

Handwritten initials

IN THE CIRCUIT COURT OF THE 15th JUDICIAL CIRCUIT
IN AND FOR PALM BEACH COUNTY, FLORIDA

CASE No.



Plaintiff,

-VS-

JEFFREY EPSTEIN,

Defendant.

DEPOSITION OF JEFFREY EPSTEIN

Wednesday, September 2, 9

10:10 - 10:15 a.m.

205 South Australian Avenue
Suite 1400
West Palm Beach, Florida 33401

Reported By:
Jeana Ricciuti, RPR, FPR, CLR
Notary Public, State of Florida
Prose Court Reporting Agency, Inc.

Certified Copy

Handwritten "A" with double lines

1 Defendant, Jeffrey Epstein.

2 MR. GOLDBERGER: Jack Goldberger on behalf of
3 Jeffrey Epstein.

4 COURT REPORTER: Sir, would you raise your
5 right hand, please.

6 MR. GOLDBERGER: Wait, wait. We've got
7 someone.

8 COURT REPORTER: I'm sorry.

9 MR. WILLITS: Yes. Richard Willits on behalf
10 of [REDACTED].

11
12 Thereupon,

13 (JEFFREY EPSTEIN)

14 having been first duly sworn or affirmed, was examined
15 and testified as follows:

16 THE WITNESS: Yes, I do.

17 DIRECT EXAMINATION

18 BY MR. KUVIN:

19 Q. Could you please give us your name.

20 A. Jeffrey Epstein.

21 Q. Is it true, sir, that you have, what's been
22 described, as an egg-shaped penis?

23 MR. PIKE: Form, vague, indefinite, and I'm
24 going to give you the first warning, Mr. Kuvin,
25 that these types of questions are not only

1 argumentative, but directed in a manner to
2 embarrass Mr. Epstein. If you continue with this
3 type of questioning, I'll adjourn the deposition
4 immediately.

5 BY MR. KUVIN:

6 Q. Sir, according to the police department's
7 probable cause affidavit, one witness described your
8 penis as oval shaped and claim, when erect, it was thick
9 towards the bottom but was thin and small --

10 MR. PIKE: We're stopping it now.

11 BY MR. KUVIN:

12 Q. -- towards the head portion, and called it
13 egg-shaped. Those are not my words, I apologize, but as
14 Mr. --

15 MR. PIKE: The depo is now adjourned.

16 BY MR. KUVIN:

17 Q. -- as Mr. Critton has stated, that this is
18 a --

19 MR. PIKE: Thank you, Mr. Kuvin. Let's go.

20 MR. GOLDBERGER: All right.

21 MR. KUVIN: I'm willing to continue. I'd
22 hate --

23 MR. GOLDBERGER: Let me --

24 MR. KUVIN: --- to call him back.

25 MR. GOLDBERGER: Let me go on the record here.

1 Jack Goldberger on behalf of Jeffrey Epstein.

2 We have tried to cooperate in setting this
3 deposition; we want it to be a meaningful
4 deposition for you. For the first question to be a
5 question that serves no other purpose other than
6 embarrass Mr. Epstein is just totally unethical,
7 it's improper and it really irritates me. We gave
8 you a warning where we said don't do that again,
9 Spencer, and you continued to do it.

10 I agree with Mr. Pike that the deposition is
11 terminated at this point. If we want to go to
12 court and argue this, we'll be happy to do it; I'm
13 sure we will. But we gave you a warning not to do
14 that, and you did it, and you chose to do it. So,
15 I'm sorry, Spencer.

16 MR. KUVIN: Let's do this.

17 MR. GOLDBERGER: Okay.

18 MR. KUVIN: Let's do this: I'll agree that
19 I'll show you how I think it's relevant, but let me
20 go ahead and continue with the deposition and I'll
21 ask, I guess, what you would consider more
22 non-sexual questions, even though this is a sexual
23 lawsuit, because I don't want to waste everyone's
24 time for showing up here today. So let me -- let
25 me ask some basic questions and then I'll determine

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

CASE NO. 502008CA037319XXXMB AB

[REDACTED]

Plaintiff,

v.

JEFFREY EPSTEIN,
and [REDACTED]

Defendants.

_____ /

AFFIDAVIT OF JACK A. GOLDBERGER, ESQ.

