

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

L.M.,

CASE NO. 502008CA028051XXXXMB AB

Plaintiff,

v.

JEFFREY EPSTEIN

Defendant.

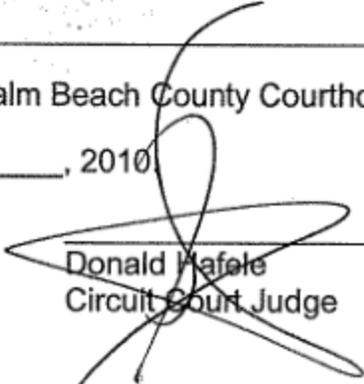
**ORDER ON EPSTEIN'S MOTION FOR PROTECTIVE ORDER TO PROHIBIT  
INAPPROPRIATE DEPOSITION QUESTIONS**

THIS CAUSE came before the Court on Epstein's Motion for Protective Order to Prohibit Inappropriate Deposition Questions, and the Court having heard argument of counsel and being fully advised in these premises, it is hereby

ORDERED and ADJUDGED that: Defendant's Motion is hereby granted/denied

*to extend referenced in the record.*

DONE AND ORDERED at Palm Beach County Courthouse, West Palm Beach,  
Florida, this 14 day of Jan., 2010

  
Donald Mafele  
Circuit Court Judge

Copies furnished:

ROBERT D. CRITTON, JR., ESQ., and MICHAEL J. PIKE, ESQ., 303 Banyan Boulevard, Suite 400, West Palm Beach, FL 33401, BRADLEY J. EDWARDS, ESQ., Farmer, Jaffe, Weissing, Edwards, Fistos & Lehrman, PL, 425 N. Andrews Avenue, Suite 2, Fort Lauderdale, FL 33301, JACK A. GOLDBERGER, ESQ. Atterbury, Goldberger & Weiss, P.A., 250 Australian Avenue South, Suite 1400, West Palm Beach, FL 33401 and JAY HOWELL, ESQ., Jay Howell & Associates, P.A., 644 Cesery Boulevard, Suite 250, Jacksonville, FL 32211

**JONES  
FOSTER  
JOHNSTON  
& STUBBS, P.A.**  
Attorneys and Counselors

Flagler Center Tower, Suite 1100  
505 South Flagler Drive  
West Palm Beach, Florida 33401  
Telephone (561) 659-3000

*Mailing Address*  
Post Office Box 3475  
West Palm Beach, Florida 33402-3475

**Joanne M. O'Connor, Esquire**

Direct Dial: [REDACTED]

Direct Fax: [REDACTED]

E-Mail: [REDACTED]

January 15, 2010

Robert Critton, Esquire  
303 Banyan Boulevard  
Suite 400  
West Palm Beach, FL 33401  
[REDACTED]

Re: B.B. v. Jeffrey Epstein, Case No. 502008CA037319XXXMB AB

Dear Bob:

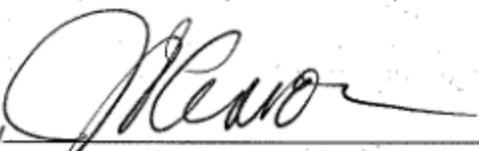
In response to your correspondence dated January 5, 2010, enclosed please find Responses and Objections to the subpoenas served on the Town of Palm Beach Police Department Records Custodian and certain Town of Palm Beach police officers.

Pursuant to the line of case law originating with Gosman v. Luzinski, 937 So. 2d 293 (Fla. 4<sup>th</sup> DCA 2006), we are not under any present duty to provide you with a privilege log identifying statutorily protected documents that we are not producing and will not produce such a log at this time.

Finally, with regard to Administrative Order G.O. 11-65, we have produced two documents to you. One document is the order effective January 15, 1999, as revised on August 29, 2000 (note the language at the bottom of the first page of G.O. 11-65: "\*\*\*Revised 08/29/00"). I am advised by the Town Records Custodian that there is no separate amendment dated August 29, 2000. The January 15, 1999 document was simply revised and you have been provided the revised version. The second document is the Order currently in effect as of June 15, 2009.

