

IN THE CIRCUIT COURT OF THE FIFTEENTH
JUDICIAL CIRCUIT, IN AND FOR PALM BEACH
COUNTY, FLORIDA
CASE NO.

2008CF009381A
STATE OF FLORIDA

vs.

JEFFREY EPSTEIN,
Defendant.

/

MOTION TO MODIFY SUPERVISION

COMES NOW the Defendant, JEFFREY EPSTEIN, by and through his undersigned attorney and moves this Honorable Court to enter an Order modifying the Defendant's category of supervision. In support thereof the Defendant would state as follows:

1.. Florida Statute 948.10 sets forth a legislative policy that encourages a reduction of the level of supervision from community control to probation prior to the expiration of the term of supervision originally ordered by the Court in appropriate circumstances.

2. In considering a petition to modify supervision from community control to probation, Florida Statute 948.10 specifically directs the Court to consider the following factors:

A. The limited staff resources committed to the community control program.

B.The offender's successful compliance with the conditions set forth in the Order of the Court

3. On July 22, 2009, the Defendant was placed on community control I (the least restrictive non-monitored type of community control).

4. The Defendant has been in complete compliance at all times with the terms of his supervision control since being placed on community control.

5. The Defendant will have completed one half of his term of community control on January 22, 2010.

.

6. The Defendant has completed all his special conditions of supervision.

7. Undersigned counsel for the Defendant has spoken to the Defendant's community control officer, Carmen Sloane, who has indicated that the Defendant's conduct on community control has been in compliance with all terms, conditions, and rules of supervision without any violations.

8. Additionally, prior to the Defendant's being released on community control, the Defendant served a jail sentence at the Palm Beach County Jail. For approximately sixmonths of the Defendant's jail sentence, the Defendant was granted work release.

9. The Defendant completed his jail sentence with the work release component without violation and with conduct described by his work release supervisor as "exemplary".

10. Given the Defendant's conduct while in jail, while on work release, and while on

community control, the Defendant is not in need of the heightened supervision and cost to the community of community control and can be supervised meaningfully for the remaining months of his supervision under normal probation with whatever special conditions the Court deems appropriate.

WHEREFORE, the Defendant moves this Honorable Court to enter an Order modifying the Defendant's supervision.

I HEREBY CERTIFY that a copy of the foregoing has been furnished by mail to Barbara Burns, Esquire, State Attorney's Office, 401 North Dixie Highway, West Palm

Beach, Florida 33401 and to Carmen Sloane, Department of Corrections, 423 Fern Street,

West Palm Beach, Florida 33401, this day of December, 2009.

JACK A. GOLDBERGER, ESQ.

Atterbury, Goldberger & Weiss, P.A.

250 Australian Avenue South

Suite 1400

West Palm Beach, Florida 33401


Florida Bar No. 262013