

EXHIBIT

120



ATTERBURY GOLDBERGER & WEISS, P.A.

JOSEPH R. ATTERBURY

JACK A. GOLDBERGER

JASON S. WEISS

Board Certified Criminal Trial Attorney
Member of New Jersey & Florida Bars

July 21, 2008

A. Marie Villafana, AUSA
U.S. Department of Justice
United States Attorney
Southern District of Florida
500 South Australian Avenue, Suite 400
West Palm Beach, Florida 33401

SENT VIA FACSIMILE
(561) 820-8777

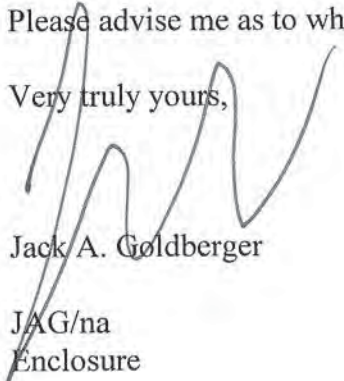
Re: Jeffrey Epstein

Dear Ms. Villafana,

Enclosed please find a Motion For Return of Property that I filed in Mr. Epstein's state case. Out of abundance of caution, I am providing you a copy of the motion.

Please advise me as to what your position is on this matter.

Very truly yours,



Jack A. Goldberger

JAG/na
Enclosure

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

STATE OF FLORIDA

CASE NO.: 2006CF009454AXX
DIVISION: "W"

vs.

JEFFREY EPSTEIN,

Defendant.

DEFENDANT'S MOTION FOR RETURN OF PROPERTY

COMES NOW the Defendant, JEFFREY EPSTEIN, by and through his undersigned attorney, and moves this Honorable Court to enter an Order for return of property seized on October 20, 2005 during execution of a search warrant at the Defendant's residence. In support thereof the Defendant states as follows:

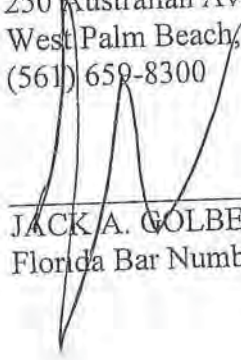
1. On October 20, 2005, the Palm Beach Police Department executed a search warrant at the Defendant's residence. During the execution of the warrant, numerous items of the Defendant's personal property were seized and impounded by the Palm Beach Police Department. A copy of the search warrant return is attached to this motion (Exhibit A).
2. On June 30, 2008, the criminal charges arising from the search warrant were resolved through a negotiated plea agreement.
3. No legal justification exists for the continued impoundment of the Defendant's personal property. The Defendant is entitled to the return of all personal property listed in Exhibit A.

WHEREFORE, the Defendant, JEFFREY EPSTEIN, respectfully requests this Honorable Court to enter an Order for the return of his personal property.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing Motion was sent via FAX and U.S. MAIL to Lanna Belohlavek, Esq., Assistant State Attorney, 401 North Dixie Highway, West Palm Beach, Florida 33401, this 21st day of July, 2008.

ATTERBURY, GOLDBERGER & WEISS, P.A.
250 Australian Avenue South, Suite 1400
West Palm Beach, Florida 33401
(561) 659-8300



JACK A. GOLBERGER, ESQUIRE
Florida Bar Number 262013

FLM BEACH POLICE DEPARTMENT PROPERTY RECEIPT SEARCH WARRANT RETURN

Pg 1 of 6
DETECTIVE BUREAU

PBR Form #52

☐ PROPERTY	☐ FOUND	☐ DECEASED (Probated)	☐ PERSONAL	☐ CONFISCATED	☐ DESTROY
☒ EVIDENCE	☒ TRIAL	☐ LABORATORY	☐ STOLEN/RECOVERED	☐ OTHER	
INCIDENT/CITATION NUMBER 05-368		DATE/TIME RECOVERED 10-20-2005		PROPERTY NUMBER (Leave Blank) 05-1024	
BIN NUMBER (Leave Blank)					
ADDRESS WHERE PROPERTY IMPOUNDED 258 FL Brillo					
DISCOVERED BY / D.O.B.		ADDRESS Street City Zip		PHONE NUMBER	
OWNER / VICTIM'S NAME / D.O.B.		ADDRESS Street City Zip		PHONE NUMBER	
SUSPECT'S NAME / D.O.B. Epstein Jeff		ADDRESS Street City Zip 358 FL Brillo		PHONE	
ADDITIONAL SUSPECT / D.O.B.		ADDRESS Street City Zip		PHONE	
SPECIAL INSTRUCTIONS				FOUND PROPERTY 90 DAYS CLAIM ☐ NOT CLAIM ☐	