Sincerely,

JONES, FOSTER, JOHNSTON & STUBBS, P.A.

By   
\_\_\_\_\_  
Joanne M. O'Connor

JMO:mtm

P:\DOCS\13156\00315\LTR\1760772.DOC

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

CASE NO: 50 2008 CA 037319 XXXX MB AB

B.B.,

Plaintiff,

vs

JEFFREY EPSTEIN,

Defendant.

---

**NON-PARTY TOWN OF PALM BEACH POLICE OFFICERS'  
RESPONSE AND OBJECTION TO SUBPOENA DUCES TECUM**

Non-parties, former Town of Palm Beach Chief of Police Michael Reiter, Captain George Frick, Detective Joseph Recarey, Detective Michael Dawson and Detective Michelle Pagan (collectively "Town of Palm Beach Police Officers"), hereby file this, their response and objection to the subpoenas duces tecum served on each of them as follows:

**GENERAL OBJECTIONS**

As noted below, the Town of Palm Beach Police Officers have previously produced documents responsive to this subpoena. In accordance with its obligations under Section 119.07 of the Florida Public Records Law, the Town of Palm Beach Police Officers have redacted a number of those documents in order to protect those matters excepted from disclosure under Chapter 119, Fla. Stat. These areas of redaction include, but are not limited to, the home addresses and telephone numbers of the law enforcement personnel and any identifying information regarding the victims.

Such redaction is necessary because of the broad range of criminal intelligence and investigative information regarding minor victims of sexual offenses under Florida Statutes Chapter 794 and/or 800 sought by the subpoenas. The redactions made by the Town of Palm Beach Police Officers may also include exempted personal information including their home addresses, telephone numbers and social security numbers.

### **RESPONSES AND OBJECTIONS TO DUCES TECUM**

1. Any and all written reports, notes, memoranda or other papers authored by you or any other member of the Palm Beach Police Department, whether in hard-copy or electronic form, that relate to any law enforcement investigation of Jeffrey Epstein including but not limited to the investigation that resulted in the filing of State criminal charges against Mr. Epstein. This request includes any written communications between you and any members of the Palm Beach Police Department, any member of any Federal Law Enforcement Agency, any member of the United States Attorney's Office, any member of the Office of the State Attorney, any representatives of the media, any civil parties, any civilian witnesses and/or any lawyers or representatives of any parents of any civilian witnesses.

**RESPONSE:** For all of the reasons set forth in response to Request No. 2 *infra* and incorporated herein, the Town Police Department objects to the request to the extent that it seeks electronic communications. Aside from personal e-mail of its employees, which the Town Police Department objects to producing for all of the reasons set forth in Response to Request No. 2, *infra*, all documents responsive to this request were produced on December 9, 2009.

2. Any and all electronic communications (EMAIL) between you any of the following relating to any law enforcement investigation of Jeffrey Epstein including but not limited to the investigation that resulted in the filing of State criminal charges against him: (A) any member of the Palm Beach Police Department, (B) any member of any Federal Law Enforcement Agency, (C) any member of the United States Attorney's Office, (D) any member of the Office of the State Attorney (E) any member of any print, television, or radio media outlet, (F) any attorney representing any civilian witness or civil party who has filed or may potentially file a civil complaint against Mr. Epstein.

**RESPONSE:** The Town of Palm Beach Police Officers object to this request on the grounds that it is unduly burdensome and seeks information that is protected from disclosure under Florida's Public Records Law. The Town reserves the right to submit a privilege log at the appropriate time should the

Court overrule its objections. See Gosman v. Luzinski, 937 So. 2d 293 (Fla. 4<sup>th</sup> DCA 2006).

3. Any and all notes, memoranda or reports reflecting any communications between you and counsel on behalf of Mr. Epstein, including but not limited to any request for exculpatory evidence.

**RESPONSE: None.**

4. Any and all notes, memoranda or reports reflecting any attempts by you to initiate or encourage a federal review of any facet/aspect of the Epstein investigation or State prosecution of Epstein.

