VB 6038	6	12-1-05 1:13 pm

EFTA00232943

PALM BEACH POLICE DEPARTMENT
PROPERTY RECEIPT

PBPD Form #52

CONTRIBUTOR'S COPY

☐ PROPERTY	☐ FOUND	☐ DECEASED (Probated)	☐ PERSONAL	☐ CONFISCATED	☐ DESTROY
☒ EVIDENCE	☒ TRIAL	☐ [redacted]	☐ STOLEN/RECOVERED	☐ OTHER	

INCIDENT/CITATION NUMBER	DATE/TIME RECOVERED	PROPERTY NUMBER (Leave Blank)	BIN NUMBER (Leave Blank)
05-368	120905 1530	05-1219	

ADDRESS WHERE PROPERTY IMPOUNDED: 345 S COUNTY ROAD

DISCOVERED BY / D.O.B.	ADDRESS	Street	City	Zip	PHONE NUMBER
DET. RECARLEY		PBPD			
OWNER'S NAME / D.O.B.	ADDRESS	Street	City	Zip	PHONE NUMBER
SUSPECT'S NAME / D.O.B. [redacted]	ADDRESS	Street	City	Zip	PHONE NUMBER
EPSTEIN, JEFF	358 El Brillo		PB		
ADDT'NL. SUSPECT / D.O.B.	ADDRESS	Street	[redacted]ity	Zip	PHONE NUMBER

SPECIAL INSTRUCTIONS

FOUND PROPERTY 90 DAYS — CLAIM ☐ NOT CLAIM ☐

ITEM #	QUANTITY	VALUE	DESCRIPTION
1	16		DVD-R DISCS FROM PBSO CASE 05250067 LABELED EPSTEIN ENUSE FILES.
			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 _____ 7915 ID# VB UNIT

RECEIVED BY	REASON	DATE/TIME RECEIVED
[redacted]	E	12-21-05 1330

PALM BEACH POLICE DEPARTMENT
PROPERTY RECEIPT

PBPD Form #52

DETECTIVE BUREAU

☐ PROPERTY	☐ FOUND	☐ DECEASED (Probated)	☐ PERSONAL	☐ CONFISCATED	☐ DESTROY
☒ EVIDENCE	☒ TRIAL	☐ LABORATORY	☐ STOLEN/RECOVERED	☐ OTHER	

INCIDENT/CITATION NUMBER	DATE/TIME RECOVERED	PROPERTY NUMBER (Leave Blank)	BIN NUMBER (Leave Blank)
05-368	010906 150	06-39	128141

ADDRESS WHERE PROPERTY IMPOUNDED: 345 S. COUNTY ROAD PB

DISCOVERED BY / D.O.B.	ADDRESS	Street	City	Zip	PHONE NUMBER
DET. RECARLEY	PBPD				
OWNER'S NAME / D.O.B.	ADDRESS	Street	City	Zip	PHONE NUMBER
SUSPECT'S NAME / D.O.B. [redacted]	ADDRESS	Street	City	Zip	PHONE NUMBER
EPSTEIN JEF	358 EL BRILLO LD				
ADDT'NL. SUSPECT / D.O.B.	ADDRESS	Street	City	Zip	PHONE NUMBER

SPECIAL INSTRUCTIONS

FOUND PROPERTY 90 DAYS — CLAIM ☐ NOT CLAIM ☐

ITEM #	QUANTITY	VALUE	DESCRIPTION
1	1		SONY MICROCASSETTE STATEMENT FW [redacted]

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 [signature] ID# 791 UNIT V3

RECEIVED BY	REASON	DATE/TIME RECEIVED
[illegible]	8275	01-10-06 0730

EFTA00232945

PALM BEACH POLICE DEPARTMENT
PROPERTY RECEIPT

PBPD Form #52 — DETECTIVE BUREAU

☐ PROPERTY	☐ FOUND	☐ DECEASED (Probated)	☐ PERSONAL	☐ CONFISCATED	☐ DESTROY
☒ EVIDENCE	☒ TRIAL	☐ LABORATORY	☐ STOLEN/RECOVERED	☐ OTHER	

INCIDENT/CITATION NUMBER	DATE/TIME RECOVERED	PROPERTY NUMBER (Leave Blank)	BIN NUMBER (Leave Blank)
05-368	011906 1100	06-59	178141

A [redacted] PALM BEACH GDNS. FL

	ADDRESS Street	City	Zip	PHONE NUMBER
DET. LEACLEY				
OWNER'S NAME / D.O.B. [redacted]	ADDRESS Street	City	Zip	PHONE NUMBER
SUSPECT'S NAME / D.O.B. EPSTEIN, Jeff [redacted]	ADDRESS 358 EL Brillo			PHONE NUMBER
ADDT'NL SUSPECT / D.O.B.	ADDRESS Street	City	Zip	PHONE NUMBER

SPECIAL INSTRUCTIONS — FOUND PROPERTY 90 DAYS — CLAIM ☐ NOT CLAIM ☐

ITEM #	QUANTITY	VALUE	DESCRIPTION
1	1		MICRO CASS[redacted]E SONY MC-90 STATEMENT [redacted]

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 7915 VB ID# UNIT

RECEIVED BY	REASON	DATE/TIME RECEIVED
YB 8338	ET	01-20-06 0730

EFTA00232946

(ATTACH TO AFFIDAVIT)

COPY

SEARCH WARRANT

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

THE STATE OF FLORIDA)

COUNTY OF PALM BEACH)
IN THE NAME OF THE STATE OF FLORIDA, TO ALL AND SINGULAR:

The Sheriff of Palm Beach County, Florida, and his lawful Deputies, All Police Officers in Palm Beach County, Florida, The Commissioner of the Florida Bureau of Law Enforcement or any of his Duly

Constituted Agents to-wit: **Detective Joseph Recarey**

WHEREAS, complaint on oath and in writing, supported by affidavit of a credible witness, or

witnesses, to wit: **Detective Joseph Recarey**
which is attached hereto and made a part hereof, has this day been made before the undersigned:

Judge Laura Johnson
(Circuit)(County) Court Judge in and for Palm Beach County, Florida, and

WHEREAS, said facts made known to me and considered by me have caused me to certify and find that the facts set forth in said affidavit show and constitute probable cause for the issuance of this warrant and the Court being satisfied of the existence of said grounds set forth in the affidavit and that the laws of the State of Florida have been violated on or in a Premises known and described as follows, to-wit:

358 El Brillo Road
Palm Beach, Florida 33480

To reach the premise desired to be searched, begin at the middle span of the Royal Park Bridge and travel East on Royal Palm Way approximately .6 (six tenths) of a mile until you reach South County Road. At South County Road, make a right or southbound turn and travel approximately .8 (eight tenths) of a mile to El Brillo Way. At El Brillo Way, make a right or westbound turn and travel approximately .1 (one tenth) of a mile to the last house on the South side of El Brillo clearly marked with the number 358.

The premises desired to be searched is two story, single family residence made of CBS construction. The residence is pink in color with white trim and has a white concrete tile roof. The residence has two separate driveway entrances from El Brillo paved in large white tiles. The eastern most driveway is separated by a large white in color concrete wall with black in color numbers "358" clearly displayed from El Brillo and leads to the east side of the residence.

On the east side of residence, there are three single car garage doors, which are white in color and an entry door also white in color to South. Each driveway entrance has a white in color call box, which is fixed on the east side of the driveways. The western most driveway leads to the North side of the residence, to a large white in color double door on the first floor. The second story of the North side of the residence shows a small walkway with white in color metal railway, and leads to three glass jalousie style doors. On the South East corner of the residence is a single story structure, made of CBS construction and is white in color with a white concrete tile roof.

To enter and search the afore described place and premise together with the yard and curtilage thereof, and any and all outbuildings and vehicles thereon, and any persons residing therein, and any other person therein reasonably believed to be connected with said illegal activity. This is a complete description of the residence desired to be searched, including the curtilage attached thereof.

being the premises occupied or under the control of:
Jeffrey Epstein
W/M Date of Birth [redacted]

and there is now being kept in the above described (vehicle)(premises) certain:
1) Computers, including any electronic magnetic, optical, electrochemical, or other high speed data processing device performing logical, arithmetic, or storage functions; data storage facilities such as magnetic tape, hard disk, floppy disk or drum, or cd rom; communications facilities directly relating to or operating in conjunction with such device; devices for printing records of data; and such records or data produced in various forms; manuals, documents, or instructional material relating to such devices.

2) Computers, personal computers, computer peripherals, modems, computer printers, floppy disk drives, hard disk drives, diskettes, tapes, computer printouts, computer software, computer programs and applications, computer manuals, system documentation.

3) Cameras, photographs, negatives, motion pictures, videotapes, magazines, books, and all other depictions of minors in sexual activity .

4) Any device or equipment that can be used to transfer images to a computer readable format.

5) Any written documentation or item containing password or encryption codes.

6) Any notes, ledger, personal phone books, roladex, books and any form of recording data of records of payments, telephone numbers and names of girls that have frequented the house.

7) Any sexual devices to which was used on the witness/victims.

8) Any hair fiber, semen, or other bodily fluids.

which is being kept and used in violation of the laws of the State of Florida, to-wit the laws prohibiting:

1. Sexual Activity with certain minors	FSS 794.05(1)	2st degree Felony
Lewd and Lascivious Molestation	FSS 800.04(5c2)	2nd degree Felony

NOW THEREFORE, you, or either of you are hereby commanded with proper and necessary assistance, in the name of the State of Florida, in the daytime or in the nighttime, or on Sunday, to forthwith search the said premises hereinbefore specified, for the property specified, and if the same, or any part thereof shall be found in said premises then you are authorized and commanded to seize the same and to bring the property and any person rested in connection therewith before the Magistrate or any other Court having jurisdiction of the offense, to be dealt with according to law, and to forthwith make return of your doings upon executing this warrant, which you are hereby commanded to execute as the law directs within ten (10) days from the date thereof.

You are further commanded, in the event that you seize any of the said property hereinbefore described, to make up, at the time and place of seizure, a full, true and itemized list and inventory of all things seized and taken, in duplicate, signed by you, and to then and there give and deliver the said duplicate copy thereof to the person from whom possession shall be taken, if taken from the possession of anyone, together with a duplicate of this warrant, and if not taken from the possession of anyone, then to any person in charge of said premises, and in the absence of any such person, to leave the same on or in the premises. The original of this warrant, together with the original inventory, shall be returned and filed with the Clerk of the Court as stated above within ten (10) days of the issuance of this warrant.

Further any property seized or taken shall be impounded for use as evidence at any trial of any criminal or penal cause growing out of the having or possession of said property.

WITNESS my hand and seal this 18th day of October, A.D., 2005.

JUDGE of the Circuit Court of the
Fifteen Judicial Circuit in and for Palm
Beach County, Florida.

AFFIDAVIT AND APPLICATION FOR SEARCH WARRANT

COPY

IN THE CIRCUIT COURT IN AND FOR PALM BEACH COUNTY, FLORIDA

THE STATE OF FLORIDA,)
COUNTY OF PALM BEACH)

BEFORE ME: Honorable Judge Laura Johnson

in and for Palm Beach County, personally appeared this day:
Detective Joseph Recarey

---

who being by me first duly sworn, deposes and says that he believes and has good reason to believe that a certain **Premises** located in Palm Beach Florida, described as follows, to-wit:

358 El Brillo Road
Palm Beach, Florida 33480

To reach the premise desired to be searched, begin at the middle span of the Royal Park Bridge and travel East on Royal Palm Way approximately .6 (six tenths) of a mile until you reach South County Road. At South County Road, make a right or southbound turn and travel approximately .8 (eight tenths) of a mile to El Brillo Way. At El Brillo Way, make a right or westbound turn and travel approximately .1 (one tenth) a mile to the last house on the South side of El Brillo clearly marked with the number 358.

The premises desired to be searched is two story, single family residence made of CBS construction. The residence is pink in color with white trim and has a white concrete tile roof. The residence has two separate driveway entrances from El Brillo paved in large white tiles. The eastern most driveway is separated by a large white in color concrete wall with black in color numbers "358" clearly displayed from El Brillo and leads to the east side of the residence. On the east side of residence, there are three single car garage doors, which are white in color and an entry door also white in color to South. Each driveway entrance has a white in color call box, which is fixed on the east side of the driveways. The western most driveway leads to the North side of the residence, to a large white in color double door on the first floor. The second story of the North side of the residence shows a small walkway with a white in color metal railway, and leads to three glass jalousie style doors. On the South East corner of the residence is a single story structure, made of CBS construction and is white in color with a white concrete tile roof.

To enter and search the afore described place and premise together with the yard and curtilage thereof, and any and all outbuildings and vehicles thereon, and any persons residing therein, and any other person therein reasonably believed to be connected with said illegal activity. This is a complete description of the residence desired to be searched, including the curtilage attached thereof.
being the Premises occupied by or under the control of:

Jeffrey Epstein
W/M Date of Birth [redacted]

EFTA00232950

and there is now being kept on the above described Premises certain:

1) Computers, including any electronic magnetic, optical, electrochemical, or other high speed data processing device performing logical, arithmetic, or storage functions; data storage facilities such as magnetic tape, hard disk, floppy disk or drum, or cd rom; communications facilities directly relating to or operating in conjunction with such device; devices for printing records of data; and such records or data produced in various forms; manuals, documents, or instructional material relating to such devices.

2) Computers, personal computers, computer peripherals, modems, computer printers, floppy disk drives, hard disk drives, diskettes, tapes, computer printouts, computer software, computer programs and applications, computer manuals, system documentation.

3) Cameras, photographs, negatives, motion pictures, videotapes, magazines, books, and all other depictions of minors in sexual activity .

4) Any device or equipment that can be used to transfer images to a computer readable format.

5) Any written documentation or item containing password or encryption codes.

6) Any notes, ledger, personal phone books, roladex, books and any form of recording data of records of payments, telephone numbers and names of girls that have frequented the house.

7) Any sexual devices to which was used on the witness/victims.

8) Any hair fiber, semen, or other bodily fluids.

which is being kept and used in violation of the laws of the State of Florida, to-wit: the laws prohibiting:

1. Sexual Activity with certain minors	FSS 794.05(1)	2st degree Felony
2. Lewd and Lascivious Molestation	FSS 800.04(5c2)	2nd degree Felony

That the facts establishing the grounds for this application and the probable cause for believing that such facts exist are as follows:

On 03/15/2005, Det Michele Pagan went to [redacted]/Sable Palm where she met with a fourteen year old white female. The female will hereinafter referred to as **"The Victim."** Also present was [redacted], the victim's therapist. During an audio taped interview, Pagan spoke with the victim who admitted to knowing that [redacted] worked for a wealthy man and possibly did sexual favors for him. She also admitted that [redacted] had offered her an opportunity to make money.

The victim identified [redacted] boss as a white male named "Jeff who lived in Palm Beach (Later positively identified as Jeffrey Epstein). The victim explained that she was first approached by [redacted] to go with her to Jeff's house. The victim stated [redacted] told her that she would pick her up at the victims house on Sunday. The victim was not sure of the exact dates but knew it was a Sunday. According to the victim, [redacted] along with a Hispanic female, later identified as [redacted] picked her up at her father s house on [redacted] The victim told her father that they were going shopping. It was later confirmed by the victim's father that [redacted] picked his daughter up on February 6, 2005. According to the victim's father, [redacted] drove

EFTA00232951

a pick up truck. [redacted] drove the victim to Palm Beach. Sometime on the way there, a conversation occurred between [redacted] and the victim whereas [redacted] reportedly told the victim that if Jeff asked her (the victim) age, she should say she was eighteen. The victim recalled that Jeff's house was on a dead end street. The victim described Epstein's house as a two story pink house with a Cadillac Escalade parked in driveway. The girls walked up a driveway, past what appeared to be a small guard/security room. In fact, the victim recalled a male approaching them asking what they wanted. [redacted] stated they were there to see Jeff. The male allowed them to continue walking up to the house. The victim stated the man told them that Epstein was not there but was expected back. He allowed them to enter the house, via the kitchen. He offered them something to drink while they waited inside. Shortly after, Epstein and a woman, described as white with blond hair entered the kitchen. The victim believed the woman was Epstein's assistant. The victim added that the woman did not seem friendly and kept her responses short and direct. Epstein introduced himself to the victim as Jeff . The victim described Epstein as being approximately forty-five years old, a long face, and bushy eyebrows, with graying hair.

[redacted] and Epstein left the kitchen leaving the victim alone in the kitchen. They returned a short time later. They all spoke briefly in the kitchen. The victim stated the woman instructed her to follow her upstairs, which she did. The victim recalled walking up a flight of stairs, lined with photographs, to a room. Upon entering the room there was a large bathroom to the right. The victim recalled a hot pink and green sofa in the room. There was a door on each side of the sofa. The victim recalled there being a mural of a naked woman in the room, as well as several photographs of naked women on a shelf. According to the victim, the woman led her to a room that had a massage table in it. The woman started to fix up the room, putting the covers on the table and taking lotions out. She then told the victim that Epstein would be up in a second.

The woman left the room, and soon after, Epstein walked in wearing only a towel and told the victim to take off her clothes. The victim stated he was stern when he told her to take off her clothes. The victim said she did not know what to do as she was the only one there in the room. The victim took off her shirt leaving her bra on. Epstein, had removed his towel and told the victim to take off everything . The victim stated Epstein exposed himself when he took his towel off, placing it on the floor as he laid down on the table. The victim stated she removed her pants leaving her thong panties on. Epstein then instructed her to give him a massage pointing to a specific lotion for her to use. As the victim began to give Epstein the massage, he told her to get on his back. The victim stated she straddled herself on Epstein s back. The victim stated her exposed buttocks were touching Epstein s bare buttocks.

The victim said Epstein was specific in his instruction to her on how to massage, telling her to go clockwise, etc. Epstein then turned over and instructed the victim, to massage his boobs. The victim resumed massaging his chest area. The victim was now standing on the ground. Epstein turned to his side, started to rub his penis in an up and down motion. The victim stated Epstein held on to the small of her back as she massaged his chest and shoulder area. Epstein pulled out a purple vibrator and began to massage her vaginal area. The victim stated there was no penetration as the vibrator was on top of her underwear. The victim recalled Epstein ejaculating because he had to use the towel to wipe himself as he got off the table.

Epstein then left the room and the victim got dressed. She went back downstairs where she met with [redacted] The victim admitted to getting paid three hundred dollars in cash from Epstein. Before they left, Epstein asked the victim to leave her phone number. As they were leaving the house, [redacted] stated she received only two hundred dollars that day for bringing her.

EFTA00232952

On October 3, 2005, Sgt Frick and I responded to the address of [redacted] and viewed her vehicle parked in the driveway. Sgt. Frick and I knocked on the door and met with [redacted] was told that we were investigating a claim involving Jeffrey Epstein of El Brillo in Palm Beach. [redacted] was asked if she wanted to accompany us back to the police station for further questioning. She was also told that at the conclusion of the interview she would be returned home.

Upon [redacted] entry in the unmarked Detective vehicle, I placed a tape recorder within the vehicle to record any conversations within the vehicle. During the ride back to the police station, [redacted] advised she is attending Palm Beach Community College in the Palm Beach Gardens Campus and is majoring in journalism.

Upon our arrival at the police station, [redacted] was brought to the interview room in the Detective Bureau. I explained to [redacted] that I appreciated her willingness to assist us and informed her that should she desire to leave at any time she may do so. I further explained the interview room door is only closed for privacy. [redacted] stated she understood. During the taped sworn interview [redacted] was asked how she became in contact with Epstein. [redacted] stated back when she turned 17 years of age she was approached by a friend "[redacted] in the Canopy Beach Resort in Rivera Beach. [redacted] was asked if she wanted to make money.

She was told she would have to provide a massage and should make $200.00. [redacted] thought about the offer and agreed to meet with Jeffrey. [redacted] (Unknown last name) and [redacted] (Unknown last name) picked her up and she was taken to Epstein's house. Upon her arrival to the house she was introduced to Epstein in the kitchen of the house. She was also introduced to a white female known to her as [redacted]. She was led upstairs to the main bedroom known to her as Jeff Epstein's bedroom . [redacted] arranged the massage table and covered the table with a sheet. She brought out the massage oils and laid them next to the massage bed. [redacted], then left the room and informed her Jeff would be in, in a minute. Jeff entered the bedroom wearing only a towel. He laid on the table onto his stomach and picked a massage oil for [redacted] to rub on him. During the massage, [redacted] stated "He tried to touch me and I stopped him." I asked how did he tried to touch her. He grabbed her buttocks and she felt uncomfortable. [redacted] also stated Epstein has a vibrator which is large and white in color. [redacted] told Epstein, I'll massage you but I don't want to be touched.

[redacted] stated she performed the massage naked. At the conclusion of the massage, Epstein paid [redacted] $200.00 for the massage. He explained, I know you're not comfortable, but I'll pay you if you bring some girls. He told her the younger the better. [redacted] stated she once tried to bring a 23 year old female and Epstein stated that the female was too old. [redacted] was asked how many girls did she bring in total to Epstein. [redacted] stated six that she can remember. [redacted] stated she brought [redacted] (16 female), [redacted] (16 female), [redacted] and at the time they were brought to Epstein's house, all the girls were 14 through 16 years of age.

I asked [redacted] which one was the youngest. [redacted] advised the victim was the youngest as she was fourteen when the massage occurred. [redacted] stated every girl she brought knew what to expect when they arrived. They were told they would provide a massage, possibly naked, and some touching. I asked her if the victim was aware. She stated every girl she brought knew what to expect. She explained she knew the victim wanted to make money . She approached the victim and explained about going to work for Jeff. The victim agreed and arrangements were made to bring the victim to Epstein's house on a weekend. [redacted] stated that she and [redacted] (Later identified as [redacted] picked up the victim at the victim's house. They traveled to Epsteins House and entered through the kitchen door. They met with the house chef and Epstein's assistant [redacted]. The victim was introduced to Epstein while they were in the kitchen area. [redacted] led the victim upstairs and Epstein went upstairs. When the massage was over, the victim returned to the kitchen area.

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[redacted] stated she was paid $200.00 for bringing the victim to Epstein's house. [redacted] stated the victim told her she was paid $300.00 for the massage. Back in the vehicle, [redacted] asked the victim what happened. The victim told her about the massage and they went shopping. [redacted] stated the victim was the last person she brought to Epstein. She further stated that she had changed her cellular number to avoid ng contacted by [redacted]. She continued that when Epstein announces to his assistant that he is traveling to Palm Beach, [redacted] would contact [redacted] to arrange girls for Epstein.

[redacted] stated that once her parents discovered that she was visiting Epstein, they disapproved of the encounters with him and she stopped. [redacted] further stated that [redacted] still tries to call the house and leaves messages. With the assistance of [redacted] we were able to identify [redacted], DOB [redacted] [redacted] DOB [redacted]

Sgt Frick entered the room and explained that based on her own statements, she had implicated herself by bringing underage girls to Epsteins house. [redacted] was aware of what she had stated and wished to assist further in hopes to receive a lesser charge . [redacted] provided cellular telephone numbers for the girls she had mentioned previously. Additionally, she also provided possible addresses and areas in which they lived. As [redacted] was being taken home in the vehicle, a tape recorder was placed within the vehicle to record any conversations within the vehicle. During the drive back to her home, [redacted] made the comment " I'm like a Heidi Fliess". (Hollywood Madam who sent girls to clients for sexual favors in California). [redacted] was dropped off at her house without incident.

Sgt Frick and I went to speak with [redacted] We met with Mrs. [redacted] Mother) at the front door. We explained the ongoing investigation and felt that [redacted] may have additional information as we had information that she had "worked" for Jeff . Mrs. [redacted] introduced us to her husband and allowed us entry into the home. We sat in the dining room and met with [redacted] Date of Birth [redacted] As she was under the age of eighteen, Mrs [redacted] was 'vised we would be speaking with her. She expressed if her daughter had information, she wanted to assist. As we interviewed [redacted] she denied having any inappropriate encounters with Jeff (Epstein).

She stated she had gone to Jeff's House with [redacted] approximately eight months ago, and sat in the kitchen with the house chef, but nothing happened. As the parents were present during the interview, we felt that [redacted] was withholding information from us. She made several comments as to she has put the entire incident behind her. I left my direct telephone number and advised should she wish to speak with me again to telephone me. Sgt Frick and I thanked Mrs. [redacted] for her time and left the area. She stated she would ask her again after we left as to what happened at Epstein's house. I informed her that [redacted] had my telephone number and hopefully she would call.

On October 4, 2005, Det Dawson and I drove to the [redacted] home and met with [redacted] and [redacted] During a sworn taped statement, [redacted] stated she was taken to house by [redacted] She was told she could make money working for Jeff. She was told she would have to provide a massage to Jeff. [redacted] stated upon her arrival to the house she was brought to the kitchen area by [redacted] They met with the house chef who was already in the kitchen area. [redacted] stated [redacted] would wait for her in the kitchen. She was introduced to [redacted], Jeff's assistant, and was brought upstairs to the mater bedroom. [redacted] prepared the room and massage table for a massage. Epstein entered the room wearing only a towel and she provided a massage. [redacted] stated she kept her clothes on during the massage.

She advised sometime during the massage, Epstein grabbed her buttocks and pulled her close to him. [redacted] said she was uncomfortable by the incident involving Jeff. At the conclusion of the massage, she as paid $200.00 for the massage. I asked [redacted] if she has any formal training in massages to which she replied no. I asked her if [redacted] received any monies for taking her to perform the massage.

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[redacted] stated [redacted] also received money for taking her there but was unsure in the amount of monies [redacted] received for bringing her to Epstein. [redacted] stated she returned to Epstein's house on another occassion with [redacted] and another girl, [redacted] [redacted] stated she waited in the kitchen with [redacted], while [redacted] was taken upstairs by [redacted]. [redacted] stated she only did the massage once as she was comfortable with the whole experience. At the conclusion of the interview, the tape was stopped. I was informed that [redacted] had attempted to reach [redacted] via cell phone. A voice mail message on October 4, 2005 at 10:59 am, revealed a female voice who identified herself as [redacted] who requested [redacted] to call her back reference the police questioning. This voice mail message was recorded onto a micro cassette.

[redacted] provided the incoming telephone number as [redacted]. [redacted] stated she inadvertently told [redacted] about the police investigation because [redacted] had called her to tell her about how she just received a rental car from Jeff Epstein. [redacted] had called her to tell her that she was given a rental car, a 2005 Silver Nissan Sentra, to utilize to visit family and visit Jeff. [redacted] asked her what was going on at the house that the police would be asking questions. [redacted] stated [redacted] then called Jeff and [redacted] and asked what was going on reference the ongoing police investigation. According to [redacted] has since then been trying to contact her to ask about the police questions. I instructed [redacted] not to contact [redacted] and do not provide any more information to [redacted] as she would notify Jeff Epstein and [redacted] what was transpiring.

On October4, 2005, I made telephone contact with [redacted] who had left several messages on voice mail. During the message, she advised she was not completely truthful when we met in person but would like to speak with me to advise what had happened. She further advised she did not want to speak of this incident in front of her mother. At approximately 15:48 pm I made telephone contact with [redacted]. During a taped recorded statement, [redacted] stated the following: Approximately a year ago, when she was sixteen years of age, [redacted] took her to Jeff's house twice. The first time she went, [redacted] drove to the house. They entered through the kitchen area where she was introduced to [redacted] and Jeff. She was taken upstairs to a bedroom by [redacted] and set the room up with a massage bed and brought out the oils to use. Jeff then entered the room wearing a towel . He laid on the table and picked out a lotion for [redacted] to rub on him. At one point during the massage, he tried to remove her shirt at which point she became very upset and discontinued the massage. Both [redacted] and Jeffrey had a verbal disagreement at which time she left without being paid.

She got with [redacted] who was sitting in the kitchen and told her "let's go." [redacted] advised she received no money for that day. [redacted] also said that [redacted] had told her if she was uncomfortable with what was going on, to let him know and he'll stop. She knew that the more you do the more you get paid.

[redacted] advised that several weeks later, she agreed to be taken a second time by [redacted] Once they arrived at the residence, [redacted] sat in the kitchen, and [redacted] took her upstairs to the master bedroom again. [redacted] set the room up with a massage bed and brought out the oils to use. Jeff then entered the room wearing a towel. He laid on the table and picked out a lotion for [redacted] to rub on him. At one point during the massage, he tried to touch her buttocks.

As [redacted] was wearing tight jeans and had a tight belt on Jeff was unable to touch her buttocks. Jeff then rolled onto his back during the massage, he attempted to touch her breasts. [redacted] then became upset again and told she didn't want to be touched. [redacted] discontinued the massage and was paid $200.00. [redacted] then went downstairs where [redacted] was waiting for her. She told [redacted] she wanted to leave. [redacted] said she never returned to the house. [redacted] stated she is aware that her friend, [redacted] was also at the house and had a problem with Jeff. She provided a telephone number for [redacted] The interview was concluded and the micro cassettes were turn in as evidence.

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I later researched [redacted] and discovered she resides in Royal Palm Beach. Det Dawson and I drove to Royal Palm Beach and met with [redacted] at her residence 111 Segovia Ave in Royal Palm Beach.

[redacted] agreed to speak with us in the kitchen area. During a sworn taped statement, [redacted] stated the llowing: On or about November 2004, She was approached by [redacted] and asked if she wanted to make money. She agreed and was told she would provide a massage to wealthy man in Palm Beach. [redacted] picked her up and drove her to a house in Palm Beach. She was brought into the kitchen area of the house. She further stated that [redacted] and [redacted] ([redacted] came with them. They were brought into the kitchen where she was introduced to Jeff and other females. [redacted] stated she was introduced to a female helper of Jeff, the female was described as white female (unknown name), with blond hair. She stated that the assistant was familiar with [redacted] The assistant brought her upstairs into a master bedroom area. The assistant set up the massage table and put out lotions to be used. She told [redacted] Jeff would be available in a minute. Jeff entered the room wearing only a towel. Jeff removed his towel, exposing himself , laid on the massage table and picked a lotion to rub on his thighs and back. [redacted] further stated during the massage, Jeff asked her to remove her clothes. She complied and removed her pants and blouse. [redacted] didn't remember if she had removed her bra but feels that she did. [redacted] was certain that she stayed in her thong underwear. [redacted] continued the massage and at one point she straddled him to massage his back, which touched his buttocks with hers. [redacted] was instructed to return to the ground at which Jeff turned to have his chest rubbed. [redacted] advised she was unsure if he was masturbating. [redacted] did not want to look at his penis area because she was uncomfortable. Jeff removed a large white vibrator which was next to the bed and turned it on. [redacted] stated he began rubbing the vibrator over her thong underwear on her vagina area. Shortly thereafter, Jeff ejaculated and removed himself from the table. He walked over to where the shower was and opened the glass door. She waited as he was taking a shower in her direct view. When I asked [redacted] how old she was when this occurred, she stated she had just turned seventeen. At the conclusion of the shower, [redacted] was paid either $350.00 or $400.00. She stated she 'asn't sure , but knows it was close to $400.00. At the conclusion of the interview, [redacted] stated she never returned to provide a massage for Jeff. She advised she was ashamed and uncomfortable with the situation.

At approximately 2:10 pm, Det Dawson and I met with [redacted] at her residence. As [redacted] was only seventeen years of age, I had notified her mother Mrs [redacted], that she would be interviewed reference an ongoing investigation in Palm Beach. I assured her that her daughter was not a suspect. I explained the possibility of her being either a witness or victim. Mrs [redacted] advised she wanted [redacted] to cooperate and consented to the interview. During a sworn taped statement, [redacted] stated the following: at the age of sixteen, during the month of September 2004, she was approached by [redacted] for a chance to make money. [redacted] was friends with the friends of [redacted] and knew the same people. [redacted] had been previously told by her friends what [redacted] did for Jeff. [redacted] called a person known to [redacted] as [redacted] and scheduled the appointment. [redacted] picked [redacted] up and drove her to Palm beach to a street called Brillo Way. They drove to the end of the street and entered a large driveway. They entered the kitchen area of the house and met with Jeff. [redacted] was introduced to Jeff.

