

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

B.B.,

CASE NO. 502008CA037319XXXXMB AB

Plaintiff,

v.

JEFFREY EPSTEIN,

and [REDACTED]

Defendants.

NOTICE OF TAKING DEPOSITION
DUCES TECUM

PLEASE TAKE NOTICE that the undersigned attorney will take the deposition duces tecum (See attached Exhibit "A") of:

DEPONENT

DATE & TIME

LOCATION OF DEPOSITION

Det. Joseph Recarey
c/o Joanne M. O'Conner, Esq.
Jones, Foster, Johnson
& Stubbs, P.A.
505 S. Flagler Drive, #1100
West Palm Beach, FL 33401

February 25, 2010
at 9:30 AM

Prose Court Reporting
One Clearlake Centre
250 Australian Avenue South
West Palm Beach, FL 33401

upon oral examination, before Prose Court Reporting, a Notary Public, or any other officer authorized by law to take depositions in the State of Florida. The oral examination is being taken for the purpose of discovery, for use at trial, or for such other purposes as are permitted under the applicable Statutes of Rules of Court.

Certificate of Service

I HEREBY CERTIFY that a true copy of the foregoing was sent by U.S. Mail to the following addressees on this 3rd day of February, 2010:

Theodore J. Leopold, Esq.
Spencer T. Kuvin, Esq.
Leopold-Kuvin, P.A.
2925 PGA Blvd., Suite 200

Jack Alan Goldberger, Esq.
Atterbury Goldberger & Weiss, P.A.
250 Australian Avenue South
Suite 1400

B.B. v. Epstein, et al.
Page 2

Palm Beach Gardens, FL 33410
Fax: [REDACTED]
Counsel for Plaintiff

West Palm Beach, FL 33401-5012
Fax: [REDACTED]
Co-Counsel for Defendant Jeffrey Epstein

BURMAN, CRITTON, LUTTIER & COLEMAN, LLP
515 N. Flagler Drive, Suite 400
West Palm Beach, FL 33401

[REDACTED]

Fax

By: _____

Robert D. Critton, Jr.
Florida Bar #224162
Michael J. Pike
Florida Bar #617296

(Counsel for Defendant Jeffrey Epstein)

EXHIBIT "A"

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.
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.
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.
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.
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.
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.
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.

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.
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."*
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.
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
 - [REDACTED] e. January 1, 2008-December 31, 2008
 - f. January 1, 2009-today's date.
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.
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.
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.
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
 - [REDACTED] e. January 1, 2008-December 31, 2008
 - f. January 1, 2009-today's date.
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.

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.
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.
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 thorough and including today.
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.
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.

*** The initials A.H. and S.R. 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].**

**** Should you need the full identity of Jane Doe #4, please contact Jessica Cadwell at 561-842-2820.**