**RESPONSE: Aside from the previously produced correspondence from Michael S. Reiter to Barry E. Krischer dated May 1, 2006 and correspondences from Michael S. Reiter to parents of victims dated July 24, 2006, no responsive documents exist.**

5. Any and all notes, memoranda or reports reflecting any complaints made to the Palm Beach Police Department from any person, parent, or lawyer for any person or parent claiming to have been a victim of any conduct of Mr. Epstein or from any other private citizen of Palm Beach County relating to any conduct of Epstein from January 1, 2000-October 22, 2009.

**RESPONSE: All responsive documents in the possession, custody or control of the Town of Palm Beach Police Officers were produced on December 9, 2009.**

6. Any and all notes, memoranda, or reports reflecting any communication between you or and any other member of the Palm Beach Police Department with "A.H."\* in relation to her being subpoenaed to testify before or her requested attendance before a State Grand Jury, including but not limited to any discussions regarding what she would testify to and/or any preparation that any law enforcement officer provided her with prior to any testimony.

**RESPONSE: All responsive documents in the possession, custody or control of the Town of Palm Beach Police Officers were produced on December 9, 2009.**

7. Any and all notes, memoranda, or reports reflecting any communication between you or any other member of the Palm Beach Police Department with "A.H."\* or referencing "A.H."\* in relation to her being subpoenaed to testify before or her requested attendance before a State Grand Jury where you or any Palm Beach police officer or official sought to discourage her or influence her not to testify or to testify in a certain manner at any Grand Jury proceeding involving Mr. Epstein.

**RESPONSE: None.**

8. Any and all agreements, memoranda, and/or notes of any kind, electronic or otherwise, between you and any member of the Palm Beach Police Department, any member of the Office of the State Attorney, and/or any member of the United States Attorney's Office relating to any criminal charges, formal or otherwise, regarding "A.H."\*\* at any time.

**RESPONSE: None.**

9. Any and all notes, memoranda, or reports of meetings or communications between you and "S.G."\*\*, her parents, or any lawyers who represent "S.G."\*\*

**RESPONSE: All responsive documents in the possession, custody or control of the Town of Palm Beach Police Officers were produced on December 9, 2009.**

10. Any and all records of expenditures made or incurred by you, and all requests for expenditures relating to the criminal investigation of Mr. Epstein.

**RESPONSE: None.**

11. Any and all logs, pictures, videos, digital information, reports, memoranda or notes, and any record of expenditure, which relate to the institution of and/or maintenance of any video surveillance of Mr. Epstein, his residence, or his visitors during the following time periods:

- a. January 1, 2004-December 31, 2004
- b. January 1, 2005-December 31, 2005
- c. January 1, 2006-December 31, 2006
- d. January 1, 2007-December 31, 2007
- e. January 1, 2008-December 31, 2008
- f. January 1, 2009-today's date.

**RESPONSE: None.**

12. Any and all reports, logs, pictures, videos, notes, records of expenditures or any other memoranda relating to any physical surveillance of Mr. Epstein, his residence, his visitors, or any individual who was believed to be a potential witnesses or co-conspirator other than the information relating to video surveillance that is requested in request number 11.

**RESPONSE: Photographs of Mr. Epstein taken by Detective Recarey will be produced. The Town possesses no other responsive documents.**

13. Any and all reports (including forensic reports), memoranda, notes, and reports of any examination of any computer seized from Mr. Epstein's residence in October 2005 or on any other occasion.

**RESPONSE: None.**

14. Any and all reports, memoranda, or notes reflecting a criminal theft or burglary investigation of Mr. Epstein or his residence on any occasion prior to October 2005.

**RESPONSE: All responsive documents in the possession, custody or control of the Town of Palm Beach Police Officers were produced on December 9, 2009.**

15. All cell phone records, both official cell phone and personal cell phone, used by you between during the following time periods:

- a. January 1, 2004-December 31, 2004
- b. January 1, 2005-December 31, 2005
- c. January 1, 2006-December 31, 2006
- d. January 1, 2007-December 31, 2007
- e. January 1, 2008-December 31, 2008
- f. January 1, 2009-today's date.

