

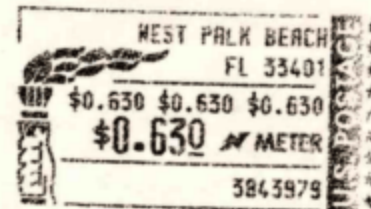
ATTERBURY GOLDBERGER



& WEISS, P.A.

250 Australian Avenue South, One Clearlake Centre
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State Attorney's Office
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JACK A. GOLDBERGER*†
SCOTT N. [REDACTED]*
JASON S. WEISS

*BOARD CERTIFIED CRIMINAL TRIAL ATTORNEY
†MEMBER OF NEW JERSEY & FLORIDA BARS

June 22, 2006

Barry Krischer
Florida State Attorney's Office
401 North Dixie Highway
West Palm Beach, FL 33401

Re: Jeffrey Epstein

Dear Mr. Krischer:

I write to you to confirm our meeting with Lanna on June 14, 2006. It is our hope that in light of the recent developments in this case which we have set forth in our letter of June 5, 2006, our meetings, and herein, in particular the fact that there is no sex alleged, this case can be disposed of with, at most, an informal agreement, or more appropriately, no charges being filed at all.

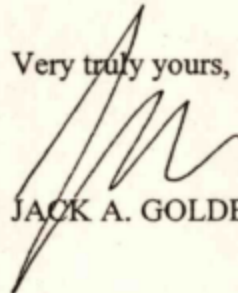
As you know, it was only at the June 1, 2006 meeting, after eight months of investigation, that you and I both learned, for the very first time, and I believe to our collective disbelief, that the allegation of the girl did not raise the slightest hint of actual sex. Up until that point, we had all been laboring under the assumption this girl had alleged multiple sexual encounters with my client. In fact, as you are aware, it was with this in mind that we hired [REDACTED] Slattery, a highly respected polygraph expert, who unequivocally confirmed our client's long held position both that there was no sex and that the girl clearly stated she was 18 years old. Since, we now know with certainty that there are in fact no allegations of sex, and no sex occurred between my client and this girl, I would ask you to consider your previous statements to the effect that you would not bring a "touching case" – NO sex, NO charge – in fashioning an appropriate resolution to this matter.

As we have discussed many times, the girl's credibility is highly questionable and has been severely undermined by her actions over the past few months in: (1) repeatedly changing her age on her web page (first 17, then 16, then 15) and posting graphic nude and suggestive photographs of herself; (2) boasting about shoplifting, underage drinking,

smoking, and having sex; (3) being observed by the police as clearly on drugs; and, (5) running away to an unsafe drug location. With this background, it has certainly taken a while to sort things out, but, the agreed to facts of this case are that: (1) this girl, was driven to my clients' home with the express and sole purpose of providing a topless massage; (2) she told my client she was 18 years old; (3) she received her agreed upon two hundred dollars; (4) before leaving she wrote down her phone number and stated next time she wanted to bring her twin sister along; (5) my client never saw her again; and, most importantly (6) no sex occurred. It was only several MONTHS later, that we are led to believe, one of her parents, both of whom have criminal records for fraud, contacted the police.

Finally, as you consider your options, I quite frankly think it unfair to give much weight to the pressure being brought to bear by law enforcement. Their comments which have been brought to my attention certainly indicate, at a minimum, a lack of objectivity. With all this in mind, I believe that it is only just, especially now that we are both certain there was no sex involved, that your office opt NOT to prosecute this case. However, given the totality of the circumstances, coupled with the fact that a "Google search" is now a "forever" reference on any job application, I believe that the girls involved, my client, and all concerned would be better served with at worst an informal resolution of this matter. Certainly it seems preferable to filing a charge that we all currently concede would likely not succeed if brought to trial. I appreciate the personal attention you have given to this matter, and look forward to you response.

Very truly yours,



JACK A. GOLDBERGER

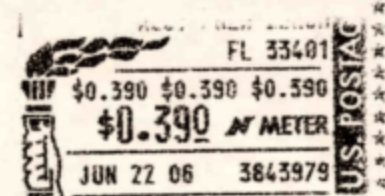
cc: Lanna Belohlavek, Esquire

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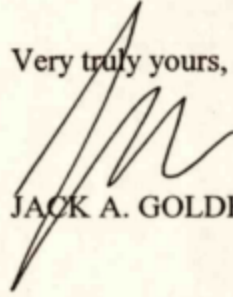
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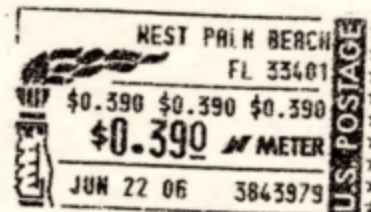
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[REDACTED] & WEISS, P.A.

