

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

STATE OF FLORIDA

Case No. 50-2006-CF-009454-A

-VS-

Jeffrey Epstein

Defendant(s)

MOTION FOR AN ORDER UNSEALING GRAND JURY TESTIMONY

COMES NOW the State of Florida, by and through its undersigned Assistant State Attorney, and pursuant to Florida Statute 905.27 (1), moves this court to enter an order authorizing the unsealing of grand jury testimony. The State further requests this court to enter an order authorizing FDLE Agent Troy K. Cope, Members of the FDLE Office of Executive Investigations Public Corruption Unit, State Attorney Bruce Colton and his assigned assistants to obtain recordings of the entire grand jury in the above captioned matter from the Palm Beach Clerk of Court and authorize the transcription of same. This motion refers specifically to the Palm Beach County Grand Jury proceedings involving the indictment dated July 19, 2006 of Jeffrey Epstein for Felony Solicitation of Prostitution.

As grounds in support of this motion, the State asserts the following:

1. 905.27(1) Florida Statutes (2019) prohibits the disclosure of the testimony of a witness examined before the grand jury or other evidence received by it.
2. An exception to the rule against non-disclosure exists when disclosure is required for the furthering of justice. 905.27(1)(c) Florida Statutes (2019).
3. On August 6, 2019, Ron DeSantis, Governor of the State of Florida, authorized the Florida Department of Law Enforcement to initiate a preliminary inquiry beyond the work release of Jeffrey Epstein and into other irregularities surrounding the prior State investigation and the ultimate plea agreement. See Exhibit A, Executive Order Number 19-183.
4. Inspector Troy K. Cope and the Office of Executive Investigations Public Corruption Unit has been assigned to spearhead the investigation on behalf of the Florida Department of Law Enforcement.
5. The aforementioned executive order assigned Bruce H. Colton, State Attorney for the Nineteenth Judicial Circuit of Florida, to assist in the investigation, prosecution and all allegations related to Jeffrey Epstein and his assigned work release program and other irregularities.

6. Bruce H. Colton assigned Assistant State Attorneys Lev Evans and Anastasia Norman to assist the Florida Department of Law Enforcement in the execution to this executive assignment.
7. A review of the Palm Beach County Clerk of Court's file in Case No. 2006CF9454AXX and 2008CF009381AXX indicate that Jeffrey Epstein was charged, in part, via grand jury indictment. See Attached Indictment, Exhibit B.
8. A review of the grand jury testimony is necessary to fulfill Governor DeSantis' assignment and required in the furtherance of justice.

WHEREFORE, the State respectfully requests this Honorable Court enter an order granting the State's Motion as requested above.

I HEREBY CERTIFY that a true copy of the foregoing has been furnished to, Jack A. Goldberger, by eservice/email at the designated email address of jgoldberger@agwpa.com, smahoney@agwpa.com; Attorney Robert D. Critton, by email at the designated email address of rcrit@lawclc.com; Sharon R. Bock, Clerk and Comptroller of Palm Beach County by mail at 205 N Dixie Hwy, West Palm Beach, FL 33401; Attorney Spencer T. Kuvin by email at the designated email address of skuvin@800goldlaw.com; Attorney Bradley J. Edwards, by email at the designated email address of brad@epllc.com; Attorney Jeffrey M. Herman by email at the designated email address of jherman@hermanlaw.com; Theodore J. Leopold, by email at the designated email address of tleopold@cohenmilstein.com; A.H. by US mail at confidential address; A.D. by US mail at confidential address; S.G. by US mail at confidential address; Gregory Parkinson by US mail at 7022 Venetian Way, West Palm Beach, FL 33406, on December 10, 2019.

RESPECTFULLY SUBMITTED
BRUCE H. COLTON, State Attorney

By: /s/ M. Levering Evans
M. Levering Evans
Assistant State Attorney
FL Bar#: 708828
411 S. 2nd Street
Fort Pierce, FL 34950
(772) 465-3000
Designated eService address:
SA19eService@sao19.org

STATE OF FLORIDA

OFFICE OF THE GOVERNOR

EXECUTIVE ORDER NUMBER 19-183

WHEREAS, in 2008, Jeffrey Epstein pled guilty to procuring a person under 18 for prostitution and felony solicitation of prostitution in Palm Beach County, following state and federal investigations, and was later placed on work release; and

WHEREAS, the State Attorney Office for Palm Beach County handled the case related to the state investigation concerning Jeffrey Epstein; and

WHEREAS, the Sheriff for Palm Beach County oversaw the work release of Jeffrey Epstein; and

WHEREAS, the Sheriff for Palm Beach County has initiated a criminal investigation concerning Jeffrey Epstein and has requested of me that the Florida Department of Law Enforcement now assume that investigation; and

WHEREAS, the Department of Law Enforcement may initiate a preliminary inquiry beyond the work release of Jeffrey Epstein and into other irregularities surrounding the prior state investigation and the ultimate plea agreement; and

WHEREAS, the Honorable BRUCE H. COLTON, State Attorney for the Nineteenth Judicial Circuit of Florida, has agreed to accept an executive assignment for any proceedings that arise from the Department of Law Enforcement investigation and inquiry in this matter; and

WHEREAS, for good and sufficient reason, the Governor has determined it is in the best interests of the State of Florida and of the ends of justice that the Honorable BRUCE H.

COLTON discharge the duties of the Honorable DAVID ARONBERG, pursuant to section 27.14, Florida Statutes.