**RESPONSE: The Town of Palm Beach Police Officers object to this request on the grounds that it seeks information that is irrelevant and not likely to lead to the discovery of admissible evidence. The Town of Palm Beach Police Officers further object on the grounds that the request is overly broad and unduly burdensome. Finally, the Town of Palm Beach Police Officers object on the grounds that the request seeks information that is specifically excepted from disclosure under Florida's Public Records Law. See *generally* Non-Party Town of Palm Beach Police Officers' Motion to Quash Subpoenas and/or Motion for Protective Order, incorporated herein. The Town reserves the right to submit a privilege log at the appropriate time should the Court overrule its objections. See Gosman v. Luzinski, 937 So. 2d 293 (Fla. 4<sup>th</sup> DCA 2006).**

16. All calendars or diaries, electronic or hard-copy, kept for the periods between October 1, 2004 up through and including today, reflecting your schedules, activities, meeting, etc.

**RESPONSE: The Town of Palm Beach Police Officers object to this request on the grounds that it seeks information that is irrelevant and not likely to lead to the discovery of admissible evidence and as overly broad. The Town of Palm Beach Police Officers further object on the grounds that the request seeks private information that is not subject to disclosure as a public record under Section**

119.011(1), Fla. Stat. and seeks statutorily protected information regarding the law enforcement officers who made the calls and the persons to whom calls were made including, but not limited, to family members, crime victims and confidential informants. See *generally* Non-Party Town of Palm Beach Police Officers' Motion to Quash Subpoenas and/or Motion for Protective Order, incorporated herein. The Town reserves the right to submit a privilege log at the appropriate time should the Court overrule its objections. See Gosman v. Luzinski, 937 So. 2d 293 (Fla. 4<sup>th</sup> DCA 2006).

17. Any and all reports, memoranda, and notes of any communication between you and any member of the Office of the State Attorney relating to the criminal investigation and subsequent prosecution of Mr. Epstein from October 1, 2004 up through and including today.

**RESPONSE:** Aside from the previously produced correspondence from Michael S. Reiter to Barry E. Krischer dated May 1, 2006, no responsive documents exist.

18. All policies and procedures of the Palm Beach Police Department setting forth the procedures for police officers, including the Chief, any detective and officers when commenting to any media outlets, including but not limiting to the local news, the national media, print outlets, and any web-based media format.

**RESPONSE:** All responsive documents in the possession, custody or control of the Town of Palm Beach Police Officers were produced on December 9, 2009.

19. All personal notes contained either on your personal computer, work computer, and those that are handwritten containing any witnesses that you, or any other member of the Palm Beach Police Department interviewed or attempted to interview with regard to the Epstein investigation from January 1, 2004, up through and including today.

**RESPONSE:** None.

20. Any and all audio tapes of any witnesses that you or any member of the Palm Beach Police Department obtained statements or interviews from, either sworn or informal, with regard to the Epstein investigation.

**RESPONSE:** None.

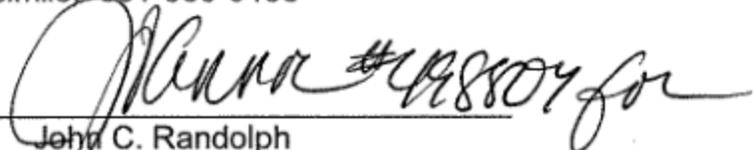
21. Any and all audio tapes, notes (hand-written or typed), memoranda, reports, messages, and/or any communications obtained or generated by you or any member of the Palm Beach Police Department, either sworn or informal, that relate to Jane Doe #4\*\*, who is the Plaintiff in a Federal Civil Case No. 08-80380 filed against Jeffrey Epstein.

**RESPONSE:** The Town of Palm Beach Police Officers have no information regarding the identity of "Jane Doe #4" and therefore cannot properly respond to this Request. Furthermore, the Town objects to producing any responsive documents of the type objected to in Request Nos. 2, 15 and 16, supra. Subject to and notwithstanding its objections, the Town Police Department responds that it possesses no responsive documents other than what has previously been produced, unless those documents are encompassed within Request No. 2.