A/G
R/W

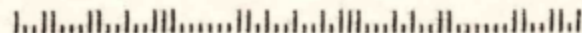
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FAX TRANSMITTAL COVER SHEET

DATE: June 16, 2006

TO: Lanna Belohlavek, Esquire

FAX: 355-7302

FROM: Jessica Cadwell, Assistant to Jack A. Goldberger, Esq.

RE: Epstein

REMARKS:

TOTAL PAGES: 8, including cover sheet

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FAITH A. [REDACTED]
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June 5, 2006

BY HAND

Lanna Belohlavek
Florida State Attorney's Office
401 North Dixie Highway
West Palm Beach, FL 33401

Re: Jeffrey Epstein

Dear Ms. Belohlavek:

As a follow up to our meeting of June 1, 2006, held in an attempt to resolve this matter, we write to address the following issues which have arisen: (1) the risk, were the client to plead to aggravated assault in Florida, that he might be subject to sex-offender registration statutes in other jurisdictions, now or in the future; (2) the nature of the charge of felony "aggravated assault with intent to commit a felony," and how it does not reflect the allegations herein; and, (3) whether a felony conviction itself is justified based on the available evidence.

At the outset of our June 1, 2006 meeting, we were mindful that an understanding had been reached with prior counsel. It was reached, however, with the clear and joint understanding that the client would not be subjected to sex offender registration requirements in any state or foreign jurisdiction. Moreover, the limited time provided did not allow for an opportunity to conduct an even cursory investigation or research into the ramifications. Were any charge to be brought, having now learned of the serious danger a plea to felony aggravated assault presents with regard to sex offender registration, coupled with the facts presented at our meeting and outlined below, we strongly believe that a plea to misdemeanor solicitation is the more appropriate resolution. As we discussed, this could include an agreed upon allocution, as we are mindful of your concern about labeling the girls "prostitutes." In this regard, as we discussed, the law and relevant statute are clear that the complaining witness need not be a "prostitute" in order to satisfy the elements of the offense.

Ms. Lanna Belohlavek

June 5, 2006

Page 2

I. *An Aggravated Assault Conviction Might Subject the Client to Sex-Registration*

There is a likely risk that a plea to aggravated assault, F.S.A. § 784.021(1)(b), will expose the client to registration obligations under the Megan's Law statutes, either as currently written, or as likely to be amended or expanded in the future, in a number of jurisdictions, including, but not limited to, ones where he lives, works, or spends time. This is true regardless of whether the plea expressly specifies that the felony he had the intent to commit was lewd and lascivious behavior under F.S.A. § 800.04 or sexual battery under F.S.A. § 794.011.

As my client is a full time resident of the Virgin Islands, the most immediate and obvious unintended result of a plea to felony aggravated assault is the possible registration in his place of residency. The Virgin Islands statute, 14 V.I.C. § 1722 *et seq.*, is very broad, imposing a duty to register upon a "person convicted ... on or after July 1, 1994 of a criminal offense against a minor". 14 V.I.C. § 1722(a) (emphasis added). Under § 1722 (c), "a person convicted ... in a federal, military or foreign court shall have the same duty to register as any other person under this statute." Failure to register is a crime. 14 V.I.C. § 1722(d). Further, while the Virgin Islands registry is currently accessible only to law enforcement, there are ongoing discussions about opening it to the public. *See*, Virgin Islands Daily News, May 15, 2006, at http://www.virginislandsdailynews.com/index.pl/article_home?id=17296624.¹

Under current law, a plea to aggravated assault will also likely subject the client to registration in his secondary domicile of New York. The list of registrable offenses in New York under the Sex Offender Registration Act (SORA) is a long one, which continues to grow. In 1999, eight new offenses were added to the list of registrable offenses, and again on March 11, 2002, seven new offenses were added.

¹ A non-exhaustive search has identified two other jurisdictions in which the client would appear to be subject to registration requirements simply on the basis of a plea, in Florida, to aggravated assault - Oklahoma and Montana.

Oklahoma requires the registration of persons convicted of assault with intent to commit a felony, in violation of 21 Okl. St. Ann. § 681 "if the offense involved sexual assault." *See*, 57 Okl. St. Ann. § 582 (A). Oklahoma law requires the registration, too, of persons convicted of an offense outside the jurisdiction which, if committed in the state, would constitute a registrable offense. 57 Okl. St. Ann. § 582(B).

Likewise, Montana requires registration of both sexual offenders and violent offenders. "Violent offenders" include persons convicted of any violent offense, which is expressly defined to include "aggravated assault" under MCA 45-05-202, or "any violation of a law of another state ... reasonably equivalent" to that crime. MCA 46-23-502(9).