[redacted] stated she observed numerous photographs of naked young girls throughout the house. [redacted] led [redacted] upstairs to the main bedroom area and set up the room with a massage table and set out the oils. [redacted] dimmed the lights and turned on soft music. [redacted] exited the room and Jeff entered the room wearing only a towel. Jeff picked a oils and instructed her to rub his legs, under his buttocks, back and chest area. Jeff asked her to get comfortable. [redacted] advised she did not remove her clothes. She was wearing tight jeans and a cropped tank top exposing her belly area.

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During the massage, Jeff removed his towel and laid on the massage table naked. As [redacted] rubbed his chest area, Jeff attempted to reach down her pants through the buttocks area however was unable to due to the tightness of the jeans and a tight belt. [redacted] advised Jeff began to masturbate as she rubbed his chest. Jeff moaned as she rubbed his chest. She observed he was continuing to masturbate and attempted to reach up [redacted]r tank top and touch her breasts. [redacted] pulled back and Jeff stopped. However, he kept masturbating until [redacted]e climaxed. He cleaned himself with the towel he was previously wearing. I asked [redacted] if she knew the difference about circumcised and not circumcised meant. She explained she knew and advised Jeff was circumcised. [redacted] was paid $200.00 for the massage. And left the area. She met with [redacted] who was waiting in the kitchen area and left the house.

[redacted] then explained she never provided another massage for Jeff. She did however, go to the house with [redacted] and [redacted] ([redacted] as they took another friend of [redacted] [redacted] advised she was present when [redacted] went to work for Jeff. She advised she rode over and sat in the kitchen area with [redacted] to wait for [redacted] [redacted] advised while they waited for [redacted] the house chef prepared lunch for them as it was almost lunchtime when they went. As [redacted] was finished with the massage, they left the area. I asked [redacted] if [redacted] ever told her what would be expected when she provided a massage. [redacted] stated yes, [redacted] told her that a massage would be expected possibly naked and possibly some touching involved. [redacted] has no formal training in providing massages.

[redacted] spoke about a third and last time she went to Jeff's house. [redacted] drove another girl, [redacted] who is [redacted] friend, to Jeff's house. [redacted] stated [redacted] knew that [redacted] had made money, massaging Jeff and wanted to make money herself. [redacted] took them in the kitchen area of the house and introduced [redacted] to [redacted]. [redacted] and [redacted] took [redacted] upstairs to the main bedroom. [redacted] advised she doesn't know what happened as [redacted] did not speak about what happened in the room. [redacted] received $100.00 from [redacted] for going with her to Jeff's house and recommending [redacted] [redacted] was unable to remember [redacted] telephone number. The interview was concluded and we left the area.

On October 6, 2005, at 11:45 am, I met with [redacted] [redacted] at Lynn University and explained to her why we there to interview her. She advised she was aware of the ongoing investigation. [redacted] stated she had previously spoken with [redacted] [redacted] who told her she was interviewed by detectives. During a sworn taped statement, [redacted] stated she knew that [redacted] [redacted] worked for Jeff in Palm Beach. [redacted] advised she has been there a lot of times for massages. I asked her if she had formal training in providing massages, which [redacted] stated she had not. [redacted] advised she was told what was expected of her by providing massages and would have to remove clothing but if she felt uncomfortable just to say so and Jeff would stop pushing the issue. [redacted] began providing massages and advised she kept her clothes on. She considered Jeff a pervert and he kept pushing to go further and further. [redacted] explained she would keep telling him she had a boyfriend and would not be right to her boyfriend. It wasn't until recently, [redacted] admitted to removing her clothes and staying in her thong underwear to provide a massage. [redacted] explained he wanted to be rubbed on his back and recently he began turning over and have her rub his chest as he masturbated. He would try to touch her breasts as she rubbed his chest.

[redacted] stated "Jeff would try to get away with more and more on each massage". Originally, [redacted] drove her to the house for the original massage. [redacted] left [redacted] her cell phone number and every time Jeff would come into town, [redacted] would call her for an appointment. Each time she went, [redacted] would meet her at the kitchen door area. She would bring her upstairs and prepare the massage table. [redacted] advised Jeff would ask her questions about her. He knew she was a soccer player and would be attending Lynn University. I asked [redacted] if he knew her real age, [redacted] stated Jeff didn't care. The most recent massage she provided was [redacted]n October 1, 2005.

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During the massage, she asked Jeff if she could borrow one of his vehicles to visit her family and boyfriend in Orlando. Jeff had told her she could borrow one of his vehicles but later stated he would rent her a car. She continued with the massage as Jeff grabbed her buttocks and caressed the buttocks checks. I asked [redacted] if she was wearing undergarments to which she replied her thong underwear. Once he tried to touch her breasts, she would pull away from him and he would stop. [redacted] was asked if he ever used a vibrator on her. [redacted] was aware of the vibrator but advised she never would allow him to use the vibrator on her. She described the vibrator as the large white vibrator with a huge head on the tip of the vibrator. She stated he kept the vibrator in a closet near the massage table. [redacted] advised she had been doing the massage for approximately two years which meant she would have started doing massages for Jeff at the age of sixteen.

[redacted] stated she was contacted by [redacted] on October 3, 2005 [redacted] had informed her that Jeff had rented her a new Nissan Sentra and she should come by the house to pick it up. [redacted] informed [redacted] she would have the car for a month. [redacted] stated Jeff knew her car was not working properly and had missed appointments in the past because of her car being inoperable. [redacted] explained the car is currently parked next to the Gym field. I asked her if she ever took any one to the house. [redacted] explained she took [redacted] a friend of hers who has returned to Orlando to attend college. I asked if she ever allowed another female in the room. [redacted] advised no one was brought into the room with her. At the conclusion of the interview, Det Dawson and I went to the Gym area of Lynn University and located the Silver Nissan Sentra bearing Florida tag [redacted]. The vehicle is registered to Dollar rent a car out of the Palm Beach International Airport.

On October, 11, 2005, Det Dawson and I had traveled to Jacksonville, Florida and met with [redacted] date of birth, [redacted]. [redacted] explained she had gone to Epsteins house since she was sixteen. She explained she was brought to the house to perform a massage by [redacted] Once she began explaining that the massage immediately escalated to other things, she further explained she had gone to the house hundreds of times. [redacted] stated she became his "number one girl." She would enter the house and get naked in the bedroom. She would then start with a back massage. Epstein would roll on to his back and allow her to massage his chest area. [redacted] stated Epstein would then began to masturbate himself and at the same time would insert his fingers in her vagina and masturbate her with his fingers. [redacted] explained Epstein would continue this process until he ejaculated. He would then utilize a vibrator/massager on her vagina until [redacted] ejaculated. [redacted] advised that during her frequent visits, Epstein asked for her real age, [redacted] stated she was sixteen. Epstein advised her not to tell anyone her real age. [redacted] advised that things escalated within the home as Epstein would pay [redacted] to have intercourse with his assistant, [redacted]. Epstein would watch and masturbate as he was watching. Occasionally, Epstein would then join in during the intercourse and provide oral sex to both [redacted] and [redacted]. This occurred during the time [redacted] was sixteen years of age.

[redacted] advised this continued to escalate and occurred during two years. The routine became familiar to [redacted] Epstein's assistant [redacted] would telephone her every time Epstein was in the Town of Palm Beach and would place appointments for her to visit and work for Epstein. [redacted] stated Epstein would photograph them naked and having sex and proudly display the photographs within the home.

[redacted] continued to come to the house and was paid approximately $400.00 to $600.00 every time she went. [redacted] stated during a massage involving [redacted] Epstein turned [redacted] on to her stomach on the massage bed and inserted his penis into her vagina. [redacted] stated Epstein began to pump his penis in her vagina. [redacted] became upset over this .

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She said her head was being held against the bed forcibly, as he continued to pump inside her. She screamed no and Epstein stopped. She told him that she did not want to have his penis inside of her. Epstein apologized for his actions and subsequently paid her a thousand dollars for that visit. [redacted] stated she knows he still displays her photographs through out the house.

Your affiant recalled working a previous case within Epstein's residence on October 5, 2003, when Epstein reported a theft from within his house. A former, disgruntled houseman was suspected in stealing monies from the house. At that time, I observed several covert cameras which, would capture and record images of anyone within the residence. Epstein had purchased covert cameras which were built in wall clocks and table clocks. These images were then downloaded onto a proprietary spy ware.software for later viewing.

WHEREOF, affiant make this affidavit and pray the issuance of a search warrant in due form of law for the search of the above described premises for the said property, heretofore described, and for the seizure and safe keeping of the property, subject to the order of this Honorable Court or such other Court having jurisdiction over the offense, by the duly constituted officers of the law.

AFFIANT

Sworn to and subscribed before me this 18th day of October, 2005 .

JUDGE in and for Palm Beach County, Florida

EFTA00232959

A TRUE BILL

IN THE NAME OF AND BY THE AUTHORITY OF THE STATE OF FLORIDA

IN THE CIRCUIT COURT OF THE FIFTEENTH JUDICIAL CIRCUIT OF THE STATE OF FLORIDA

For Palm Beach County, at the Spring Term thereof, in the year of our Lord Two Thousand and Six, to-wit: The Grand Jurors of the State of Florida, inquiring in and for the body of said County of Palm Beach, upon their oaths do present that JEFFREY E. EPSTEIN in the County of Palm Beach aforesaid, in the Circuit and State aforesaid,

COUNT ONE
FELONY SOLICITATION OF PROSTITUTION

on or about or between the 1st day of August in the year of our Lord Two Thousand and Four and October 31, 2005, did solicit, induce, entice, or procure another to commit prostitution lewdness, or assignation, contrary to Florida Statute 796.07(1) on three or more occasions between August 01, 2004 and October 31, 2005, contrary to Florida Statute 796.07(2)(f) and (4)(c). (3 DEG FEL)(LEVEL 1)

against the form of the statute, to the evil example of all others, and against the peace and dignity of the State of Florida.

I hereby certify that I have advised the Grand Jury returning this indictment as authorized and required by law.

_____

Assistant State Attorney of the
Fifteenth Judicial Circuit of the

State

of Florida, prosecuting for the said
State

GRAND JURY FOREPERSON

DATE

Jeffrey E. Epstein, Race: White, Sex: Male, DOB: [redacted]
Issue Warrant

REQUEST FOR WARRANT

DEFENDANT: Jeffrey Esptein DATE OF BIRTH [redacted]

HABITUAL OFFENDER: YES _____ NO _____ A/K/A _____

VICTIM RELATED / ACQUAINTED WITH DEFENDANT? YES XX NO _____

AGENCY CASE NUMBER: 05-368 (1)

LEAD OFFICER: Det. Joe Recaery

AGENCY: PALM BEACH POLICE DEPARTMENT PHONE NUMBER: [redacted]

CURRENT SHIFT HOURS: 8 am TO 5 pm DAYS OFF: _____

LEAVE / SHIFT CHANGE INFO: _____

WAS ARREST MADE FOR, OR IN CONJUNCTION WITH ANOTHER AGENCY. IF SO, WHAT AGENCY?:

_____

SENTENCING RECOMMENDATIONS: CONTACT DETECTIVE

ADDITIONAL COMMENTS: _____

****

FILING DOCUMENTS ATTACHED:

- X ARREST FORM
- X P.C. AFFIDAVIT (2 COPIES)
- X WITNESS / EVIDENCE LIST Previously Given to ASA Belohlavek
- ____ SWORN STATEMENT OF MATERIAL WITNESS(ES)
- X OFFENSE REPORT (2 COPIES)
- ____ ACCIDENT REPORTS (ALL)
- ____ WITNESS STATEMENTS (ALL)
- X FCIC/NCIC CRIMINAL HISTORY Previously Given to ASA Belohlavek
- ____ REQUEST FOR CONVICTION LETTERS
- X PROPERTY RECEIPT Previous given to ASA Belohlavek
- ____ VEHICLE TOW RECEIPT
- ____ OTHER ATTACHMENTS INCLUDE:

_____

_____

INITIAL FOR COMPLETENESS: JR (OFFICER) 7915 (ID#) 050106 (DATE)

_____ (SUPERVISOR) _____ (ID#) 5-01-06 (DATE)

DELIVERED BY: Recarey (DETECTIVE) 7915 (ID#) 050106 (DATE)

RECEIVED
MAY 01 2006
INTAKE

RECEIVED, STATE ATTORNEY'S OFFICE ON: 5/01/06 BY: [signature]

ARREST / NOTICE TO APPEAR
Juvenile Referral Report

1 Arrest 3 Request for Warrant
2 NTA 4 Request for Capia

3

Juvenile

ADMINISTRATIVE

OBTS Number

Agency ORI Number: FL 5 0 0 6 0 0

Agency Name: PALM BEACH POLICE DEPARTMENT

Agency Report Number (N.T.A.'s only): 7 6 - - ( )

Charge Type (Check as many as apply): ☒ 1. Felony ☐ 2. Traffic Felony ☐ 3. Misdemeanor ☐ 4. Traffic Misdemeanor ☐ 5. Ordinance ☐ 6. Other

If Weapon Seized — Enter Type

Multiple Clearance Indicator

Location of Arrest (Including Name of Business)

Location of Offenses (Business Name, Address): 358 EL BRILLO WAY PALM BEACH, FL

Date of Arrest	Time of Arrest	Booking Date	Booking Time	Jail Date	Jail Time	Location of Vehicle

DEFENDANT

Name (Last, First, Middle): EPSTEIN, JEFFREY E.

Alias (Name, DOB, Soc. Sec. #, Etc.)

Race (W - White, B - Black, I - American Indian, O - Oriental/Asian)	Sex	Height	Weight	Eye Color	Hair Color	Complexion	Build
W	M	6'00"	175	BLUE	GREY		MED

Scars, Marks, Tattoos, Unique Physical Features (Location, Type, Description)

Marital Status

Religion

Indication of: Alcohol Influence ☐ Y ☐ N ☐ Unk; Drug Influence ☐ Y ☐ N ☐ Unk

Local Address (Street, Apt. Number): 358 EL BRILLO WAY (City): PALM BEACH (State): FL (Zip): 33480 Phone: (561) 832-4117

Residence Type: 1. City 2. County 3. Florida 4. Out of State

Permanent Address (Street, Apt. Number): 34 E 64 ST (City): N.Y. (State): N.Y. (Zip): 10021 Phone: ( )

Address Source

Business Address (Name, Street): 45 MADISON AVE (City): NY (State): NY (Zip): 10022 Phone: ( )

Occupation: FINANCIER

DL Number, State: [redacted] Soc. Sec. Number: [redacted]

INS Number

Place of Birth (City, State): NEW YORK

Citizenship: USA

CO-DEF.

Co-Defendant Name (Last, First, Middle)	Race	Sex	Date of Birth	☐ 1. Arrested ☐ 2. At Large	☐ 3. Felony ☐ 4. Misdemeanor ☐ 5. Juvenile
Co-Defendant Name (Last, First, Middle)	Race	Sex	Date of Birth	☐ 1. Arrested ☐ 2. At Large	☐ 3. Felony ☐ 4. Misdemeanor ☐ 5. Juvenile

JUVENILE

☐ Parent ☐ Legal Custodian ☐ Other: Name (Last) (First) (Middle)

Residence Phone ( )

Address (Street, Apt. Number) (City) (State) (Zip)

Business Phone ( )

TOT JAC

Date

Time

The above address was provided by ☐ defendant and / or ☐ defendant's parents. The child and / or parent was told to keep the Juvenile Court Clerk's Office (Phone 355-2526) informed of any change of address. ☐ Yes, by: (Name) ☐ No: (Reason)

School Attended

Grade

Property Crime? ☐ Yes ☐ No

Description of Property

Value of Property

CODE

Drug Activity: N. N/A P. Possess S. Sell B. Buy T. Traffic R. Smuggle D. Deliver E. Use K. Dispense/ Distribute M. Manufacture/ Produce/ Cultivate Z. Other

Drug Type: N. N/A A. Amphetamine B. Barbiturate C. Cocaine E. Heroin H. Hallucinogen M. Marijuana O. Opium/Deriv. P. Paraphernalia/ Equipment S. Synthetic U. Unknown Z. Other

CHARGE

Charge Description	Counts	Domestic Violence	Statute Violation Number	Violation of ORD #
UNLAWFUL SEX ACTS W/MINOR	4	☐ Y ☒ N	794.05 (1)	

Drug Activity	Drug Type	Amount / Unit	Offense #	Warrant / Capias Number	Bond
N	N		08-268		

CHARGE

Charge Description	Counts	Domestic Violence	Statute Violation Number	Violation of ORD #
LEWD/LASCIVIOUS MOL	1	☐ Y ☒ N	800.04 (5)	

Drug Activity	Drug Type	Amount / Unit	Offense #	Warrant / Capias Number	Bond
N	N		08-268		

CHARGE

Charge Description	Counts	Domestic Violence	Statute Violation Number	Violation of ORD #
		☐ Y ☐ N	. ( )	

Drug Activity	Drug Type	Amount / Unit	Offense #	Warrant / Capias Number	Bond

CHARGE

Charge Description	Counts	Domestic Violence	Statute Violation Number	Violation of ORD #
		☐ Y ☐ N	. ( )	

Drug Activity	Drug Type	Amount / Unit	Offense #	Warrant / Capias Number	Bond

NOTICE TO APPEAR

☐ Instruction No. 1 Mandatory Appearance in Court

☐ Instruction No. 2 You need not appear in Court but must comply with instructions on Reverse Side.

Location (Court, Room Number, Address)

Court Date and Time — Month Day Year Time A.M. P.M.

I AGREE TO APPEAR [redacted] THE TIME AND PLACE DESIGNATED TO ANSWER THE OFFENSE CHARGED OR TO PAY THE FINE SUBSCRIBED. I UNDERSTAND THAT SHOULD I WILLFULLY FAIL TO APPEAR BEFORE THE COURT AS REQUIRED BY THIS **NOTICE TO APPEAR**, THAT I MAY BE HELD IN CONTEMPT OF COURT AND A WARRANT FOR MY ARREST SHALL BE ISSUED.

Signature of Defendant (or Juvenile and Parent / Custodian)

Date Signed

ADMIN.

HOLD for other Agency

Re:

☐ Dangerous ☐ Resisted Arrest ☐ Suicidal ☐ Other:

Signature of Arresting Officer: X

Name of Arresting Officer (Print): DET. JOE KELLEY I.D. #: 715

Name Verification (Printed by Arrestee) (PRINT)

Intake Deputy I.D. # Pouch

Transporting Officer I.D. # Agency

Witness here if subject signed with an "X".

PAGE ____ OF ____

DISTRIBUTION: WHITE — COURT COPY GREEN — STATE ATTORNEY YELLOW — AGENCY PINK — JAIL GOLD - DEFENDANT (N.T.A's ONLY)

EFTA00232963

ARREST / NOTICE TO APPEAR
Juvenile Referral Report

1 Arrest 3 Request for Warrant
2 NTA 4 Request for Capia

Juvenile ☐

ADMINISTRATIVE

OBTS Number

Agency ORI Number: FL0 5 0 0 6 0 0

Agency Name: PALM BEACH POLICE DEPARTMENT

Agency Report Number (N.T.A.'s only): 7 6 - - -

Charge Type (Check as many as apply)
☑ 1. Felony ☐ 3. Misdemeanor ☐ 5. Ordinance
☐ 2. Traffic Felony ☐ 4. Traffic Misdemeanor ☐ 6. Other _____

If Weapon Seized — Enter Type _____

Multiple Clearance Indicator

Location of Arrest (Including Name of Business)

Location of Offenses (Business Name, Address)

Date of Arrest	Time of Arrest	Booking Date	Booking Time	Jail Date	Jail Time	Location of Vehicle

DEFENDANT

Name (Last, First, Middle)

Alias (Name, DOB, Soc. Sec. #, Etc.)

Race (W - White, B - Black, I - American Indian, O - Oriental/Asian)	Sex	Date of Birth	Height	Weight	Eye Color	Hair Color	Complexion	Build

Scars, Marks, Tattoos, Unique Physical Features (Location, Type, Description)

Marital Status

Religion

Indication of: Alcohol Influence ☐ Y ☐ N ☐ Unk. ☐; Drug Influence ☐ ☐ ☐

Local Address (Street, Apt. Number) (City) (State) (Zip) Phone ( )

Residence Type: 1. City 2. County 3. Florida 4. Out of State

Permanent Address (Street, Apt. Number) (City) (State) (Zip) Phone ( )

Address Source

Business Address (Name, Street) (City) (State) (Zip) Phone ( )

Occupation

D/L Number, State	Soc. Sec. Number	INS Number	Place of Birth (City, State)	Citizenship

CO-DEF.

Co-Defendant Name (Last, First, Middle)	Race	Sex	Date of Birth	1. Arrested 2. At Large	3. Felony 4. Misdemeanor 5. Juvenile
				☐ ☐	☐ ☐ ☐
Co-Defendant Name (Last, First, Middle)	Race	Sex	Date of Birth	1. Arrested 2. At Large	3. Felony 4. Misdemeanor 5. Juvenile
				☐ ☐	☐ ☐ ☐

JUVENILE

☐ Parent ☐ Legal Custodian ☐ Other: Name (Last) (First) (Middle)

Residence Phone ( )

Address (Street, Apt. Number) (City) (State) (Zip)

Business Phone ( )

TOT JAC

Date

Time

The above address was provided by ☐ defendant and / or ☐ defendant's parents. The child and / or parent was told to contact the Juvenile Court Clerk's Office (Phone 355-2526) informed of any change of address.
[redacted] by: (Name) ☐ No: (Reason)

School Attended

Grade

Property Crime? ☐ Yes ☐ No

Description of Property

Value of Property

CODE

Drug Activity: N. N/A, P. Possess, S. Sell, B. Buy, T. Traffic, R. Smuggle, D. Deliver, E. Use, K. Dispense/Distribute, M. Manufacture/Produce/Cultivate, Z. Other

Drug Type: N. N/A, A. Amphetamine, B. Barbiturate, [redacted] Cocaine, E. Heroin, H. Hallucinogen, M. Marijuana, O. Opium/Deriv, P. Paraphernalia/Equipment, S. Synthetic, U. Unknown, Z. Other

CHARGE

Charge Description	Counts	Domestic Violence ☐ Y ☐ N	Statute Violation Number	Violation of ORD #
Drug Activity	Drug Type	Amount / Unit	Offense #	Warrant / Capias Number	Bond

CHARGE

Charge Description	Counts	Domestic Violence ☐ Y ☐ N	Statute Violation Number	Violation of ORD #
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Signature of Defendant (or Juvenile and Parent / Custodian) Date Signed

ADMIN.

HOLD for other Agency

☐ Dangerous ☐ Resisted Arrest
☐ Suicidal ☐ Other: _____

Intake Deputy I.D. # Pouch

Signature of Arresting Officer
X

Name of Arresting Officer (Print) I.D. #

Transporting Officer I.D. # Agency

Name Verification (Printed by Arrestee)
(PRINT)

Witness here if subject signed with an "X".

PAGE ____ OF ____

DISTRIBUTION: WHITE — COURT COPY GREEN — STATE ATTORNEY YELLOW — AGENCY PINK — JAIL GOLD - DEFENDANT (N.T.A's ONLY)

EFTA00232964

Probable Cause Affidavit

Palm Beach Police Department

Agency ORI# FLO 500600

Police Case#: 05-368 (1)

Defendant: Jeffrey Epstein
Race/Sex: White Male
DOB: [redacted]
Charges: Unlawful Sexual Activity with a Minor (4) counts
Lewd and Lascivious Molestation

From March 15, 2005, through February 2006, the Palm Beach Police Department conducted a sexual battery investigation involving Jeffrey Epstein, [redacted] and [redacted] Sworn taped statements were taken from five victims and seventeen witnesses concerning massages and unlawful sexual activity that took place at the residence of Jeffrey Epstein, 358 El Brillo Way, Palm Beach. Several of the victims were recruited by and brought to the residence by [redacted] to perform massages for Epstein, for which [redacted] received monetary compensation. During the visit they would be introduced to [redacted], Epstein's assistant, who in turn would record their telephone numbers and name. The victims would be brought to Epstein's bedroom to provide the massage. Epstein would enter the room and order the victims to remove their clothing to provide the massage. As the victims complied and provided the massages, Epstein would rub his fingers on their vaginas. On occasion, Epstein would introduce a massager/vibrator and rub the victims vaginas as they provided the massage. On three separate occasions, Epstein had intercourse and inserted his penis/fingers in the victims vaginas. At the conclusion of the massages the victims were paid sums of money ranging from $200 - $1,000. The facts, as reported, are as follows:

On 03/15/2005, A fourteen year old white female, hereinafter referred to as '[redacted] dob [redacted] and her family reported unlawful sexual activity which occurred at a residence within the Town of Palm Beach. [redacted] reported that a subject known to her as "Jeff" had touched her vaginal area with a vibrator/massager while within his residence. "Jeff" was later identified as Jeffrey Epstein through a photo line up.

During a sworn taped interview, [redacted] stated that [redacted] dob [redacted] a cousin of [redacted] boyfriend and classmate at [redacted] High School, worked for a wealthy man and did sexual favors for him. She also admitted that [redacted] had offered her an opportunity to make money. During the beginning of the month of February 2005, [redacted] explained that she was first approached by [redacted] to go with her to Epstein's house. [redacted] stated that [redacted] along with a Hispanic female, later identified at [redacted] pick her up at her father's house on a Sunday. [redacted] was not sure of the exact dates but knew it was a Sunday. [redacted] told her father that they were going shopping but in reality [redacted] drove them to Palm Beach. During the drive a

The foregoing instrument was sworn to or affirmed before me this 1st day of May, 2006 by Det Joe Recarey, who is personally known to me.

Signature of Police Officer (F.S.S. 117.10)

State of Florida
County of Palm Beach

Signature/Arresting Officer

Date: 05/01/2006

EFTA00232965

conversation occurred between [redacted] and [redacted] whereas [redacted] reportedly told [redacted] that if Jeff asked her age, she should say she was eighteen. It was later confirmed by the [redacted] father that [redacted] picked his daughter up on February 6, 2005. According to [redacted] father, [redacted] drove a pick up truck.

[redacted] described Epstein's house as a two-story pink house with a Cadillac Escalade parked in the driveway. She recalled that Jeff's house was on a dead end street. Upon arriving at the house [redacted] stated that they walked up a driveway, past what appeared to be a small guard/security room. A male approaching them asking what they wanted. [redacted] stated they were there to see Epstein. The male allowed them to continue walking up to the house. [redacted] stated the man told them that Epstein was not there but was expected back. He allowed them to enter the house, via the kitchen. He offered them something to drink while they waited inside. Shortly thereafter, Epstein and his assistant, described as white female with blond hair and later identified as [redacted], entered the kitchen. Epstein introduced himself to [redacted] [redacted] described Epstein as being approximately forty-five years old, having a long face and bushy eyebrows, with graying hair.

[redacted] and Epstein left the kitchen leaving [redacted] alone in the kitchen. They returned a short time later. They all spoke briefly in the kitchen. [redacted] was instructed to follow [redacted] upstairs. [redacted] recalled walking up a flight of stairs, lined with photographs, to a room that had a massage table in it. Upon entering the room there was a large bathroom to the right and a hot pink and green sofa in the room. There was a door on each side of the sofa. [redacted] recalled there being a mural of a naked woman in the room, as well as several photographs of naked women on a shelf. [redacted] told the victim that Epstein would be up in a second.

Epstein entered the room wearing only a towel and told [redacted] to take off her clothes. [redacted] stated Epstein was stern when he told her to take off her clothes. [redacted] said she did not know what to do as she was the only one there in the room so she took off her shirt leaving her bra on. Epstein had removed his towel and told the [redacted] to take off everything. [redacted] stated Epstein was nude when he took his towel off, placing it on the floor as he laid down on the table. [redacted] stated she then removed her pants leaving her thong panties on. Epstein then instructed her to give him a massage pointing to a specific lotion for her to use. As [redacted] began to give Epstein the massage, he told her to get on his back. [redacted] stated she straddled herself on Epstein's back whereby her exposed buttocks were touching Epstein's bare buttocks. [redacted] said Epstein was specific in his instruction to her on how to massage him, telling her to go clockwise or counter clockwise. Epstein then turned over and instructed [redacted] to massage his chest. [redacted] was now standing on the ground and resumed massaging Epstein's chest area. [redacted] stated Epstein held onto the small of her back as she massaged his chest and shoulder area. Epstein then turned to his side and started to rub his penis in an up and down motion. Epstein then pulled out a purple vibrator and began to

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Date: 05/01/2006

EFTA00232966

massage [redacted]s vaginal area. [redacted] stated there was no penetration as the vibrator was on top of her underwear. [redacted] recalled Epstein ejaculating because he had to use the towel to wipe himself as he got off the table. Epstein then left the room and [redacted] got dressed. She went back downstairs where she met with [redacted] [redacted] said she was paid three hundred dollars in cash from Epstein. Before she left, Epstein asked [redacted] to leave her phone number. As [redacted] [redacted] and [redacted] were leaving the house, [redacted] told [redacted] she received two hundred dollars that day for bringing her.

During the course of the investigation, parental consent was granted for [redacted] to assist with the investigation. At our direction [redacted] conducted controlled taped phone calls to [redacted] cellular telephone 561-[redacted] [redacted] spoke with [redacted] in an attempt to arrange another meeting with Epstein. [redacted] asked [redacted] what did she need to do to make more money. [redacted] stated, "the more you do, the more you get paid." [redacted] had subsequently called back [redacted] and left a voice mail message for her indicating that she had set up an appointment for [redacted] to go to Epstein's house at 11:00 am on April 5, 2005. This message was recorded from [redacted]s voice mail.

Based on the above, trash pulls were established at Epstein's residence with Supervisor Tony Higgins of the Sanitation Bureau of the Town of Palm Beach. The trash pull from April 5, 2005 revealed a telephone message for Epstein which stated [redacted] and [redacted] name at 11:00 am. This was the time frame [redacted] had informed [redacted] to be ready to go work at Epstein's house.

On October 3, 2005, Sgt Frick and I went to [redacted] residence and viewed her vehicle parked in the driveway, a red Dodge Neon. Sgt. Frick and I knocked on the door and met with [redacted] [redacted] was told that we were investigating a claim involving Jeffrey Epstein of El Brillo Way, in Palm Beach. [redacted] was asked if she would accompany us back to the police station for further questioning. She was also told that at the conclusion of the interview she would be returned home. [redacted] voluntarily came with us back to the Palm Beach Police Department.

Upon our arrival at the police station, [redacted] was brought to the interview room in the Detective Bureau where I obtained a taped, sworn statement. I began the interview by asking [redacted] how she became acquainted with Epstein. [redacted] stated that approximately two years ago, just after she turned 17 years of age, she was approached by a friend named [redacted] at the Canopy Beach Resort in Rivera Beach. [redacted] was asked if she wanted to make money. She was told she would have to provide a massage and should make $200.00. [redacted] thought about the offer and agreed to meet with Jeffrey.

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Date: 05/01/2006

EFTA00232967

[redacted] (Unknown last name) and [redacted] (Unknown last name) picked [redacted] up and she was taken to Epstein's house. Upon her arrival to the house she was introduced to Epstein in the kitchen of the house. She was also introduced to a white female known to her as [redacted]. She was led upstairs to the main bedroom known to her as Jeff Epstein's bedroom. [redacted] arranged the massage table and covered the table with a sheet. She brought out the massage oils and laid them next to the massage bed. [redacted], then left the room and informed [redacted] Jeff would be in, in a minute. Jeff entered the bedroom wearing only a towel. He removed the towel and laid nude on the massage table. He laid on the table onto his stomach and picked a massage oil for [redacted] to rub on him. During the massage, [redacted] stated "He tried to touch me and I stopped him." I asked how he tried to touch her. [redacted] stated that Epstein grabbed her buttocks and she felt uncomfortable. [redacted] told Epstein, I'll massage you but I don't want to be touched. [redacted] stated she performed the massage naked. At the conclusion of the massage, Epstein paid [redacted] $200.