I HEREBY CERTIFY that a true copy of the foregoing instrument has been furnished by United States mail to **Theodore J. Leopold, Esquire** and **Spencer T. Kuvin, Esquire**, Leopold-Kuvin, P.A., 2925 PGA Boulevard, Suite 200, Palm Beach Gardens, Florida 33410; **Jack Alan Goldberger, Esquire**, Atterbury Goldberger & Weiss, P.A. 250 Australian Avenue South, Suite 1400, West Palm Beach, Florida 33401-5012; and **Robert D. Critton, Jr., Esquire**, Burman, Critton, Luttier & Coleman, LLP, 515 North Flagler Drive, Suite 400, West Palm Beach, Florida 33401, this 15<sup>th</sup> day of January, 2010.

JONES, FOSTER, JOHNSTON & STUBBS,  
P.A.  
505 South Flagler Drive, Suite 1100  
Post Office Box 3475  
West Palm Beach, Florida 33402-3475  
Telephone: 561-659-3000  
Facsimile: 561-650-0465

By



John C. Randolph  
Florida Bar No. 129000



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

CASE NO: 50 2008 CA 037319 XXXX MB AB

B.B.,

Plaintiff,

vs

JEFFREY EPSTEIN,

Defendant.

---

**NON-PARTY TOWN OF PALM BEACH RECORDS CUSTODIAN'S  
RESPONSE AND OBJECTION TO SUBPOENA DUCES TECUM**

Non-party, Town of Palm Beach Police Department Records Custodian ("Town Police Department"), hereby file this, her response and objection to the subpoenas duces tecum served on her as follows:

**GENERAL OBJECTIONS**

As noted below, the Town Police Department has previously produced documents responsive to this subpoena. In accordance with its obligations under Section 119.07 of the Florida Public Records Law, the Town Police Department has redacted a number of those documents in order to protect those matters excepted from disclosure under Chapter 119, Fla. Stat. These areas of redaction include, but are not limited to, the home addresses and telephone numbers of the law enforcement personnel and any identifying information regarding the victims. Such redaction is necessary because of the broad range of criminal intelligence and investigative information regarding minor victims of sexual offenses under Florida Statutes Chapter

794 and/or 800 sought by the subpoenas. The redactions made by the Town Police Department may also include exempted personal information regarding its law employment officers and personnel including their home addresses, telephone numbers and social security numbers.

### **RESPONSES AND OBJECTIONS TO DUCES TECUM**

1. Any and all written reports, notes, memoranda or other papers authored by any member of the Palm Beach Police Department and/or any of its employees, members, agents, or representatives acting on behalf of the Palm Beach Police Department whether in hard-copy or electronic form, that relate to any law enforcement investigation of Jeffrey Epstein including but not limited to the investigation that resulted in the filing of State criminal charges against Mr. Epstein. This request includes any written communications between the Palm Beach Police Department and/or any of its members, agents, or representatives acting on behalf of the Palm Beach Police Department and any members of any Federal Law Enforcement Agency, any member of the United States Attorney's Office, any member of the Office of the State Attorney, any representatives of any media outlet, any civil parties, any civilian witnesses and/or any lawyers or representatives of any parents of any civilian witnesses.

**RESPONSE:** For all of the reasons set forth in response to Request No. 2 *infra* and incorporated herein, the Town Police Department objects to the request to the extent that it seeks electronic communications. Aside from personal e-mail of its employees, which the Town Police Department objects to producing for all of the reasons set forth in Response to Request No. 2, *infra*, all documents responsive to this request on December 9, 2009.

2. Any and all electronic communications (EMAIL) between the Palm Beach Police Department and/or any of its employees, members, agents, or representatives acting on behalf of the Palm Beach Police Department and any of the following that relate to any law enforcement investigation of Jeffrey Epstein including but not limited to the investigation that resulted in the filing of State criminal charges against him: (A) any other member of the Palm Beach Police Department, (B) any member of any Federal Law Enforcement Agency, (C) any member of the United States Attorney's Office, (D) any member of the Office of the State Attorney (E) any member of any print, television, and/or radio media outlets (F) any attorney representing any civilian witness or civil party who has filed or may potentially file a civil complaint against Mr. Epstein.