STATE OF FLORIDA) SS
COUNTY OF PALM BEACH)

BEFORE ME, the undersigned authority, personally appeared Jack A. Goldberger, Esq. having personal knowledge and being duly sworn, deposes and says:

1. I am co-counsel for Defendant, Jeffrey Epstein, in this and other pending matters involving Mr. Epstein.

2. I am becoming increasingly concerned about my client's ability to receive a fair trial with the recent press coverage of these cases.

3. Mr. Kuvin specifically told me prior to a hearing at the Palm Beach County Courthouse concerning Mr. Epstein that:

a) He knew that he did not expect to make much money in this case.

"B"

- b) He was a young lawyer, he knew he needed to market himself and get as much publicity for himself and his firm as possible.
- c) He pointed out that his firm has an advertising plan to market to other lawyers;
- d) The Epstein case was another marketing method for himself and his firm.

4. In particular, Mr. Kuvin had to have given a copy of Mr. Epstein's video deposition to The Palm Beach Post in this matter and the abbreviated deposition ended up on the internet.

5. The decision to terminate/adjourn the deposition and seek relief from the court was made by the attorneys, Michael Pike and me, not Mr. Epstein. Mr. Epstein followed our legal advice.

6. As the Court knows, Defendant and his attorneys must defend against an "anonymous" Plaintiff, yet the Plaintiff's attorneys including Mr. Kuvin, apparently intend to try this case in the press to prejudice Mr. Epstein's right to a fair trial.

FURTHER THE AFFIANT SAYETH NAUGHT,



Jack A. Goldberger, Esq.

STATE OF FLORIDA
COUNTY OF PALM BEACH

I hereby Certify that on this day, before me, an officer duly authorized to administer oaths and take acknowledgments, personally appeared Jack A. Goldberger, Esquire, known to me to be the person described in and who executed the foregoing Affidavit, who acknowledged before me that he executed the same, that I relied upon the following form of identification of the above named person: JACK A. GOLDBERGER, and that an oath was/was not taken.

WITNESS my hand and official seal in the County and State last aforesaid this 21st day of September, 2009.



PRINT NAME: JESSICA CADWELL
NOTARY PUBLIC/STATE OF FLORIDA
COMMISSION NO.: DD 853529
MY COMMISSION EXPIRES: 04-19-2013

██████████ D. Critton Jr.

(Low)

From: Martin Weinberg ██████████
Sent: Friday, September 18, 2009 7:07 PM
To: Epstein, Jeffrey
Cc: ██████████ D. Critton Jr.

The newest - identifies the station's source

Epstein Plea Bargain Unsealed

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September 18, 2009 6:11 PM
Al Pefley

By all accounts, it was a sweet deal that Palm Beach billionaire Jeffrey Epstein struck with the feds.

One that most of us probably wouldn't have gotten.

He pleaded guilty to engaging in sex with teenage girls and got very little time in the county jail. Not even prison.

Epstein's lawyers kept the details of the deal sealed until today.

We just got our hands on the 11 page plea deal that Jeffrey Epstein reached with federal prosecutors in 2007.

An attorney for some of the teenage girls who were Epstein's victims calls this plea deal "atrocious" and he says "it's an embarrassment to the U.S. Attorney's office." Billionaire Jeffrey Epstein could've gone to prison for life.

Instead, he got just 18 months.

Police say he had teenage girls coming to his Palm Beach home to give him massages and also perform sex acts on him.

One attorney for some of the girls says Epstein victimized at least 33 teenage girls.

"C"

9/22/2009

"He could've faced at least 33 life sentences had he been convicted under these charges," said Spencer Kuvin, with the law firm Leopold-Kuvin in Palm Beach Gardens.

But instead, Epstein spent little time behind bars under a secret plea deal with federal prosecutors.

"It's extremely unfair, extremely unfair to the 33 girls because it essentially brushes them aside as though nothing happened to them and it wasn't a big deal," Kuvin said.

The secret plea bargain has just been made public and it reveals Epstein agreed to pay for an attorney to represent all the victims who came to his home for sex acts.

In addition, if any of the girls decides to [REDACTED] him for damages, Epstein gave up his right to contest the amount of money they could collect up to \$50-thousand dollars.

Also, the plea deal specifies if Epstein successfully meets the house arrest and other terms of the deal, the government won't charge four women in the case, including his girlfriend [REDACTED] [REDACTED], who brought the teenage girls to him.

"There is no other person, no other person who would've gotten such a sweetheart deal had they not been as wealthy and as powerful as Jeffrey Epstein," Kuvin said.