After the massage Epstein stated to [redacted] that he understood she was not comfortable, but he would pay her if she brought over some girls. He told her the younger the better. [redacted] stated she once tried to bring a 23 year old female and Epstein stated that the female was too old. [redacted] stated that in total she only remembers six girls that she brought to see Epstein, each time she was paid $200. [redacted] stated she had brought the following girls: [redacted] (a16 year old female), [redacted] (a 16 year old female) and [redacted] said that at the time she brought these girls to Epstein's house they were all14 through 16 years of age. I asked [redacted] which one was the youngest. [redacted] advised [redacted] was the youngest as she was fourteen when the massage occurred. [redacted] stated every girl she brought knew what to expect when they arrived. They were told they would provide a massage, possibly naked, and allow some touching. I asked her if [redacted] was aware. She stated every girl she brought knew what to expect. She explained she knew that [redacted] wanted to make money. She approached [redacted] and explained about going to work for Jeff, [redacted] agreed and arrangements were made to bring her to Epstein's house on a weekend. [redacted] stated that she and [redacted] (Later identified as [redacted] picked up [redacted] at her house. [redacted] stated that at that time she was driving a red pickup truck. They traveled to Epstein's house and entered through the kitchen door. They met with the house chef and Epstein's assistant [redacted]. [redacted] was introduced to Epstein while they were in the kitchen area. [redacted] led [redacted] upstairs and Epstein went upstairs. When the massage was over [redacted] returned to the kitchen area. [redacted] stated she was paid $200.00 for bringing [redacted] to Epstein's house. [redacted] stated [redacted] told her she was paid $300.00 for the massage.

[redacted] stated that [redacted] was the last person she brought to Epstein's house. She had changed her cellular number to avoid being contacted by [redacted]. She continued stating that she had no direct contact with Epstein

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Signature/Arresting Officer

Date: 05/01/2006

EFTA00232968

when he was going to travel to Palm Beach. [redacted] said when Epstein announces to his assistant, [redacted], that he is traveling to Palm Beach, [redacted] would then contact [redacted] to arrange girls to "work" for Epstein. [redacted] stated that once her parents discovered that she was visiting Epstein, they disapproved of the encounters with him and she stopped. [redacted] further stated that [redacted] still tries to call [redacted] house and leaves messages.

Sgt Frick entered the room and explained to [redacted] that based on her own statements, she had implicated herself by bringing underage girls to Epstein's house. [redacted] provided cellular telephone numbers for the girls she had mentioned previously. Additionally, she also provided possible addresses and areas in which they lived.

As [redacted] was being taken home in the vehicle, a tape recorder was placed within the vehicle to record any conversations within the vehicle. During the drive back to her home, [redacted] made the comment " I'm like a Heidi Fleiss." (Hollywood Madam who sent girls to clients for sexual favors in California). [redacted] was dropped off at her house without incident.

On October 3, 2005, Sgt Frick and I went to speak with [redacted] a sixteen year-old female who was brought to Epstein's residence by [redacted] We met with [redacted] mother at their front door. We explained the ongoing investigation and asked to speak with [redacted] as we had information that she had "worked" for Jeff. Mrs. [redacted] introduced us to her husband and allowed us entry into the home. We sat in the dining room and met vith [redacted] Date of Birth [redacted] As she was under the age of eighteen, Mrs [redacted] was advised we would be speaking with her. She expressed if her daughter had information, she wanted to assist. We interviewed [redacted] who denied having any inappropriate encounters with Jeff (Epstein). She stated she had gone to Jeff's house with [redacted] approximately eight months ago and sat in the kitchen with the house chef, but nothing happened. As the parents were present during the interview, we felt that [redacted] was withholding information from us. She made several comments as to putting the entire incident behind her. I left my telephone number and advised should she wish to speak with me again to telephone me. Sgt Frick and I thanked Mrs. [redacted] for her time and left the area. She stated she would ask [redacted] again after we left as to what happened at Epstein's house. I informed her that [redacted] had my telephone number and hopefully she would call.

On October 4, 2005, Det Dawson and I drove to the [redacted] home and met with [redacted] and [redacted] dob [redacted]. During a sworn taped statement, [redacted] stated approximately a year ago when she was seventeen years old, she was taken to a house by [redacted] stated she knows [redacted] because they both attend [redacted] High School. She was told she could make money working

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Date: 05/01/2006

EFTA00232969

for Jeff. She was told she would have to provide a massage to Jeff. [redacted] stated upon her arrival to the house she was brought to the kitchen area by [redacted] They met with the house chef who was already in the kitchen area. [redacted] stated [redacted] would wait for her in the kitchen. [redacted] was introduced to [redacted], Jeff's assistant, who brought her upstairs to the master bedroom. [redacted] prepared the room and massage table for a massage. Epstein entered the room wearing only a towel and she provided a massage. [redacted] stated she kept her clothes on during the massage. She advised sometime during the massage, Epstein grabbed her buttocks and pulled her close to him. [redacted] said she was uncomfortable by the incident involving Jeff. At the conclusion of the massage, she was paid $200.00 for the massage. I asked [redacted] if she has any formal training in massages to which she replied no. I asked her if [redacted] received any monies for taking her to perform the massage. [redacted] stated [redacted] had received money for taking her there but was unsure in the amount. [redacted] stated she returned to Epstein's house on another occasion with [redacted] and another girl, [redacted] stated she waited in the kitchen with [redacted] while [redacted] was taken upstairs by [redacted]. [redacted] stated she only did the massage once as she was uncomfortable with the whole experience.

At the conclusion of the interview, the tape was stopped. I was informed that [redacted] had attempted to reach [redacted] via cell phone. A voice mail message on October 4, 2005 at 10:59 am, revealed a female voice who identified herself as [redacted] who requested [redacted] to call her back reference the police questioning. [redacted] provided the incoming telephone number as [redacted]. [redacted] stated she inadvertently told [redacted] about the police investigation because [redacted] had called her to tell her about how she just received a rental car from Jeff Epstein. [redacted] had called her to tell her that she was given a rental car, a 2005 Silver Nissan Sentra, to utilize to visit family and visit Epstein. [redacted] asked her what was going on at the house that the police would be asking questions. [redacted] stated [redacted] then called Jeff and [redacted] and asked what was going on reference the ongoing police investigation. According to [redacted] has since then been trying to contact her to ask about the police questions. I instructed [redacted] not to contact [redacted] and do not provide any more information to [redacted] as she would notify Jeff Epstein and [redacted] what was transpiring.

On October4, 2005, I made telephone contact with [redacted] who had left several messages for me to contact her. During the message, she advised she was not completely truthful when we met in person but would like to speak with me to advise what had happened. She further advised she did not want to speak of this incident in front of her mother. At approximately 3:48 pm I made telephone contact with [redacted] During a taped recorded statement [redacted] stated the following: approximately a year ago, when she was sixteen years of age, [redacted] took her to Epstein's house twice. She knows [redacted] because they both attend [redacted] High School. The first time she went, [redacted] drove to the house. They entered through the kitchen area where she was

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County of Palm Beach

Signature/Arresting Officer

Date: 05/01/2006

EFTA00232970

introduced to [redacted] and Epstein. She was taken upstairs to a bedroom by [redacted] who set the room up with a massage bed and brought out the oils to use. Epstein then entered the room wearing a towel. He laid on the table and picked out a lotion for [redacted] to rub on him. At one point during the massage he tried to remove her shirt, at which point she became very upset and discontinued the massage. Both [redacted] and Epstein had a verbal disagreement, at which time she left without being paid. She got with [redacted] who was sitting in the kitchen and told her "let's go." [redacted] advised she received no money for that day. [redacted] also said that [redacted] had told her if she was uncomfortable with what was going on, to let him know and he'll stop. She knew that the more you do the more you get paid. [redacted] advised that several weeks later she agreed to be taken a second time by [redacted] Once they arrived at the residence, [redacted] sat in the kitchen and [redacted] took her upstairs to the master bedroom again. [redacted] set the room up with a massage bed and brought out the oils to use. Epstein then entered the room wearing a towel. He laid on the table and picked out a lotion for [redacted] to rub on him. At one point during the massage he tried to touch her buttocks. As [redacted] was wearing tight jeans and had a tight belt on Epstein was unable to touch her buttocks. Epstein then rolled onto his back during the massage and then attempted to touch her breasts. [redacted] then became upset again and told Epstein she didn't want to be touched. [redacted] discontinued the massage and was paid $200.00. [redacted] then went downstairs where [redacted] was waiting for her. She told [redacted] she wanted to leave. [redacted] said she never returned to the house. [redacted] stated she is aware that her friend, [redacted] was also at the house and had a problem with Epstein.

I later researched [redacted] dob [redacted], and met with her at her residence. During a sworn taped statement, [redacted] stated the following: on or about November 2004, she was approached at Royal Palm Beach High School by [redacted] a fellow student. [redacted] asked [redacted] if she wanted to make money. She agreed and was told she would provide a massage to wealthy man in Palm Beach. [redacted] picked her up and drove her to a house in Palm Beach. She was brought into the kitchen area of the house. She further stated that fellow [redacted] High School students [redacted] and [redacted] ([redacted] came with them. They were brought into the kitchen where she was introduced to Epstein and other females. [redacted] stated she was introduced to a female helper of Epstein, the female was described as white female (unknown name), with blond hair. She stated that the assistant was familiar with [redacted] The assistant brought her upstairs into a master bedroom area. The assistant set up the massage table and put out lotions to be used. She told [redacted] Epstein would be available in a minute. Epstein entered the room wearing only a towel. Epstein removed his towel, and laid naked on the massage table and picked a lotion to rub on his thighs and back. [redacted] further stated during the massage, Epstein asked her to remove her clothes. She complied and removed her pants and blouse. [redacted] didn't remember if she had removed her bra but feels that she did. [redacted] was certain that she stayed in her thong underwear. [redacted] continued the massage and at one point she climbed onto the massage

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State of Florida
County of Palm Beach

Signature of Police Officer (F.S.S. 117.10)

Signature/Arresting Officer

Date: 05/01/2006

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table, straddling Epstein to massage his back. While doing this her buttocks were touching Epsteins. [redacted] was instructed to return to the ground at which time Epstein turned to have his chest rubbed. [redacted] advised she was sure he was masturbating based on his hand movements going up and down on his penis area. [redacted] did not want to look at his penis area because she was uncomfortable. Epstein removed a large white vibrator which was next to the massage table and turned it on. [redacted] stated Epstein began rubbing the vibrator over her thong underwear on her vaginal area. Shortly thereafter, Epstein ejaculated and removed himself from the table. He walked over to where the shower was and opened the glass door. She waited as he was taking a shower in her direct view. When I asked [redacted] how old she was when this occurred, she stated she had just turned seventeen. At the conclusion of the shower, [redacted] was paid either $350.00 or $400.00. She stated she wasn't sure, but knows it was close to $400.00. [redacted] stated she never returned to provide a massage for Epstein.

At approximately 2:10 pm, Det Dawson and I met with [redacted] dob [redacted] at her residence. As [redacted] was only seventeen years of age, I had notified her mother, that she would be interviewed reference an ongoing investigation in Palm Beach. I assured her that her daughter was not a suspect. I explained the possibility of her being either a witness or victim. Mrs [redacted] advised she wanted [redacted] to cooperate and consented to the interview.

During a sworn taped statement, [redacted] stated the following: at the age of sixteen, during the month of September 2004, she was approached by [redacted] for a chance to make money. [redacted] was friends with associates of [redacted] and knew the same people. [redacted] had been previously told by her friends from [redacted] High School, what [redacted] did for Epstein. [redacted] called a person known to [redacted] as [redacted] and scheduled the appointment. [redacted] picked [redacted] up and drove her to Palm Beach to a street called "Brillo Way". They drove to the end of the street and entered a large driveway. They entered the kitchen area of the house and met with Epstein. [redacted] was introduced to Jeff Epstein. [redacted] led [redacted] upstairs to the main bedroom area and set up the room with a massage table and set out the oils. [redacted] stated that while going up the stairs and into the bedroom she observed numerous photographs of naked young girls. [redacted] dimmed the lights and turned on soft music. [redacted] exited the room and Epstein entered the room wearing only a towel. Epstein picked oils and instructed her to rub his legs, under his buttocks, back and chest area. Epstein asked her to get comfortable. [redacted] advised she did not remove her clothes. She was wearing tight jeans and a cropped tank top exposing her belly area. During the massage, Epstein removed his towel and laid on the massage table naked. As [redacted] rubbed Epstein's chest area, he attempted to reach down her pants to touch her buttocks area however was unable to due so due to the tightness of the jeans and a tight belt. [redacted] advised Epstein began to masturbate as she rubbed his chest. Epstein moaned as she rubbed his chest. She observed he was continuing to masturbate and

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attempted to reach up her tank top and touch her breasts. [redacted] pulled back and Epstein stopped, however he kept masturbating until he climaxed. He cleaned himself with the towel he was previously wearing. [redacted] was paid $200.00 for the massage and left the area. She met with [redacted] who was waiting in the kitchen area and left the house.

[redacted] then explained she never provided another massage for Epstein. She did however, go to the house with [redacted] and [redacted] ([redacted] as they took another friend of [redacted] [redacted] advised she was present when [redacted] went to work for Epstein. She advised she rode over and sat in the kitchen area with [redacted] to wait for [redacted] [redacted] advised while they waited for [redacted] the house chef prepared lunch for them as it was almost lunchtime when they went. When [redacted] was finished with the massage they left the area. I asked [redacted] if [redacted] ever told her what would be expected when she provided a massage. [redacted] stated yes, [redacted] told her that a massage would be expected, possibly naked and possibly some touching involved. [redacted] has no formal training in providing massages. [redacted] spoke about a third and last time she went to Epstein's house. [redacted] drove another girl, [redacted] (sixteen years of age) who is [redacted] friend, to Epstein's house. [redacted] stated [redacted] knew that [redacted] had made money massaging Epstein and wanted to make money herself. [redacted] took them in the kitchen area of the house and introduced [redacted] to [redacted]. [redacted] and [redacted] took [redacted] upstairs to the main bedroom. [redacted] advised she doesn't know what happened as [redacted] did not speak about what happened in the room. [redacted] received $100.00 from [redacted] for going with her to Epstein's house and recommending [redacted]

On October 6, 2005, at 11:45 am, I met with [redacted] [redacted] dob [redacted], at Lynn University and explained to her why we there to interview her. She advised she was aware of the ongoing investigation. [redacted] stated she had previously spoken with [redacted] [redacted] who told her she was interviewed by detectives. During a sworn taped statement, [redacted] stated she knew that [redacted] [redacted] worked for Jeff Epstein in Palm Beach. [redacted] advised she originally had been taken to the Epstein house by [redacted] [redacted] whom she met when they both attended [redacted] High School. She began going to the house when she was sixteen years of age and stated she had been there a lot of times to provide massages over the past two years. I asked her if she had formal training in providing massages, which [redacted] stated she had not. [redacted] advised she was told what was expected of her by providing massages and she would have to remove clothing but if she felt uncomfortable just to say so and Epstein would stop pushing the issue. [redacted] began providing massages and advised she kept her clothes on. She considered Epstein a pervert and he kept pushing to go further and further. [redacted] explained she would keep telling him she had a boyfriend and would not be right to her boyfriend. It wasn't until recently that [redacted] began removing her clothes and staying in her thong underwear to provide a massage. [redacted] explained

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Epstein wanted to be rubbed on his back and recently he began turning over and have her rub his chest as he masturbated. He would try to touch her breasts as she rubbed his chest. [redacted] stated "Jeff would try to get away with more and more on each massage". [redacted] stated Epstein would try to touch her more and on one occasion he attempted to use a massager/vibrator on her. [redacted] drove [redacted] to the house for the original massage. [redacted] left [redacted] her cell phone number and every time Epstein would come into town, [redacted] would call her for an appointment to "work". Each time she went, [redacted] would meet her at the kitchen door area. She would bring her upstairs and prepare the massage table. [redacted] advised Epstein would ask her questions about herself. Epstein knew she was a soccer player and would be attending Lynn University. I asked [redacted] if Epstein knew her real age. [redacted] stated Epstein did and didn't care. The most recent massage she provided was on October 1, 2005. During the massage, she asked Epstein if she could borrow one of his vehicles to visit her family and boyfriend in Orlando, Florida. Epstein had told her she could borrow one of his vehicles but later stated he would rent her a car. She continued with the massage as Epstein grabbed her buttocks and caressed the buttocks cheeks. I asked [redacted] if she was wearing undergarments to which she replied her thong underwear. Once he tried to touch her breasts, she would pull away from him and he would stop. [redacted] was asked if he ever used a vibrator on her. [redacted] was aware of the vibrator but advised she never would allow him to use the vibrator on her. She described the vibrator as the large white vibrator with a huge head on the tip of the vibrator. She stated he kept the vibrator in a closet near the massage table.

[redacted] stated that on October 3, 2005, she was contacted by Epstein's assistant, [redacted], who informed her that Jeff Epstein had rented her a new Nissan Sentra and she should come by the house to pick it up. [redacted] informed [redacted] she would have the car for a month. [redacted] stated Epstein knew her car was not working properly and that she had missed appointments in the past because of her car being inoperable. [redacted] explained the car is currently parked next to the Lynn University Gym field. I asked her if she ever took any one to the house. [redacted] explained she took [redacted] [redacted] a friend of hers who attended Royal Palm Beach High School, who has relocated to Orlando to attend college. I asked if she ever allowed another female in the room. [redacted] advised no one was brought into the room with her.

At the conclusion of the interview, Det Dawson and I went to the gym area of Lynn University and located the Silver Nissan Sentra bearing Florida tag [redacted]. The vehicle is registered to Dollar Rent a Car out of the Palm Beach International Airport. The vehicle was rented by Janusz Banasiack, later learned to be Epstein's houseman, and paid with Epstein's credit card.

On September 11, 2005, w/f [redacted] dob [redacted] was arrested by the Palm Beach Police Department

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for misdemeanor possession of marijuana. During the arrest [redacted] told the arresting officer that she had information about sexual activity taking place at the residence of Jeffrey Epstein. Additionally, during the ongoing trash pulls from Epstein's residence, discarded papers were found which contained [redacted] name and cell phone number.

On October, 11, 2005, Det Dawson and I met with [redacted] and obtained a sworn taped statement. [redacted] explained she had been going to Epstein's house since 2002, when she was sixteen years of age. Since then she has gone to the house hundreds of times. [redacted] stated she became his "number one girl." She explained that on her first visit she was brought to the house by fellow [redacted] School classmate, [redacted] [redacted] said she was brought through the kitchen area where she met [redacted] for the first time. [redacted] was led to the master bedroom, Epstein s room. [redacted] explained that as she was walking up the stairs she observed several photographs of naked women along the walls and tables of the house. [redacted] further explained that she was brought into the bedroom, where [redacted] prepared the room by setting up the massage table and provided the oils for her to rub on Epstein. [redacted] explained she remembered the steam room area, which contained two large showers. Epstein entered the room from the steam room area and introduced himself. Epstein lay on the table and told her to get comfortable. [redacted] removed her skirt and kept her shirt on. Epstein then instructed her to remove her shirt. [redacted] removed her shirt and remembered she was not wearing a bra. [redacted] stated she provided the massage wearing only her panties. She continued rubbing his legs, thighs and feet. [redacted] advised he turned over onto his back. Epstein touched her breasts and began to masturbate. Epstein ejaculated which meant the massage was over. At the conclusion of the massage, [redacted] was paid $200.00. They walked together downstairs where [redacted] and [redacted] [redacted] were waiting. [redacted] stated [redacted] received an unknown amount of money for taking her to Epstein. Epstein instructed to leave her cellular telephone number so that he could contact her when he is in town.

[redacted] stated that during her many visits a routine was established between her and Epstein. She would enter the house and get naked in the bedroom. She would then start with a back massage. Epstein would roll on to his back and allow her to massage his chest area. [redacted] stated Epstein would then began to masturbate himself and at the same time would insert his fingers in her vagina and masturbate her with his fingers. [redacted] explained Epstein would continue this process until he ejaculated. He would then utilize a vibrator/massager on her vagina until [redacted] climaxed. [redacted] advised that during her frequent visits, Epstein asked for her real age, [redacted] stated she was sixteen. Epstein advised her not to tell anyone her real age. [redacted] advised that things escalated within the home as Epstein would instruct and pay [redacted] to have intercourse with his female friend, [redacted]. [redacted] explained the intercourse included using strap on dildos, large rubber penis' and other devices that Epstein had at his disposal. Epstein would watch them have intercourse and masturbate himself . Occasionally, Epstein would then join in

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during the female on female intercourse and provide oral sex to both [redacted] and [redacted] This occurred during the time [redacted] was sixteen years of age.

[redacted] advised this continued to escalate during two years. The routine became familiar to [redacted] Epstein's assistant [redacted] would telephone her every time Epstein was in the Town of Palm Beach and would place appointments for her to visit and work for Epstein. Each time something new was introduced, additional monies were produced and offered for [redacted] to allow the acts to happen. [redacted] consented to perform all these acts but was adamant that there was an understanding with Epstein that no vaginal penetration would occur with his penis. [redacted] explained that Epstein's penis was deformed. [redacted] explained that his penis was oval shaped. [redacted] claimed when Epstein's penis was erect, it was thick toward the bottom but was thin and small toward the head portion. [redacted] called Epstein's penis "egg-shaped." [redacted] stated Epstein would photograph [redacted] and her naked and having sex and proudly display the photographs within the home. [redacted] stated during one visit to Epstein's house in which she provided a massage to Epstein, his female friend, [redacted] was also present. [redacted] provided the massage in which [redacted] and her would fondle each others breasts and kiss for Epstein to enjoy. Towards the end of this massage, Epstein grabbed [redacted] and turned her over onto her stomach on the massage table and forcibly inserted his penis into her vagina. [redacted] stated Epstein began to pump his penis in her vagina. [redacted] became upset over this. She said her head was being held against the table forcibly, as he continued to pump inside her. She screamed "No!" and Epstein stopped. She told him that she did not want to have his penis inside of her. Epstein did not ejaculate inside of her and apologized for his actions and subsequently paid her a thousand dollars for that visit. [redacted] stated she knows he still displays her photographs through out the house.

On October 12, 2005, Det Dawson and I met with [redacted] dob [redacted] who stated during a sworn taped statement, that nothing happened between her and Epstein. [redacted] appeared nervous during the interview. I assured her that I have spoken with other people who advised differently. [redacted] stated on several occasions she provided a massage to Epstein. She stated she was brought to the Epstein house in March of 2005. [redacted] a classmate at [redacted] High School, approached her and asked her if she wanted to "work". [redacted] made the arrangements with [redacted], Epstein's assistant. [redacted] who has no formal training in providing massages, stated she provided a massage, fully clothed for $200.00 . As I sensed hesitancy in her answers, I asked [redacted] if she had been contacted by anyone from Epstein's organizations or his house. [redacted] stated she was interviewed already by a private investigator for Epstein. He identified himself as '[redacted] and inquired about the police investigation, and left his telephone number [redacted] for additional contact. [redacted] provided no additional information, as it appeared her responses were almost scripted.

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On November 6, 2005, at approximately 3:30 pm, I met with [redacted] dob [redacted], at the Palm Beach Police Department. [redacted] was identified as a potential witness/victim through information obtained during the trash pulls. During the sworn taped statement, [redacted] advised she was at Jeffrey Epstein's house one time, approximately two months ago. She was approached by a girl, [redacted] who was dating [redacted] roommate, for an opportunity to make some quick money. [redacted] advised she needed to make some quick cash to make the rent that month. She agreed to go to the house. She had been told by [redacted] that the massage would have to be done in her underwear. She advised [redacted] drove with her and brought her into the house. They walked into the kitchen area, and took the stairs upstairs. [redacted] further stated she was brought into a master bedroom area. She advised she recalled seeing portraits of naked women throughout the room. A massage table was already out near the sauna/shower area in the master bedroom. Epstein entered the room wearing only a towel and introduced himself as "Jeff." At Epstein's direction, [redacted] and [redacted] removed their clothing down to their panties, Epstein laid on his stomach area and they provided a massage on his legs and feet area. I asked [redacted] if she had any formal massage training and she replied "no." [redacted] advised she was topless and the panties she wore were the boy shorts lace panties. She and [redacted] continued the massage until the last ten minutes of the massage, Epstein, told [redacted] to leave the room so that [redacted] could finish the massage. [redacted] got dressed, and left the room as Epstein turned over onto his back. Epstein then removed the towel and laid naked . Epstein requested that [redacted] rub his chest area. [redacted] stated as she did this, Epstein, began masturbating. [redacted] stated Epstein pulled down her boy short panties, and he produced a large white vibrator with a large head. She stated it was within his reach in a drawer in his master bathroom. He rubbed the vibrator on her vaginal area. [redacted] advised he never penetrated her vagina with the vibrator. He continued to rub her vagina with the vibrator as he continued to masturbate. [redacted] stated she was very uncomfortable during the incident but knew it was almost over. Epstein climaxed and started to remove himself from the table. He wiped himself with the towel he had on previously and went into the shower area. [redacted] got dressed and met with [redacted] in the kitchen area. Epstein came into the kitchen and provided [redacted] $200.00 for bringing [redacted] and paid $200.00 to [redacted] for providing the massage. [redacted] was told to leave her telephone number with [redacted] for future contact. [redacted] provided her cellular telephone number. [redacted] was asked if she was recently contacted about this investigation by anyone from the Epstein organization. She replied she was called but it was for work. She stated she was called by [redacted] for her to return to "work" for Epstein. [redacted] stated "work" is the term used by [redacted] to provide the massages and other things. [redacted] advised she declined as she was not comfortable in providing that type of "work."

On November 7, 2005, Det Sandman and I met with [redacted] dob [redacted] During a sworn taped statement, [redacted] stated she met Jeffrey Epstein through [redacted] when they were still

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attending [redacted] High School. [redacted] would approach females who wished to work for Epstein. [redacted] stated she was offered to work for Epstein but declined. [redacted] explained that "work" means give massages. She was asked about any formal training in providing massages which she said "no." [redacted] said she accompanied [redacted] and other females who were taken to Epstein's house to provide massages. [redacted] further stated she had been to the house approximately 4 or 5 times in the past year. She accompanied [redacted] with [redacted] and [redacted] Each time the girls were taken over, they were previously told they would have to provide a massage, possibly naked. They were also told that should Epstein require them to do anything extra, and they were not comfortable just to tell him and he would stop. [redacted] stated [redacted] received $200.00 for each girl she brought over to massage Jeffrey Epstein. When I asked which girl appeared to be the youngest, she replied, [redacted] who was really young, fifteen years old at the most. [redacted] further stated each time she went to the house, she sat in the kitchen and waited with [redacted] until the massage was over. She further stated that the cook would make lunch or a snack for them as they waited. I asked her if there was anything that caught her attention within the home. [redacted] stated there were a lot of naked girls in photographs throughout the house.

On November 8, 2005, at approximately 2:00pm , I met with [redacted] dob [redacted] at the Palm Beach Police Department. During a sworn taped statement, [redacted] stated she had met Epstein approximately two years ago when she was first approached by [redacted] a classmate at [redacted] High School. [redacted] approached her about working for Epstein and providing a massage to him for $200.00. Robson had made the arrangements however was unable to take her the day the arrangements were made. [redacted] had [redacted] take [redacted] also attended Royal Palm Beach High School and was familiar with Epstein. [redacted] recalled she was brought there and entered through the back kitchen door. She had met with an assistant [redacted] and another assistant [redacted]. [redacted] brought her upstairs as she observed several photographs of naked females throughout the house. [redacted] stated Epstein came in the room, wearing only a towel, and laid on the table. [redacted] stated he picked out the oils he wanted her to use and requested she remove her clothing to provide the massage. [redacted] stated that on the first massage she provided she did not remove her clothing. [redacted] stated she had returned several times after that. Each time she returned it was more than a massage. Epstein would walk into the master bedroom/bathroom area wearing only a towel. He would masturbate as she provided a massage. [redacted] stated she was unsure if he climaxed as he masturbated under the towel. Additionally, she never looked below his waist. She claimed that Epstein would convince her to remove her clothes. She eventually removed her clothes and stayed in her thong panties. On occasion, Epstein would use a massager/vibrator, which she described as white in color and a large head. Epstein would rub the vibrator/massager on her vaginal area as he would masturbate. [redacted] stated she had been to the house

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numerous times. [redacted] added she has no formal training in providing a massage. [redacted] stated she brought two females during her visits to provide massages. [redacted] stated she brought a girl named '[redacted] and [redacted] from [redacted] High School. [redacted] stated she received $200.00 for each girl she brought.

On November 8, 2005, I met with [redacted] W/F, [redacted] at the Palm Beach Police Department. During a sworn taped statement, [redacted] stated she had met Jeffrey Epstein approximately one year ago. She was approached by a subject known to her as [redacted] had asked her if she wanted to make money providing massages to Epstein. [redacted] had heard that several girls from [redacted] High School were doing this and making money. She agreed and was taken to the house by [redacted] had introduced her to [redacted] and Epstein and brought her upstairs to a master bedroom where a massage table was prepared and the proper oils were selected. [redacted] left the room and waited downstairs for her. [redacted] stated Epstein entered the room wearing a towel and laid on his stomach. She provided a massage wearing only her thong panties. [redacted] advised Epstein had masturbated every time she provided a massage. She stated Epstein continued to masturbate until he climaxed. Once that occurred the massage was over. She felt the whole situation was weird but she advised she was paid $200.00 for providing the massage. She also stated [redacted] was paid $200.00 by Epstein for bringing [redacted] stated she had gone a total of 15 times to Epstein's residence to provide a massage and things had escalated from just providing a massage. Epstein began touching her on her buttocks and grabbed her closer to him as he masturbated. Epstein also grabbed her breasts and fondled her breasts with his hands as she provided the massage. [redacted] stated on one occasion, while she was only seventeen years of age, he offered extra monies to have vaginal intercourse. She stated this all occurred on the massage table. [redacted] stated Epstein penetrated her vagina with his penis and began having intercourse with her until he reached the point of climax. Epstein removed his penis from her vagina and climaxed onto the massage table. [redacted] received $350.00 for her massage. I asked her if she had any formal training in providing massages, [redacted] stated she did not. [redacted] continued to state on one other occasion, Epstein introduced his girlfriend, [redacted] into the massage. [redacted] was brought into room with [redacted] to provide a massage. Epstein had them kiss and fondle each other around the breasts and buttocks as they provided a massage to Epstein. Epstein, watched and masturbated as this occurred. On other occasions, Epstein, introduced the large white vibrator/massager in the massage. Epstein stroked the vibrator/massager on [redacted] vagina as she provided the massage.

On November 14, 2005, Det Sandman and I met with [redacted] dob [redacted] During a sworn taped statement she advised she started going to the house approximately one year ago and has been there approximately five or six times. [redacted] also stated she was sixteen years old when she first went to Epstein's house. On her first visit she was brought by a fellow student from [redacted] High School known to her

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as [redacted] [redacted] stated [redacted] brought her into the house and she was introduced to [redacted]. [redacted] then brought her upstairs into a master bathroom, located within the bedroom. [redacted] stated she met Epstein in the bathroom. He laid on the table and picked the massage oils. She provided the massage as he laid naked on the massage bed. She stated she rubbed his calves and back area. Upon the end of the massage, Epstein removed himself from the massage table and paid her $300.00 for the massage. [redacted] said each subsequent time she went to the house, she was notified by [redacted] that Epstein was in town and would like her to "work". [redacted] stated she returned to the house and was again led upstairs by [redacted]. She provided the massage, clothed. [redacted] was asked if she ever removed her clothing to provide a massage. [redacted] stated it was not until the third time that she went that she removed her clothing. [redacted] stated she was notified by [redacted] that Epstein wanted her to come to work. She arrived at the house and was led upstairs by [redacted]. She started providing the massage when Epstein asked her to remove her clothing. [redacted] removed her pants, shirt and bra. She stayed in her thong panties and continued rubbing Epstein. Epstein turned over onto his back and she rubbed his chest area. [redacted] stated she knew he was masturbating himself as she providing the massage. [redacted] stated she believed he climaxed based on his breathing. She did not want to view either the climax or the fact that he was masturbating. [redacted] stated once the breathing relaxed he got up and told her to get dressed. She was paid $300.00 for her services. [redacted] stated on the last time she went to provide a massage, she was notified by [redacted] to come to the house and "work". [redacted] stated she was now dating her current boyfriend and did not feel comfortable going. She recalled it was approximately January 2005. She said she went, already thinking that this would be the last time. She went upstairs and went into the master bathroom. She met with Epstein, who was wearing only a towel, and laid onto the table. [redacted] stated Epstein caught her looking at the clock on several occasions. Epstein asked her if she was in a hurry. [redacted] stated her boyfriend was in the car waiting for her. [redacted] further stated that Epstein got upset as he wasn't enjoying the massage. She told him that she didn't want to continue and she would not be back. Epstein told her to leave as she was ruining his massage. [redacted] advised she had no formal training in providing any massages. [redacted] stated although she had a falling out with Epstein, she still received a Christmas bonus from Epstein. [redacted] stated she was wired money from Western Union for her Christmas bonus. Subpoena results from Western Union revealed money was sent from Jeffrey Epstein on December 23, 2004. [redacted] received $200.00 from Epstein for her Christmas bonus.