Lanna Belohlavek

June 5, 2006

Page 3

In New York, a person must register as a sex offender if they are required to register in the jurisdiction of conviction or, if convicted in a foreign jurisdiction, his conviction there meets "all the essential elements" of New York's enumerated sexual offenses. See N.Y. Corr. Law §§ 168-1(2)(a)(I), (d), (3). In spite of the statutory reference to "essential elements," some New York courts have looked at the facts underlying the offense of conviction, rather than the formal elements of the offense, in determining whether registration is required. Each finding that a defendant was required to register on the basis of the underlying conduct even though the essential elements test was not satisfied. See, People v. Burden, 6 Misc.3d 1033(a)(Sup. Ct. Bronx Cty. 2005); People v. Millan, 189 Misc.2d 419, 730 N.Y.S.2d 392 (Sup. Ct. N.Y. Cty. 2001).

The same serious concern arises in other states, including California and Colorado, which authorize courts to look behind the plea, and beyond the formal elements of the offense of conviction, and enable them on a case by case basis to determine if registration is required.

Like New York, California requires an individual to register if they are required to register in the state of conviction, or pursuant to CA Penal Code § 290(a)(2)(D)(I) if that individual "... since July 1, 1944, has been, or is hereafter convicted in any other court, including any state, federal, or military court, of any offense that, if committed or attempted in this state, would have been punishable as one or more of the offenses described in subparagraph (A)". The wording of the statute leaves open the possibility that, in determining whether the offense would have been punishable as one or more of the registrable offenses, one looks at the underlying facts, and not at the formal elements of the crime to which the defendant pled. The registrable California offenses include commission of "any lewd or lascivious act ... upon or with the body of child" where the child is "14 or 15 years" of age and "that person is at least 10 years older than the child" "with the intent of arousing, appealing to, or gratifying the lust, passions, or sexual desires of that person or the child". CA Penal Code § 288(a), (c) (1). Thus, an aggravated assault plea may subject the client to a registration requirement in the State of California.

Colorado likewise has a very broad statute. It requires an individual to register within five business days of becoming a temporary or permanent resident of the state, if, among other things, the person has been convicted in Colorado or any other state of an offense involving sexual behavior (or an attempt, solicitation or conspiracy to commit such an offense), or if they are required to register in another state or jurisdiction for a sex offense. C.R.S.A. §§ 16-22-103, 16-22-108.

With regard to Florida, as you know, it is reasonably clear that under Florida's current version of Megan's Law, a plea to aggravated assault would not subject the client to registration in Florida since it is not included among the state's enumerated "sexual offender" offenses. See

Ms. Lanna Belohlavek
June 5, 2006
Page 4

F.S.A. §§ 943.0435, 784.021. However, the offense of sexual battery is on the list, as well as the charge of lewd and lascivious behavior, so there is no assurance that, in the future, a Florida prosecutor or court will not take the position that, where the aggravated assault is combined with what some states have labeled a "sexually motivated intent" registration is required.

Moreover, as you indicated at our meeting, there is no guarantee that the Florida legislature will not expand the category of persons subject to Megan's law, and expressly make persons convicted of aggravated assault subject to the law, especially where the felony the actor had the intent to commit is a sexual offense, and the victim is a minor. The trend today is towards expansion, not contraction, of these kinds of statutes, and as you noted, Florida will be no exception. See, e.g., "Sex Offenders; No More Escaping Registration," 36 McGeorge L. Rev. 822 2005 (Over the last twenty years expanded registration requirements, enhanced penalties for failure to register, and public notification provisions have enlarged the scope of sex offender registration laws); see news articles of just this past week *infra* describing many of the proscriptions being adopted around the nation. And, the ex post facto clause stands as no significant bar. See *v. Doe*, 538 U.S. 84 (2003) (upholding Alaska Sex Offender Registration Act against a challenge that its application to persons whose offenses were committed prior to its enactment would violate the ex post facto clause). If this trend continues, as it likely will, the client will almost certainly be subject to sex offender registration.

Even if the client is not and will never be subject to registration requirements under Florida's laws, a plea to aggravated assault under the circumstances of this case could subject him to Megan's Law requirements in other jurisdictions. Thus, if the client pleads guilty to the proposed aggravated assault charge, there is a grave risk that under existing state and Virgin Islands law – quite apart from future expansion or expansive construction of those laws – he will be subject to sex offender registration requirements and/or criminal exposure for failure to register. There is an even graver risk still that there will be future expansion of the statutes or expansive construction of them that will mean he is covered or arguably so. See, e.g., Cherry Sex Offender Ordinance Upheld, Courier Post, June 1, 2006, at <http://www.courierpostonline.com/apps/pbcs.dll/article?AID=/20060601/NEWS01/606010389/1006>;² More States Move to Use GPS Tracking of Sex Offenders, Fox News, May 31, 2006, at <http://www.foxnews.com/story/0,2933,196455,00.html>; Sex Offenders Sue City Over Park, Pools

² This article discusses a decision handed down by a municipal court judge in New Jersey during the course of our meeting. That decision upheld a zoning restriction on sex offenders living within 2500 feet of schools, playgrounds, public libraries, or day care centers. While other jurisdictions' zoning laws currently restrict such individuals from living within 1000 feet of these institutions, were they to follow the lead of Cherry, New Jersey, the client would most certainly be faced with the added burdens of selling his residences and moving in order to be in compliance with the law.