EXHIBIT

"A"

ITEM #	QUANTITY	VALUE	DESCRIPTION
1	1		Phone message book (Kitchen)
2	3		Phone message book (Office off kitchen)
3	3		file folder (messages) w/ 2 more files (Purse)
4	1		shredded paper (office off kitchen)
5	1		orange file folder marked "massage"
6	1		* items 2-5 from office off kitchen
7	1		Beige massage table off from closet
8	1		Brown massage table foyer
9	1		Black Framed Photo of nude girl
10	99		Pictures in frame - 10-16-8 from about
11	1		1 from Yellow/Blue room off kitchen (foyer)
12	8		Photos from office off Pool area
13	2		Photos from table on left - 1 from room off
14	2		Photos table on right - 1 from Pool area
TOTAL PACKAGE WEIGHT			

I hereby acknowledge that the above list represents all property taken from me and that I have received a copy of this receipt.

I hereby acknowledge that the above list represents all property impounded by me in the official performance of my duty as a police officer.

SIGNATURE

DATE

SIGNATURE

ID#

UNIT

RECEIVED BY

REASON

DATE/TIME RECEIVED

I, Joseph Recarey, the officer by whom this warrant was executed, do swear that the above inventory contains a true and detailed account of all the property taken by me, under the authority of this warrant.

Sworn to and subscribed before me

this 21 day of October 2005.

08-80736-CV-MARRA

7915 DZ

John A. Burns

RFP WPB 000484

M BEACH POLICE DEPARTMENT

PAGE 2 OF 6

PROPERTY RECEIPT
SEARCH WARRANT RETURN

DETECTIVE BUREAU

PBPD Form #52

☐ PROPERTY	☐ FOUND	☐ DECEASED (Probated)	☐ PERSONAL	☐ CONFISCATED	☐ DESTROY
☒ EVIDENCE	☒ TRIAL	☐ LABORATORY	☐ STOLEN/RECOVERED	☐ OTHER	
INCIDENT/CITATION NUMBER 05-368	DATE/TIME RECOVERED 10-20-05	PROPERTY NUMBER (Leave Blank) 05-1024	BIN NUMBER (Leave Blank)		
ADDRESS WHERE PROPERTY IMPOUNDED 358 EL-Brillo					
DISCOVERED BY / D.O.B.	ADDRESS	Street	City	Zip	PHONE NUMBER
OWNER / VICTIM'S NAME / D.O.B.	ADDRESS	Street	City	Zip	PHONE NUMBER
SUSPECT'S NAME / D.O.B. Foster, Jeff 01-20-53	ADDRESS	Street	City	Zip	PHONE NUMBER
ADD'L SUSPECT / D.O.B.	ADDRESS	Street	City	Zip	PHONE NUMBER
SPECIAL INSTRUCTIONS				FOUND PROPERTY 90 DAYS	CLAIM ☐ NOT CLAIM ☐

ITEM #	QUANTITY	VALUE	DESCRIPTION
13	2	✓	VHS tapes from (r data By roof
14	2	*	CD's - Ricki La Voie, Brindley
15	3		Photos framed from Calsona
16	1	✓	message book 1st floor S/W corner (top disk)
17	1	✓	message book (from inside)
18	3	✓	CD's from desk
19	1	*	DVD from desk (Items # 18-19, 20, 21)
20	unframed		Photos from desk from 1st floor S.W.
21	2		framed Photos from desk
22	2		framed Photos from table in S/W corner office
23	3		Soap on Rope (NE Bedroom) (wh. to room)
24	2		Twin Torpedo in Brown box
25	2		Soap on Rope (middle Bedroom) (Bathroom)
26	1		Large framed Picture (from foyer into Master Bedroom)
TOTAL PACKAGE WEIGHT			

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REASON

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08-80736-CV-MARRA

RFP WPB 000485

LM BEACH POLICE DEPARTMENT PROPERTY RECEIPT SEARCH WARRANT RETURN

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DETECTIVE BUREAU

PBPD Form #52

☐ PROPERTY	☐ FOUND	☐ DECEASED (Probated)	☐ PERSONAL	☐ CONFISCATED	☐ DESTROY
☒ EVIDENCE	☒ TRIAL	☐ LABORATORY	☐ STOLEN/RECOVERED	☐ OTHER	Lab
INCIDENT/CITATION NUMBER 05-368		DATE/TIME RECOVERED 10-20-05		PROPERTY NUMBER (Leave Blank) 05-1024	
ADDRESS WHERE PROPERTY IMPOUNDED 358 EL Brillo					
DISCOVERED BY / D.O.B.		ADDRESS Street City Zip		PHONE NUMBER	
OWNER / VICTIM'S NAME / D.O.B.		ADDRESS Street City Zip		PHONE NUMBER	
SUSPECT'S NAME / D.O.B. 01-20-53 Epstein Jeff		ADDRESS Street City Zip 358 EL Brillo		PHONE NUMBER	
ADD'L SUSPECT / D.O.B.		ADDRESS Street City Zip		PHONE NUMBER	
SPECIAL INSTRUCTIONS				FOUND PROPERTY 90 DAYS CLAIM ☐ NOT CLAIM ☐	