On November 15, 2005, Det. Sandman and I met with [redacted] dob [redacted] During a sworn taped statement, [redacted] stated she met Jeffrey Epstein over a year ago. She was sixteen years of age and was approached by [redacted] [redacted] a fellow [redacted] High School student, who informed her that she could make $200.00 providing a massage to Epstein. [redacted] had informed her that she would have to provide this

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Date: 05/01/2006

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massage topless. [redacted] made the arrangements with Epstein and his assistants and took [redacted] to the house. [redacted] stated [redacted] and she entered through a glass door that led into a kitchen. She was taken upstairs by [redacted] to a master bedroom. She recalled the master bathroom had a large pink couch, sauna and matching shower. Epstein entered into the room wearing only a towel. [redacted] and [redacted] removed their clothing remaining only in thong underwear. She further stated that Epstein laid on his chest on the table. The oils were selected on which ones to use. Both [redacted] and [redacted] provided the massage on his legs, back and feet. Forty minutes into the massage, Epstein turned over onto his back and requested [redacted] wait downstairs in the kitchen area for [redacted] Epstein instructed [redacted] to finish the massage. As [redacted] got dressed, [redacted] starting rubbing Epstein's chest. [redacted] left the room, and Epstein began masturbating as [redacted] rubbed Epstein's chest. [redacted] stated Epstein continued masturbating until he climaxed on the towel he was wearing. When asked if he had removed the towel she stated he turned the towel around so that the opening would allow him to expose himself. After he cleaned himself off with the towel he instructed [redacted] the massage was done and to get dressed and meet with him downstairs. [redacted] got dressed and met with Epstein in the kitchen area. She was paid $200.00 dollars for providing the massage. [redacted] stated she was aware that [redacted] also received monies for the same thing. The second time she went to the house she was again approached by [redacted] advised if she wanted to return to the house to provide another massage. [redacted] agreed and the arrangements were made by [redacted] for her to return to the house. [redacted] stated [redacted] drove her to the house and knocked on the same glass door which leads to the kitchen area. They were allowed entry into the house by one of the staff members. [redacted] led her upstairs to the master bedroom and master bathroom area. [redacted] left [redacted] this time to do the massage alone. Epstein entered the room again wearing only a towel. [redacted] began removing her clothing as she did the last time she was at the house. Epstein instructed her to get naked. He laid on the table onto his stomach as [redacted] began massaging his legs and back. As [redacted] finished with Epstein's back and legs, Epstein then turned over onto his back. [redacted] started to rub his chest and he began masturbating. As [redacted] rubbed his chest, Epstein leaned over and produced a massager/vibrator. He turned it on and began rubbing [redacted] vagina and masturbating himself at the same time. [redacted] stated she continued to rub his chest as this was occurring. She described the vibrator/massager as large grey with a large head. Epstein rubbed her vagina for approximately two to three minutes with the massager/vibrator. He then removed the vibrator from her vaginal area and concentrated on masturbating himself. [redacted] stated Epstein climaxed onto the towel again and informed her that the massage was done. [redacted] got dressed and met with [redacted] who was waiting in the kitchen area. She received $200.00 for the massage. [redacted] said she never returned to the house and had no desire to return to the house. [redacted] was asked if she received any formal massage training. She advised she had no formal training. [redacted] was asked if Epstein knew her real age. [redacted] stated he knew, as he asked her questions about herself and high school. He was aware she attended, and is still attending [redacted] High School.

The foregoing instrument was sworn to or affirmed before me this 1st day of May, 2006 by Det Joe Recarey, who is personally known to me.

Signature of Police Officer (F.S.S. 117.10)

State of Florida
County of Palm Beach

Signature Arresting Officer

Date: 05/01/2006

EFTA00232981

During the course of the investigation a search warrant was executed at Jeffrey Epstein's home located at 358 El Brillo Way in Palm Beach. While in the home I observed the pink and green couch within the master bedroom area just as the girls previously mentioned. The stairway, which is located from the kitchen area to the master bedroom area, is lined with photos of naked young girls. Additionally, numerous photographs of naked young females, some of which appeared to be the girls I previously interviewed, were on display throughout the house. Also located in the house were various phone message books. The telephone message books have a duplicate copy (Carbon Copy) which, once a phone message is written into the book, the top copy is then torn on the perforated edge and the carbon copy is left in the book. First names of girls, dates and telephone numbers were on the copy of the messages. I recognized various numbers and names of girls that had already been interviewed. The body of the messages were time of the day that they called for confirmation of "work." Other names and telephone numbers were located in which the body of the messages were, "I have girls for him" or "I have 2 girls for him." These messages were taken by [redacted], who signed the bottom of the messages. During the execution of the warrant, I located a [redacted] High School transcript for [redacted] in Epstein's bedroom desk. This desk had stationary marked Jeffrey E Epstein. I located a wood colored armoire beside Epstein's bed that contained a bottle of "Joy Jelly," which is used to provide a warm massage. Several massage tables were located throughout the second floor of the residence, including a massage table found in Epstein's bedroom. On the first floor of the residence I found two covert cameras hidden within clocks. One was located in the garage and the other located in the library area on a shelf behind Epstein's desk. A computer was located which was believed to contain the images from the covert cameras. The computer's hard drive was reviewed which showed several images of [redacted] and other witnesses that have been interviewed. All of these images appeared to come from the camera positioned behind Epstein's desk.

On December 13, 2005, Det. Dawson and I met with [redacted] dob [redacted] During a sworn taped statement, [redacted] stated that when she was sixteen years old she was taken to Epstein's house to provide a massage for money. [redacted] stated it was before Christmas last year (2004) when an associate, [redacted] approached her and asked if she needed to make money for Christmas. [redacted] made arrangements to take [redacted] to the house and drove [redacted] to the house to "work." They were encountered by a white female with long blond hair. [redacted] was unable to remember the name of the white female with blond hair but knew she was Epstein's assistant. She was led upstairs by the white female who explained that there would be lotions out already and Epstein would choose the lotion he wanted her to use. She was led through a spiral staircase which led to a master bedroom and bathroom. The massage table was already set up in the bathroom. [redacted] described the bathroom as a large spacious bathroom with a steam room and shower beside it. [redacted] was introduced to Epstein who was on the phone when she entered the room. Epstein was wearing a white towel and laid on his stomach so that [redacted] may

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County of Palm Beach

Signature of Police Officer (F.S.S. 117.10)

Signature/Arresting Officer

Date: 05/01/2006

EFTA00232982

massage his feet and calves. [redacted] started the massage with the oils Epstein chose and rubbed his feet and calves. Epstein got off the phone and requested she massage his back as well. [redacted] began rubbing his back and got to the small of his back. During the rubbing of his back, Epstein asked her to get comfortable. He requested she remove her pants and shirt. [redacted] removed her shirt and pulled her pants off. [redacted] stayed in her bra and thong panties. As she finished massaging the small of Epstein's back, he then turned onto his back. Epstein instructed [redacted] to rub his chest and pinch his nipples. As she began to rub his chest, Epstein asked her questions about herself. [redacted] remembered telling him she attended [redacted] High School. Epstein asked her if she was sexually active. Before [redacted] could answer, he also asked what sexual position does she enjoy. [redacted] stated she was shy and didn't like talking about those things. She continued rubbing his chest. Epstein reached up and unsnapped her bra from the front. [redacted] explained the bra she used had a front snapping device. Epstein rubbed her breasts and asked her if she like having her breasts rubbed. [redacted] said "no, I don't like that." Epstein then removed his towel and laid on the bed naked exposing his penis to [redacted] He began touching his penis and masturbated as he touched her breasts. [redacted] explained Epstein then touched her vaginal area by rubbing her vagina with his fingers on the outside of her thong panties. [redacted] tensed up and stated Epstein was aware that she was uncomfortable. [redacted] stated that Epstein said to her, "Relax, I'm not going inside." She further explained Epstein commented to her how beautiful and sexy she was. Epstein then moved her thong panties to one side and began stroking her clitoris. [redacted] said, "He commented how hard my clit was." He then inserted two fingers in her vagina and was stroking her within her vagina. She tried pulling back to pull out his fingers from within her vagina. Epstein removed his fingers from within her vagina and apologized for putting his fingers inside her. During this time, he kept his hand on her vaginal area and continued to rub her vagina. [redacted] stated he rubbed her really hard as he was masturbating. [redacted] said he climaxed onto the towel he had been previously wearing and got up from the table. Epstein told her there was $200.00 dollars for her on the dresser within the master bathroom. Epstein also told her that there was an additional $100.00 that was to be given to [redacted] for bringing her there to massage him. Epstein told her to leave her telephone number with his assistant as he wanted to see her again. Epstein stated his assistant would contact her to work again soon. I asked her if she ever received any formal massage training to which [redacted] stated she did not. [redacted] stated it was the only time she ever went to work for Jeff and knew what happened to her was wrong. She further stated that she had never been contacted for any additional work.

On January 9, 2006, I located and interviewed another victim, [redacted] dob [redacted]. [redacted] was identified as a potential victim/witness from information obtained during trash pulls from Epstein's residence. [redacted] stated she met Epstein when she was fifteen years of age. She was approached by a friend from [redacted] High School, [redacted] to be taken to Jeffrey Epstein's house to work. She was originally told she would be able

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Date: 05/01/2006

EFTA00232983

to model lingerie for a wealthy Palm Beacher. [redacted] was taken to Epstein's house located on El BrilloWay. [redacted] introduced [redacted] to Jeffrey Epstein. Epstein had his personal chef prepare dinner for [redacted] and [redacted] At the conclusion of dinner, [redacted] and Epstein brought [redacted] upstairs into a master bedroom area. [redacted] observed a large massage table with a sheet on it. Epstein entered through a door and exited wearing only a towel. [redacted] informed [redacted] that they were going to provide a massage on Epstein. [redacted] asked why were they doing this instead of modeling lingerie. [redacted] explained to [redacted] that this was his routine and to rub his calves and feet. Epstein had told [redacted] to get comfortable. [redacted] removed her pants and blouse. [redacted] stated she stayed only in panties as she did not wear a bra that evening. [redacted] stated while rubbing his calves and feet, Epstein turned over onto his back. Epstein told [redacted] to rub his chest and rub his nipples. [redacted] stated that as she started rubbing his chest, Epstein began masturbating himself . Epstein touched her breasts and stroked her vagina with his fingers. Epstein continued to masturbate himself as he stroked her vagina. Epstein ejaculated on his towel and paid [redacted] $200.00 for the massage. Epstein told [redacted] that if she told anyone what happened at his house that bad things could happen. [redacted] and [redacted] were brought home by Epstein's houseman and [redacted] was afraid that Epstein knew where she lived. [redacted] stated that several days later she received a telephone call from [redacted] who coordinated for [redacted] to return to "work." [redacted] returned to the house and was brought to Epstein's bedroom area by [redacted] who prepared the room for the massage. Epstein entered the room wearing only a towel. Epstein had [redacted] remove her clothing and provide the massage naked. [redacted] began rubbing his feet and calves and Epstein turned over onto his back. Epstein rubbed her vagina with his fingers. Epstein began to masturbate himself with an upwards and downward motion on his penis. Epstein continued to touch her vagina with one hand and masturbate with the other hand. Once Epstein ejaculated onto the towel he was wearing, the massage was over. [redacted] was paid $200.00 for the massage. Epstein again told [redacted] not to speak of what happened at his house or bad things would happen. [redacted] wanted to notify authorities however she was afraid of what would happen to either her or her family.

During the course of the investigation, several subjects were identified as a potential witness/victim through information obtained during the trash pulls, physical surveillance and telephone message books retrieved from the search warrant. While conducting research on the subjects, I discovered that the females were age eighteen or older. Interviews were conducted on the consenting adults whose statements provided the same massage routine when they went to "work" for Epstein. The females would be notified by [redacted], and made appointments for the females to "work" for Epstein. The females would come to Epstein's house and were led upstairs, through a stairwell from the kitchen area, by [redacted] to Epstein's bedroom. Epstein would then enter the room wearing only a towel, and ask them to get comfortable. The females would then provide the massage naked as Epstein would either touch their vaginas with his fingers and/or utilize the massager/vibrator on

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State of Florida
County of Palm Beach

Signature/Arresting Officer

Date: 05/01/2006

EFTA00232984

their vaginal area. He would masturbate during the massage and upon his climaxing, the massage would end. The girls were then paid two or three hundred dollars for the massage.

On November 21, 2005 I interviewed Jose Alessi, a former houseman for Jeffrey Epstein. Alessi stated he was employed for eleven years with Mr. Epstein, from approximately 1993 through 2004. Alessi stated he was the house manager, driver and house maintenance person. It was his responsibility to prepare the house for Epstein s arrival. When asked about cooks or assistants, Alessi stated they traveled with Epstein on his private plane. I asked Mr. Alessi about the massages that have occurred at Epstein's home. Alessi stated Epstein receives three massages a day. Each masseuse that visited the house was different. Alessi stated that towards the end of his employment, the masseuses were younger and younger. When asked how young, Mr. Alessi stated they appeared to be sixteen or seventeen years of age at the most. The massages would occur in Epstein's bedroom or bathroom. He knew this because he often set up the massage tables. I asked if there were things going on other than a massage. Alessi stated that there were times towards the end of his employment that he would have to wash off a massager/vibrator and a long rubber penis, which were in the sink after the massage. Additionally, he stated the bed would almost always have to be made after the massage.

On January 4, 2006 I interviewed another former houseman, Mr Alfredo Rodriguez. During a sworn taped statement, Mr. Rodriguez stated he was employed by Jeffrey Epstein for approximately six months, from November 2004 through May of 2005. His responsibilities as house manager included being the butler, chauffeur, chef, houseman, run errands for Epstein and provide for Epstein's guests. I asked Rodriguez about masseuses coming to the house. Rodriguez stated Epstein would have two massages a day. Epstein would have one massage in the morning and one massage in the afternoon everyday he was in residence. Rodriguez stated he would be informed to expect someone and make them comfortable until either [redacted] or Epstein would meet with them. Rodriguez stated once the masseuses would arrive, he would allow them entry into the kitchen area and offer them something to drink or eat. They would then be encountered by either [redacted] or Epstein. They would be taken upstairs to provide the massage. I asked Rodriguez if any of the masseuses appeared young in age. Rodriguez stated the girls that would come appeared to be too young to be masseuses. He stated one time under Epstein's direction, he delivered a dozen roses to [redacted] High School for one of the girls that came to provide a massage. He knew the girls were still in high school and were of high school age. I asked Rodriguez about the massages. He felt there was a lot more going on than just massages. He would often clean Mr. Epstein's bedroom after the alleged massages and would discover massagers/vibrators and sex toys scattered on the floor. He also said he would wipe down the vibrators and sex toys and put them away in an armoire. He described the armoire as a small wood armoire which was on the wall close to Epstein's

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State of Florida
County of Palm Beach

Signature/Arresting Officer

Signature of Police Officer (F.S.S. 117.10)

Date: 05/01/2006

EFTA00232985

bed. On one occasion Epstein ordered Rodriguez to go to the Dollar rent a car and rent a car for the same girl he brought the roses to, so that she could drive her self to Epstein's house without incident. Rodriguez said the girl always needed rides to and from the house.

Rodriguez produced a green folder which contained documents, and a note with Mr. Epstein's stationary with direction to deliver a bucket of roses to [redacted] High School after [redacted] high school drama performance. Also in that same note was direction to rent a car for [redacted] and direction to extend the rental contract.

During the course of the investigation, subpoenas were obtained for cell phone and home phone records from several victims and witnesses along with the cell phone records of [redacted]. An analysis of these records was conducted which found numerous telephone calls were made between [redacted] and the victims. These records indicate the dates the calls were made are consistent with the dates and times they victims/witnesses stated they were contacted. Specifically, The phone records showed [redacted] called [redacted] during the exact times and dates when victim [redacted] advised the incident occurred. [redacted] also coordinated the encounters with [redacted] and [redacted] during the time frame the girls stated they occurred.

Pursuant to a lawful subpoena I obtained Epstein's private plane records for 2005 from Jet Aviation. The plane records show arrival and departure of Epstein's plane at Palm Beach International airport. These records were compared to the cell phone records of [redacted] This comparison found that all the phone calls [redacted] made to [redacted] and the victims were made in the days just prior to their arrival or during the time Epstein was in Palm Beach.

Therefore, as Jeffrey Epstein, who at the time of these incidents was fifty one years of age, did have vaginal intercourse either with his penis or digitally with [redacted] and [redacted] who were minors at the time this occurred, there is sufficient probable cause to charge Jeffrey Epstein with four counts of Unlawful Sexual Activity with a Minor, in violation of Florida State Statute 794.05(1), a second degree felony. As Epstein, who at the time of the incident was fifty two years of age, did use a vibrator on the external vaginal area of [redacted] a fourteen year old minor, there is sufficient probable cause to charge him with Lewd and Lascivious Molestation, in violation of Florida State Statute 800.04 (5), a second degree felony.

The foregoing instrument was sworn to or affirmed before me this 1st day of May, 2006 by Det Joe Recarey, who is personally known to me.

State of Florida
County of Palm Beach

Signature/Arresting Officer

Signature of Police Officer (F.S.S. 117.10)

Date: 05/01/2006

EFTA00232986

REQUEST FOR WARRANT

DEFENDANT: [redacted] DATE OF BIRTH [redacted]

HABITUAL OFFENDER: YES _____ NO _____ A/K/A _____

VICTIM RELATED / ACQUAINTED WITH DEFENDANT? YES XX NO _____

AGENCY CASE NUMBER: 05-368 (2)

LEAD OFFICER: Det. Joe Recaery

AGENCY: **PALM BEACH POLICE DEPARTMENT** PHONE NUMBER: [redacted]

CURRENT SHIFT HOURS: 8 am TO 5 pm DAYS OFF: _____

LEAVE / SHIFT CHANGE INFO: _____

WAS ARREST MADE FOR, OR IN CONJUNCTION WITH ANOTHER AGENCY. IF SO, WHAT AGENCY?:

_____

SENTENCING RECOMMENDATIONS: CONTACT DETECTIVE

ADDITIONAL COMMENTS: _____

****

ILLING DOCUMENTS ATTACHED:

- X ARREST FORM
- X P.C. AFFIDAVIT (2 COPIES)
- X WITNESS / EVIDENCE LIST Previously given to ASA Belohlavek
- ____ SWORN STATEMENT OF MATERIAL WITNESS(ES)
- X OFFENSE REPORT (2 COPIES)
- ____ ACCIDENT REPORTS (ALL)
- ____ WITNESS STATEMENTS (ALL)
- X FCIC/NCIC CRIMINAL HISTORY Previously Given to ASA Belohlavek
- ____ REQUEST FOR CONVICTION LETTERS
- X PROPERTY RECEIPT Previously Given to ASA [redacted] Belohlavek
- ____ VEHICLE TOW RECEIPT
- ____ OTHER ATTACHMENTS INCLUDE:

_____

_____

INITIAL FOR COMPLETENESS: JR (OFFICER) 7915 (ID#) 050106 (DATE)

_____ (SUPERVISOR) _____ (ID#) _____ (DATE)

DELIVERED BY: Recarey (DETECTIVE) 7915 (ID#) 050106 (DATE)

RECEIVED
MAY 01 2006
INTAKE

RECEIVED, STATE ATTORNEY'S OFFICE ON: 5/1/06 BY: [signature]

ARREST / NOTICE TO APPEAR
Juvenile Referral Report

OBTS Number

1 Arrest 2 NTA 3 Request for Warrant 4 Request for Capias: 3

Juvenile:

ADMINISTRATIVE

Agency ORI Number: FL0 5 0 0 6 0 0

Agency Name: PALM BEACH POLICE DEPARTMENT

Agency Report Number (N.T.A.'s only): 7 6 -

Charge Type (Check as many as apply): ☐ 1. Felony ☐ 2. Traffic Felony ☐ 3. Misdemeanor ☐ 4. Traffic Misdemeanor ☐ 5. Ordinance ☐ 6. Other

If Weapon Seized — Enter Type

Multiple Clearance Indicator

Location of Arrest (Including Name of Business)

Location of Offenses (Business Name, Address)

Date of Arrest | Time of Arrest | Booking Date | Booking Time | Jail Date | Jail Time | Location of Vehicle

DEFENDANT

Name (Last, First, Middle): [redacted]

(Name, DOB, Soc. Sec. #, Etc.)

Race: W - White, B - Black, I - American Indian, O - Oriental/Asian: W

Sex: M

Date of Birth: [redacted]

Height: 6'0"

Weight: 220

Eye Color: BLU

Hair Color: BRO

Complexion

Build: MED

Scars, Marks, Tattoos, Unique Physical Features (Location, Type, Description)

Marital Status

Religion

Indication of: Alcohol Influence ☐ Y ☐ N ☐ Unk.; Drug Influence ☐ Y ☐ N ☐ Unk.

Local Address (Street, Apt. Number) (City) (State) (Zip) Phone ( )

Residence Type: 1. City 2. County 3. Florida 4. Out of State

Permanent Address (Street, Apt. Number): [illegible] (City) (State) (Zip) Phone ( )

Address Source

Business Address (Name, Street) (City) (State) (Zip) Phone ( )

Occupation: [illegible]

[redacted]

INS Number

Place of Birth (City, State)

Citizenship

CO-DEF.

Co-Defendant Name (Last, First, Middle) | Race | Sex | Date of Birth | ☐ 1. Arrested ☐ 2. At Large | ☐ 3. Felony ☐ 4. Misdemeanor ☐ 5. Juvenile

[redacted]-Defendant Name (Last, First, Middle) | Race | Sex | Date of Birth | ☐ 1. Arrested ☐ 2. At Large | ☐ 3. Felony ☐ 4. Misdemeanor ☐ 5. Juvenile

JUVENILE

☐ Parent ☐ Legal Custodian ☐ Other: Name (Last) (First) (Middle) Residence Phone ( )

Address (Street, Apt. Number) (City) (State) (Zip) Business Phone ( )

TOT JAC | Date | Time

The above address was provided by ☐ defendant and / or ☐ defendant's parents. The child and / or parent was told to keep the Juvenile Court Clerk's Office (Phone 355-2526) informed of any change of address.

☐ Yes, by: (Name) ☐ No: (Reason)

School Attended | Grade

Property Crime? ☐ Yes ☐ No

Description of Property

Value of Property

CODE

Drug Activity: N. N/A, P. Possess, S. Sell, B. Buy, T. Traffic, R. Smuggle, D. Deliver, E. Use, K. Dispense/Distribute, M. Manufacture/Produce/Cultivate, Z. Other

Drug Type: N. N/A, A. Amphetamine, B. Barbiturate, C. Cocaine, E. Heroin, H. Hallucinogen, M. Marijuana, O. Opium/Deriv., P. Paraphernalia/Equipment, S. Synthetic, U. Unknown, Z. Other

CHARGE

Charge Description: [illegible] | Counts: 4 | Domestic Violence ☐ Y ☐ N | Statute Violation Number: 7 6 . 0 3 | Violation of ORD #

Drug Activity | Drug Type | Amount / Unit | Offense #: 2nd(2) | Warrant / Capias Number | Bond

CHARGE

Charge Description: [illegible] | Counts | Domestic Violence ☐ Y ☐ N | Statute Violation Number | Violation of ORD #

Drug Activity | Drug Type | Amount / Unit | Offense # | Warrant / Capias Number | Bond

CHARGE

Charge Description | Counts | Domestic Violence ☐ Y ☐ N | Statute Violation Number | Violation of ORD #

Drug Activity | Drug Type | Amount / Unit | Offense # | Warrant / Capias Number | Bond

CHARGE

Charge Description | Counts | Domestic Violence ☐ Y ☐ N | Statute Violation Number | Violation of ORD #

Drug Activity | Drug Type | Amount / Unit | Offense # | Warrant / Capias Number | Bond

NOTICE TO APPEAR

☐ Instruction No. 1 Mandatory Appearance in Court

☐ Instruction No. 2 You need not appear in Court but must comply with instructions on Reverse Side.

Location (Court, Room Number, Address)

Court Date and Time: Month Day Year Time A.M. P.M.

I AGREE TO APPEAR AT THE TIME AND PLACE DESIGNATED TO ANSWER THE OFFENSE CHARGED OR TO PAY THE FINE SUBSCRIBED. I UNDERSTAND THAT SHOULD I WILLFULLY FAIL TO APPEAR BEFORE THE COURT AS REQUIRED BY THIS **NOTICE TO APPEAR**, THAT I MAY BE HELD IN CONTEMPT OF COURT AND A WARRANT FOR MY ARREST SHALL BE ISSUED.

Signature of Defendant (or Juvenile and Parent / Custodian) Date Signed

ADMIN.

HOLD for other Agency

Signature of Arresting Officer: X

Name Verification (Printed by Arrestee) (PRINT)

☐ Dangerous ☐ Resisted Arrest ☐ Suicidal ☐ Other:

Name of Arresting Officer (Print) I.D. #: DET. [illegible]

Intake Deputy I.D. # Pouch

Transporting Officer I.D. # Agency

Witness here if subject signed with an "X".

PAGE ____ OF ____

DISTRIBUTION: WHITE — COURT COPY GREEN — STATE ATTORNEY YELLOW — AGENCY PINK — JAIL GOLD - DEFENDANT (N.T.A.'s ONLY)

EFTA00232988

ARREST / NOTICE TO APPEAR
Juvenile Referral Report

1 Arrest 3 Request for Warrant
2 N T A 4 Request for Capia

Juvenile ☐

ADMINISTRATIVE

OBTS Number

Agency ORI Number: FLO 5 0 0 6 0 0

Agency Name: PALM BEACH POLICE DEPARTMENT

Agency Report Number (N.T.A.'s only): 7 6 - - ( )

Charge Type (Check as many apply.): ☐ 1. Felony ☐ 2. Traffic Felony ☐ 3. Misdemeanor ☐ 4. Traffic Misdemeanor ☐ 5. Ordinance ☐ 6. Other _____

If Weapon Seized — Enter Type _____

Multiple Clearance Indicator

Location of Arrest (Including Name of Business)

Location of Offenses (Business Name, Address)

Date of Arrest | Time of Arrest | Booking Date | Booking Time | Jail Date | Jail Time | Location of Vehicle

DEFENDANT

Name (Last, First, Middle)

Alias (Name, DOB, Soc. Sec. #, Etc.)

Race (W - White, B - Black, I - American Indian, O - Oriental/Asian) | Sex | Date of Birth | Height | Weight | Eye Color | Hair Color | Complexion | Build

Scars, Marks, Tattoos, Unique Physical Features (Location, Type, Description) | Marital Status | Religion

Indication of: Alcohol Influence ☐ Y ☐ N ☐ Unk; Drug Influence ☐ Y ☐ N ☐ Unk

Local Address (Street, Apt. Number) (City) (State) (Zip) | Phone ( ) | Residence Type: 1. City 2. County 3. Florida 4. Out of State

Permanent Address (Street, Apt. Number) (City) (State) (Zip) | Phone ( ) | Address Source

Business Address (Name, Street) (City) (State) (Zip) | Phone ( ) | Occupation

D/L Number, State | Soc. Sec. Number | INS Number | Place of Birth (City, State) | Citizenship

CO-DEF.

Co-Defendant Name (Last, First, Middle) | Race | Sex | Date of Birth | ☐ 1. Arrested ☐ 2. At Large | ☐ 3. Felony ☐ 4. Misdemeanor ☐ 5. Juvenile

Co-Defendant Name (Last, First, Middle) | Race | Sex | Date of Birth | ☐ 1. Arrested ☐ 2. At Large | ☐ 3. Felony ☐ 4. Misdemeanor ☐ 5. Juvenile

JUVENILE

☐ Parent ☐ Legal Custodian ☐ Other: Name (Last) (First) (Middle) | Residence Phone ( )

Address (Street, Apt. Number) (City) (State) (Zip) | Business Phone ( )

TOT JAC | Date | Time

The above address was provided by ☐ defendant and / or ☐ defendant's parents. The child and / or parent was told to keep the Juvenile Court Clerk's Office (Phone 355-2526) informed of any change of address. ☐ Yes, by: (Name) ☐ No: (Reason)

School Attended | Grade

Property Crime? ☐ Yes ☐ No | Description of Property | Value of Property

CODE

Drug Activity: N. N/A, P. Possess, S. Sell, B. Buy, T. Traffic, R. Smuggle, D. Deliver, E. Use, K. Dispense/ Distribute, M. Manufacture/ Produce/ Cultivate, Z. Other

Drug Type: N. N/A, A. Amphetamine, B. Barbiturate, C. Cocaine, E. Heroin, H. Hallucinogen, M. Marijuana, O. Opium/Deriv, P. Paraphernalia/ Equipment, S. Synthetic, U. Unknown, Z. Other

CHARGE

Charge Description | Counts | Domestic Violence ☐ Y ☐ N | Statute Violation Number | Violation of ORD #

Drug Activity | Drug Type | Amount / Unit | Offense # | Warrant / Capias Number | Bond

CHARGE

Charge Description | Counts | Domestic Violence ☐ Y ☐ N | Statute Violation Number | Violation of ORD #

Drug Activity | Drug Type | Amount / Unit | Offense # | Warrant / Capias Number | Bond

CHARGE

Charge Description | Counts | Domestic Violence ☐ Y ☐ N | Statute Violation Number | Violation of ORD #

Drug Activity | Drug Type | Amount / Unit | Offense # | Warrant / Capias Number | Bond

CHARGE

Charge Description | Counts | Domestic Violence ☐ Y ☐ N | Statute Violation Number | Violation of ORD #

Drug Activity | Drug Type | Amount / Unit | Offense # | Warrant / Capias Number | Bond

NOTICE TO APPEAR

☐ Instruction No. 1 Mandatory Appearance in Court

☐ Instruction No. 2 You need not appear in Court but must comply with instructions on Reverse Side.

Location (Court, Room Number, Address)

Court Date and Time: Month Day Year Time A.M. P.M.

I AGREE TO APPEAR [redacted] THE TIME AND PLACE DESIGNATED TO ANSWER THE OFFENSE CHARGED OR TO PAY THE FINE SUBSCRIBED. I UNDERSTAND THAT SHOULD I WILLFULLY FAIL TO APPEAR BEFORE THE COURT AS REQUIRED BY THIS **NOTICE TO APPEAR**, THAT I MAY BE HELD IN CONTEMPT OF COURT AND A WARRANT FOR MY ARREST SHALL BE ISSUED.

Signature of Defendant (or Juvenile and Parent / Custodian) Date Signed

ADMIN

HOLD for other Agency:

☐ Dangerous ☐ Suicidal ☐ Resisted Arrest ☐ Other: _____

Intake Deputy I.D. # Pouch

Signature of Arresting Officer: X

Name of Arresting Officer (Print) I.D. #

Transporting Officer I.D. # Agency

Name Verification (Printed by Arrestee) (PRINT)

Witness here if subject signed with an "X".