Ms. Lanna Belohlavek
June 5, 2006
Page 5

and Playgrounds Ban, Fox News, May 31, 2006, at
<http://www.foxnews.com/story/0,2933,197701,00.html>.

Indeed, as you recognized during our meeting, many people who were advised by competent counsel to plead guilty to offenses when registration was not required have now been horrified to find themselves subjected to registration laws enacted or expanded after their guilty pleas, without any recourse. See, [REDACTED] v. Doe, *supra*, 538 U.S. 84. Finally, although there is some risk that even a plea to a misdemeanor charge could trigger registration in some jurisdictions, our research suggests that this risk is considerably lower for a misdemeanor plea than for a felony plea.

II. Aggravated Assault is Generally Considered A Violent Felony And Does Not Apply to the Facts of This Case

Assault is generally considered an act of force. It "create[s] in the victims a well founded fear of imminent violence." *Velasquez v. State*, 654 So. 2d 1227, 1228 (Fla.2d DCA 1995). The general public is certainly not aware of Florida's unique nuanced definition. Indeed, as you will agree, in common usage, aggravated assault, on its face sounds inherently violent. Thus, at the very least, most people will consider an aggravated assault charge, even of the "intent to commit a felony" variety, to be a violent crime. In this regard, undifferentiated aggravated assault is one of only four crimes listed in the FBI's Uniform Crime Report "violent crime" category.³

More importantly, as noted, this crime clearly does not reflect what allegedly occurred since there has been no suggestion that a threat of serious bodily harm was made or a deadly weapon used. In addition, most pleas are "downward" – the defendant agrees to waive his right to trial in return for the prosecution's offer of a downward departure in charging or sentencing. Further, in the typical case a plea involves crimes that bear a close resemblance to the underlying events. The facts herein, obviously do not support a charge of aggravated assault, thus a plea to same would be inappropriate.

³ The UCR divides its statistics into three major categories: violent crimes, property crimes, and hate crimes. "Violent crime is composed of four offenses: murder and nonnegligent manslaughter, forcible rape, robbery, and aggravated assault." "Violent Crime," Crime in the United States, 2004, at http://www.fbi.gov/ucr/cius_04/offenses_reported/violent_crime/index.html.

Ms. Lanna Belohlavek
June 5, 2006
Page 6

III. *Since the Meeting on February 16, 2006 When Misdemeanor Charges Were Initially discussed, the State's Case has Gotten Considerably Weaker*

At the February 16, 2006 meeting, you suggested the Office was investigating a felony and you indicated you would consider pleading it down to a misdemeanor. As you are aware, since then much has happened which makes the alleged case considerably weaker and undermines the credibility of the witnesses upon which it was based. Indeed as you already know the following information has come to light severely damaging the reliability of the witnesses: (i) [REDACTED] background, including a history of theft, confessions and repeated denials of stealing from employers and customers, lying about her age, sexual promiscuity, and prostitution; (ii) [REDACTED] boastful admission of drug use, underage drinking, sexual activity, shoplifting, [REDACTED] exaggeration of her income (at least \$250,000), representing herself naked on a website and as 17 years old, then 16, then 15, only changing it to her truthful age, coincidentally four days before the last scheduled grand jury. In addition, as you have acknowledged, she was found in an inappropriate place in Georgia after the police were called when she ran away from home. This is separate and apart from the Florida police report presented to you, detailing her being dropped off by the local drug dealer at 5:45 a.m., only two days after returning to West Palm Beach, and being described by the officer as clearly on drugs; and (iii) both of [REDACTED] parents' criminal history of fraud.

In stark contrast to this is the fact that, as we indicated at the meeting, the client has passed both a rigorous lie detector test, conducted by the most highly qualified expert we could find, one whose reputation is beyond reproach, and provided you copies of two psycho-sexual evaluations prepared by experts that you have agreed are well-recognized and accepted by the State.

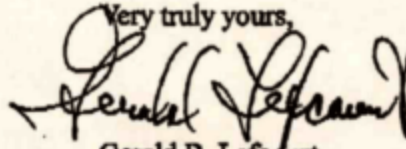
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Ms. Lanna Belohlavek
June 5, 2006
Page 7

IV. Conclusion

Under the circumstances of this case a plea to felony aggravated assault is both unwarranted and presents a grave risk the client will be brandished a sex offender, bearing the attendant burdens inherent with that classification. In light of this, and the credibility issues presented by the complaining witnesses, combined with the client's two psycho-sexual evaluations and lie detector tests, we believe that at the very most, a misdemeanor plea to solicitation is appropriate.