The U.S. Attorney's office in Miami declined to comment on the plea deal.

In a written statement, Epstein's defense attorney says: "He is looking forward to putting this difficult period of his life behind him."

--
Martin G. Weinberg, Esq.
20 Park Plaza, Suite 1000
Boston, MA 02116
617-227-3700
[REDACTED]

=====

This Electronic Message contains information from the Law Office of Martin G. Weinberg, P.C., and may be privileged. The information is intended for the use of the addressee only. If you are not the addressee, please note that any disclosure, copying, distribution, or use of the contents of this message is prohibited.

9/22/2009

EFTA00726551

LOCAL & BUSINESS

Appeals court backs unsealing of Epstein's '07 deal with feds

By SUSAN SPENCER-WENDEL
Palm Beach Post Staff Writer

WEST PALM BEACH — An appeals court has affirmed a lower court ruling unsealing the confidential deal Jeffrey Epstein struck with federal prosecutors to avoid being charged by them.

The 4th District Court of Appeal this week upheld Circuit Judge Jeffrey Colbath's earlier decision to unseal the agreement. Attorneys for the mon-

ey manager of billionaires have fought vigorously against the agreement's release. They have 15 days to request a rehearing with the 4th District Court of Appeal.

Absent that, it will become public.

Epstein's local criminal defense attorney Jack Goldberger did not return a call seeking comment.

Epstein's own attorneys, in federal filings, have
See EPSTEIN, 6B ▶



Epstein
Attorneys for the Palm Beach money manager have 15 days to seek a rehearing.

s to Marines, including grandson, **2B** ■ Officials seek public's sugg

"D"

Civil litigation intensifies; deposition ends abruptly

► EPSTEIN from 1B

referred to his confidential deferred prosecution agreement with the U.S. Attorney's Office, struck in September 2007, as "unprecedented" and "highly unusual."

Attorneys for *The Palm Beach Post* as well as alleged victims of Epstein's sexual advances sought to have the deal unsealed in state court.

Colbath found that the proper sealing procedures had not been followed by an earlier judge.

"There is nothing more fundamentally important than for the public and press to observe how the government is doing its job," *Post* attorney Deanna Shullman has said. "There is great public interest in how everybody in this case is doing their job."

According to various media accounts, Epstein moved in circles that included President Clinton,

An attorney's questioning of Epstein becomes personal.

Donald Trump and Prince Andrew. "International Moneyman of Mystery," declared a 2002 *New York* magazine profile of Epstein.

He pleaded guilty in 2008 to procuring teens for prostitution and was sentenced to 18 months in jail, but allowed out extensively for work release. Epstein was released in late July, after serving 13 months of the sentence.

He now faces civil lawsuits filed by young women allegedly lured to his Palm Beach home and paid to perform massages and other acts.

That civil litigation is intensifying.

This week, while Epstein was being deposed by attorney Spencer Kuvin,

who represents an alleged victim identified only as "B.B.," Kuvin questioned Epstein about the shape of his genitalia and the deposition abruptly ended, according to a transcript.

Kuvin has since made a motion in court to be able to inspect Epstein's genitalia.

Kuvin said Thursday he seeks to corroborate a description one woman gave Palm Beach police.

Because Epstein is invoking his right to remain silent in depositions, this is the only way to do it, Kuvin said.

"We want to corroborate what those girls saw," Kuvin said.

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Jeffrey Epstein victim seeks to unseal document from sex offender case

Click-2-Listen

By MICHELE DARGAN, Daily News Staff Writer

Monday, July 13, 2009

One of the young women victimized by Jeffrey Epstein is asking that a federal non-prosecution agreement pertaining to the sex offender be unsealed to help in the discovery process of her civil case.

She also says that a federal judge's ruling allowing victims and their attorneys to view the document does not pertain to her because her case is filed in state court.

Attorneys Spencer Kuvin and Diana Martin filed court papers Monday on behalf of [redacted], asking that the Fourth District Court of Appeal uphold a state judge's ruling to unseal the document. Circuit Judge Jeffrey Colbath ruled the document was improperly sealed at the time of Epstein's plea hearing, where he pleaded guilty to soliciting prostitution and soliciting a minor for prostitution.

Kuvin/Martin's response says, "[redacted] is entitled to this document as both a victim of Epstein and as a citizen of Florida. [redacted] needs the agreement to demonstrate Epstein lacks a valid basis to plead the Fifth Amendment during the discovery phase of her civil case. And, as a Florida citizen, it is within [redacted]'s right and interest to review the non-prosecution agreement."