PAGE ____ OF ____

DISTRIBUTION: WHITE — COURT COPY GREEN — STATE ATTORNEY YELLOW — AGENCY PINK — JAIL GOLD - DEFENDANT (N.T.A's ONLY)

EFTA00232989

Probable Cause Affidavit

Palm Beach Police Department

Agency ORI# FLO 500600

Police Case#: 05-368 (2)

Defendant: [redacted]
Race/Sex: White Female
DOB: [redacted]
Charges: **Principal in the 1st Unlawful Sexual Activity with a Minor (4) counts**
Principal in the 1st Lewd and Lascivious Molestation (1) count

From March 15, 2005, through February 2006, the Palm Beach Police Department conducted a sexual battery investigation involving Jeffrey Epstein, [redacted] and [redacted] Sworn taped statements were taken from five victims and seventeen witnesses concerning massages and unlawful sexual activity that took place at the residence of Jeffrey Epstein, 358 El Brillo Way, Palm Beach. Several of the victims were recruited by and brought to the residence by [redacted] to perform massages for Epstein, for which [redacted] received monetary compensation. During the visit they would be introduced to [redacted], Epstein's assistant, who in turn would record their telephone numbers and name. The victims would be brought to Epstein's bedroom to provide the massage. Epstein would enter the room and order the victims to remove their clothing to provide the massage. As the victims complied and provided the massages, Epstein would rub his fingers on their vaginas. On occasion, Epstein would introduce a massager/vibrator and rub the victims vaginas as they provided the massage. On three separate occasions, Epstein had intercourse and inserted his penis/fingers in the victims vaginas. At the conclusion of the massages the victims were paid sums of money ranging from $200 - $1,000. The facts, as reported, are as follows:

On 03/15/2005, A fourteen year old white female, hereinafter referred to as "[redacted] dob [redacted], and her family reported unlawful sexual activity which occurred at a residence within the Town of Palm Beach. [redacted] reported that a subject known to her as "Jeff" had touched her vaginal area with a vibrator/massager while within his residence. "Jeff" was later identified as Jeffrey Epstein through a photo line up.

During a sworn taped interview, [redacted] stated that [redacted] dob [redacted], a cousin of [redacted] boyfriend and classmate at [redacted] High School, worked for a wealthy man and did sexual favors for him. She also admitted that [redacted] had offered her an opportunity to make money. During the beginning of the month of February 2005, [redacted] explained that she was first approached by [redacted] to go with her to Epstein's house. [redacted] stated that [redacted] along with a Hispanic female, later identified at [redacted] pick her up at her father's house on a Sunday. [redacted] was not sure of the exact dates but knew it was a Sunday. [redacted] told her father that they were going shopping but in reality [redacted] drove them to Palm Beach. During the drive a

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Signature of Police Officer (F.S.S. 117.10)

State of Florida
County of Palm Beach

Signature Arresting Officer

Date: 05/01/2006

EFTA00232990

conversation occurred between [redacted] and [redacted] whereas [redacted] reportedly told [redacted] that if Jeff asked her age, she should say she was eighteen. It was later confirmed by the [redacted] father that [redacted] picked his daughter up on February 6, 2005. According to [redacted] father, [redacted] drove a pick up truck.

[redacted] described Epstein's house as a two-story pink house with a Cadillac Escalade parked in the driveway. She recalled that Jeff's house was on a dead end street. Upon arriving at the house [redacted] stated that they walked up a driveway past what appeared to be a small guard/security room. A male approaching them asking what they wanted. [redacted] stated they were there to see Epstein. The male allowed them to continue walking up to the house. [redacted] stated the man told them that Epstein was not there but was expected back. He allowed them to enter the house, via the kitchen. He offered them something to drink while they waited inside. Shortly thereafter, Epstein and his assistant, described as white female with blond hair and later identified as Sarah Kellen, entered the kitchen. Epstein introduced himself to [redacted] [redacted] described Epstein as being approximately forty-five years old, having a long face and bushy eyebrows, with graying hair.

[redacted] and Epstein left the kitchen leaving [redacted] alone in the kitchen. They returned a short time later. They all spoke briefly in the kitchen. [redacted] was instructed to follow Kellen upstairs. [redacted] recalled walking up a flight of stairs, lined with photographs, to a room that had a massage table in it. Upon entering the room there was a large bathroom to the right and a hot pink and green sofa in the room. There was a door on each side of the sofa. [redacted] recalled there being a mural of a naked woman in the room, as well as several photographs of naked women on a shelf. Kellen told the victim that Epstein would be up in a second.

Epstein entered the room wearing only a towel and told [redacted] to take off her clothes. [redacted] stated Epstein was stern when he told her to take off her clothes. [redacted] said she did not know what to do as she was the only one there in the room so she took off her shirt leaving her bra on. Epstein had removed his towel and told the [redacted] to take off everything. [redacted] stated Epstein was nude when he took his towel off, placing it on the floor as he laid down on the table. [redacted] stated she then removed her pants leaving her thong panties on. Epstein then instructed her to give him a massage pointing to a specific lotion for her to use. As [redacted] began to give Epstein the massage, he told her to get on his back. [redacted] stated she straddled herself on Epstein's back whereby her exposed buttocks were touching Epstein's bare buttocks. [redacted] said Epstein was specific in his instruction to her on how to massage him, telling her to go clockwise or counter clockwise. Epstein then turned over and instructed [redacted] to massage his chest. [redacted] was now standing on the ground and resumed massaging Epstein's chest area. [redacted] stated Epstein held onto the small of her back as she massaged his chest and shoulder area. Epstein then turned to his side and started to rub his penis in an up and down motion. Epstein then pulled out a purple vibrator and began to

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massage [redacted] vaginal area. [redacted] stated there was no penetration as the vibrator was on top of her underwear. [redacted] recalled Epstein ejaculating because he had to use the towel to wipe himself as he got off the table. Epstein then left the room and [redacted] got dressed. She went back downstairs where she met with [redacted] [redacted] said she was paid three hundred dollars in cash from Epstein. Before she left, Epstein asked [redacted] to leave her phone number. As [redacted] [redacted] and [redacted] were leaving the house, [redacted] told [redacted] she received two hundred dollars that day for bringing her.

During the course of the investigation, parental consent was granted for [redacted] to assist with the investigation. At our direction [redacted] conducted controlled taped phone calls to [redacted] cellular telephone 561-[redacted] [redacted] spoke with [redacted] in an attempt to arrange another meeting with Epstein. [redacted] asked [redacted] what did she need to do to make more money. [redacted] stated, "the more you do, the more you get paid." [redacted] had subsequently called back [redacted] and left a voice mail message for her indicating that she had set up an appointment for [redacted] to go to Epstein's house at 11:00 am on April 5, 2005. This message was recorded from [redacted] voice mail.

Based on the above, trash pulls were established at Epstein's residence with Supervisor Tony Higgins of the Sanitation Bureau of the Town of Palm Beach. The trash pull from April 5, 2005 revealed a telephone message for Epstein which stated [redacted] and [redacted] name at 11:00 am. This was the time frame [redacted] had informed [redacted] to be ready to go work at Epstein's house.

On October 3, 2005, Sgt Frick and I went to [redacted] residence and viewed her vehicle parked in the driveway, a red Dodge Neon. Sgt. Frick and I knocked on the door and met with [redacted] [redacted] was told that we were investigating a claim involving Jeffrey Epstein of El Brillo Way, in Palm Beach. [redacted] was asked if she would accompany us back to the police station for further questioning. She was also told that at the conclusion of the interview she would be returned home. [redacted] voluntarily came with us back to the Palm Beach Police Department.

Upon our arrival at the police station, [redacted] was brought to the interview room in the Detective Bureau where I obtained a taped, sworn statement. I began the interview by asking [redacted] how she became acquainted with Epstein. [redacted] stated that approximately two years ago, just after she turned 17 years of age, she was approached by a friend named [redacted] at the Canopy Beach Resort in Rivera Beach. [redacted] was asked if she wanted to make money. She was told she would have to provide a massage and should make $200.00. [redacted] thought about the offer and agreed to meet with Jeffrey.

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[redacted] (Unknown last name) and [redacted] (Unknown last name) picked [redacted] up and she was taken to Epstein's house. Upon her arrival to the house she was introduced to Epstein in the kitchen of the house. She was also introduced to a white female known to her as [redacted]. She was led upstairs to the main bedroom known to her as Jeff Epstein's bedroom. [redacted] arranged the massage table and covered the table with a sheet. She brought out the massage oils and laid them next to the massage bed. [redacted], then left the room and informed [redacted] Jeff would be in, in a minute. Jeff entered the bedroom wearing only a towel. He removed the towel and laid nude on the massage table. He laid on the table onto his stomach and picked a massage oil for [redacted] to rub on him. During the massage, [redacted] stated "He tried to touch me and I stopped him." I asked how he tried to touch her. [redacted] stated that Epstein grabbed her buttocks and she felt uncomfortable. [redacted] told Epstein, I'll massage you but I don't want to be touched. [redacted] stated she performed the massage naked. At the conclusion of the massage, Epstein paid [redacted] $200.

After the massage Epstein stated to [redacted] that he understood she was not comfortable, but he would pay her if she brought over some girls. He told her the younger the better. [redacted] stated she once tried to bring a 23 year old female and Epstein stated that the female was too old. [redacted] stated that in total she only remembers six girls that she brought to see Epstein, each time she was paid $200. [redacted] stated she had brought the following girls: [redacted] (a16 year old female), [redacted] (a 16 year old female) and [redacted] said that at the time she brought these girls to Epstein's house they were all14 through 16 years of age. I asked [redacted] which one was the youngest. [redacted] advised [redacted] was the youngest as she was fourteen when the massage occurred. [redacted] stated every girl she brought knew what to expect when they arrived. They were told they would provide a massage, possibly naked, and allow some touching. I asked her if [redacted] was aware. She stated every girl she brought knew what to expect. She explained she knew that [redacted] wanted to make money. She approached [redacted] and explained about going to work for Jeff, [redacted] agreed and arrangements were made to bring her to Epstein's house on a weekend. [redacted] stated that she and [redacted] (Later identified as [redacted] picked up [redacted] at her house. [redacted] stated that at that time she was driving a red pickup truck. They traveled to Epstein's house and entered through the kitchen door. They met with the house chef and Epstein's assistant [redacted]. [redacted] was introduced to Epstein while they were in the kitchen area. [redacted] led [redacted] upstairs and Epstein went upstairs. When the massage was over [redacted] returned to the kitchen area. [redacted] stated she was paid $200.00 for bringing [redacted] to Epstein's house. [redacted] stated [redacted] told her she was paid $300.00 for the massage.

[redacted] stated that [redacted] was the last person she brought to Epstein's house. She had changed her cellular number to avoid being contacted by [redacted]. She continued stating that she had no direct contact with Epstein

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when he was going to travel to Palm Beach. [redacted] said when Epstein announces to his assistant, [redacted], that he is traveling to Palm Beach, [redacted] would then contact [redacted] to arrange girls to "work" for Epstein. [redacted] stated that once her parents discovered that she was visiting Epstein, they disapproved of the encounters with him and she stopped. [redacted] further stated that [redacted] still tries to call [redacted] house and leaves messages.

Sgt Frick entered the room and explained to [redacted] that based on her own statements, she had implicated herself by bringing underage girls to Epstein's house. [redacted] provided cellular telephone numbers for the girls she had mentioned previously. Additionally, she also provided possible addresses and areas in which they lived.

As [redacted] was being taken home in the vehicle, a tape recorder was placed within the vehicle to record any conversations within the vehicle. During the drive back to her home, [redacted] made the comment " I'm like a Heidi Fleiss." (Hollywood Madam who sent girls to clients for sexual favors in California). [redacted] was dropped off at her house without incident.

On October 3, 2005, Sgt Frick and I went to speak with [redacted] a sixteen year-old female who was brought to Epstein's residence by [redacted] We met with [redacted] mother at their front door. We explained the ongoing investigation and asked to speak with [redacted] as we had information that she had "worked" for Jeff. Mrs. [redacted] introduced us to her husband and allowed us entry into the home. We sat in the dining room and met with [redacted] Date of Birth [redacted]. As she was under the age of eighteen, Mrs [redacted] was advised we would be speaking with her. She expressed if her daughter had information, she wanted to assist. We interviewed [redacted] who denied having any inappropriate encounters with Jeff (Epstein). She stated she had gone to Jeff's house with [redacted] approximately eight months ago and sat in the kitchen with the house chef, but nothing happened. As the parents were present during the interview, we felt that [redacted] was withholding information from us. She made several comments as to putting the entire incident behind her. I left my telephone number and advised should she wish to speak with me again to telephone me. Sgt Frick and I thanked Mrs. [redacted] for her time and left the area. She stated she would ask [redacted] again after we left as to what happened at Epstein's house. I informed her that [redacted] had my telephone number and hopefully she would call.

On October 4, 2005, Det Dawson and I drove to the [redacted] home and met with [redacted] and [redacted] dob [redacted] During a sworn taped statement, [redacted] stated approximately a year ago when she was seventeen years old, she was taken to a house by [redacted] stated she knows [redacted] because they both attend [redacted] High School. She was told she could make money working

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for Jeff. She was told she would have to provide a massage to Jeff. [redacted] stated upon her arrival to the house she was brought to the kitchen area by [redacted] They met with the house chef who was already in the kitchen area. [redacted] stated [redacted] would wait for her in the kitchen. [redacted] was introduced to [redacted], Jeff's assistant, who brought her upstairs to the master bedroom. [redacted] prepared the room and massage table for a massage. Epstein entered the room wearing only a towel and she provided a massage. [redacted] stated she kept her clothes on during the massage. She advised sometime during the massage, Epstein grabbed her buttocks and pulled her close to him. [redacted] said she was uncomfortable by the incident involving Jeff. At the conclusion of the massage, she was paid $200.00 for the massage. I asked [redacted] if she has any formal training in massages to which she replied no. I asked her if [redacted] received any monies for taking her to perform the massage. [redacted] stated [redacted] had received money for taking her there but was unsure in the amount. [redacted] stated she returned to Epstein's house on another occasion with [redacted] and another girl, [redacted] stated she waited in the kitchen with [redacted] while [redacted] was taken upstairs by [redacted]. [redacted] stated she only did the massage once as she was uncomfortable with the whole experience.

At the conclusion of the interview, the tape was stopped. I was informed that [redacted] had attempted to reach [redacted] via cell phone. A voice mail message on October 4, 2005 at 10:59 am, revealed a female voice who identified herself as [redacted] who requested [redacted] to call her back reference the police questioning. [redacted] provided the incoming telephone number as [redacted]. [redacted] stated she inadvertently told [redacted] about the police investigation because [redacted] had called her to tell her about how she just received a rental car from Jeff Epstein. [redacted] had called her to tell her that she was given a rental car, a 2005 Silver Nissan Sentra, to utilize to visit family and visit Epstein. [redacted] asked her what was going on at the house that the police would be asking questions. [redacted] stated [redacted] then called Jeff and [redacted] and asked what was going on reference the ongoing police investigation. According to [redacted] has since then been trying to contact her to ask about the police questions. I instructed [redacted] not to contact [redacted] and do not provide any more information to [redacted] as she would notify Jeff Epstein and [redacted] what was transpiring.

On October4, 2005, I made telephone contact with [redacted] who had left several messages for me to contact her. During the message, she advised she was not completely truthful when we met in person but would like to speak with me to advise what had happened. She further advised she did not want to speak of this incident in front of her mother. At approximately 3:48 pm I made telephone contact with [redacted] During a taped recorded statement [redacted] stated the following: approximately a year ago, when she was sixteen years of age, [redacted] took her to Epstein's house twice. She knows [redacted] because they both attend Royal Pal Beach High School. The first time she went, [redacted] drove to the house. They entered through the kitchen area where she was

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introduced to [redacted] and Epstein. She was taken upstairs to a bedroom by [redacted] who set the room up with a massage bed and brought out the oils to use. Epstein then entered the room wearing a towel. He laid on the table and picked out a lotion for [redacted] to rub on him. At one point during the massage he tried to remove her shirt, at which point she became very upset and discontinued the massage. Both [redacted] and Epstein had a verbal disagreement, at which time she left without being paid. She got with [redacted] who was sitting in the kitchen and told her "let's go." [redacted] advised she received no money for that day. [redacted] also said that [redacted] had told her if she was uncomfortable with what was going on, to let him know and he'll stop. She knew that the more you do the more you get paid. [redacted] advised that several weeks later she agreed to be taken a second time by [redacted] Once they arrived at the residence, [redacted] sat in the kitchen and [redacted] took her upstairs to the master bedroom again. [redacted] set the room up with a massage bed and brought out the oils to use. Epstein then entered the room wearing a towel. He laid on the table and picked out a lotion for [redacted] to rub on him. At one point during the massage he tried to touch her buttocks. As [redacted] was wearing tight jeans and had a tight belt on Epstein was unable to touch her buttocks. Epstein then rolled onto his back during the massage and then attempted to touch her breasts. [redacted] then became upset again and told Epstein she didn't want to be touched. [redacted] discontinued the massage and was paid $200.00. [redacted] then went downstairs where [redacted] was waiting for her. She told [redacted] she wanted to leave. [redacted] said she never returned to the house. [redacted] stated she is aware that her friend, [redacted] was also at the house and had a problem with Epstein.

I later researched [redacted] dob [redacted] and met with her at her residence. During a sworn taped statement, [redacted] stated the following: on or about November 2004, she was approached at [redacted] High School by [redacted] a fellow student. [redacted] asked [redacted] if she wanted to make money. She agreed and was told she would provide a massage to wealthy man in Palm Beach. [redacted] picked her up and drove her to a house in Palm Beach. She was brought into the kitchen area of the house. She further stated that fellow [redacted] High School students [redacted] and [redacted] ([redacted] came with them. They were brought into the kitchen where she was introduced to Epstein and other females. [redacted] stated she was introduced to a female helper of Epstein, the female was described as white female (unknown name), with blond hair. She stated that the assistant was familiar with [redacted] The assistant brought her upstairs into a master bedroom area. The assistant set up the massage table and put out lotions to be used. She told [redacted] Epstein would be available in a minute. Epstein entered the room wearing only a towel. Epstein removed his towel, and laid naked on the massage table and picked a lotion to rub on his thighs and back. [redacted] further stated during the massage, Epstein asked her to remove her clothes. She complied and removed her pants and blouse. [redacted] didn't remember if she had removed her bra but feels that she did. [redacted] was certain that she stayed in her thong underwear. [redacted] continued the massage and at one point she climbed onto the massage

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table, straddling Epstein to massage his back. While doing this her buttocks were touching Epsteins. [redacted] was instructed to return to the ground at which time Epstein turned to have his chest rubbed. [redacted] advised she was sure he was masturbating based on his hand movements going up and down on his penis area. [redacted] did not want to look at his penis area because she was uncomfortable. Epstein removed a large white vibrator which was next to the massage table and turned it on. [redacted] stated Epstein began rubbing the vibrator over her thong underwear on her vaginal area. Shortly thereafter, Epstein ejaculated and removed himself from the table. He walked over to where the shower was and opened the glass door. She waited as he was taking a shower in her direct view. When I asked [redacted] how old she was when this occurred, she stated she had just turned seventeen. At the conclusion of the shower, [redacted] was paid either $350.00 or $400.00. She stated she wasn't sure, but knows it was close to $400.00. [redacted] stated she never returned to provide a massage for Epstein.

At approximately 2:10 pm, Det Dawson and I met with [redacted] dob [redacted], at her residence. As [redacted] was only seventeen years of age, I had notified her mother, that she would be interviewed reference an ongoing investigation in Palm Beach. I assured her that her daughter was not a suspect. I explained the possibility of her being either a witness or victim. Mrs [redacted] advised she wanted [redacted] to cooperate and consented to the interview.

During a sworn taped statement, [redacted] stated the following: at the age of sixteen, during the month of September 2004, she was approached by [redacted] for a chance to make money. [redacted] was friends with associates of [redacted] and knew the same people. [redacted] had been previously told by her friends from [redacted] High School, what [redacted] did for Epstein. [redacted] called a person known to [redacted] as [redacted] and scheduled the appointment. [redacted] picked [redacted] up and drove her to Palm Beach to a street called "Brillo Way". They drove to the end of the street and entered a large driveway. They entered the kitchen area of the house and met with Epstein. [redacted] was introduced to Jeff Epstein. [redacted] led [redacted] upstairs to the main bedroom area and set up the room with a massage table and set out the oils. [redacted] stated that while going up the stairs and into the bedroom she observed numerous photographs of naked young girls. [redacted] dimmed the lights and turned on soft music. [redacted] exited the room and Epstein entered the room wearing only a towel. Epstein picked oils and instructed her to rub his legs, under his buttocks, back and chest area. Epstein asked her to get comfortable. [redacted] advised she did not remove her clothes. She was wearing tight jeans and a cropped tank top exposing her belly area. During the massage, Epstein removed his towel and laid on the massage table naked. As [redacted] rubbed Epstein's chest area, he attempted to reach down her pants to touch her buttocks area however was unable to due so due to the tightness of the jeans and a tight belt. [redacted] advised Epstein began to masturbate as she rubbed his chest. Epstein moaned as she rubbed his chest. She observed he was continuing to masturbate and

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attempted to reach up her tank top and touch her breasts. [redacted] pulled back and Epstein stopped, however he kept masturbating until he climaxed. He cleaned himself with the towel he was previously wearing. [redacted] was paid $200.00 for the massage and left the area. She met with [redacted] who was waiting in the kitchen area and left the house.

[redacted] then explained she never provided another massage for Epstein. She did however, go to the house with [redacted] and [redacted] ([redacted] as they took another friend of [redacted] [redacted] advised she was present when [redacted] went to work for Epstein. She advised she rode over and sat in the kitchen area with [redacted] to wait for [redacted] [redacted] advised while they waited for [redacted] the house chef prepared lunch for them as it was almost lunchtime when they went. When [redacted] was finished with the massage they left the area. I asked [redacted] if [redacted] ever told her what would be expected when she provided a massage. [redacted] stated yes, [redacted] told her that a massage would be expected, possibly naked and possibly some touching involved. [redacted] has no formal training in providing massages. [redacted] spoke about a third and last time she went to Epstein's house. [redacted] drove another girl, [redacted] (sixteen years of age) who is [redacted] friend, to Epstein's house. [redacted] stated [redacted] knew that [redacted] had made money massaging Epstein and wanted to make money herself. [redacted] took them in the kitchen area of the house and introduced [redacted] to [redacted]. [redacted] and [redacted] took [redacted] upstairs to the main bedroom. [redacted] advised she doesn't know what happened as [redacted] did not speak about what happened in the room. [redacted] received $100.00 from [redacted] for going with her to Epstein's house and recommending [redacted]

On October 6, 2005, at 11:45 am, I met with [redacted] [redacted] dob [redacted] at Lynn University and explained to her why we there to interview her. She advised she was aware of the ongoing investigation. [redacted] stated she had previously spoken with [redacted] [redacted] who told her she was interviewed by detectives. During a sworn taped statement, [redacted] stated she knew that [redacted] [redacted] worked for Jeff Epstein in Palm Beach. [redacted] advised she originally had been taken to the Epstein house by [redacted] [redacted] whom she met when they both attended [redacted] High School. She began going to the house when she was sixteen years of age and stated she had been there a lot of times to provide massages over the past two years. I asked her if she had formal training in providing massages, which [redacted] stated she had not. [redacted] advised she was told what was expected of her by providing massages and she would have to remove clothing but if she felt uncomfortable just to say so and Epstein would stop pushing the issue. [redacted] began providing massages and advised she kept her clothes on. She considered Epstein a pervert and he kept pushing to go further and further. [redacted] explained she would keep telling him she had a boyfriend and would not be right to her boyfriend. It wasn't until recently that [redacted] began removing her clothes and staying in her thong underwear to provide a massage. [redacted] explained

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Date: 05/01/2006

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Epstein wanted to be rubbed on his back and recently he began turning over and have her rub his chest as he masturbated. He would try to touch her breasts as she rubbed his chest. [redacted] stated "Jeff would try to get away with more and more on each massage". [redacted] stated Epstein would try to touch her more and on one occasion he attempted to use a massager/vibrator on her. [redacted] drove [redacted] to the house for the original massage. [redacted] left [redacted] her cell phone number and every time Epstein would come into town, [redacted] would call her for an appointment to "work". Each time she went, [redacted] would meet her at the kitchen door area. She would bring her upstairs and prepare the massage table. [redacted] advised Epstein would ask her questions about herself. Epstein knew she was a soccer player and would be attending Lynn University. I asked [redacted] if Epstein knew her real age. [redacted] stated Epstein did and didn't care. The most recent massage she provided was on October 1, 2005. During the massage, she asked Epstein if she could borrow one of his vehicles to visit her family and boyfriend in Orlando, Florida. Epstein had told her she could borrow one of his vehicles but later stated he would rent her a car. She continued with the massage as Epstein grabbed her buttocks and caressed the buttocks cheeks. I asked [redacted] if she was wearing undergarments to which she replied her thong underwear. Once he tried to touch her breasts, she would pull away from him and he would stop. [redacted] was asked if he ever used a vibrator on her. [redacted] was aware of the vibrator but advised she never would allow him to use the vibrator on her. She described the vibrator as the large white vibrator with a huge head on the tip of the vibrator. She stated he kept the vibrator in a closet near the massage table.

[redacted] stated that on October 3, 2005, she was contacted by Epstein's assistant, [redacted], who informed her that Jeff Epstein had rented her a new Nissan Sentra and she should come by the house to pick it up. [redacted] informed [redacted] she would have the car for a month. [redacted] stated Epstein knew her car was not working properly and that she had missed appointments in the past because of her car being inoperable. [redacted] explained the car is currently parked next to the Lynn University Gym field. I asked her if she ever took any one to the house. [redacted] explained she took [redacted] a friend of hers who attended [redacted] High School, who has relocated to Orlando to attend college. I asked if she ever allowed another female in the room. [redacted] advised no one was brought into the room with her.

At the conclusion of the interview, Det Dawson and I went to the gym area of Lynn University and located the Silver Nissan Sentra bearing Florida tag [redacted]. The vehicle is registered to Dollar Rent a Car out of the Palm Beach International Airport. The vehicle was rented by Janusz Banasiack, later learned to be Epstein's houseman, and paid with Epstein's credit card.

On September 11, 2005, w/f [redacted] dob [redacted] was arrested by the Palm Beach Police Department

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State of Florida
County of Palm Beach

Signature of Police Officer (F.S.S. 117.10)

Signature/Arresting Officer

Date: 05/01/2006

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for misdemeanor possession of marijuana. During the arrest [redacted] told the arresting officer that she had information about sexual activity taking place at the residence of Jeffrey Epstein. Additionally, during the ongoing trash pulls from Epstein's residence, discarded papers were found which contained AH's name and cell phone number.

On October, 11, 2005, Det Dawson and I met with [redacted] and obtained a sworn taped statement. [redacted] explained she had been going to Epstein's house since 2002, when she was sixteen years of age. Since then she has gone to the house hundreds of times. [redacted] stated she became his "number one girl." She explained that on her first visit she was brought to the house by fellow [redacted] High School classmate, [redacted] [redacted] said she was brought through the kitchen area where she met [redacted] for the first time. [redacted] was led to the master bedroom, Epstein s room. [redacted] explained that as she was walking up the stairs she observed several photographs of naked women along the walls and tables of the house. [redacted] further explained that she was brought into the bedroom, where [redacted] prepared the room by setting up the massage table and provided the oils for her to rub on Epstein. [redacted] explained she remembered the steam room area, which contained two large showers. Epstein entered the room from the steam room area and introduced himself. Epstein lay on the table and told her to get comfortable. [redacted] removed her skirt and kept her shirt on. Epstein then instructed her to remove her shirt. [redacted] removed her shirt and remembered she was not wearing a bra. [redacted] stated she provided the massage wearing only her panties. She continued rubbing his legs, thighs and feet. [redacted] advised he turned over onto his back. Epstein touched her breasts and began to masturbate. Epstein ejaculated which meant the massage was over. At the conclusion of the massage, [redacted] was paid $200.00. They walked together downstairs where [redacted] and [redacted] were waiting. [redacted] stated [redacted] received an unknown amount of money for taking her to Epstein. Epstein instructed to leave her cellular telephone number so that he could contact her when he is in town.

[redacted] stated that during her many visits a routine was established between her and Epstein. She would enter the house and get naked in the bedroom. She would then start with a back massage. Epstein would roll on to his back and allow her to massage his chest area. [redacted] stated Epstein would then began to masturbate himself and at the same time would insert his fingers in her vagina and masturbate her with his fingers. [redacted] explained Epstein would continue this process until he ejaculated. He would then utilize a vibrator/massager on her vagina until [redacted] climaxed. [redacted] advised that during her frequent visits, Epstein asked for her real age, [redacted] stated she was sixteen. Epstein advised her not to tell anyone her real age. [redacted] advised that things escalated within the home as Epstein would instruct and pay [redacted] to have intercourse with his female friend, [redacted] [redacted] explained the intercourse included using strap on dildos, large rubber penis' and other devices that Epstein had at his disposal. Epstein would watch them have intercourse and masturbate himself . Occasionally, Epstein would then join in

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during the female on female intercourse and provide oral sex to both [redacted] and [redacted]. This occurred during the time [redacted] was sixteen years of age.

[redacted] advised this continued to escalate during two years. The routine became familiar to [redacted] Epstein's assistant [redacted] would telephone her every time Epstein was in the Town of Palm Beach and would place appointments for her to visit and work for Epstein. Each time something new was introduced, additional monies were produced and offered for [redacted] to allow the acts to happen. [redacted] consented to perform all these acts but was adamant that there was an understanding with Epstein that no vaginal penetration would occur with his penis. [redacted] explained that Epstein's penis was deformed. [redacted] explained that his penis was oval shaped. [redacted] claimed when Epstein's penis was erect, it was thick toward the bottom but was thin and small toward the head portion. [redacted] called Epstein's penis "egg-shaped." [redacted] stated Epstein would photograph [redacted] and her naked and having sex and proudly display the photographs within the home. [redacted] stated during one visit to Epstein's house in which she provided a massage to Epstein, his female friend, [redacted], was also present. [redacted] provided the massage in which [redacted] and her would fondle each others breasts and kiss for Epstein to enjoy. Towards the end of this massage, Epstein grabbed [redacted] and turned her over onto her stomach on the massage table and forcibly inserted his penis into her vagina. [redacted] stated Epstein began to pump his penis in her vagina. [redacted] became upset over this. She said her head was being held against the table forcibly, as he continued to pump inside her. She screamed "No!" and Epstein stopped. She told him that she did not want to have his penis inside of her. Epstein did not ejaculate inside of her and apologized for his actions and subsequently paid her a thousand dollars for that visit. [redacted] stated she knows he still displays her photographs through out the house.

On October 12, 2005, Det [redacted] and I met with [redacted] dob [redacted] who stated during a sworn taped statement, that nothing happened between her and Epstein. [redacted] appeared nervous during the interview. I assured her that I have spoken with other people who advised differently. [redacted] stated on several occasions she provided a massage to Epstein. She stated she was brought to the Epstein house in March of 2005. [redacted] a classmate at [redacted] High School, approached her and asked her if she wanted to "work". [redacted] made the arrangements with [redacted] Epstein's assistant. [redacted] who has no formal training in providing massages, stated she provided a massage, fully clothed for $200.00 . As I sensed hesitancy in her answers, I asked [redacted] if she had been contacted by anyone from Epstein's organizations or his house. [redacted] stated she was interviewed already by a private investigator for Epstein. He identified himself as '[redacted] and inquired about the police investigation, and left his telephone number [redacted] for additional contact. [redacted] provided no additional information, as it appeared her responses were almost scripted.

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[redacted]
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EFTA00233001

On November 6, 2005, at approximately 3:30 pm, I met with [redacted] dob [redacted] at the Palm Beach Police Department. [redacted] was identified as a potential witness/victim through information obtained during the trash pulls. During the sworn taped statement, [redacted] advised she was at Jeffrey Epstein's house one time, approximately two months ago. She was approached by a girl, [redacted] who was dating [redacted] roommate, for an opportunity to make some quick money. [redacted] advised she needed to make some quick cash to make the rent that month. She agreed to go to the house. She had been told by [redacted] that the massage would have to be done in her underwear. She advised [redacted] drove with her and brought her into the house. They walked into the kitchen area, and took the stairs upstairs. [redacted] further stated she was brought into a master bedroom area. She advised she recalled seeing portraits of naked women throughout the room. A massage table was already out near the sauna/shower area in the master bedroom. Epstein entered the room wearing only a towel and introduced himself as "Jeff." At Epstein's direction, [redacted] and [redacted] removed their clothing down to their panties, Epstein laid on his stomach area and they provided a massage on his legs and feet area. I asked [redacted] if she had any formal massage training and she replied "no." [redacted] advised she was topless and the panties she wore were the boy shorts lace panties. She and [redacted] continued the massage until the last ten minutes of the massage, Epstein, told [redacted] to leave the room so that [redacted] could finish the massage. [redacted] got dressed, and left the room as Epstein turned over onto his back. Epstein then removed the towel and laid naked . Epstein requested that [redacted] rub his chest area. [redacted] stated as she did this, Epstein, began masturbating. [redacted] stated Epstein pulled down her boy short panties, and he produced a large white vibrator with a large head. She stated it was within his reach in a drawer in his master bathroom. He rubbed the vibrator on her vaginal area. [redacted] advised he never penetrated her vagina with the vibrator. He continued to rub her vagina with the vibrator as he continued to masturbate. [redacted] stated she was very uncomfortable during the incident but knew it was almost over. Epstein climaxed and started to remove himself from the table. He wiped himself with the towel he had on previously and went into the shower area. [redacted] got dressed and met with [redacted] in the kitchen area. Epstein came into the kitchen and provided [redacted] $200.00 for bringing [redacted] and paid $200.00 to [redacted] for providing the massage. [redacted] was told to leave her telephone number with [redacted] for future contact. [redacted] provided her cellular telephone number. [redacted] was asked if she was recently contacted about this investigation by anyone from the Epstein organization. She replied she was called but it was for work. She stated she was called by [redacted] for her to return to "work" for Epstein. [redacted] stated "work" is the term used by [redacted] to provide the massages and other things. [redacted] advised she declined as she was not comfortable in providing that type of "work."