Very truly yours,



Gerald B. Lefcourt

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June 5, 2006

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Under current law, a plea to aggravated assault will also likely subject the client to registration in his secondary domicile of New York. The list of registrable offenses in New York under the Sex Offender Registration Act (SORA) is a long one, which continues to grow. In 1999, eight new offenses were added to the list of registrable offenses, and again on March 11, 2002, seven new offenses were added.

¹ A non-exhaustive search has identified two other jurisdictions in which the client would appear to be subject to registration requirements simply on the basis of a plea, in Florida, to aggravated assault - Oklahoma and Montana.

Oklahoma requires the registration of persons convicted of assault with intent to commit a felony, in violation of 21 Okl. St. Ann. § 681 "if the offense involved sexual assault." *See*, 57 Okl. St. Ann. § 582 (A). Oklahoma law requires the registration, too, of persons convicted of an offense outside the jurisdiction which, if committed in the state, would constitute a registrable offense. 57 Okl. St. Ann. § 582(B).

Likewise, Montana requires registration of both sexual offenders and violent offenders. "Violent offenders" include persons convicted of any violent offense, which is expressly defined to include "aggravated assault" under MCA 45-05-202, or "any violation of a law of another state ... reasonably equivalent" to that crime. MCA 46-23-502(9).

Ms. Lanna Belohlavek
June 5, 2006
Page 3

In New York, a person must register as a sex offender if they are required to register in the jurisdiction of conviction or, if convicted in a foreign jurisdiction, his conviction there meets "all the essential elements" of New York's enumerated sexual offenses. See, N.Y. Corr. Law §§ 168-1(2)(a)(I), (d), (3). In spite of the statutory reference to "essential elements," some New York courts have looked at the facts underlying the offense of conviction, rather than the formal elements of the offense, in determining whether registration is required. Each finding that a defendant was required to register on the basis of the underlying conduct even though the essential elements test was not satisfied. See, People v. Burden, 6 Misc.3d 1033(a)(Sup. Ct. Bronx Cty. 2005); People v. Millan, 189 Misc.2d 419, 730 N.Y.S.2d 392 (Sup. Ct. N.Y. Cty. 2001).

The same serious concern arises in other states, including California and Colorado, which authorize courts to look behind the plea, and beyond the formal elements of the offense of conviction, and enable them on a case by case basis to determine if registration is required.

Like New York, California requires an individual to register if they are required to register in the state of conviction, or pursuant to CA Penal Code § 290(a)(2)(D)(I) if that individual "... since July 1, 1944, has been, or is hereafter convicted in any other court, including any state, federal, or military court, of any offense that, if committed or attempted in this state, would have been punishable as one or more of the offenses described in subparagraph (A)". The wording of the statute leaves open the possibility that, in determining whether the offense would have been punishable as one or more of the registrable offenses, one looks at the underlying facts, and not at the formal elements of the crime to which the defendant pled. The registrable California offenses include commission of "any lewd or lascivious act ... upon or with the body of child" where the child is "14 or 15 years" of age and "that person is at least 10 years older than the child" "with the intent of arousing, appealing to, or gratifying the lust, passions, or sexual desires of that person or the child". CA Penal Code § 288(a), (c) (1). Thus, an aggravated assault plea may subject the client to a registration requirement in the State of California.

Colorado likewise has a very broad statute. It requires an individual to register within five business days of becoming a temporary or permanent resident of the state, if, among other things, the person has been convicted in Colorado or any other state of an offense involving sexual behavior (or an attempt, solicitation or conspiracy to commit such an offense), or if they are required to register in another state or jurisdiction for a sex offense. C.R.S.A. §§ 16-22-103, 16-22-108.

With regard to Florida, as you know, it is reasonably clear that under Florida's current version of Megan's Law, a plea to aggravated assault would not subject the client to registration in Florida since it is not included among the state's enumerated "sexual offender" offenses. See

Ms. Lanna Belohlavek

June 5, 2006

Page 4

F.S.A. §§ 943.0435, 784.021. However, the offense of sexual battery is on the list, as well as the charge of lewd and lascivious behavior, so there is no assurance that, in the future, a Florida prosecutor or court will not take the position that, where the aggravated assault is combined with what some states have labeled a "sexually motivated intent" registration is required.

Moreover, as you indicated at our meeting, there is no guarantee that the Florida legislature will not expand the category of persons subject to Megan's law, and expressly make persons convicted of aggravated assault subject to the law, especially where the felony the actor had the intent to commit is a sexual offense, and the victim is a minor. The trend today is towards expansion, not contraction, of these kinds of statutes, and as you noted, Florida will be no exception. See, e.g., "Sex Offenders; No More Escaping Registration," 36 McGeorge L. Rev 822 2005 (Over the last twenty years expanded registration requirements, enhanced penalties for failure to register, and public notification provisions have enlarged the scope of sex offender registration laws); see news articles of just this past week infra describing many of the proscriptions being adopted around the nation. And, the ex post facto clause stands as no significant bar. See [REDACTED] v. Doe, 538 U.S. 84 (2003) (upholding Alaska Sex Offender Registration Act against a challenge that its application to persons whose offenses were committed prior to its enactment would violate the ex post facto clause). If this trend continues, as it likely will, the client will almost certainly be subject to sex offender registration.