There are more than a dozen civil lawsuits — both state and federal — pending against Epstein, 56. All contain similar allegations: Epstein, through his employees and assistants, brought minor girls to his Palm Beach home on El Brillo Way for erotic massages and sometimes sex.

Epstein's attorneys filed papers with the appellate court, asking to throw out Colbath's ruling.

Epstein's attorneys say he will suffer "irreparable harm once the documents are produced."

Epstein's attorneys say the document cannot be made public because it references grand jury proceedings, which are protected under Federal Rule of Criminal Procedure.

But [redacted]'s attorneys say Epstein failed to raise this argument in his motion to make the agreement confidential and, in addition, the Rule only pertains if disclosure would "reveal secret inner workings of the grand jury." Epstein has not demonstrated that to be the case, the court papers say.

Epstein's attorneys argue that a federal judge already has denied a motion to unseal the document and that victims and their attorneys may view the document, but may not disclose its contents to other parties.

Kuvin, whose client filed suit in state court, says that he and his client would have to go back to federal court and go through a rigorous process to view the document.

"My client is not bound by the federal court ruling," Kuvin said by phone. "She shouldn't have to subject herself to federal jurisdiction for a document that should be public anyway. She's a direct victim and she has never seen it and I have never seen it."

Attorney [redacted] Edwards, representing [redacted], and attorney Deanna Shulmann, representing the Palm Beach Post, are expected to have filed court papers asking to uphold the ruling to unseal. Edwards and Shulmann did not return calls on Monday.

Epstein will be released from the Palm Beach County Stockade July 22, after serving less than 13 months of his 18-month sentence.

Talk of the Town

We appreciate reader comments on this story, but at PalmBeachDailyNews.com, we want to avoid comments that are obscene, hateful, racist or otherwise inappropriate. If you post such comments, we will delete them. If you see such comments, please report them to us by emailing feedback@pbdailynews.com.

Joyce Reingold



"E"

Court: Epstein agreement stays sealed

By **WILLIAM KELLY**
Daily News Staff Writer

The Fourth District Court of Appeal has agreed to Jeffrey Epstein's request to halt the impending release of his non-prosecution agreement with the federal government.

Circuit Judge Jeffrey Colbath had ordered the release of the documents at noon today. The documents were sealed in state court last year when Epstein, a convicted sex offender and billionaire financier, pleaded guilty to two felony charges. Colbath ruled proper procedures weren't followed in sealing the documents.

Now the decision whether to make them

Please see EPSTEIN, Page A4

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Palm Beach Daily News
Vol. 113, No. 257
2 Sections

+ **A4**

Palm Beach Daily News, Thursday, July 2 th

EPSTEIN

Lawyer: Document release would harm client

From Page A1

public is in the hands of the appellate court, which has given attorneys on both sides of the case a total of 20 days to present their arguments.

Epstein's appellate lawyer, Jane Kreuzler-Walsh, made an emergency request Wednesday that the appellate court annul the lower court order, saying release of the agreement would cause irreparable harm to her client.

Attorneys for women suing Epstein, and a law-

yer for *The Palm Beach Post*, have argued that the public and media should have access to the information and that the victims should be able to use it in their lawsuits.

Kreuzler-Walsh would not comment on the Fourth District's order.

But Spencer Kuvin, a lawyer for one of the victims, called the decision "frustrating."

"The rules shouldn't be different for rich people than they are for poor people," Kuvin said. "Had Epstein been a regular cit-

izen, and not a billionaire, this document would have been made public a long time ago."

Epstein pleaded guilty to solicitation of prostitution and procuring teenagers for prostitution. He was sentenced to 18 months incarceration, but is due to get out five months early, on July 22.

State and federal authorities said Epstein paid teenage girls for massages and sometimes sex at his Palm Beach home.

— *wkelly*
@pbdailynews.com

11 / 11

Girl sues Epstein, two others she says conspired in massages

Jane Doe, 17, sues in state court after dropping a federal suit.

By LARRY KELLER
Palm Beach Post Staff Writer

WEST PALM BEACH — A former Palm Beach Community College student who police say procured underage girls to give Jeffrey Epstein sexual massages at his Palm Beach mansion, and Epstein's personal assistant have been sued along with Epstein over their alleged conduct.