On November 7, 2005, Det Sandman and I met with [redacted] dob [redacted]. During a sworn taped statement, [redacted] stated she met Jeffrey Epstein through [redacted] when they were still

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attending [redacted] High School. [redacted] would approach females who wished to work for Epstein. [redacted] stated she was offered to work for Epstein but declined. [redacted] explained that "work" means give massages. She was asked about any formal training in providing massages which she said "no." [redacted] said she accompanied [redacted] and other females who were taken to Epstein's house to provide massages. [redacted] further stated she had been to the house approximately 4 or 5 times in the past year. She accompanied [redacted] with [redacted] and [redacted] Each time the girls were taken over, they were previously told they would have to provide a massage, possibly naked. They were also told that should Epstein require them to do anything extra, and they were not comfortable just to tell him and he would stop. [redacted] stated [redacted] received $200.00 for each girl she brought over to massage Jeffrey Epstein. When I asked which girl appeared to be the youngest, she replied, [redacted] who was really young, fifteen years old at the most. [redacted] further stated each time she went to the house, she sat in the kitchen and waited with [redacted] until the massage was over. She further stated that the cook would make lunch or a snack for them as they waited. I asked her if there was anything that caught her attention within the home. [redacted] stated there were a lot of naked girls in photographs throughout the house.

On November 8, 2005, at approximately 2:00pm , I met with [redacted] dob [redacted], at the Palm Beach Police Department. During a sworn taped statement, [redacted] stated she had met Epstein approximately two years ago when she was first approached by [redacted] a classmate at [redacted] High School. [redacted] approached her about working for Epstein and providing a massage to him for $200.00. [redacted] had made the arrangements however was unable to take her the day the arrangements were made. [redacted] had [redacted] take [redacted] also attended [redacted] High School and was familiar with Epstein. [redacted] recalled she was brought there and entered through the back kitchen door. She had met with an assistant [redacted] and another assistant [redacted]. [redacted] brought her upstairs as she observed several photographs of naked females throughout the house. [redacted] stated Epstein came in the room, wearing only a towel, and laid on the table. [redacted] stated he picked out the oils he wanted her to use and requested she remove her clothing to provide the massage. [redacted] stated that on the first massage she provided she did not remove her clothing. [redacted] stated she had returned several times after that. Each time she returned it was more than a massage. Epstein would walk into the master bedroom/bathroom area wearing only a towel. He would masturbate as she provided a massage. [redacted] stated she was unsure if he climaxed as he masturbated under the towel. Additionally, she never looked below his waist. She claimed that Epstein would convince her to remove her clothes. She eventually removed her clothes and stayed in her thong panties. On occasion, Epstein would use a massager/vibrator, which she described as white in color and a large head. Epstein would rub the vibrator/massager on her vaginal area as he would masturbate. [redacted] stated she had been to the house

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numerous times. [redacted] added she has no formal training in providing a massage. [redacted] stated she brought two females during her visits to provide massages. [redacted] stated she brought a girl named "[redacted] and [redacted] from [redacted] High School. [redacted] stated she received $200.00 for each girl she brought.

On November 8, 2005, I met with [redacted] W/F, [redacted], at the Palm Beach Police Department. During a sworn taped statement, [redacted] stated she had met Jeffrey Epstein approximately one year ago. She was approached by a subject known to her as [redacted] had asked her if she wanted to make money providing massages to Epstein. [redacted] had heard that several girls from [redacted] High School were doing this and making money. She agreed and was taken to the house by [redacted] had introduced her to [redacted] and Epstein and brought her upstairs to a master bedroom where a massage table was prepared and the proper oils were selected. [redacted] left the room and waited downstairs for her. [redacted] stated Epstein entered the room wearing a towel and laid on his stomach. She provided a massage wearing only her thong panties. [redacted] advised Epstein had masturbated every time she provided a massage. She stated Epstein continued to masturbate until he climaxed. Once that occurred the massage was over. She felt the whole situation was weird but she advised she was paid $200.00 for providing the massage. She also stated [redacted] was paid $200.00 by Epstein for bringing [redacted] stated she had gone a total of 15 times to Epstein's residence to provide a massage and things had escalated from just providing a massage. Epstein began touching her on her buttocks and grabbed her closer to him as he masturbated. Epstein also grabbed her breasts and fondled her breasts with his hands as she provided the massage. [redacted] stated on one occasion, while she was only seventeen years of age, he offered extra monies to have vaginal intercourse. She stated this all occurred on the massage table. [redacted] stated Epstein penetrated her vagina with his penis and began having intercourse with her until he reached the point of climax. Epstein removed his penis from her vagina and climaxed onto the massage table. [redacted] received $350.00 for her massage. I asked her if she had any formal training in providing massages, [redacted] stated she did not. [redacted] continued to state on one other occasion, Epstein introduced his girlfriend [redacted] into the massage. [redacted] was brought into room with [redacted] to provide a massage. Epstein had them kiss and fondle each other around the breasts and buttocks as they provided a massage to Epstein. Epstein, watched and masturbated as this occurred. On other occasions, Epstein, introduced the large white vibrator/massager in the massage. Epstein stroked the vibrator/massager on [redacted] vagina as she provided the massage.

On November 14, 2005, Det Sandman and I met with [redacted] dob [redacted] During a sworn taped statement she advised she started going to the house approximately one year ago and has been there approximately five or six times. [redacted] also stated she was sixteen years old when she first went to Epstein's house. On her first visit she was brought by a fellow student from [redacted] High School known to her

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as [redacted] [redacted] stated [redacted] brought her into the house and she was introduced to [redacted]. [redacted] then brought her upstairs into a master bathroom, located within the bedroom. [redacted] stated she met Epstein in the bathroom. He laid on the table and picked the massage oils. She provided the massage as he laid naked on the massage bed. She stated she rubbed his calves and back area. Upon the end of the massage, Epstein removed himself from the massage table and paid her $300.00 for the massage. [redacted] said each subsequent time she went to the house, she was notified by [redacted] that Epstein was in town and would like her to "work". [redacted] stated she returned to the house and was again led upstairs by [redacted]. She provided the massage, clothed. [redacted] was asked if she ever removed her clothing to provide a massage. [redacted] stated it was not until the third time that she went that she removed her clothing. [redacted] stated she was notified by [redacted] that Epstein wanted her to come to work. She arrived at the house and was led upstairs by [redacted]. She started providing the massage when Epstein asked her to remove her clothing. [redacted] removed her pants, shirt and bra. She stayed in her thong panties and continued rubbing Epstein. Epstein turned over onto his back and she rubbed his chest area. [redacted] stated she knew he was masturbating himself as she providing the massage. [redacted] stated she believed he climaxed based on his breathing. She did not want to view either the climax or the fact that he was masturbating. [redacted] stated once the breathing relaxed he got up and told her to get dressed. She was paid $300.00 for her services. [redacted] stated on the last time she went to provide a massage, she was notified by [redacted] to come to the house and "work". [redacted] stated she was now dating her current boyfriend and did not feel comfortable going. She recalled it was approximately January 2005. She said she went, already thinking that this would be the last time. She went upstairs and went into the master bathroom. She met with Epstein, who was wearing only a towel, and laid onto the table. [redacted] stated Epstein caught her looking at the clock on several occasions. Epstein asked her if she was in a hurry. [redacted] stated her boyfriend was in the car waiting for her. [redacted] further stated that Epstein got upset as he wasn't enjoying the massage. She told him that she didn't want to continue and she would not be back. Epstein told her to leave as she was ruining his massage. [redacted] advised she had no formal training in providing any massages. [redacted] stated although she had a falling out with Epstein, she still received a Christmas bonus from Epstein. [redacted] stated she was wired money from Western Union for her Christmas bonus. Subpoena results from Western Union revealed money was sent from Jeffrey Epstein on December 23, 2004. [redacted] received $200.00 from Epstein for her Christmas bonus.

On November 15, 2005, Det. Sandman and I met with [redacted] dob [redacted] During a sworn taped statement, [redacted] stated she met Jeffrey Epstein over a year ago. She was sixteen years of age and was approached by [redacted] [redacted] a fellow [redacted] High School student, who informed her that she could make $200.00 providing a massage to Epstein. [redacted] had informed her that she would have to provide this

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massage topless. [redacted] made the arrangements with Epstein and his assistants and took [redacted] to the house. [redacted] stated [redacted] and she entered through a glass door that led into a kitchen. She was taken upstairs by [redacted] to a master bedroom. She recalled the master bathroom had a large pink couch, sauna and matching shower. Epstein entered into the room wearing only a towel. [redacted] and [redacted] removed their clothing remaining only in thong underwear. She further stated that Epstein laid on his chest on the table. The oils were selected on which ones to use. Both [redacted] and [redacted] provided the massage on his legs, back and feet. Forty minutes into the massage, Epstein turned over onto his back and requested [redacted] wait downstairs in the kitchen area for [redacted] Epstein instructed [redacted] to finish the massage. As [redacted] got dressed, [redacted] starting rubbing Epstein's chest. [redacted] left the room, and Epstein began masturbating as [redacted] rubbed Epstein's chest. [redacted] stated Epstein continued masturbating until he climaxed on the towel he was wearing. When asked if he had removed the towel she stated he turned the towel around so that the opening would allow him to expose himself. After he cleaned himself off with the towel he instructed [redacted] the massage was done and to get dressed and meet with him downstairs. [redacted] got dressed and met with Epstein in the kitchen area. She was paid $200.00 dollars for providing the massage. [redacted] stated she was aware that [redacted] also received monies for the same thing. The second time she went to the house she was again approached by [redacted] advised if she wanted to return to the house to provide another massage. [redacted] agreed and the arrangements were made by [redacted] for her to return to the house. [redacted] stated [redacted] drove her to the house and knocked on the same glass door which leads to the kitchen area. They were allowed entry into the house by one of the staff members. [redacted] led her upstairs to the master bedroom and master bathroom area. [redacted] left [redacted] this time to do the massage alone. Epstein entered the room again wearing only a towel. [redacted] began removing her clothing as she did the last time she was at the house. Epstein instructed her to get naked. He laid on the table onto his stomach as [redacted] began massaging his legs and back. As [redacted] finished with Epstein's back and legs, Epstein then turned over onto his back. [redacted] started to rub his chest and he began masturbating. As [redacted] rubbed his chest, Epstein leaned over and produced a massager/vibrator. He turned it on and began rubbing [redacted] vagina and masturbating himself at the same time. [redacted] stated she continued to rub his chest as this was occurring. She described the vibrator/massager as large grey with a large head. Epstein rubbed her vagina for approximately two to three minutes with the massager/vibrator. He then removed the vibrator from her vaginal area and concentrated on masturbating himself. [redacted] stated Epstein climaxed onto the towel again and informed her that the massage was done. [redacted] got dressed and met with [redacted] who was waiting in the kitchen area. She received $200.00 for the massage. [redacted] said she never returned to the house and had no desire to return to the house. [redacted] was asked if she received any formal massage training. She advised she had no formal training. [redacted] was asked if Epstein knew her real age. [redacted] stated he knew, as he asked her questions about herself and high school. He was aware she attended, and is still attending [redacted] High School.

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Signature Arresting Officer

Date: 05/01/2006

EFTA00233006

During the course of the investigation a search warrant was executed at Jeffrey Epstein's home located at 358 El Brillo Way in Palm Beach. While in the home I observed the pink and green couch within the master bedroom area just as the girls previously mentioned. The stairway, which is located from the kitchen area to the master bedroom area, is lined with photos of naked young girls. Additionally, numerous photographs of naked young females, some of which appeared to be the girls I previously interviewed, were on display throughout the house. Also located in the house were various phone message books. The telephone message books have a duplicate copy (Carbon Copy) which, once a phone message is written into the book, the top copy is then torn on the perforated edge and the carbon copy is left in the book. First names of girls, dates and telephone numbers were on the copy of the messages. I recognized various numbers and names of girls that had already been interviewed. The body of the messages were time of the day that they called for confirmation of "work." Other names and telephone numbers were located in which the body of the messages were, "I have girls for him" or "I have 2 girls for him." These messages were taken by [redacted], who signed the bottom of the messages. During the execution of the warrant, I located a [redacted] High School transcript for [redacted] in Epstein's bedroom desk. This desk had stationary marked Jeffrey E Epstein. I located a wood colored armoire beside Epstein's bed that contained a bottle of "Joy Jelly," which is used to provide a warm massage. Several massage tables were located throughout the second floor of the residence, including a massage table found in Epstein's bedroom. On the first floor of the residence I found two covert cameras hidden within clocks. One was located in the garage and the other located in the library area on a shelf behind Epstein's desk. A computer was located which was believed to contain the images from the covert cameras. The computer's hard drive was reviewed which showed several images of [redacted] and other witnesses that have been interviewed. All of these images appeared to come from the camera positioned behind Epstein's desk.

On December 13, 2005, Det. Dawson and I met with [redacted] dob [redacted]. During a sworn taped statement, [redacted] stated that when she was sixteen years old she was taken to Epstein's house to provide a massage for money. [redacted] stated it was before Christmas last year (2004) when an associate, [redacted] approached her and asked if she needed to make money for Christmas. [redacted] made arrangements to take [redacted] to the house and drove [redacted] to the house to "work." They were encountered by a white female with long blond hair. [redacted] was unable to remember the name of the white female with blond hair but knew she was Epstein's assistant. She was led upstairs by the white female who explained that there would be lotions out already and Epstein would choose the lotion he wanted her to use. She was led through a spiral staircase which led to a master bedroom and bathroom. The massage table was already set up in the bathroom. [redacted] described the bathroom as a large spacious bathroom with a steam room and shower beside it. [redacted] was introduced to Epstein who was on the phone when she entered the room. Epstein was wearing a white towel and laid on his stomach so that [redacted] may

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Date: 05/01/2006

EFTA00233007

massage his feet and calves. [redacted] started the massage with the oils Epstein chose and rubbed his feet and calves. Epstein got off the phone and requested she massage his back as well. [redacted] began rubbing his back and got to the small of his back. During the rubbing of his back, Epstein asked her to get comfortable. He requested she remove her pants and shirt. [redacted] removed her shirt and pulled her pants off. [redacted] stayed in her bra and thong panties. As she finished massaging the small of Epstein's back, he then turned onto his back. Epstein instructed [redacted] to rub his chest and pinch his nipples. As she began to rub his chest, Epstein asked her questions about herself. [redacted] remembered telling him she attended [redacted] High School. Epstein asked her if she was sexually active. Before [redacted] could answer, he also asked what sexual position does she enjoy. [redacted] stated she was shy and didn't like talking about those things. She continued rubbing his chest. Epstein reached up and unsnapped her bra from the front. [redacted] explained the bra she used had a front snapping device. Epstein rubbed her breasts and asked her if she like having her breasts rubbed. [redacted] said "no, I don't like that." Epstein then removed his towel and laid on the bed naked exposing his penis to [redacted] He began touching his penis and masturbated as he touched her breasts. [redacted] explained Epstein then touched her vaginal area by rubbing her vagina with his fingers on the outside of her thong panties. [redacted] tensed up and stated Epstein was aware that she was uncomfortable. [redacted] stated that Epstein said to her, "Relax, I'm not going inside." She further explained Epstein commented to her how beautiful and sexy she was. Epstein then moved her thong panties to one side and began stroking her clitoris. [redacted] said, "He commented how hard my clit was." He then inserted two fingers in her vagina and was stroking her within her vagina. She tried pulling back to pull out his fingers from within her vagina. Epstein removed his fingers from within her vagina and apologized for putting his fingers inside her. During this time, he kept his hand on her vaginal area and continued to rub her vagina. [redacted] stated he rubbed her really hard as he was masturbating. [redacted] said he climaxed onto the towel he had been previously wearing and got up from the table. Epstein told her there was $200.00 dollars for her on the dresser within the master bathroom. Epstein also told her that there was an additional $100.00 that was to be given to [redacted] for bringing her there to massage him. Epstein told her to leave her telephone number with his assistant as he wanted to see her again. Epstein stated his assistant would contact her to work again soon. I asked her if she ever received any formal massage training to which [redacted] stated she did not. [redacted] stated it was the only time she ever went to work for Jeff and knew what happened to her was wrong. She further stated that she had never been contacted for any additional work.

On January 9, 2006, I located and interviewed another victim, [redacted] dob [redacted]. [redacted] was identified as a potential victim/witness from information obtained during trash pulls from Epstein's residence. [redacted] stated she met Epstein when she was fifteen years of age. She was approached by a friend from [redacted] High School, [redacted] [redacted] to be taken to Jeffrey Epstein's house to work. She was originally told she would be able

The foregoing instrument was sworn to or affirmed before me this 1st day of May, 2006 by Det Joe Recarey, who is personally known to me.

Signature of Police Officer (F.S.S. 117.10)

State of Florida
County of Palm Beach

Signature/Arresting Officer

Date: 05/01/2006

EFTA00233008

to model lingerie for a wealthy Palm Beacher. [redacted] was taken to Epstein's house located on El BrilloWay. [redacted] introduced [redacted] to Jeffrey Epstein. Epstein had his personal chef prepare dinner for [redacted] and [redacted] At the conclusion of dinner, [redacted] and Epstein brought [redacted] upstairs into a master bedroom area. [redacted] observed a large massage table with a sheet on it. Epstein entered through a door and exited wearing only a towel. [redacted] informed [redacted] that they were going to provide a massage on Epstein. [redacted] asked why were they doing this instead of modeling lingerie. [redacted] explained to [redacted] that this was his routine and to rub his calves and feet. Epstein had told [redacted] to get comfortable. [redacted] removed her pants and blouse. [redacted] stated she stayed only in panties as she did not wear a bra that evening. [redacted] stated while rubbing his calves and feet, Epstein turned over onto his back. Epstein told [redacted] to rub his chest and rub his nipples. [redacted] stated that as she started rubbing his chest, Epstein began masturbating himself . Epstein touched her breasts and stroked her vagina with his fingers. Epstein continued to masturbate himself as he stroked her vagina. Epstein ejaculated on his towel and paid [redacted] $200.00 for the massage. Epstein told [redacted] that if she told anyone what happened at his house that bad things could happen. [redacted] and [redacted] were brought home by Epstein's houseman and [redacted] was afraid that Epstein knew where she lived. [redacted] stated that several days later she received a telephone call from [redacted] who coordinated for [redacted] to return to "work." [redacted] returned to the house and was brought to Epstein's bedroom area by [redacted] who prepared the room for the massage. Epstein entered the room wearing only a towel. Epstein had [redacted] remove her clothing and provide the massage naked. [redacted] began rubbing his feet and calves and Epstein turned over onto his back. Epstein rubbed her vagina with his fingers. Epstein began to masturbate himself with an upwards and downward motion on his penis. Epstein continued to touch her vagina with one hand and masturbate with the other hand. Once Epstein ejaculated onto the towel he was wearing, the massage was over. [redacted] was paid $200.00 for the massage. Epstein again told [redacted] not to speak of what happened at his house or bad things would happen. [redacted] wanted to notify authorities however she was afraid of what would happen to either her or her family.

During the course of the investigation, several subjects were identified as a potential witness/victim through information obtained during the trash pulls, physical surveillance and telephone message books retrieved from the search warrant. While conducting research on the subjects, I discovered that the females were age eighteen or older. Interviews were conducted on the consenting adults whose statements provided the same massage routine when they went to "work" for Epstein. The females would be notified by [redacted], and made appointments for the females to "work" for Epstein. The females would come to Epstein's house and were led upstairs, through a stairwell from the kitchen area, by [redacted] to Epstein's bedroom. Epstein would then enter the room wearing only a towel, and ask them to get comfortable. The females would then provide the massage naked as Epstein would either touch their vaginas with his fingers and/or utilize the massager/vibrator on

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County of Palm Beach

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Signature/Arresting Officer

Date: 05/01/2006

EFTA00233009

their vaginal area. He would masturbate during the massage and upon his climaxing, the massage would end. The girls were then paid two or three hundred dollars for the massage.

On November 21, 2005 I interviewed Jose Alessi, a former houseman for Jeffrey Epstein. Alessi stated he was employed for eleven years with Mr. Epstein, from approximately 1993 through 2004. Alessi stated he was the house manager, driver and house maintenance person. It was his responsibility to prepare the house for Epstein s arrival. When asked about cooks or assistants, Alessi stated they traveled with Epstein on his private plane. I asked Mr. Alessi about the massages that have occurred at Epstein's home. Alessi stated Epstein receives three massages a day. Each masseuse that visited the house was different. Alessi stated that towards the end of his employment, the masseuses were younger and younger. When asked how young, Mr. Alessi stated they appeared to be sixteen or seventeen years of age at the most. The massages would occur in Epstein's bedroom or bathroom. He knew this because he often set up the massage tables. I asked if there were things going on other than a massage. Alessi stated that there were times towards the end of his employment that he would have to wash off a massager/vibrator and a long rubber penis, which were in the sink after the massage. Additionally, he stated the bed would almost always have to be made after the massage.

On January 4, 2006 I interviewed another former houseman, Mr Alfredo Rodriguez. During a sworn taped statement, Mr. Rodriguez stated he was employed by Jeffrey Epstein for approximately six months, from November 2004 through May of 2005. His responsibilities as house manager included being the butler, chauffeur, chef, houseman, run errands for Epstein and provide for Epstein's guests. I asked Rodriguez about masseuses coming to the house. Rodriguez stated Epstein would have two massages a day. Epstein would have one massage in the morning and one massage in the afternoon everyday he was in residence. Rodriguez stated he would be informed to expect someone and make them comfortable until either [redacted] or Epstein would meet with them. Rodriguez stated once the masseuses would arrive, he would allow them entry into the kitchen area and offer them something to drink or eat. They would then be encountered by either [redacted] or Epstein. They would be taken upstairs to provide the massage. I asked Rodriguez if any of the masseuses appeared young in age. Rodriguez stated the girls that would come appeared to be too young to be masseuses. He stated one time under Epstein's direction, he delivered a dozen roses to [redacted] High School for one of the girls that came to provide a massage. He knew the girls were still in high school and were of high school age. I asked Rodriguez about the massages. He felt there was a lot more going on than just massages. He would often clean Mr. Epstein's bedroom after the alleged massages and would discover massagers/vibrators and sex toys scattered on the floor. He also said he would wipe down the vibrators and sex toys and put them away in an armoire. He described the armoire as a small wood armoire which was on the wall close to Epstein's

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Signature of Police Officer (F.S.S. 117.10)

State of Florida
County of Palm Beach

Signature/Arresting Officer

Date: 05/01/2006

EFTA00233010

bed. On one occasion Epstein ordered Rodriguez to go to the Dollar rent a car and rent a car for the same girl he brought the roses to, so that she could drive her self to Epstein's house without incident. Rodriguez said the girl always needed rides to and from the house. Rodriguez produced a green folder which contained documents, and a note with Mr. Epstein's stationary with direction to deliver a bucket of roses to [redacted] High School after [redacted] high school drama performance. Also in that same note was direction to rent a car for [redacted] and direction to extend the rental contract.

During the course of the investigation, subpoenas were obtained for cell phone and home phone records from several victims and witnesses along with the cell phone records of [redacted]. An analysis of these records was conducted which found numerous telephone calls were made between [redacted] and the victims. These records indicate the dates the calls were made are consistent with the dates and times they victims/witnesses stated they were contacted. Specifically, The phone records showed [redacted] called [redacted] during the exact times and dates when victim [redacted] advised the incident occurred. [redacted] also coordinated the encounters with [redacted] and [redacted] during the time frame the girls stated they occurred.

Pursuant to a lawful subpoena I obtained Epstein's private plane records for 2005 from Jet Aviation. The plane records show arrival and departure of Epstein's plane at Palm Beach International airport. These records were compared to the cell phone records of [redacted] This comparison found that all the phone calls [redacted] made to [redacted] and the victims were made in the days just prior to their arrival or during the time Epstein was in Palm Beach.

Jeffrey Epstein, who at the time of these incidents was fifty one years of age, did have vaginal intercourse either with his penis or digitally with [redacted] and [redacted] who were minors at the time this occurred, and who at the time of the incident was fifty two years of age, did use a vibrator on the external vaginal area of [redacted] a fourteen year old minor. Therefore, as [redacted] coordinated and aided in the recruitment of minors to frequent Epstein's house so that sexual services were provided to Epstein, scheduled the said minors to return to the work for Epstein, secured their appointments for the purpose of sexual activity and lewd and lascivious acts and arranged the bedroom for said minors, there is sufficient probable cause to charge [redacted] with four counts of Principal in the 1st degree Unlawful Sexual Activity with a Minor, in violation of Florida State Statute 794.05(1) , a second degree felony and there is sufficient probable cause to charge her with Lewd and Lascivious Molestation, in violation of Florida State Statute 800.04 (5), a second degree felony.

The foregoing instrument was sworn to or affirmed before me this 1st day of May, 2006 by Det Joe Recarey, who is personally known to me.

Signature of Police Officer (F.S.S. 117.10)

State of Florida
County of Palm Beach

Signature/Arresting Officer

Date: 05/01/2006

EFTA00233011

REQUEST FOR WARRANT

DEFENDANT: [redacted] DATE OF BIRTH [redacted]

HABITUAL OFFENDER: YES _____ NO _____ A/K/A _____

VICTIM RELATED / ACQUAINTED WITH DEFENDANT? YES XX NO _____

AGENCY CASE NUMBER: 05-368 (3)

LEAD OFFICER: Det. Joe Recarey

AGENCY: **PALM BEACH POLICE DEPARTMENT** PHONE NUMBER: [redacted]

CURRENT SHIFT HOURS: 8 am TO 5 pm DAYS OFF: _____

LEAVE / SHIFT CHANGE INFO: _____

WAS ARREST MADE FOR, OR IN CONJUNCTION WITH ANOTHER AGENCY. IF SO, WHAT AGENCY?:

_____

SENTENCING RECOMMENDATIONS: CONTACT DETECTIVE

ADDITIONAL COMMENTS: _____

****

FILING DOCUMENTS ATTACHED:

- X ARREST FORM
- X P.C. AFFIDAVIT (2 COPIES)
- X WITNESS / EVIDENCE LIST PREVIOUSLY GIVEN TO ASA BELOHLAVEK
- ____ SWORN STATEMENT OF MATERIAL WITNESS(ES)
- X OFFENSE REPORT (2 COPIES)
- ____ ACCIDENT REPORTS (ALL)
- ____ WITNESS STATEMENTS (ALL)
- X FCIC/NCIC CRIMINAL HISTORY PREVIOUSLY GIVEN TO ASA BELOHLAVEK
- ____ REQUEST FOR CONVICTION LETTERS
- X PROPERTY RECEIPT PREVIOUSLY GIVEN TO ASA BELOHLAVEK
- ____ VEHICLE TOW RECEIPT
- ____ OTHER ATTACHMENTS INCLUDE:

_____

_____

INITIAL FOR COMPLETENESS: JR (OFFICER) 7915 (ID#) 050106 (DATE)

_____ (SUPERVISOR) _____ (ID#) _____ (DATE)

DELIVERED BY: Recarey (DETECTIVE) 7915 (ID#) 050106 (DATE)

RECEIVED
MAY 01 2006
OINTAKE

RECEIVED, STATE ATTORNEY'S OFFICE ON: 5/01/06 BY: [signature]

ARREST / NOTICE TO APPEAR
Juvenile Referral Report

1 Arrest 3 Request for Warrant
2 NTA 4 Request for Capia

Juvenile ☐

ADMINISTRATIVE

OBTS Number

Agency ORI Number: FLO 5 0 0 6 0 0

Agency Name: PALM BEACH POLICE DEPARTMENT

Agency Report Number (N.T.A.'s only): 7 6 -

Charge Type (Check as many apply.)
☐ 1. Felony ☐ 3. Misdemeanor ☐ 5. Ordinance
☐ 2. Traffic Felony ☐ 4. Traffic Misdemeanor ☐ 6. Other

If Weapon Seized — Enter Type

Multiple Clearance Indicator

Location of Arrest (Including Name of Business)

Location of Offenses (Business Name, Address)

Date of Arrest	Time of Arrest	Booking Date	Booking Time	Jail Date	Jail Time	Location of Vehicle

DEFENDANT

Name (Last, First, Middle) [redacted]

Alias (Name, DOB, Soc. Sec. #, Etc.)

Race (W - White, B - Black, I - American Indian, O - Oriental/Asian)	Sex	Height	Weight	Eye Color	Hair Color	Complexion	Build
	[redacted]						

Scars, Marks, Tattoos, Unique Physical Features (Location, Type, Description)

Marital Status | Religion

Indication of: Alcohol Influence ☐ Y ☐ N ☐ Unk. / Drug Influence ☐ ☐ ☐

[redacted]

Residence Type: 1. City 2. County 3. Florida 4. Out of State

Address Source

Business Address (Name, Street) (City) (State) (Zip) — Phone ( ) — Occupation

[redacted] NS Number — Place of Birth (City, State) — Citizenship

CO-DEF.

Co-Defendant Name (Last, First, Middle)	Race	Sex	Date of Birth	☐ 1. Arrested ☐ 2. At Large	☐ 3. Felony ☐ 4. Misdemeanor ☐ 5. Juvenile
Co-Defendant Name (Last, First, Middle)	Race	Sex	Date of Birth	☐ 1. Arrested ☐ 2. At Large	☐ 3. Felony ☐ 4. Misdemeanor ☐ 5. Juvenile

JUVENILE

☐ Parent ☐ Legal Custodian ☐ Other: Name (Last) (First) (Middle) — Residence Phone ( )

Address (Street, Apt. Number) (City) (State) (Zip) — Business Phone ( )

TOT JAC — Date — Time

The above address was provided by ☐ defendant and / or ☐ defendant's parents. The child and / or parent was told to keep the Juvenile Court Clerk's Office (Phone 355-2526) informed of any change of address.
☐ Yes, by: (Name) ☐ No: (Reason)

School Attended — Grade

Property Crime? ☐ Yes ☐ No — Description of Property — Value of Property

CODE

Drug Activity: N. N/A, P. Possess, S. Sell, T. Traffic, B. Buy, D. Deliver, E. Use, R. Smuggle, K. Dispense/Distribute, M. Manufacture/Produce/Cultivate, Z. Other

Drug Type: N. N/A, A. Amphetamine, B. Barbiturate, C. Cocaine, E. Heroin, H. Hallucinogen, M. Marijuana, O. Opium/Deriv., P. Paraphernalia/Equipment, S. Synthetic, U. Unknown, Z. Other

CHARGE

Charge Description	Counts	Domestic Violence ☐ Y ☐ N	Statute Violation Number	Violation of ORD #
Drug Activity	Drug Type	Amount / Unit	Offense #	Warrant / Capias Number	Bond

CHARGE

Charge Description	Counts	Domestic Violence ☐ Y ☐ N	Statute Violation Number	Violation of ORD #
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Drug Activity	Drug Type	Amount / Unit	Offense #	Warrant / Capias Number	Bond

NOTICE TO APPEAR

☐ Instruction No. 1 Mandatory Appearance in Court
☐ Instruction No. 2 You need not appear in Court but must comply with instructions on Reverse Side.

Location (Court, Room Number, Address)

Court Date and Time — Month Day Year Time A.M. P.M.