Even if the client is not and will never be subject to registration requirements under Florida's laws, a plea to aggravated assault under the circumstances of this case could subject him to Megan's Law requirements in other jurisdictions. Thus, if the client pleads guilty to the proposed aggravated assault charge, there is a grave risk that under existing state and Virgin Islands law – quite apart from future expansion or expansive construction of those laws – he will be subject to sex offender registration requirements and/or criminal exposure for failure to register. There is an even graver risk still that there will be future expansion of the statutes or expansive construction of them that will mean he is covered or arguably so. See, e.g., Cherry [REDACTED] Sex Offender Ordinance Upheld, Courier Post, June 1, 2006, at <http://www.courierpostonline.com/apps/pbcs.dll/article?AID=/20060601/NEWS01/606010389/1006>; ² More States Move to Use GPS Tracking of Sex Offenders, Fox News, May 31, 2006, at <http://www.foxnews.com/story/0,2933,196455,00.html>; Sex Offenders Sue City Over Park, Pools

² This article discusses a decision handed down by a municipal court judge in New Jersey during the course of our meeting. That decision upheld a zoning restriction on sex offenders living within 2500 feet of schools, [REDACTED], playgrounds, public libraries, or day care centers. While other jurisdictions' zoning laws currently restrict such individuals from living within 1000 feet of these institutions, were they to follow the lead of Cherry [REDACTED], New Jersey, the client would most certainly be faced with the added burdens of selling his residences and moving in order to be in compliance with the law.

Ms. Lanna Belohlavek
June 5, 2006
Page 5

and Playgrounds Ban, Fox News, May 31, 2006, at
<http://www.foxnews.com/story/0,2933,197701,00.html>.

Indeed, as you recognized during our meeting, many people who were advised by competent counsel to plead guilty to offenses when registration was not required have now been horrified to find themselves subjected to registration laws enacted or expanded after their guilty pleas, without any recourse. See, [REDACTED] v. Doe, *supra*, 538 U.S. 84. Finally, although there is some risk that even a plea to a misdemeanor charge could trigger registration in some jurisdictions, our research suggests that this risk is considerably lower for a misdemeanor plea than for a felony plea.

II. Aggravated Assault is Generally Considered A Violent Felony And Does Not Apply to the Facts of This Case

Assault is generally considered an act of force. It "create[s] in the victims a well founded fear of imminent violence." *Velasquez v. State*, 654 So. 2d 1227, 1228 (Fla.2d DCA 1995). The general public is certainly not aware of Florida's unique nuanced definition. Indeed, as you will agree, in common usage, aggravated assault, on its face sounds inherently violent. Thus, at the very least, most people will consider an aggravated assault charge, even of the "intent to commit a felony" variety, to be a violent crime. In this regard, undifferentiated aggravated assault is one of only four crimes listed in the FBI's Uniform Crime Report "violent crime" category.³

More importantly, as noted, this crime clearly does not reflect what allegedly occurred since there has been no suggestion that a threat of serious bodily harm was made or a deadly weapon used. In addition, most pleas are "downward" – the defendant agrees to waive his right to trial in return for the prosecution's offer of a downward departure in charging or sentencing. Further, in the typical case a plea involves crimes that bear a close resemblance to the underlying events. The facts herein, obviously do not support a charge of aggravated assault, thus a plea to same would be inappropriate.

³ The UCR divides its statistics into three major categories: violent crimes, property crimes, and hate crimes. "Violent crime is composed of four offenses: murder and nonnegligent manslaughter, forcible rape, robbery, and aggravated assault." "Violent Crime," Crime in the United States, 2004, at http://www.fbi.gov/ucr/cius_04/offenses_reported/violent_crime/index.html.

Ms. Lanna Belohlavek
June 5, 2006
Page 6

III. Since the Meeting on February 16, 2006 When Misdemeanor Charges Were Initially discussed, the State's Case has Gotten Considerably Weaker