The girl behind the lawsuit was 14 years old when she contends he engaged in sexual conduct with her after she went to his waterfront home in 2005 to give him a massage. Her lawsuit, filed under the name Jane Doe, seeks unspecified damages from Epstein for sexual assault and intentional infliction of emotional distress.

She also sued Epstein, [redacted] of Loxahatchee and [redacted] of New York City on grounds of conspiracy and civil racketeering.

"We just want a full measure of justice for this girl," said her attorney, Ted Leopold.

[redacted] who attended Palm Beach Community College, was paid by Epstein to bring girls to his mansion for massages and more, according to Palm Beach police. "I'm like a Heidi Fleiss," they said she told them. Her attorney could not be reached immediately for comment.

[redacted] was an Epstein personal assistant who arranged the encounters, even escorting the girls to his massage room, police alleged.



Epstein

"These two conspired with him to help with the criminal enterprise," Leopold said.

Jane Doe, through her father and stepmother, filed a federal lawsuit against Epstein in January. She dismissed it after her mother said she wasn't consulted about the litigation and sought to intervene. The

mother is acting on her daughter's behalf in the latest lawsuit.

Epstein's lawyer has denied the girl's allegations and said her family is simply attempting to get money from a very rich man. Epstein, 55, is a Manhattan money manager who has homes there, in New Mexico and the Virgin Islands, in addition to his \$8.5 million Palm Beach mansion.

Two other Jane Does have sued Epstein in federal court this year, making similar allegations to those of the first Jane Doe. Those cases remain active.

Also pending against Epstein in state court is a felony charge of solicitation of prostitution arising from the same alleged incidents with several girls. That case is set for trial in July, two years after he was indicted.

Jane Doe's new lawsuit, filed in Palm Beach County Circuit Court, is the most explicit in detailing Epstein's alleged misconduct. It is the only suit to include [redacted] and [redacted] as defendants, and the only one to make conspiracy and racketeering allegations.

Jane Doe will turn 18 in May. She lives with other family members in Palm Beach County, is nearing graduation from high school and is working part time, Leopold said.

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"6"

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No monitoring device for Epstein

'Difficult part in his life is ending,' says attorney for sex offender released from jail. Victims say sentence too short.

By **MICHELE DARGAN**

Daily News Staff Writer

Convicted sex offender Jeffrey Epstein, released from jail shortly after 6 a.m. Wednesday, will not be tracked by an electronic monitoring device during his one-year probation, ac-

ording to a court order.

Epstein, who served less than 13 months of his 18-month sentence at the Palm Beach County Stockade, will serve one year of probation at his El Brillo Way home. He already has registered as a sex offender.

In addition, Epstein, who has been

out of jail on work release for 16 hours a day, six days a week since October, has been going to his Palm Beach home as well as his West Palm Beach office for the past two weeks.

His attorney, Jack Goldberger, as well as Palm Beach County Sheriff's Office records confirm that Epstein has been to his home on several occasions. Goldberger said Epstein was given PBSO permission to be at home for specific time periods in order to make the transition from jail to his home.

The plea agreement stipulated that Epstein, a billionaire financier, would not be placed on electronic monitoring, Goldberger said. An earlier court order incorrectly had him listed as having to be monitored.

"A very difficult part in his life is ending, and he is looking forward to moving on," Goldberger said.

Epstein, 56, pleaded guilty to procuring a minor for prostitution and so-

Please see **EPSTEIN, Page A6**



Epstein

Served less than 13 months.

"H"

EPSTEIN

Civil lawsuits pending

From Page A1

liciting prostitution.

More than a dozen young women, who were minors at the time of their encounters, are suing Epstein for sexual abuse. Among them: Jane Doe No. 3 and Jane Doe No. 5, who both say they fear Epstein and believe he should have gotten a much harsher sentence. Both women have filed federal lawsuits.

Doe No. 3, who was 16 at the time of her encounter with Epstein, said she was shocked to learn Sunday that the Palm Beach resident was getting out of jail early. She said she also didn't find out he was on work release until months after the fact.

'I'm afraid of seeing him'

"I'm scared to go to Palm Beach because I'm afraid of seeing him out in public," said Doe No. 3, now 21. "They say, 'once a sex offender, always a sex offender.' What makes them think he won't do it again? I'm afraid for future victims. I believe every one of his victims is grieving and the justice system did not do justice for his victims."