I AGREE TO APPEAR [redacted] THE TIME AND PLACE DESIGNATED TO ANSWER THE OFFENSE CHARGED OR TO PAY THE FINE SUBSCRIBED. I UNDERSTAND THAT SHOULD I WILLFULLY FAIL TO APPEAR BEFORE THE COURT AS REQUIRED BY THIS **NOTICE TO APPEAR**, THAT I MAY BE HELD IN CONTEMPT OF COURT AND A WARRANT FOR MY ARREST SHALL BE ISSUED.

Signature of Defendant (or Juvenile and Parent / Custodian) — Date Signed

ADMIN.

HOLD for other Agency

☐ Dangerous ☐ Resisted Arrest
☐ Suicidal ☐ Other:

Signature of Arresting Officer
X

Name of Arresting Officer (Print) I.D. #

Name Verification (Printed by Arrestee)
(PRINT)

Intake Deputy I.D. # Pouch

Transporting Officer I.D. # Agency

Witness here if subject signed with an "X".

PAGE ____ OF ____

DISTRIBUTION: WHITE — COURT COPY GREEN — STATE ATTORNEY YELLOW — AGENCY PINK — JAIL GOLD - DEFENDANT (N.T.A.'s ONLY)

EFTA00233013

ARREST / NOTICE TO APPEAR
Juvenile Referral Report

1 Arrest 3 Request for Warrant
2 NTA 4 Request for Capia

Juvenile

ADMINISTRATIVE

OBTS Number

Agency ORI Number: FLO 5 0 0 6 0 0

Agency Name: PALM BEACH POLICE DEPARTMENT

Agency Report Number (N.T.A.'s only): 7 6 - - -

Charge Type (Check as many apply.)
☐ 1. Felony ☐ 2. Traffic Felony ☐ 3. Misdemeanor ☐ 4. Traffic Misdemeanor ☐ 5. Ordinance ☐ 6. Other

If Weapon Seized — Enter Type

Multiple Clearance Indicator

Location of Arrest (Including Name of Business)

Location of Offenses (Business Name, Address)

Date of Arrest	Time of Arrest	Booking Date	Booking Time	Jail Date	Jail Time	Location of Vehicle

DEFENDANT

Name (Last, First, Middle)

Alias (Name, DOB, Soc. Sec. #, Etc.)

Race (W - White, B - Black, I - American Indian, O - Oriental/Asian)	Sex	Date of Birth	Height	Weight	Eye Color	Hair Color	Complexion	Build

Scars, Marks, Tattoos, Unique Physical Features (Location, Type, Description)

Marital Status

Religion

Indication of: Alcohol Influence ☐ Y ☐ N ☐ Unk; Drug Influence ☐ Y ☐ N ☐ Unk

Local Address (Street, Apt. Number) (City) (State) (Zip) Phone ( )

Residence Type: 1. City 2. County 3. Florida 4. Out of State

Permanent Address (Street, Apt. Number) (City) (State) (Zip) Phone ( )

Address Source

Business Address (Name, Street) (City) (State) (Zip) Phone ( )

Occupation

D/L Number, State	Soc. Sec. Number	INS Number	Place of Birth (City, State)	Citizenship

CO-DEF.

Co-Defendant Name (Last, First, Middle)	Race	Sex	Date of Birth	☐ 1. Arrested ☐ 2. At Large	☐ 3. Felony ☐ 4. Misdemeanor ☐ 5. Juvenile
Co-Defendant Name (Last, First, Middle)	Race	Sex	Date of Birth	☐ 1. Arrested ☐ 2. At Large	☐ 3. Felony ☐ 4. Misdemeanor ☐ 5. Juvenile

JUVENILE

☐ Parent ☐ Legal Custodian ☐ Other: Name (Last) (First) (Middle)

Residence Phone ( )

Address (Street, Apt. Number) (City) (State) (Zip)

Business Phone ( )

TOT JAC

Date

Time

The above address was provided by ☐ defendant and / or ☐ defendant's parents. The child and / or parent was told to keep the Juvenile Court Clerk's Office (Phone 355-2526) informed of any change of address.
☐ Yes, by: (Name) ☐ No: (Reason)

School Attended

Grade

Property Crime? ☐ Yes ☐ No

Description of Property

Value of Property

CODE

Drug Activity: N. N/A, P. Possess, S. Sell, B. Buy, T. Traffic, R. Smuggle, D. Deliver, E. Use, K. Dispense/Distribute, M. Manufacture/Produce/Cultivate, Z. Other

Drug Type: N. N/A, A. Amphetamine, B. Barbiturate, C. Cocaine, E. Heroin, H. Hallucinogen, M. Marijuana, O. Opium/Deriv., P. Paraphernalia/Equipment, S. Synthetic, U. Unknown, Z. Other

CHARGE

Charge Description	Counts	Domestic Violence	Statute Violation Number	Violation of ORD #
		☐ Y ☐ N		

Drug Activity	Drug Type	Amount / Unit	Offense #	Warrant / Capias Number	Bond

CHARGE

Charge Description	Counts	Domestic Violence	Statute Violation Number	Violation of ORD #
		☐ Y ☐ N		

Drug Activity	Drug Type	Amount / Unit	Offense #	Warrant / Capias Number	Bond

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		☐ Y ☐ N		

Drug Activity	Drug Type	Amount / Unit	Offense #	Warrant / Capias Number	Bond

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		☐ Y ☐ N		

Drug Activity	Drug Type	Amount / Unit	Offense #	Warrant / Capias Number	Bond

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Location (Court, Room Number, Address)

Court Date and Time — Month Day Year Time A.M. P.M.

I AGREE TO APPEAR AT THE TIME AND PLACE DESIGNATED TO ANSWER THE OFFENSE CHARGED OR TO PAY THE FINE SUBSCRIBED. I UNDERSTAND THAT SHOULD I WILLFULLY FAIL TO APPEAR BEFORE THE COURT AS REQUIRED BY THIS **NOTICE TO APPEAR**, THAT I MAY BE HELD IN CONTEMPT OF COURT AND A WARRANT FOR MY ARREST SHALL BE ISSUED.

Signature of Defendant (or Juvenile and Parent / Custodian) Date Signed

ADMIN.

HOLD for other Agency

Name:

☐ Dangerous ☐ Resisted Arrest
☐ Suicidal ☐ Other:

Signature of Arresting Officer
X

Name of Arresting Officer (Print) I.D. #

Name Verification (Printed by Arrestee)
(PRINT)

Intake Deputy	I.D. #	Pouch	Transporting Officer	I.D. #	Agency

Witness here if subject signed with an "X".

PAGE ____ OF ____

DISTRIBUTION: WHITE — COURT COPY GREEN — STATE ATTORNEY YELLOW — AGENCY PINK — JAIL GOLD - DEFENDANT (N.T.A's ONLY)

EFTA00233014

Probable Cause Affidavit

Palm Beach Police Department

Agency ORI# FLO 500600

Police Case#: 05-368 (3)

Defendant: [redacted]
Race/Sex: White Female
DOB: [redacted]
Charges: Lewd and Lascivious Act on a child under 16 years of age 800.04(6)(2b)

From March 15, 2005, through February 2006, the Palm Beach Police Department conducted a sexual battery investigation involving Jeffrey Epstein, [redacted] and [redacted] Sworn taped statements were taken from five victims and seventeen witnesses concerning massages and unlawful sexual activity that took place at the residence of Jeffrey Epstein, 358 El Brillo Way, Palm Beach. Several of the victims were recruited by and brought to the residence by [redacted] to perform massages for Epstein, for which [redacted] received monetary compensation. During the visit they would be introduced to [redacted], Epstein's assistant, who in turn would record their telephone numbers and name. The victims would be brought to Epstein's bedroom to provide the massage. Epstein would enter the room and order the victims to remove their clothing to provide the massage. As the victims complied and provided the massages, Epstein would rub his fingers on their vaginas. On occasion, Epstein would introduce a massager/vibrator and rub the victims vaginas as they provided the massage. On three separate occasions, Epstein had intercourse and inserted his penis/fingers in the victims vaginas. At the conclusion of the massages the victims were paid sums of money ranging from $200 - $1,000. The facts, as reported, are as follows:

On 03/15/2005, A fourteen year old white female, hereinafter referred to as "[redacted] dob [redacted] and her family reported unlawful sexual activity which occurred at a residence within the Town of Palm Beach. [redacted] reported that a subject known to her as "Jeff" had touched her vaginal area with a vibrator/massager while within his residence. "Jeff" was later identified as Jeffrey Epstein through a photo line up.

During a sworn taped interview, [redacted] stated that [redacted] dob [redacted] a cousin of [redacted] boyfriend and classmate at [redacted] High School, worked for a wealthy man and did sexual favors for him. She also admitted that [redacted] had offered her an opportunity to make money. During the beginning of the month of February 2005, [redacted] explained that she was first approached by [redacted] to go with her to Epstein's house. [redacted] stated that [redacted] along with a Hispanic female, later identified at [redacted] pick her up at her father's house on a Sunday. [redacted] was not sure of the exact dates but knew it was a Sunday. [redacted] told her father that they were going shopping but in reality [redacted] drove them to Palm Beach. During the drive a conversation occurred between [redacted] and [redacted] whereas [redacted] reportedly told [redacted] that if Jeff asked her age,

The foregoing instrument was sworn to or affirmed before me this 1st day of May, 2006 by Det Joe Recarey, who is personally known to me.

Signature of Police Officer (F.S.S. 117.10)

State of Florida
County of Palm Beach

Signature/Arresting Officer

Date: 05/01/2006

EFTA00233015

she should say she was eighteen. It was later confirmed by the [redacted]s father that [redacted] picked his daughter up on February 6, 2005. According to [redacted] father, [redacted] drove a pick up truck.

[redacted] described Epstein's house as a two-story pink house with a Cadillac Escalade parked in the driveway. She recalled that Jeff's house was on a dead end street. Upon arriving at the house [redacted] stated that they walked up a driveway, past what appeared to be a small guard/security room. A male approaching them asking what they wanted. [redacted] stated they were there to see Epstein. The male allowed them to continue walking up to the house. [redacted] stated the man told them that Epstein was not there but was expected back. He allowed them to enter the house, via the kitchen. He offered them something to drink while they waited inside. Shortly thereafter, Epstein and his assistant, described as white female with blond hair and later identified as [redacted], entered the kitchen. Epstein introduced himself to [redacted] [redacted] described Epstein as being approximately forty-five years old, having a long face and bushy eyebrows, with graying hair.

[redacted] and Epstein left the kitchen leaving [redacted] alone in the kitchen. They returned a short time later. They all spoke briefly in the kitchen. [redacted] was instructed to follow [redacted] upstairs. [redacted] recalled walking up a flight of stairs, lined with photographs, to a room that had a massage table in it. Upon entering the room there was a large bathroom to the right and a hot pink and green sofa in the room. There was a door on each side of the sofa. [redacted] recalled there being a mural of a naked woman in the room, as well as several photographs of naked women on a shelf. [redacted] told the victim that Epstein would be up in a second.

Epstein entered the room wearing only a towel and told [redacted] to take off her clothes. [redacted] stated Epstein was stern when he told her to take off her clothes. [redacted] said she did not know what to do as she was the only one there in the room so she took off her shirt leaving her bra on. Epstein had removed his towel and told the [redacted] to take off everything. [redacted] stated Epstein was nude when he took his towel off, placing it on the floor as he laid down on the table. [redacted] stated she then removed her pants leaving her thong panties on. Epstein then instructed her to give him a massage pointing to a specific lotion for her to use. As [redacted] began to give Epstein the massage, he told her to get on his back. [redacted] stated she straddled herself on Epstein's back whereby her exposed buttocks were touching Epstein's bare buttocks. [redacted] said Epstein was specific in his instruction to her on how to massage him, telling her to go clockwise or counter clockwise. Epstein then turned over and instructed [redacted] to massage his chest. [redacted] was now standing on the ground and resumed massaging Epstein's chest area. [redacted] stated Epstein held onto the small of her back as she massaged his chest and shoulder area. Epstein then turned to his side and started to rub his penis in an up and down motion. Epstein then pulled out a purple vibrator and began to

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massage [redacted] vaginal area. [redacted] stated there was no penetration as the vibrator was on top of her underwear. [redacted] recalled Epstein ejaculating because he had to use the towel to wipe himself as he got off the table. Epstein then left the room and [redacted] got dressed. She went back downstairs where she met with [redacted] [redacted] said she was paid three hundred dollars in cash from Epstein. Before she left, Epstein asked [redacted] to leave her phone number. As [redacted] [redacted] and [redacted] were leaving the house, [redacted] told [redacted] she received two hundred dollars that day for bringing her.

During the course of the investigation, parental consent was granted for [redacted] to assist with the investigation. At our direction [redacted] conducted controlled taped phone calls to [redacted] cellular telephone 561-[redacted] [redacted] spoke with [redacted] in an attempt to arrange another meeting with Epstein. [redacted] asked [redacted] what did she need to do to make more money. [redacted] stated, "the more you do, the more you get paid." [redacted] had subsequently called back [redacted] and left a voice mail message for her indicating that she had set up an appointment for [redacted] to go to Epstein's house at 11:00 am on April 5, 2005. This message was recorded from [redacted]s voice mail.

Based on the above, trash pulls were established at Epstein's residence with Supervisor Tony Higgins of the Sanitation Bureau of the Town of Palm Beach. The trash pull from April 5, 2005 revealed a telephone message for Epstein which stated [redacted] and [redacted] name at 11:00 am. This was the time frame [redacted] had informed [redacted] to be ready to go work at Epstein's house.

On October 3, 2005, Sgt Frick and I went to [redacted] residence and viewed her vehicle parked in the driveway, a red Dodge Neon. Sgt. Frick and I knocked on the door and met with [redacted] [redacted] was told that we were investigating a claim involving Jeffrey Epstein of El Brillo Way, in Palm Beach. [redacted] was asked if she would accompany us back to the police station for further questioning. She was also told that at the conclusion of the interview she would be returned home. [redacted] voluntarily came with us back to the Palm Beach Police Department.

Upon our arrival at the police station, [redacted] was brought to the interview room in the Detective Bureau where I obtained a taped, sworn statement. I began the interview by asking [redacted] how she became acquainted with Epstein. [redacted] stated that approximately two years ago, just after she turned 17 years of age, she was approached by a friend named [redacted] at the Canopy Beach Resort in Rivera Beach. [redacted] was asked if she wanted to make money. She was told she would have to provide a massage and should make $200.00. [redacted] thought about the offer and agreed to meet with Jeffrey.

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[redacted] (Unknown last name) and [redacted] (Unknown last name) picked [redacted] up and she was taken to Epstein's house. Upon her arrival to the house she was introduced to Epstein in the kitchen of the house. She was also introduced to a white female known to her as [redacted]. She was led upstairs to the main bedroom known to her as Jeff Epstein's bedroom. [redacted] arranged the massage table and covered the table with a sheet. She brought out the massage oils and laid them next to the massage bed. [redacted], then left the room and informed [redacted] Jeff would be in, in a minute. Jeff entered the bedroom wearing only a towel. He removed the towel and laid nude on the massage table. He laid on the table onto his stomach and picked a massage oil for [redacted] to rub on him. During the massage, [redacted] stated "He tried to touch me and I stopped him." I asked how he tried to touch her. [redacted] stated that Epstein grabbed her buttocks and she felt uncomfortable. [redacted] told Epstein, I'll massage you but I don't want to be touched. [redacted] stated she performed the massage naked. At the conclusion of the massage, Epstein paid [redacted] $200.

After the massage Epstein stated to [redacted] that he understood she was not comfortable, but he would pay her if she brought over some girls. He told her the younger the better. [redacted] stated she once tried to bring a 23 year old female and Epstein stated that the female was too old. [redacted] stated that in total she only remembers six girls that she brought to see Epstein, each time she was paid $200. [redacted] stated she had brought the following girls: [redacted] (a16 year old female), [redacted] (a 16 year old female) and [redacted] said that at the time she brought these girls to Epstein's house they were all14 through 16 years of age. I asked [redacted] which one was the youngest. [redacted] advised [redacted] was the youngest as she was fourteen when the massage occurred. [redacted] stated every girl she brought knew what to expect when .hey arrived. They were told they would provide a massage, possibly naked, and allow some touching. I asked her if [redacted] was aware. She stated every girl she brought knew what to expect. She explained she knew that [redacted] wanted to make money. She approached [redacted] and explained about going to work for Jeff, [redacted] agreed and arrangements were made to bring her to Epstein's house on a weekend. [redacted] stated that she and [redacted] (Later identified as [redacted] picked up [redacted] at her house. [redacted] stated that at that time she was driving a red pickup truck. They traveled to Epstein's house and entered through the kitchen door. They met with the house chef and Epstein's assistant [redacted]. [redacted] was introduced to Epstein while they were in the kitchen area. [redacted] led [redacted] upstairs and Epstein went upstairs. When the massage was over [redacted] returned to the kitchen area. [redacted] stated she was paid $200.00 for bringing [redacted] to Epstein's house. [redacted] stated [redacted] told her she was paid $300.00 for the massage.

[redacted] stated that [redacted] was the last person she brought to Epstein's house. She had changed her cellular number to avoid being contacted by [redacted]. She continued stating that she had no direct contact with Epstein

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when he was going to travel to Palm Beach. [redacted] said when Epstein announces to his assistant, [redacted], that he is traveling to Palm Beach, [redacted] would then contact [redacted] to arrange girls to "work" for Epstein. [redacted] stated that once her parents discovered that she was visiting Epstein, they disapproved of the encounters with him and she stopped. [redacted] further stated that [redacted] still tries to call [redacted] house and leaves messages.

Sgt Frick entered the room and explained to [redacted] that based on her own statements, she had implicated herself by bringing underage girls to Epstein's house. [redacted] provided cellular telephone numbers for the girls she had mentioned previously. Additionally, she also provided possible addresses and areas in which they lived.

As [redacted] was being taken home in the vehicle, a tape recorder was placed within the vehicle to record any conversations within the vehicle. During the drive back to her home, [redacted] made the comment " I'm like a Heidi Fleiss." (Hollywood Madam who sent girls to clients for sexual favors in California). [redacted] was dropped off at her house without incident.

On October 3, 2005, Sgt Frick and I went to speak with [redacted] a sixteen year-old female who was brought to Epstein's residence by [redacted] We met with [redacted] mother at their front door. We explained the ongoing investigation and asked to speak with [redacted] as we had information that she had "worked" for Jeff. Mrs. [redacted] introduced us to her husband and allowed us entry into the home. We sat in the dining room and met with [redacted] Date of Birth [redacted] As she was under the age of eighteen, Mrs [redacted] was advised we would be speaking with her. She expressed if her daughter had information, she wanted to assist. We interviewed [redacted] who denied having any inappropriate encounters with Jeff (Epstein). She stated she had gone to Jeff's house with [redacted] approximately eight months ago and sat in the kitchen with the house chef, but nothing happened. As the parents were present during the interview, we felt that [redacted] was withholding information from us. She made several comments as to putting the entire incident behind her. I left my telephone number and advised should she wish to speak with me again to telephone me. Sgt Frick and I thanked Mrs. [redacted] for her time and left the area. She stated she would ask [redacted] again after we left as to what happened at Epstein's house. I informed her that [redacted] had my telephone number and hopefully she would call.

On October 4, 2005, Det Dawson and I drove to the [redacted] home and met with [redacted] and [redacted] dob [redacted] During a sworn taped statement, [redacted] stated approximately a year ago when she was seventeen years old, she was taken to a house by [redacted] stated she knows [redacted] because they both attend [redacted] High School. She was told she could make money working

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for Jeff. She was told she would have to provide a massage to Jeff. [redacted] stated upon her arrival to the house she was brought to the kitchen area by [redacted] They met with the house chef who was already in the kitchen area. [redacted] stated [redacted] would wait for her in the kitchen. [redacted] was introduced to [redacted], Jeff's assistant, who brought her upstairs to the master bedroom. [redacted] prepared the room and massage table for a massage. Epstein entered the room wearing only a towel and she provided a massage. [redacted] stated she kept her clothes on during the massage. She advised sometime during the massage, Epstein grabbed her buttocks and pulled her close to him. [redacted] said she was uncomfortable by the incident involving Jeff. At the conclusion of the massage, she was paid $200.00 for the massage. I asked [redacted] if she has any formal training in massages to which she replied no. I asked her if [redacted] received any monies for taking her to perform the massage. [redacted] stated [redacted] had received money for taking her there but was unsure in the amount. [redacted] stated she returned to Epstein's house on another occasion with [redacted] and another girl, [redacted] stated she waited in the kitchen with [redacted] while [redacted] was taken upstairs by [redacted]. [redacted] stated she only did the massage once as she was uncomfortable with the whole experience.

At the conclusion of the interview, the tape was stopped. I was informed that [redacted] had attempted to reach [redacted] via cell phone. A voice mail message on October 4, 2005 at 10:59 am, revealed a female voice who identified herself as [redacted] who requested [redacted] to call her back reference the police questioning. [redacted] provided the incoming telephone number as [redacted]. [redacted] stated she inadvertently told [redacted] about the police investigation because [redacted] had called her to tell her about how she just received a rental car from Jeff Epstein. [redacted] had called her to tell her that she was given a rental car, a 2005 Silver Nissan Sentra, to utilize to visit family and visit Epstein. [redacted] asked her what was going on at the house that the police would be asking questions. [redacted] stated [redacted] then called Jeff and [redacted] and asked what was going on reference the ongoing police investigation. According to [redacted] has since then been trying to contact her to ask about the police questions. I instructed [redacted] not to contact [redacted] and do not provide any more information to [redacted] as she would notify Jeff Epstein and [redacted] what was transpiring.

On October4, 2005, I made telephone contact with [redacted] who had left several messages for me to contact her. During the message, she advised she was not completely truthful when we met in person but would like to speak with me to advise what had happened. She further advised she did not want to speak of this incident in front of her mother. At approximately 3:48 pm I made telephone contact with [redacted] During a taped recorded statement [redacted] stated the following: approximately a year ago, when she was sixteen years of age, [redacted] took her to Epstein's house twice. She knows [redacted] because they both attend Royal Pal Beach High School. The first time she went, [redacted] drove to the house. They entered through the kitchen area where she was

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introduced to [redacted] and Epstein. She was taken upstairs to a bedroom by [redacted] who set the room up with a massage bed and brought out the oils to use. Epstein then entered the room wearing a towel. He laid on the table and picked out a lotion for [redacted] to rub on him. At one point during the massage he tried to remove her shirt, at which point she became very upset and discontinued the massage. Both [redacted] and Epstein had a verbal disagreement, at which time she left without being paid. She got with [redacted] who was sitting in the kitchen and told her "let's go." [redacted] advised she received no money for that day. [redacted] also said that [redacted] had told her if she was uncomfortable with what was going on, to let him know and he'll stop. She knew that the more you do the more you get paid. [redacted] advised that several weeks later she agreed to be taken a second time by [redacted] Once they arrived at the residence, [redacted] sat in the kitchen and [redacted] took her upstairs to the master bedroom again. [redacted] set the room up with a massage bed and brought out the oils to use. Epstein then entered the room wearing a towel. He laid on the table and picked out a lotion for [redacted] to rub on him. At one point during the massage he tried to touch her buttocks. As [redacted] was wearing tight jeans and had a tight belt on Epstein was unable to touch her buttocks. Epstein then rolled onto his back during the massage and then attempted to touch her breasts. [redacted] then became upset again and told Epstein she didn't want to be touched. [redacted] discontinued the massage and was paid $200.00. [redacted] then went downstairs where [redacted] was waiting for her. She told [redacted] she wanted to leave. [redacted] said she never returned to the house. [redacted] stated she is aware that her friend, [redacted] was also at the house and had a problem with Epstein.

I later researched [redacted] dob [redacted] and met with her at her residence. During a sworn taped statement, [redacted] stated the following: on or about November 2004, she was approached at Royal Palm Beach High School by [redacted] a fellow student. [redacted] asked [redacted] if she wanted to make money. She agreed and was told she would provide a massage to wealthy man in Palm Beach. [redacted] picked her up and drove her to a house in Palm Beach. She was brought into the kitchen area of the house. She further stated that fellow [redacted] High School students [redacted] and [redacted] ([redacted] came with them. They were brought into the kitchen where she was introduced to Epstein and other females. [redacted] stated she was introduced to a female helper of Epstein, the female was described as white female (unknown name), with blond hair. She stated that the assistant was familiar with [redacted] The assistant brought her upstairs into a master bedroom area. The assistant set up the massage table and put out lotions to be used. She told [redacted] Epstein would be available in a minute. Epstein entered the room wearing only a towel. Epstein removed his towel, and laid naked on the massage table and picked a lotion to rub on his thighs and back. [redacted] further stated during the massage, Epstein asked her to remove her clothes. She complied and removed her pants and blouse. [redacted] didn't remember if she had removed her bra but feels that she did. [redacted] was certain that she stayed in her thong underwear. [redacted] continued the massage and at one point she climbed onto the massage

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table, straddling Epstein to massage his back. While doing this her buttocks were touching Epsteins. [redacted] was instructed to return to the ground at which time Epstein turned to have his chest rubbed. [redacted] advised she was sure he was masturbating based on his hand movements going up and down on his penis area. [redacted] did not want to look at his penis area because she was uncomfortable. Epstein removed a large white vibrator which was next to the massage table and turned it on. [redacted] stated Epstein began rubbing the vibrator over her thong underwear on her vaginal area. Shortly thereafter, Epstein ejaculated and removed himself from the table. He walked over to where the shower was and opened the glass door. She waited as he was taking a shower in her direct view. When I asked [redacted] how old she was when this occurred, she stated she had just turned seventeen. At the conclusion of the shower, [redacted] was paid either $350.00 or $400.00. She stated she wasn't sure, but knows it was close to $400.00. [redacted] stated she never returned to provide a massage for Epstein.

At approximately 2:10 pm, Det Dawson and I met with [redacted] dob [redacted], at her residence. As [redacted] was only seventeen years of age, I had notified her mother, that she would be interviewed reference an ongoing investigation in Palm Beach. I assured her that her daughter was not a suspect. I explained the possibility of her being either a witness or victim. Mrs [redacted] advised she wanted [redacted] to cooperate and consented to the interview.

During a sworn taped statement, [redacted] stated the following: at the age of sixteen, during the month of September 2004, she was approached by [redacted] for a chance to make money. [redacted] was friends with associates of [redacted] and knew the same people. [redacted] had been previously told by her friends from Royal Palm Beach High School, what [redacted] did for Epstein. [redacted] called a person known to [redacted] as [redacted] and scheduled the appointment. [redacted] picked [redacted] up and drove her to Palm Beach to a street called "Brillo Way". They drove to the end of the street and entered a large driveway. They entered the kitchen area of the house and met with Epstein. [redacted] was introduced to Jeff Epstein. [redacted] led [redacted] upstairs to the main bedroom area and set up the room with a massage table and set out the oils. [redacted] stated that while going up the stairs and into the bedroom she observed numerous photographs of naked young girls. [redacted] dimmed the lights and turned on soft music. [redacted] exited the room and Epstein entered the room wearing only a towel. Epstein picked oils and instructed her to rub his legs, under his buttocks, back and chest area. Epstein asked her to get comfortable. [redacted] advised she did not remove her clothes. She was wearing tight jeans and a cropped tank top exposing her belly area. During the massage, Epstein removed his towel and laid on the massage table naked. As [redacted] rubbed Epstein's chest area, he attempted to reach down her pants to touch her buttocks area however was unable to due so due to the tightness of the jeans and a tight belt. [redacted] advised Epstein began to masturbate as she rubbed his chest. Epstein moaned as she rubbed his chest. She observed he was continuing to masturbate and

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attempted to reach up her tank top and touch her breasts. [redacted] pulled back and Epstein stopped, however he kept masturbating until he climaxed. He cleaned himself with the towel he was previously wearing. [redacted] was paid $200.00 for the massage and left the area. She met with [redacted] who was waiting in the kitchen area and left the house.

[redacted] then explained she never provided another massage for Epstein. She did however, go to the house with [redacted] and [redacted] ([redacted] as they took another friend of [redacted] [redacted] advised she was present when [redacted] went to work for Epstein. She advised she rode over and sat in the kitchen area with [redacted] to wait for [redacted] [redacted] advised while they waited for [redacted] the house chef prepared lunch for them as it was almost lunchtime when they went. When [redacted] was finished with the massage they left the area. I asked [redacted] if [redacted] ever told her what would be expected when she provided a massage. [redacted] stated yes, [redacted] told her that a massage would be expected, possibly naked and possibly some touching involved. [redacted] has no formal training in providing massages. [redacted] spoke about a third and last time she went to Epstein's house. [redacted] drove another girl, [redacted] (sixteen years of age) who is [redacted] friend, to Epstein's house. [redacted] stated [redacted] knew that [redacted] had made money massaging Epstein and wanted to make money herself. [redacted] took them in the kitchen area of the house and introduced [redacted] to [redacted]. [redacted] and [redacted] took [redacted] upstairs to the main bedroom. [redacted] advised she doesn't know what happened as [redacted] did not speak about what happened in the room. [redacted] received $100.00 from [redacted] for going with her to Epstein's house and recommending [redacted]

On October 6, 2005, at 11:45 am, I met with [redacted] [redacted] dob [redacted], at Lynn University and explained to her why we there to interview her. She advised she was aware of the ongoing investigation. [redacted] stated she had previously spoken with [redacted] [redacted] who told her she was interviewed by detectives. During a sworn taped statement, [redacted] stated she knew that [redacted] [redacted] worked for Jeff Epstein in Palm Beach. [redacted] advised she originally had been taken to the Epstein house by [redacted] [redacted] whom she met when they both attended [redacted] High School. She began going to the house when she was sixteen years of age and stated she had been there a lot of times to provide massages over the past two years. I asked her if she had formal training in providing massages, which [redacted] stated she had not. [redacted] advised she was told what was expected of her by providing massages and she would have to remove clothing but if she felt uncomfortable just to say so and Epstein would stop pushing the issue. [redacted] began providing massages and advised she kept her clothes on. She considered Epstein a pervert and he kept pushing to go further and further. [redacted] explained she would keep telling him she had a boyfriend and would not be right to her boyfriend. It wasn't until recently that [redacted] began removing her clothes and staying in her thong underwear to provide a massage. [redacted] explained

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Epstein wanted to be rubbed on his back and recently he began turning over and have her rub his chest as he masturbated. He would try to touch her breasts as she rubbed his chest. [redacted] stated "Jeff would try to get away with more and more on each massage". [redacted] stated Epstein would try to touch her more and on one occasion he attempted to use a massager/vibrator on her. [redacted] drove [redacted] to the house for the original massage. [redacted] left [redacted] her cell phone number and every time Epstein would come into town, [redacted] would call her for an appointment to "work". Each time she went, [redacted] would meet her at the kitchen door area. She would bring her upstairs and prepare the massage table. [redacted] advised Epstein would ask her questions about herself. Epstein knew she was a soccer player and would be attending Lynn University. I asked [redacted] if Epstein knew her real age. [redacted] stated Epstein did and didn't care. The most recent massage she provided was on October 1, 2005. During the massage, she asked Epstein if she could borrow one of his vehicles to visit her family and boyfriend in Orlando, Florida. Epstein had told her she could borrow one of his vehicles but later stated he would rent her a car. She continued with the massage as Epstein grabbed her buttocks and caressed the buttocks cheeks. I asked [redacted] if she was wearing undergarments to which she replied her thong underwear. Once he tried to touch her breasts, she would pull away from him and he would stop. [redacted] was asked if he ever used a vibrator on her. [redacted] was aware of the vibrator but advised she never would allow him to use the vibrator on her. She described the vibrator as the large white vibrator with a huge head on the tip of the vibrator. She stated he kept the vibrator in a closet near the massage table.

[redacted] stated that on October 3, 2005, she was contacted by Epstein's assistant, [redacted], who informed her that Jeff Epstein had rented her a new Nissan Sentra and she should come by the house to pick it up. [redacted] .nformed [redacted] she would have the car for a month. [redacted] stated Epstein knew her car was not working properly and that she had missed appointments in the past because of her car being inoperable. [redacted] explained the car is currently parked next to the Lynn University Gym field. I asked her if she ever took any one to the house. [redacted] explained she took [redacted] [redacted] a friend of hers who attended [redacted] High School, who has relocated to Orlando to attend college. I asked if she ever allowed another female in the room. [redacted] advised no one was brought into the room with her.