NOW, THEREFORE, I, RON DESANTIS, Governor of Florida, in obedience to my solemn constitutional duty to "take care that the laws be faithfully executed," and pursuant to the Constitution and laws of the State of Florida, issue the following Executive Order, effective immediately:

Section 1.

The Honorable BRUCE H. COLTON, State Attorney for the Nineteenth Judicial Circuit of Florida, referred to as the "Assigned State Attorney," is assigned to discharge the duties of the Honorable DAVID ARONBERG, State Attorney for the Fifteenth Judicial Circuit of Florida, as they relate to the investigation, prosecution, and all matters related to allegations related to Jeffrey Epstein and his assigned work release program and other irregularities.

Section 2.

The Assigned State Attorney or one or more Assistant State Attorneys and Investigators, who have been designated by the Assigned State Attorney, shall proceed immediately to the Fifteenth Judicial Circuit of Florida, and are vested with the authority to perform the duties prescribed herein.

Section 3.

All residents of the Fifteenth Judicial Circuit are requested, and all public officials are directed, to cooperate and render whatever assistance is necessary to the Assigned State Attorney, so that justice may be served.

Section 4.

The period of this Executive Assignment shall be for one (1) year, to and including August 6, 2020.

Section 5.

The Assigned State Attorney shall notify the Governor on or before July 6, 2020, if additional time is required.



IN TESTIMONY WHEREOF, I have hereunto set my hand and have caused the Great Seal of the State of Florida to be affixed at Tallahassee, this 6th day of August, 2019.


RON DESANTIS, GOVERNOR

ATTEST:


SECRETARY OF STATE

FILED
2019 AUG -6 PM 1:20
TALLAHASSEE, FLORIDA

INDICTMENT

Exhibit B

A TRUE BILL

06-9454CF
A-2

SHARON FIDBOCK, CLERK
PALM BEACH COUNTY, FLORIDA
CIRCUIT COURT

05 JUL 19 PM 2:4

FILED

IN THE NAME OF AND BY THE AUTHORITY OF THE STATE OF FLORIDA

IN THE CIRCUIT COURT OF THE FIFTEENTH JUDICIAL
CIRCUIT OF THE STATE OF FLORIDA

For Palm Beach County, at the Spring Term thereof, in the year of our Lord Two Thousand and Six, to-wit:
The Grand Jurors of the State of Florida, inquiring in and for the body of said County of Palm Beach, upon their
oaths do present that JEFFREY E. EPSTEIN in the County of Palm Beach aforesaid, in the Circuit and State
aforesaid,

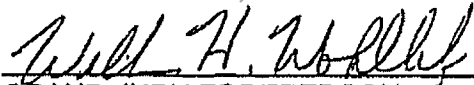
COUNT ONE FELONY SOLICITATION OF PROSTITUTION

on or about or between the 1st day of August in the year of our Lord Two Thousand and Four and October 31,
2005, did solicit, induce, entice, or procure another to commit prostitution lewdness, or assignation, contrary to
Florida Statute 796.07(1) on three or more occasions between August 01, 2004 and October 31, 2005,
contrary to Florida Statute 796.07(2)(f) and (4)(c). (3 DEG FEL)(LEVEL 1)

against the form of the statute, to the evil example of all others, and against the peace and dignity of the State
of Florida.

I hereby certify that I have advised the Grand Jury returning this indictment as authorized and required by law.


Assistant State Attorney of the
Fifteenth Judicial Circuit of the State
of Florida, prosecuting for the said
State


GRAND JURY FOREPERSON


DATE

Jeffrey E. Epstein, Race: White, Sex: Male, DOB: January 20, 1953, SS#: [REDACTED]; Issue Warrant

CAA RULE 2.5

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STATE OF FLORIDA

Case No. 50-2006-CF-009454-A

-VS-

Jeffrey Epstein

Defendant(s)

ORDER ON BRUCE COLTON'S MOTION TO UNSEAL GRAND JURY TESTIMONY

THIS CAUSE coming on to be heard on the State's Motion and the Court being otherwise fully advised in the premises, it is hereby;

ORDERED AND ADJUDGED that the State's Motion is hereby _____

DONE AND ORDERED West Palm Beach, Palm Beach County, Florida this ____ day of December, 2019.

Judge Jeffrey D. Gillen

cc: M. Levering Evans, Assistant State Attorney, SA19eService@sao19.org
Jack A. Goldberger, Defense Attorney, jgoldberger@agwpa.com, smahoney@agwpa.com
Attorney Robert D. Critton, rcrit@lawcl.com
Sharon R. Bock, Clerk and Comptroller of Palm Beach County, 205 N Dixie Hwy, West Palm Beach, FL 33401
Attorney Spencer T. Kuvin, skuvin@800goldlaw.com
Attorney Bradley J. Edwards, brad@epllc.com
Attorney Jeffrey M. Herman, jherman@hermanlaw.com
Theodore J. Leopold, tleopold@cohenmilstein.com
A.H., c/o Victim's Services, 19th Circuit State Attorney's Office, 411 S 2nd St, Fort Pierce, FL 34950
A.D., c/o Victim's Services, 19th Circuit State Attorney's Office, 411 S 2nd St, Fort Pierce, FL 34950
S.G., c/o Victim's Services, 19th Circuit State Attorney's Office, 411 S 2nd St, Fort Pierce, FL 34950
Gregory Parkinson, 7022 Venetian Way, West Palm Beach, FL 33406