

EPSTEIN – SUBPOENAS DUCES TECUM FOR EX POLICE CHIEF
REITER AND RACAREY

1. Any and all written reports, notes, memoranda or other papers authored by yourself or any other member of the WPB PD, whether in hard-copy or electronic form, that relates to any law enforcement investigation of Jeffrey Epstein including but not necessarily limited to the investigation that resulted in the filing of state criminal charges against him. This request includes any written communications between yourself, any other member of the WPB PD and any federal law enforcement agent, Assistant United States Attorney, representative of the media, civil party, civilian witness, lawyer for or parent of any civilian witness;
2. Any and all e-mail communications between yourself and any of the following relating to any law enforcement investigation of Jeffrey Epstein including but not necessarily limited to the investigation that resulted in the filing of state criminal charges against him: (a) any other employee of the WPB PD, (b) any federal law enforcement agent or Assistant United States Attorney, (c) any employee of any print, television, or radio media, (d) any civilian witness or any parent of any civilian witness, (e) any attorney representing any civilian witness or civil party who filed or who potentially could file a civil complaint against Epstein;
3. Any notes, memoranda or report reflecting communications with any counsel for Epstein, including but not limited to any requests for exculpatory evidence;
4. Any notes, memoranda or report reflecting attempts to initiate or encourage a federal review of any facet of the Epstein investigation or state prosecution;
5. Any notes, memoranda or report reflecting any complaints made to the WPB PD from any person or parent or lawyer for any person claiming to have been a victim of any conduct of Epstein or from any other private citizen of Palm Beach County;
6. Any notes, memoranda or report reflecting communications with ██████████ in relation to her being subpoenaed to a state grand jury, relating to any grand jury testimony that was sought or discouraged by any law enforcement or prosecutorial official, or regarding any contact with Hall relating to any investigation of Epstein

7. Any and all notes, memoranda, or report of meetings or communications with ██████████ or either parent of or lawyer for either parent of ██████████
8. Any and all record of all expenditures and all requests for expenditures relating to the criminal investigation of Epstein
9. Any and all logs, pictures, videos, digital information, reports, memoranda or notes and any record of expenditure relating to the installment and maintaining of video surveillance of Epstein or his residence or his visitors
10. Any and all reports, including forensic reports, memoranda, notes, and reports of any examination of any computer seized from Epstein's residence in October of 2005 or on any other occasion
11. Any reports, memoranda or notes reflecting a criminal theft or burglary investigation of Epstein or his residence on an occasion prior to October 2005
12. Any and all cellphone records, for both any official or personal cellphones, used between January 2005 and the present
13. Any and all calendars or diaries, electronic or hard-copy, kept for the period between January 2005 and January 2008
14. Any and all reports, memoranda, notes of any communications with any member of the State Attorney's Office relating to the criminal investigation or prosecution of Epstein