At the conclusion of the interview, Det Dawson and I went to the gym area of Lynn University and located the Silver Nissan Sentra bearing Florida tag [redacted]. The vehicle is registered to Dollar Rent a Car out of the Palm Beach International Airport. The vehicle was rented by Janusz Banasiack, later learned to be Epstein's houseman, and paid with Epstein's credit card.

On September 11, 2005, w/f [redacted] dob [redacted], was arrested by the Palm Beach Police Department

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for misdemeanor possession of marijuana. During the arrest [redacted] told the arresting officer that she had information about sexual activity taking place at the residence of Jeffrey Epstein. Additionally, during the ongoing trash pulls from Epstein's residence, discarded papers were found which contained [redacted] name and cell phone number.

On October, 11, 2005, Det Dawson and I met with [redacted] and obtained a sworn taped statement. [redacted] explained she had been going to Epstein's house since 2002, when she was sixteen years of age. Since then she has gone to the house hundreds of times. [redacted] stated she became his "number one girl." She explained that on her first visit she was brought to the house by fellow Royal Palm Beach High School classmate, [redacted] [redacted] said she was brought through the kitchen area where she met [redacted] for the first time. [redacted] was led to the master bedroom, Epstein s room. [redacted] explained that as she was walking up the stairs she observed several photographs of naked women along the walls and tables of the house. [redacted] further explained that she was brought into the bedroom, where [redacted] prepared the room by setting up the massage table and provided the oils for her to rub on Epstein. [redacted] explained she remembered the steam room area, which contained two large showers. Epstein entered the room from the steam room area and introduced himself. Epstein lay on the table and told her to get comfortable. [redacted] removed her skirt and kept her shirt on. Epstein then instructed her to remove her shirt. [redacted] removed her shirt and remembered she was not wearing a bra. [redacted] stated she provided the massage wearing only her panties. She continued rubbing his legs, thighs and feet. [redacted] advised he turned over onto his back. Epstein touched her breasts and began to masturbate. Epstein ejaculated which meant the massage was over. At the conclusion of the massage, [redacted] was paid $200.00. They walked together downstairs where [redacted] and [redacted] were waiting. [redacted] stated [redacted] received an unknown amount of .noney for taking her to Epstein. Epstein instructed to leave her cellular telephone number so that he could contact her when he is in town.

[redacted] stated that during her many visits a routine was established between her and Epstein. She would enter the house and get naked in the bedroom. She would then start with a back massage. Epstein would roll on to his back and allow her to massage his chest area. [redacted] stated Epstein would then began to masturbate himself and at the same time would insert his fingers in her vagina and masturbate her with his fingers. [redacted] explained Epstein would continue this process until he ejaculated. He would then utilize a vibrator/massager on her vagina until [redacted] climaxed. [redacted] advised that during her frequent visits, Epstein asked for her real age, [redacted] stated she was sixteen. Epstein advised her not to tell anyone her real age. [redacted] advised that things escalated within the home as Epstein would instruct and pay [redacted] to have intercourse with his female friend, [redacted] [redacted] explained the intercourse included using strap on dildos, large rubber penis' and other devices that Epstein had at his disposal. Epstein would watch them have intercourse and masturbate himself . Occasionally, Epstein would then join in

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during the female on female intercourse and provide oral sex to both [redacted] and [redacted] This occurred during the time [redacted] was sixteen years of age.

[redacted] advised this continued to escalate during two years. The routine became familiar to [redacted] Epstein's assistant [redacted] would telephone her every time Epstein was in the Town of Palm Beach and would place appointments for her to visit and work for Epstein. Each time something new was introduced, additional monies were produced and offered for [redacted] to allow the acts to happen. [redacted] consented to perform all these acts but was adamant that there was an understanding with Epstein that no vaginal penetration would occur with his penis. [redacted] explained that Epstein's penis was deformed. [redacted] explained that his penis was oval shaped. [redacted] claimed when Epstein's penis was erect, it was thick toward the bottom but was thin and small toward the head portion. [redacted] called Epstein's penis "egg-shaped." [redacted] stated Epstein would photograph [redacted] and her naked and having sex and proudly display the photographs within the home. [redacted] stated during one visit to Epstein's house in which she provided a massage to Epstein, his female friend, [redacted] was also present. [redacted] provided the massage in which [redacted] and her would fondle each others breasts and kiss for Epstein to enjoy. Towards the end of this massage, Epstein grabbed [redacted] and turned her over onto her stomach on the massage table and forcibly inserted his penis into her vagina. [redacted] stated Epstein began to pump his penis in her vagina. [redacted] became upset over this. She said her head was being held against the table forcibly, as he continued to pump inside her. She screamed "No!" and Epstein stopped. She told him that she did not want to have his penis inside of her. Epstein did not ejaculate inside of her and apologized for his actions and subsequently paid her a thousand dollars for that visit. [redacted] stated she knows he still displays her photographs through out the house.

On October 12, 2005, Det Dawson and I met with [redacted] dob [redacted] who stated during a sworn taped statement, that nothing happened between her and Epstein. [redacted] appeared nervous during the interview. I assured her that I have spoken with other people who advised differently. [redacted] stated on several occasions she provided a massage to Epstein. She stated she was brought to the Epstein house in March of 2005. [redacted] a classmate at [redacted] High School, approached her and asked her if she wanted to "work". [redacted] made the arrangements with [redacted], Epstein's assistant. [redacted] who has no formal training in providing massages, stated she provided a massage, fully clothed for $200.00 . As I sensed hesitancy in her answers, I asked [redacted] if she had been contacted by anyone from Epstein's organizations or his house. [redacted] stated she was interviewed already by a private investigator for Epstein. He identified himself as "[redacted] and inquired about the police investigation, and left his telephone number [redacted] for additional contact. [redacted] provided no additional information, as it appeared her responses were almost scripted.

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On November 6, 2005, at approximately 3:30 pm, I met with [redacted] dob [redacted], at the Palm Beach Police Department. [redacted] was identified as a potential witness/victim through information obtained during the trash pulls. During the sworn taped statement, [redacted] advised she was at Jeffrey Epstein's house one time, approximately two months ago. She was approached by a girl, [redacted] who was dating [redacted] roommate, for an opportunity to make some quick money. [redacted] advised she needed to make some quick cash to make the rent that month. She agreed to go to the house. She had been told by [redacted] that the massage would have to be done in her underwear. She advised [redacted] drove with her and brought her into the house. They walked into the kitchen area, and took the stairs upstairs. [redacted] further stated she was brought into a master bedroom area. She advised she recalled seeing portraits of naked women throughout the room. A massage table was already out near the sauna/shower area in the master bedroom. Epstein entered the room wearing only a towel and introduced himself as "Jeff." At Epstein's direction, [redacted] and [redacted] removed their clothing down to their panties, Epstein laid on his stomach area and they provided a massage on his legs and feet area. I asked [redacted] if she had any formal massage training and she replied "no." [redacted] advised she was topless and the panties she wore were the boy shorts lace panties. She and [redacted] continued the massage until the last ten minutes of the massage, Epstein, told [redacted] to leave the room so that [redacted] could finish the massage. [redacted] got dressed, and left the room as Epstein turned over onto his back. Epstein then removed the towel and laid naked . Epstein requested that [redacted] rub his chest area. [redacted] stated as she did this, Epstein, began masturbating. [redacted] stated Epstein pulled down her boy short panties, and he produced a large white vibrator with a large head. She stated it was within his reach in a drawer in his master bathroom. He rubbed the vibrator on her vaginal area. [redacted] advised he never penetrated her vagina with the vibrator. He continued to rub her vagina with the vibrator as he continued to masturbate. [redacted] stated she was very uncomfortable during the incident but knew it was almost over. Epstein climaxed and started to remove himself from the table. He wiped himself with the towel he had on previously and went into the shower area. [redacted] got dressed and met with [redacted] in the kitchen area. Epstein came into the kitchen and provided [redacted] $200.00 for bringing [redacted] and paid $200.00 to [redacted] for providing the massage. [redacted] was told to leave her telephone number with [redacted] for future contact. [redacted] provided her cellular telephone number. [redacted] was asked if she was recently contacted about this investigation by anyone from the Epstein organization. She replied she was called but it was for work. She stated she was called by [redacted] for her to return to "work" for Epstein. [redacted] stated "work" is the term used by [redacted] to provide the massages and other things. [redacted] advised she declined as she was not comfortable in providing that type of "work."

On November 7, 2005, Det Sandman and I met with [redacted] dob [redacted] During a sworn taped statement, [redacted] stated she met Jeffrey Epstein through [redacted] when they were still

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attending [redacted] High School. [redacted] would approach females who wished to work for Epstein. [redacted] stated she was offered to work for Epstein but declined. [redacted] explained that "work" means give massages. She was asked about any formal training in providing massages which she said "no." [redacted] said she accompanied [redacted] and other females who were taken to Epstein's house to provide massages. [redacted] further stated she had been to the house approximately 4 or 5 times in the past year. She accompanied [redacted] with [redacted] and [redacted] Each time the girls were taken over, they were previously told they would have to provide a massage, possibly naked. They were also told that should Epstein require them to do anything extra, and they were not comfortable just to tell him and he would stop. [redacted] stated [redacted] received $200.00 for each girl she brought over to massage Jeffrey Epstein. When I asked which girl appeared to be the youngest, she replied, [redacted] who was really young, fifteen years old at the most. [redacted] further stated each time she went to the house, she sat in the kitchen and waited with [redacted] until the massage was over. She further stated that the cook would make lunch or a snack for them as they waited. I asked her if there was anything that caught her attention within the home. [redacted] stated there were a lot of naked girls in photographs throughout the house.

On November 8, 2005, at approximately 2:00pm , I met with [redacted] dob [redacted], at the Palm Beach Police Department. During a sworn taped statement, [redacted] stated she had met Epstein approximately two years ago when she was first approached by [redacted] a classmate at [redacted] High School. [redacted] approached her about working for Epstein and providing a massage to him for $200.00. [redacted] had made the arrangements however was unable to take her the day the arrangements were made. [redacted] had [redacted] take [redacted] also attended [redacted] High School and was familiar with Epstein. [redacted] recalled she was brought there and entered through the back kitchen door. She had met with an assistant [redacted] and another assistant [redacted]. [redacted] brought her upstairs as she observed several photographs of naked females throughout the house. [redacted] stated Epstein came in the room, wearing only a towel, and laid on the table. [redacted] stated he picked out the oils he wanted her to use and requested she remove her clothing to provide the massage. [redacted] stated that on the first massage she provided she did not remove her clothing. [redacted] stated she had returned several times after that. Each time she returned it was more than a massage. Epstein would walk into the master bedroom/bathroom area wearing only a towel. He would masturbate as she provided a massage. [redacted] stated she was unsure if he climaxed as he masturbated under the towel. Additionally, she never looked below his waist. She claimed that Epstein would convince her to remove her clothes. She eventually removed her clothes and stayed in her thong panties. On occasion, Epstein would use a massager/vibrator, which she described as white in color and a large head. Epstein would rub the vibrator/massager on her vaginal area as he would masturbate. [redacted] stated she had been to the house

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numerous times. [redacted] added she has no formal training in providing a massage. [redacted] stated she brought two females during her visits to provide massages. [redacted] stated she brought a girl named "[redacted] and [redacted] from [redacted] High School. [redacted] stated she received $200.00 for each girl she brought.

On November 8, 2005, I met with [redacted] W/F, [redacted], at the Palm Beach Police Department. During a sworn taped statement, [redacted] stated she had met Jeffrey Epstein approximately one year ago. She was approached by a subject known to her as [redacted] had asked her if she wanted to make money providing massages to Epstein. [redacted] had heard that several girls from [redacted] High School were doing this and making money. She agreed and was taken to the house by [redacted] had introduced her to [redacted] and Epstein and brought her upstairs to a master bedroom where a massage table was prepared and the proper oils were selected. [redacted] left the room and waited downstairs for her. [redacted] stated Epstein entered the room wearing a towel and laid on his stomach. She provided a massage wearing only her thong panties. [redacted] advised Epstein had masturbated every time she provided a massage. She stated Epstein continued to masturbate until he climaxed. Once that occurred the massage was over. She felt the whole situation was weird but she advised she was paid $200.00 for providing the massage. She also stated [redacted] was paid $200.00 by Epstein for bringing [redacted] stated she had gone a total of 15 times to Epstein's residence to provide a massage and things had escalated from just providing a massage. Epstein began touching her on her buttocks and grabbed her closer to him as he masturbated. Epstein also grabbed her breasts and fondled her breasts with his hands as she provided the massage. [redacted] stated on one occasion, while she was only seventeen years of age, he offered extra monies to have vaginal intercourse. She stated this all occurred on the massage table. [redacted] stated Epstein penetrated her vagina with his penis and began having intercourse with her until he reached the point of climax. Epstein removed his penis from her vagina and climaxed onto the massage table. [redacted] received $350.00 for her massage. I asked her if she had any formal training in providing massages, [redacted] stated she did not. [redacted] continued to state on one other occasion, Epstein introduced his girlfriend [redacted], into the massage. [redacted] was brought into room with [redacted] to provide a massage. Epstein had them kiss and fondle each other around the breasts and buttocks as they provided a massage to Epstein. Epstein, watched and masturbated as this occurred. On other occasions, Epstein, introduced the large white vibrator/massager in the massage. Epstein stroked the vibrator/massager on [redacted] vagina as she provided the massage.

On November 14, 2005, Det Sandman and I met with [redacted] dob [redacted] During a sworn taped statement she advised she started going to the house approximately one year ago and has been there approximately five or six times. [redacted] also stated she was sixteen years old when she first went to Epstein's house. On her first visit she was brought by a fellow student from [redacted] High School known to her

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as [redacted] [redacted] stated [redacted] brought her into the house and she was introduced to [redacted]. [redacted] then brought her upstairs into a master bathroom, located within the bedroom. [redacted] stated she met Epstein in the bathroom. He laid on the table and picked the massage oils. She provided the massage as he laid naked on the massage bed. She stated she rubbed his calves and back area. Upon the end of the massage, Epstein removed himself from the massage table and paid her $300.00 for the massage. [redacted] said each subsequent time she went to the house, she was notified by [redacted] that Epstein was in town and would like her to "work". [redacted] stated she returned to the house and was again led upstairs by [redacted]. She provided the massage, clothed. [redacted] was asked if she ever removed her clothing to provide a massage. [redacted] stated it was not until the third time that she went that she removed her clothing. [redacted] stated she was notified by [redacted] that Epstein wanted her to come to work. She arrived at the house and was led upstairs by [redacted]. She started providing the massage when Epstein asked her to remove her clothing. [redacted] removed her pants, shirt and bra. She stayed in her thong panties and continued rubbing Epstein. Epstein turned over onto his back and she rubbed his chest area. [redacted] stated she knew he was masturbating himself as she providing the massage. [redacted] stated she believed he climaxed based on his breathing. She did not want to view either the climax or the fact that he was masturbating. [redacted] stated once the breathing relaxed he got up and told her to get dressed. She was paid $300.00 for her services. [redacted] stated on the last time she went to provide a massage, she was notified by [redacted] to come to the house and "work". [redacted] stated she was now dating her current boyfriend and did not feel comfortable going. She recalled it was approximately January 2005. She said she went, already thinking that this would be the last time. She went upstairs and went into the master bathroom. She met with Epstein, who was wearing only a towel, and laid onto the table. [redacted] stated Epstein caught her looking at the clock on several occasions. Epstein asked her if she was in a hurry. [redacted] stated her boyfriend was in the car waiting for her. [redacted] further stated that Epstein got upset as he wasn't enjoying the massage. She told him that she didn't want to continue and she would not be back. Epstein told her to leave as she was ruining his massage. [redacted] advised she had no formal training in providing any massages. [redacted] stated although she had a falling out with Epstein, she still received a Christmas bonus from Epstein. [redacted] stated she was wired money from Western Union for her Christmas bonus. Subpoena results from Western Union revealed money was sent from Jeffrey Epstein on December 23, 2004. [redacted] received $200.00 from Epstein for her Christmas bonus.

On November 15, 2005, Det. [redacted] and I met with [redacted] dob [redacted] During a sworn taped statement, [redacted] stated she met Jeffrey Epstein over a year ago. She was sixteen years of age and was approached by [redacted] [redacted] a fellow [redacted] High School student, who informed her that she could make $200.00 providing a massage to Epstein. [redacted] had informed her that she would have to provide this

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massage topless. [redacted] made the arrangements with Epstein and his assistants and took [redacted] to the house. [redacted] stated [redacted] and she entered through a glass door that led into a kitchen. She was taken upstairs by [redacted] to a master bedroom. She recalled the master bathroom had a large pink couch, sauna and matching shower. Epstein entered into the room wearing only a towel. [redacted] and [redacted] removed their clothing remaining only in thong underwear. She further stated that Epstein laid on his chest on the table. The oils were selected on which ones to use. Both [redacted] and [redacted] provided the massage on his legs, back and feet. Forty minutes into the massage, Epstein turned over onto his back and requested [redacted] wait downstairs in the kitchen area for [redacted]. Epstein instructed [redacted] to finish the massage. As [redacted] got dressed, [redacted] starting rubbing Epstein's chest. [redacted] left the room, and Epstein began masturbating as [redacted] rubbed Epstein's chest. [redacted] stated Epstein continued masturbating until he climaxed on the towel he was wearing. When asked if he had removed the towel she stated he turned the towel around so that the opening would allow him to expose himself. After he cleaned himself off with the towel he instructed [redacted] the massage was done and to get dressed and meet with him downstairs. [redacted] got dressed and met with Epstein in the kitchen area. She was paid $200.00 dollars for providing the massage. [redacted] stated she was aware that [redacted] also received monies for the same thing. The second time she went to the house she was again approached by [redacted] advised if she wanted to return to the house to provide another massage. [redacted] agreed and the arrangements were made by [redacted] for her to return to the house. [redacted] stated [redacted] drove her to the house and knocked on the same glass door which leads to the kitchen area. They were allowed entry into the house by one of the staff members. [redacted] led her upstairs to the master bedroom and master bathroom area. [redacted] left [redacted] this time to do the massage alone. Epstein entered the room again wearing only a towel. [redacted] began removing her clothing as she did the last time she was at the house. Epstein instructed her to get naked. He laid on the table onto his stomach as [redacted] began massaging his legs and back. As [redacted] finished with Epstein's back and legs, Epstein then turned over onto his back. [redacted] started to rub his chest and he began masturbating. As [redacted] rubbed his chest, Epstein leaned over and produced a massager/vibrator. He turned it on and began rubbing [redacted] vagina and masturbating himself at the same time. [redacted] stated she continued to rub his chest as this was occurring. She described the vibrator/massager as large grey with a large head. Epstein rubbed her vagina for approximately two to three minutes with the massager/vibrator. He then removed the vibrator from her vaginal area and concentrated on masturbating himself. [redacted] stated Epstein climaxed onto the towel again and informed her that the massage was done. [redacted] got dressed and met with [redacted] who was waiting in the kitchen area. She received $200.00 for the massage. [redacted] said she never returned to the house and had no desire to return to the house. [redacted] was asked if she received any formal massage training. She advised she had no formal training. [redacted] was asked if Epstein knew her real age. [redacted] stated he knew, as he asked her questions about herself and high school. He was aware she attended, and is still attending [redacted] High School.

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During the course of the investigation a search warrant was executed at Jeffrey Epstein's home located at 358 El Brillo Way in Palm Beach. While in the home I observed the pink and green couch within the master bedroom area just as the girls previously mentioned. The stairway, which is located from the kitchen area to the master bedroom area, is lined with photos of naked young girls. Additionally, numerous photographs of naked young females, some of which appeared to be the girls I previously interviewed, were on display throughout the house. Also located in the house were various phone message books. The telephone message books have a duplicate copy (Carbon Copy) which, once a phone message is written into the book, the top copy is then torn on the perforated edge and the carbon copy is left in the book. First names of girls, dates and telephone numbers were on the copy of the messages. I recognized various numbers and names of girls that had already been interviewed. The body of the messages were time of the day that they called for confirmation of "work." Other names and telephone numbers were located in which the body of the messages were, "I have girls for him" or "I have 2 girls for him." These messages were taken by [redacted], who signed the bottom of the messages. During the execution of the warrant, I located a [redacted] High School transcript for [redacted] in Epstein's bedroom desk. This desk had stationary marked Jeffrey E Epstein. I located a wood colored armoire beside Epstein's bed that contained a bottle of "Joy Jelly," which is used to provide a warm massage. Several massage tables were located throughout the second floor of the residence, including a massage table found in Epstein's bedroom. On the first floor of the residence I found two covert cameras hidden within clocks. One was located in the garage and the other located in the library area on a shelf behind Epstein's desk. A computer was located which was believed to contain the images from the covert cameras. The computer's hard drive was reviewed which showed several images of [redacted] and other witnesses that have been interviewed. All of these images appeared to come from the camera positioned behind Epstein's desk.

On December 13, 2005, Det. Dawson and I met with [redacted] dob [redacted] During a sworn taped statement, [redacted] stated that when she was sixteen years old she was taken to Epstein's house to provide a massage for money. [redacted] stated it was before Christmas last year (2004) when an associate, [redacted] approached her and asked if she needed to make money for Christmas. [redacted] made arrangements to take [redacted] to the house and drove [redacted] to the house to "work." They were encountered by a white female with long blond hair. [redacted] was unable to remember the name of the white female with blond hair but knew she was Epstein's assistant. She was led upstairs by the white female who explained that there would be lotions out already and Epstein would choose the lotion he wanted her to use. She was led through a spiral staircase which led to a master bedroom and bathroom. The massage table was already set up in the bathroom. [redacted] described the bathroom as a large spacious bathroom with a steam room and shower beside it. [redacted] was introduced to Epstein who was on the phone when she entered the room. Epstein was wearing a white towel and laid on his stomach so that [redacted] may

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massage his feet and calves. [redacted] started the massage with the oils Epstein chose and rubbed his feet and calves. Epstein got off the phone and requested she massage his back as well. [redacted] began rubbing his back and got to the small of his back. During the rubbing of his back, Epstein asked her to get comfortable. He requested she remove her pants and shirt. [redacted] removed her shirt and pulled her pants off. [redacted] stayed in her bra and thong panties. As she finished massaging the small of Epstein's back, he then turned onto his back. Epstein instructed [redacted] to rub his chest and pinch his nipples. As she began to rub his chest, Epstein asked her questions about herself. [redacted] remembered telling him she attended [redacted] High School. Epstein asked her if she was sexually active. Before [redacted] could answer, he also asked what sexual position does she enjoy. [redacted] stated she was shy and didn't like talking about those things. She continued rubbing his chest. Epstein reached up and unsnapped her bra from the front. [redacted] explained the bra she used had a front snapping device. Epstein rubbed her breasts and asked her if she like having her breasts rubbed. [redacted] said "no, I don't like that." Epstein then removed his towel and laid on the bed naked exposing his penis to [redacted] He began touching his penis and masturbated as he touched her breasts. [redacted] explained Epstein then touched her vaginal area by rubbing her vagina with his fingers on the outside of her thong panties. [redacted] tensed up and stated Epstein was aware that she was uncomfortable. [redacted] stated that Epstein said to her, "Relax, I'm not going inside." She further explained Epstein commented to her how beautiful and sexy she was. Epstein then moved her thong panties to one side and began stroking her clitoris. [redacted] said, "He commented how hard my clit was." He then inserted two fingers in her vagina and was stroking her within her vagina. She tried pulling back to pull out his fingers from within her vagina. Epstein removed his fingers from within her vagina and apologized for putting his fingers inside her. During this time, he kept his hand on her vaginal area and continued to rub her vagina. [redacted] stated he rubbed her really hard as he was masturbating. [redacted] said he climaxed onto the towel he had been previously wearing and got up from the table. Epstein told her there was $200.00 dollars for her on the dresser within the master bathroom. Epstein also told her that there was an additional $100.00 that was to be given to [redacted] for bringing her there to massage him. Epstein told her to leave her telephone number with his assistant as he wanted to see her again. Epstein stated his assistant would contact her to work again soon. I asked her if she ever received any formal massage training to which [redacted] stated she did not. [redacted] stated it was the only time she ever went to work for Jeff and knew what happened to her was wrong. She further stated that she had never been contacted for any additional work.

On January 9, 2006, I located and interviewed another victim, [redacted] dob [redacted] [redacted] was identified as a potential victim/witness from information obtained during trash pulls from Epstein's residence. [redacted] stated she met Epstein when she was fifteen years of age. She was approached by a friend from [redacted] High School, [redacted] [redacted] to be taken to Jeffrey Epstein's house to work. She was originally told she would be able

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to model lingerie for a wealthy Palm Beacher. [redacted] was taken to Epstein's house located on El BrilloWay. [redacted] introduced [redacted] to Jeffrey Epstein. Epstein had his personal chef prepare dinner for [redacted] and [redacted] At the conclusion of dinner, [redacted] and Epstein brought [redacted] upstairs into a master bedroom area. [redacted] observed a large massage table with a sheet on it. Epstein entered through a door and exited wearing only a towel. [redacted] informed [redacted] that they were going to provide a massage on Epstein. [redacted] asked why were they doing this instead of modeling lingerie. [redacted] explained to [redacted] that this was his routine and to rub his calves and feet. Epstein had told [redacted] to get comfortable. [redacted] removed her pants and blouse. [redacted] stated she stayed only in panties as she did not wear a bra that evening. [redacted] stated while rubbing his calves and feet, Epstein turned over onto his back. Epstein told [redacted] to rub his chest and rub his nipples. [redacted] stated that as she started rubbing his chest, Epstein began masturbating himself . Epstein touched her breasts and stroked her vagina with his fingers. Epstein continued to masturbate himself as he stroked her vagina. Epstein ejaculated on his towel and paid [redacted] $200.00 for the massage. Epstein told [redacted] that if she told anyone what happened at his house that bad things could happen. [redacted] and [redacted] were brought home by Epstein's houseman and [redacted] was afraid that Epstein knew where she lived. [redacted] stated that several days later she received a telephone call from [redacted] who coordinated for [redacted] to return to "work." [redacted] returned to the house and was brought to Epstein's bedroom area by [redacted] who prepared the room for the massage. Epstein entered the room wearing only a towel. Epstein had [redacted] remove her clothing and provide the massage naked. [redacted] began rubbing his feet and calves and Epstein turned over onto his back. Epstein rubbed her vagina with his fingers. Epstein began to masturbate himself with an upwards and downward motion on his penis. Epstein continued to touch her vagina with one hand and masturbate with the other hand. Once Epstein ejaculated onto the towel he was wearing, the massage was over. [redacted] was paid $200.00 for the massage. Epstein again told [redacted] not to speak of what happened at his house or bad things would happen. [redacted] wanted to notify authorities however she was afraid of what would happen to either her or her family.

During the course of the investigation, several subjects were identified as a potential witness/victim through information obtained during the trash pulls, physical surveillance and telephone message books retrieved from the search warrant. While conducting research on the subjects, I discovered that the females were age eighteen or older. Interviews were conducted on the consenting adults whose statements provided the same massage routine when they went to "work" for Epstein. The females would be notified by [redacted], and made appointments for the females to "work" for Epstein. The females would come to Epstein's house and were led upstairs, through a stairwell from the kitchen area, by [redacted] to Epstein's bedroom. Epstein would then enter the room wearing only a towel, and ask them to get comfortable. The females would then provide the massage naked as Epstein would either touch their vaginas with his fingers and/or utilize the massager/vibrator on

The foregoing instrument was sworn to or affirmed before me this 1st day of May, 2006 by Det Joe Recarey, who is personally known to me.

Signature of Police Officer (F.S.S. 117.10)

State of Florida
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their vaginal area. He would masturbate during the massage and upon his climaxing, the massage would end. The girls were then paid two or three hundred dollars for the massage.

On November 21, 2005 I interviewed Jose Alessi, a former houseman for Jeffrey Epstein. Alessi stated he was employed for eleven years with Mr. Epstein, from approximately 1993 through 2004. Alessi stated he was the house manager, driver and house maintenance person. It was his responsibility to prepare the house for Epstein s arrival. When asked about cooks or assistants, Alessi stated they traveled with Epstein on his private plane. I asked Mr. Alessi about the massages that have occurred at Epstein's home. Alessi stated Epstein receives three massages a day. Each masseuse that visited the house was different. Alessi stated that towards the end of his employment, the masseuses were younger and younger. When asked how young, Mr. Alessi stated they appeared to be sixteen or seventeen years of age at the most. The massages would occur in Epstein's bedroom or bathroom. He knew this because he often set up the massage tables. I asked if there were things going on other than a massage. Alessi stated that there were times towards the end of his employment that he would have to wash off a massager/vibrator and a long rubber penis, which were in the sink after the massage. Additionally, he stated the bed would almost always have to be made after the massage.

On January 4, 2006 I interviewed another former houseman, Mr Alfredo Rodriguez. During a sworn taped statement, Mr. Rodriguez stated he was employed by Jeffrey Epstein for approximately six months, from November 2004 through May of 2005. His responsibilities as house manager included being the butler, chauffeur, chef, houseman, run errands for Epstein and provide for Epstein's guests. I asked Rodriguez about masseuses coming to the house. Rodriguez stated Epstein would have two massages a day. Epstein would have one massage in the morning and one massage in the afternoon everyday he was in residence. Rodriguez stated he would be informed to expect someone and make them comfortable until either [redacted] or Epstein would meet with them. Rodriguez stated once the masseuses would arrive, he would allow them entry into the kitchen area and offer them something to drink or eat. They would then be encountered by either [redacted] or Epstein. They would be taken upstairs to provide the massage. I asked Rodriguez if any of the masseuses appeared young in age. Rodriguez stated the girls that would come appeared to be too young to be masseuses. He stated one time under Epstein's direction, he delivered a dozen roses to [redacted] High School for one of the girls that came to provide a massage. He knew the girls were still in high school and were of high school age. I asked Rodriguez about the massages. He felt there was a lot more going on than just massages. He would often clean Mr. Epstein's bedroom after the alleged massages and would discover massagers/vibrators and sex toys scattered on the floor. He also said he would wipe down the vibrators and sex toys and put them away in an armoire. He described the armoire as a small wood armoire which was on the wall close to Epstein's

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bed. On one occasion Epstein ordered Rodriguez to go to the Dollar rent a car and rent a car for the same girl he brought the roses to, so that she could drive her self to Epstein's house without incident. Rodriguez said the girl always needed rides to and from the house.

Rodriguez produced a green folder which contained documents, and a note with Mr. Epstein's stationary with direction to deliver a bucket of roses to [redacted] High School after [redacted] high school drama performance. Also in that same note was direction to rent a car for [redacted] and direction to extend the rental contract.

During the course of the investigation, subpoenas were obtained for cell phone and home phone records from several victims and witnesses along with the cell phone records of [redacted]. An analysis of these records was conducted which found numerous telephone calls were made between [redacted] and the victims. These records indicate the dates the calls were made are consistent with the dates and times they victims/witnesses stated they were contacted. Specifically, The phone records showed [redacted] called [redacted] during the exact times and dates when victim [redacted] advised the incident occurred. [redacted] also coordinated the encounters with [redacted] and [redacted] during the time frame the girls stated they occurred.

Pursuant to a lawful subpoena I obtained Epstein's private plane records for 2005 from Jet Aviation. The plane records show arrival and departure of Epstein's plane at Palm Beach International airport. These records were compared to the cell phone records of [redacted] This comparison found that all the phone calls [redacted] made to [redacted] and the victims were made in the days just prior to their arrival or during the time Epstein was in Palm Beach.

As Epstein, who at the time of the incident was fifty two years of age, did commit lewd and lascivious molestation on [redacted] a fourteen year old minor, by using a vibrator on her external vaginal area and as [redacted] recruited, set up the appointment and drove to Epstein's residence, knowing that [redacted] was fourteen years old and knowing there would be unlawful sexual activity between [redacted] and Epstein that [redacted] received monetary compensation for taking said fourteen year old female by Epstein, there is sufficient probable cause to arrest [redacted] for Lewd and Lascivious Act on victim under 16 years of age in violation of Florida State Statue 800.04 (6)(2b) a second degree felony.

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