

EXHIBIT "A" (Records Custodian)

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.
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.
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 Mr. Epstein, including but not limited to any request for exculpatory evidence.
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.
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.
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 "[REDACTED]"* 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.

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 "██████"* relating to any investigation of Mr. Epstein.

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 "██████"*. at any time.

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 "██████".*, her parents, or any lawyers who represent "██████"*. .

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.

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.

12. 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 of 2004 or on any other occasion.

13. 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 2004.

14. 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.

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

16. 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.

17. 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.

*** The initials [REDACTED] and [REDACTED] refer to the individuals identified in the Palm Beach County Probable Cause Affidavit as it relates to the Jeffrey Epstein investigation. Should you require the complete name of the individuals, please contact Jessica Cadwell at [REDACTED].**