ITEM #	QUANTITY	VALUE	DESCRIPTION
27	1	NCV	School TRANSCRIPT, ALEXANDER HALL, MASTER BEDROOM DESK
28	1	NCV	BOTTLE OF TOY JELLY, MASTER BEDROOM CROCHING MASTER BEDROOM
29	3	NCV	VIDEOTAPES 1/2", SEX IN CITY, EATING JANINE, I LOVE LESBIANS FOUR, MASTER R. Bedroom
30	6	NCV	FRAMED PHOTOS FROM MEN'S BATHROOM - MASTER BEDROOM
31	1	NCV	GREEN MASSAGE TABLE, MEN'S BATHROOM - MASTER BEDROOM → DNA test 3-11-09
32	1	NCV	THRIFTY RENTAL AGREEMENT FROM CHEVROLET SUBURBAN (COPIED)
33	1	NCV	NOTE FROM JOHANNA FROM CHEVROLET SUBURBAN
34	11	CD'S	CD'S from office of kitchen
35	6	ZIP CD'S	ZIP CD'S from Book case RETURN
36	2	8MM Video	8MM Video tapes from Book case RETURN
37	4	Compact flash cards	Compact flash cards from Book case RETURN
38	1	flash card	flash card from camera on book case RETURN TO owner
39	3	ZIP CD'S	ZIP CD'S from Book case RETURN
40	30	CD'S	CD'S from Book case (items 35-40 from guest house) RETURN
TOTAL PACKAGE WEIGHT			

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SIGNATURE

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UNIT

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REASON

DATE/TIME RECEIVED

LM BEACH POLICE DEPARTMENT
PROPERTY RECEIPT

PAGE 4 of 6

DETECTIVE BUREAU

PBPD Form #52

SEARCH WARRANT RETURN

☐ PROPERTY	☐ FOUND	☐ DECEASED (Probated)	☐ PERSONAL	☐ CONFISCATED	☐ DESTROY
☒ EVIDENCE	☒ TRIAL	☐ LABORATORY	☐ STOLEN/RECOVERED	☐ OTHER	Lab
INCIDENT/CITATION NUMBER 05-368		DATE/TIME RECOVERED 10-20-05		PROPERTY NUMBER (Leave Blank) 05-1024	
BIN NUMBER (Leave Blank)					
ADDRESS WHERE PROPERTY IMPOUNDED 258 E1 Brillo					
DISCOVERED BY / D.O.B.		ADDRESS Street City Zip		PHONE NUMBER	
OWNER'S NAME / D.O.B.		ADDRESS Street City Zip		PHONE NUMBER	
SUSPECT'S NAME / D.O.B. Epstein, Jeff 01-20-53		ADDRESS Street City Zip 358 E1 Brillo		PHONE NUMBER	
ADD'L SUSPECT / D.O.B.		ADDRESS Street City Zip		PHONE NUMBER	
SPECIAL INSTRUCTIONS				FOUND PROPERTY CLAIM ☐ 90 DAYS NOT CLAIM ☐	

ITEM #	QUANTITY	VALUE	DESCRIPTION
41	11	✓	Floppy disks from desk middle shelf RETURN
42	1	✗	ZIP Drive disk from guest room RETURN
43	1		Power Cord for CPU from guest room
44	1		CPU from Guest Bedroom
45	10	✓	8mm video Tapes in Guest Bedroom RETURN
46	1	✓	Maxell CD-R in guest bedroom RETURN (COPIES)
47	10	✗	Disks in clear Box RETURN
48	7		ZIP Disks from guest room RETURN
49	1		Items # 35-48 from guest bedroom
50	1		message book from guest house office RETURN
51	2		compact flash cards from RETURN
52	6		CD's RETURN #49-51 from guest house office
53	1		CPU from guest house office RETURN
TOTAL PACKAGE WEIGHT			

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REASON

DATE/TIME RECEIVED

08-80736-CV-MARRA

RFP WPB 000487

RFP WPB 000489