**RESPONSE:** The Town of Palm Beach Police Officers object to this request on the grounds that it is unduly burdensome and seeks information that is protected from disclosure under Florida's Public Records Law. The Town reserves the right to submit a privilege log at the appropriate time should the

**Court overrule its objections. See Gosman v. Luzinski, 937 So. 2d 293 (Fla. 4<sup>th</sup> DCA 2006).**

3. Any and all notes, memoranda or reports reflecting any communications by the Palm Beach Police Department and/or any of its employees, members, agents, or representatives acting on behalf of the Palm Beach Police Department with any counsel on behalf of Epstein, including but not limited to any request for exculpatory evidence.

**RESPONSE: None.**

4. Any and all notes, memoranda or reports reflecting any attempts by the Palm Beach Police Department and/or any of its employees, members, agents, or representatives acting on behalf of the Palm Beach Police Department to initiate or encourage a federal review of any facet/aspect of the Epstein investigation or State prosecution of same.

**RESPONSE: Aside from the previously produced correspondence from Michael S. Reiter to Barry E. Krischer dated May 1, 2006 and correspondences from Michael S. Reiter to parents of victims dated July 24, 2006, no responsive documents exist.**

5. Any and all notes, memoranda or reports reflecting any complaints made to the Palm Beach Police Department or any of its employees, members, agents, or representatives acting on behalf of the Palm Beach Police Department from any person, parent, or lawyer for any person or parent claiming to have been a victim of any conduct of Mr. Epstein or from any other private citizen of Palm Beach County from 2000-2009.

**RESPONSE: All responsive documents in the possession, custody or control of the Town Police Department were produced on December 9, 2009.**

6. Any and all notes, memoranda, or reports reflecting any communication between the Palm Beach Police Departments and/or any of its employees, members, agents or representatives acting on behalf of the Palm Beach Police Department with "A.H." in relation to her being subpoenaed to testify before or her requested attendance before a State Grand Jury, including but not limited to any discussions regarding what she would testify to and/or any preparation that any law enforcement officer provided her with prior to any testimony.

**RESPONSE: All responsive documents in the possession, custody or control of the Town Police Department were produced on December 9, 2009.**

7. Any State Grand Jury testimony that was sought or discouraged by the Palm Beach Police Department or any of its employees, members, agents, or representatives acting on behalf of the Palm Beach Police Department regarding any contact with "A.H." relating to any investigation of Mr. Epstein.

**RESPONSE: None.**

8. Any and all agreements, memoranda, and/or notes of any kind, electronic or otherwise, between the Palm Beach Police Department or any of its employees, members, agents, or representatives acting on behalf of the Palm Beach Police Department and any member of the Office of the State Attorney, and/or any member of the United States Attorney's Office relating to any criminal charges, formal or otherwise, regarding "A.H." at any time.

**RESPONSE: None.**

9. Any and all notes, memoranda, or reports of meetings or communications between the Palm Beach Police Department or any of its employees, members, agents, or representatives acting on behalf of the Palm Beach Police Department and "S.G.", her parents, or any lawyers who represent "S.G."

**RESPONSE: All responsive documents in the possession, custody or control of the Town Police Department were produced on December 9, 2009.**

10. Any and all records and requests of expenditures made or incurred by the Palm Beach Police Department or any of its employees, members, agents, or representatives acting on behalf of the Palm Beach Police Department relating to the criminal investigation of Mr. Epstein.

**RESPONSE: None. The Town Police Department does not generally assign expenditures to specific cases.**

11. Any and all logs, pictures, videos, digital information, reports, memoranda or notes, and any record of expenditure, which relate to the institution of and maintenance of any video surveillance of Mr. Epstein, his residence, or his visitors.

**RESPONSE: None.**

12. Any and all reports, logs, pictures, videos, notes, records of expenditures or any other memoranda relating to any physical surveillance of Mr. Epstein, his residence, his visitors, or any individual who was believed to be a potential witness or co-conspirator other than the information relating to video surveillance identified in request number 11.