Doe No. 5 was 16 at the time of her one encounter. She is now 22

and has a young daughter, whom she wants to protect.

"It's really upsetting to me," she said. "I'm scared. He's such a powerful man, and I don't know what he's capable of. I would have liked to see him get a longer jail term. He just got a slap on the wrist and what he has done to all of us is never going to leave us."

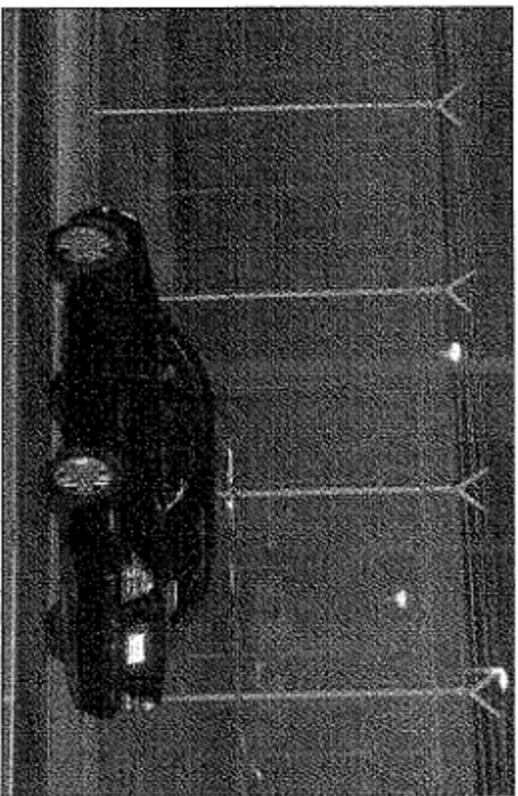
She said that she gets upset when she hears people accuse the victims of being all about the money.

"It's about getting justice," she said. "He's acting like he's the victim and he walks away. I couldn't talk about it for a long time. I have flashbacks. I thought it was all my fault for a long time and that's the way he wanted me to feel."

Miami attorneys Adam Horowitz and Stuart Mermelstein represent Jane Does No. 2 through No. 8 in federal lawsuits.

"We're outraged that a registered sex offender has such a short sentence," Horowitz said. "They put people in jail for longer periods of time for much lesser offenses. Through his guilty admission he has acknowledged that he's a sex offender. Our clients have a life sentence of dealing with his abuse and he gets a slap on the wrist."

West Palm Beach attorney Spencer Kuvvin represented Jane Doe No. 1, who has settled her lawsuit. Kuvvin said he could not disclose the amount because of a



Palm Beach Post Photo by Lannis Waters

Jeffrey Epstein is whisked away from the Palm Beach County Jail shortly after 6 a.m. Wednesday. Epstein left the jail through the sally port, where prisoners are brought in, rather than through the main doors where confidentiality agreement. But he did say that she didn't want to be in the public eye anymore.

"She was not happy with the resolution," Kuvvin said, "but she wanted it over. He's got investigators in the civil cases trying to dig up dirt on every one of his accusers. The disgusting thing is that he pleads the fifth on everything that's been asked of him and now he demands these girls' lives become an open book."

Attorney: Victim 'petrified'

Kuvvin has a pending lawsuit

in state court, representing victim Kuvvin said his client is "petrified" about Epstein's release.

"A man with unlimited wealth can hire people to follow her, dig into every crevice of her personal life and re-victimize her all over again. A convicted pedophile released on the streets? This would never, ever happen if this was someone of normal or lesser financial means. He absolutely got special treatment because he's wealthy."

— mdargan@pbdailynews.com

PROBATION CONDITIONS

Conditions of Jeffrey Epstein's one-year probation:

- Must register as a sex offender.
- Will not be electronically monitored.
- Shall have no unsupervised conduct with minors, and the supervising adult must be approved by the Department of Corrections.
- Shall submit to a mandatory curfew from 10 p.m. to 6 a.m.
- Shall not live within 1,000 feet of a school, day care center, park, playground or other place where children regularly congregate.
- Shall not have any contact with the victims directly or indirectly, including through a third person.
- Shall not view, own or possess obscene, pornographic or sexually stimulating visual or auditory material.
- Shall not work or volunteer in any school, day care center, park, playground or other place where children regularly congregate.
- Shall meet with probation officer a minimum of once a week.
- Shall submit to a warrantless search by probation officer of person, residence or vehicle.

Source: Court file