**RESPONSE: None.**

13. Any and all reports (including forensic reports), memoranda, notes, and reports of any examination of any computer seized from Mr. Epstein's residence in October 2005 or on any other occasion.

**RESPONSE: None.**

14. Any and all reports, memoranda, or notes reflecting a criminal theft or burglary investigation of Mr. Epstein or his residence on any occasion prior to October 2005.

**RESPONSE: All responsive documents in the possession, custody or control of the Town Police Department were produced on December 9, 2009**

15. Any and all reports, memoranda, and notes of any communication by the Palm Beach Police Department or any of its employees, members, agents, or representatives acting on behalf of the Palm Beach Police Department and the Office of the State Attorney relating to the criminal investigation and subsequent prosecution of Mr. Epstein from October 1, 2004 up through and including today.

**RESPONSE: All responsive documents in the possession, custody or control of the Town Police Department were produced on December 9, 2009.**

16. All policies and procedures regarding commentary to any media outlets, including but not limited to the local news, the national media, print outlets, and any web-based media format.

**RESPONSE: All responsive documents in the possession, custody or control of the Town Police Department were produced on December 9, 2009.**

17. Any and all notes generated by the Palm Beach Police Department, its employees, members, agents, or representatives acting on behalf of the Palm Beach Police Department that concern or relate to any interviews or statements obtained regarding the Epstein investigation from January 1, 2004, up through and including today, including but not limited to notes that are handwritten, contained on any work computer, and/or any personal computer.

**RESPONSE: Aside from the Incident Report produced on December 9, 2009, no responsive documents exist.**

18. Any and all audio tapes of any witnesses that the Palm Beach Police Department or any of its employees, members, agents, or representatives acting on behalf of the Palm Beach Police Department obtained statements or interviews from, either sworn or informal, with regard to the Epstein investigation.

**RESPONSE: None.**

19. Any and all personnel records of Michael Reiter, Detective Joseph Recarey, Detective Michelle Pagan, and Detective Michael Dawson.

**RESPONSE: None.**

20. Any and all audio tapes, notes (hand-written or typed), memoranda, reports, messages, and/or any communications, either sworn or informal, obtained or generated by Palm Beach Police Department, its employees, members, agents, or representatives acting on behalf of the Palm Beach Police Department that relate to Jane Doe #4\*\*, who is the Plaintiff in a Federal Civil Case No. 08-80380 filed against Jeffrey Epstein.

**RESPONSE:** The Town of Palm Beach Police Officers have no information regarding the identity of "Jane Doe #4" and therefore cannot properly respond to this Request. Furthermore, the Town objects to producing any responsive documents of the type objected to in Request Nos. 2, 15 and 16, supra. Subject to and notwithstanding its objections, the Town Police Department responds that it possesses no responsive documents other than what has previously been produced, unless those documents are encompassed within Request No. 2.

I HEREBY CERTIFY that a true copy of the foregoing instrument has been furnished by United States mail to **Theodore J. Leopold, Esquire** and **Spencer T. Kuvin, Esquire**, Leopold-Kuvin, P.A., 2925 PGA Boulevard, Suite 200, Palm Beach Gardens, Florida 33410; **Jack Alan Goldberger, Esquire**, Atterbury Goldberger & Weiss, P.A. 250 Australian Avenue South, Suite 1400, West Palm Beach, Florida 33401-5012; and **Robert D. Critton, Jr., Esquire**, Burman, Critton, Luttier & Coleman, LLP, 515 North Flagler Drive, Suite 400, West Palm Beach, Florida 33401, this 15<sup>th</sup> day of January, 2010.

JONES, FOSTER, JOHNSTON & STUBBS,  
P.A.

505 South Flagler Drive, Suite 1100

Post Office Box 3475

West Palm Beach, Florida 33402-3475

Telephone: [REDACTED]

Facsimile: [REDACTED]

By

John C. Randolph

Florida Bar No. 129000  
[REDACTED]