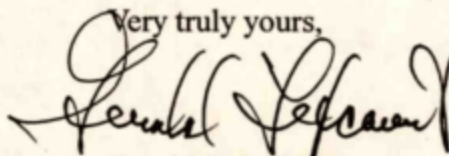
At the February 16, 2006 meeting, you suggested the Office was investigating a felony and you indicated you would consider pleading it down to a misdemeanor. As you are aware, since then much has happened which makes the alleged case considerably weaker and undermines the credibility of the witnesses upon which it was based. Indeed as you already know the following information has come to light severely damaging the reliability of the witnesses: (i) [REDACTED] background, including a history of theft, confessions and repeated denials of stealing from employers and customers, lying about her age, sexual promiscuity, and prostitution; (ii) [REDACTED] boastful admission of drug use, underage drinking, sexual activity, shoplifting, [REDACTED] exaggeration of her income (at least \$250,000), representing herself naked on a website and as 17 years old, then 16, then 15, only changing it to her truthful age, coincidentally four days before the last scheduled grand jury. In addition, as you have acknowledged, she was found in an inappropriate place in Georgia after the police were called when she ran away from home. This is separate and apart from the Florida police report presented to you, detailing her being dropped off by the local drug dealer at 5:45 a.m., only two days after returning to West Palm Beach, and being described by the officer as clearly on drugs; and (iii) both of Saige's parents' criminal history of fraud.

In stark contrast to this is the fact that, as we indicated at the meeting, the client has passed both a rigorous lie detector test, conducted by the most highly qualified expert we could find, one whose reputation is beyond reproach, and provided you copies of two psycho-sexual evaluations prepared by experts that you have agreed are well-recognized and accepted by the State.

Ms. Lanna Belohlavek
June 5, 2006
Page 7

IV. Conclusion

Under the circumstances of this case a plea to felony aggravated assault is both unwarranted and presents a grave risk the client will be brandished a sex offender, bearing the attendant burdens inherent with that classification. In light of this, and the credibility issues presented by the complaining witnesses, combined with the client's two psycho-sexual evaluations and lie detector tests, we believe that at the very most, a misdemeanor plea to solicitation is appropriate.

Very truly yours,

Gerald B. Lefcourt

YA FUCK YOU 2!!!!!!

"twins do have more fun "



United States

Online Now!

Last Login: 6/13/2006

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Contacting YA FUCK YOU 2!!!!!!

 Send Message

 Forward to Friend

 Add to Friends

 Add to Favorites

 Instant Message

 Block User

 Add to Group

 Rank User

MySpace URL:

<http://www.myspace.com/lovelysaige>

YA FUCK YOU 2!!!!!!'s Blurbs**About me:**

[] The full name is [REDACTED] [] I am a twin her..her name is amber [] Im the most outgoing person youll ever meet wen u get to no me [] I hate drama [] I LOVE TO HAVE FUN!!! [] I am half cuban and half [REDACTED] /irish [] I love tanning [] I don't get jealous very easily [] I am the biggest flirt ever [] I love my ass [] I am NOT a phone person [] I am so easy to get along with [] Ive been through more then more people think i have [] I smile even when i am not happy. [] I want a monkey someday lol [] I love all my georgia friends [] I love music [] I love to joke around [] I laugh at the stupidest things [..] I love to sleep [] I love funny people so much [] I hate mean people [] I am a closet nerd lol jk [] I love volleyball [] [REDACTED]! yeah i was a ballerina for 10 years [] I love to dance..no matter where i am at [] I miss you all in ga an [REDACTED] ..winslow lina britt carissa mary katie nikki lea zack .. see ya soon [] If u wanna talk to me .. iloveanirishboi

Who I'd like to meet:

 I ALREADY HAVE 

YA FUCK YOU 2!!!!!!'s Interests**General**

[*]i love shopping [*] tanning [*]
hanging out with friends[*]
playing volleyball[*]sleeping in

Music**TELL ME ABOUT YOURSELF - The Survey**

■
Name:
Birthday:
Birthplace:
Current
Location:
Eye Color:
Hair Color:
Height:
Right Handed
or Left Handed:
Your Heritage:
The Shoes
You Wore
Today:
Your
Weakness:
Your Fears:

Your Perfect
Pizza:
Goal You
Would Like To
Achieve This
Year:
Your Most
Overused
Phrase On an
instant
messenger:
Thoughts First
Waking Up:
Your Best
Physical
Feature:
Your Bedtime:
Your Most
Missed
Memory:
Pepsi or Coke:
MacDonalds or
Burger ■:
Single or
Group Dates:
Lipton Ice Tea
or Nestea:
Chocolate or
Vanilla:
Cappuccino or
Coffee:
Do you Smoke:
Do you Swear:
Do you Sing:
Do you
Shower Daily:
Have you
Been in Love:

Do you want to
go to College:
Do you want to
get Married:
Do you believe
in yourself:
Do you get
Motion
Sickness:
Do you think
you are
Attractive:
Are you a
Health Freak:
Do you get
along with your
Parents:
Do you like
Thunderstorms:
Do you play an
Instrument:
In the past
month have
you Drank
Alcohol:
In the past
month have
you Smoked:
In the past
month have
you been on
Drugs:
In the past
month have
you gone on a
Date:
In the past
month have
you gone to a
Mall:
In the past
month have
you eaten a
box of Oreos:
In the past
month have
you eaten
Sushi:
In the past
month have
you been on
Stage:
In the past
month have
you been
Dumped:
In the past
month have
you gone
Skinny Dipping:
In the past
month have
you Stolen
Anything:
Ever been
Drunk:

Ever been
called a Tease:

Ever been
Beaten up:

Ever
Shoplifted:

How do you
want to Die:

What do you
want to be
when you
Grow Up:

What country
would you
most like to
Visit:

In

Favourite Eye
Color:

Favourite Hair
Color:

Short or Long
Hair:

Height:

Weight:

Best Clothing
Style:

Number of
Drugs I have
taken:

Number of
CDs I own:

Number of
Piercings:

Number of
Tattoos:

Number of
things in my
Past I Regret:

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[Back to Profile](#)[Post a Comment](#)[E-Mail to a Friend](#)[Report This Image](#)< [Previous](#) | [Next](#) >

Listing 1 - 2 of 2

From	Comment
♥The Lucky One♥ 	June 11, 2006 8:23 AM Get it girl (lol)
im that [x] SuNSHiNE ♥ 	June 10, 2006 6:44 PM .. sweetie .. PDA lol

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paid YOU for a check-up?
LAWN DOCTOR



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[Back to Profile](#)[Post a Comment](#)[E-Mail to a Friend](#)[Report This Image](#)< [Previous](#) | [Next](#) >

Listing 1 - 4 of 4

From	Comment
LA Swii\$\$ 	June 11, 2006 9:13 AM I DEF TOOK THAT PIC AND ALL THE OTHER ONES...damm [REDACTED] be looking goodd lol jkjkjk.. i mean u.
♥love'n a choquette ♥ 	June 11, 2006 9:12 AM aw how cute and who introduced you guys????? haha that would be me! lol love you both....omg [REDACTED] is actually kinda smiling holy shit lol
♥The Lucky One♥	June 11, 2006 8:21 AM CuTe



Lea <3

June 10, 2006 7:17 AM

aww u guys look so cute..



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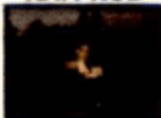
[Back to YA FUCK YOU 2!!!!!!'s Profile](#)

View All Friends

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1 2 of 2

YA FUCK YOU 2!!!!!!'s Friends... (41)

Tom 	!! I pReG.. 	josh 	Chelsie=M.. 	▼ .. 	▼T.. 	BISH 
Drake 	KRiSTiE [.. 	Morrida. 	▼B.. 	LA Swii\$\$  Online Now!	SaCcOnI 	I DONT FU 
Killa Cam 	UR T0 G00.. 	HaNNiNg 	Very Funn.. 	Jo-sepy 	"RAM ROD" 	YA BOY 
H E A t H..	Lea <3	Anthony	LiL Wee Cor	▼ ..	Kyle	im that [..



Listing 1-40 of 41

1 2 of 2

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Incident Report CHEROKEE COUNTY SHERIFF'S OFFICE

498 CHATTIN DRIVE

(678) 493-4200

05-104607

Supplement No
ORIG

Reported Date
11/24/2005
Nature of Call
INFO
Officer
BEDOYA, BROOKE

Administrative Information

Agency	CHEROKEE COUNTY SHERIFF'S OFFICE	Report No	05-104607	Supplement No	ORIG	Reported Date	11/24/2005	Reported Time	21:49
CAD Call No	050174770	Status	MISCELLANEOUS REPORT	Nature of Call	INFORMATION				
Location				City			ZIP Code		
Rep Dist	unknown area	Beat	42	From Date	11/24/2005	From Time	21:49	Officer	000202/BEDOYA, BROOKE
Assignment	WARRANT UNIT	Entered by	000202	Assignment	WARRANT UNIT	RMS Transfer	Successful	Approving Officer	000202
Approval Date	11/28/2005	Approval Time	20:21:19						

Person Summary

Inv#	Inv# No	Type	Name	MNI	Race	Sex	Date of Birth
JUV	1	I		258904	W	M	
OTH	1	I		258903	W	F	03/17/1969

Summary Narrative

****Information Only****

Report Officer	000202/BEDOYA, BROOKE	Printed At	06/06/2006 11:21	Page 1 of 2
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Incident Report
CHEROKEE COUNTY SHERIFF'S OFFICE

05-104607

Supplement No
ORIG

JUVENILE 1: JAMES

Involvement	Invl No	Type	Name	MNI	Race	Sex
JUVENILE	1	Individual	JAMES	258904		MALE
Juvenile?	Yes					

Phone Type	Phone No
OTHER	(404) 316-3145

OTHER 1:

Involvement	Invl No	Type	Name	MNI	Race	Sex
OTHER	1	Individual		258903		FEMALE

Date of Birth	Age	Juvenile?
03/17/1969	36	No

Type	Address	City	State
HOME	411 [REDACTED] CT	WALESKA	GEORGIA

ZIP Code
WALESKA

Phone Type	Phone No
HOME	(678) 880-2746

Narrative

On 11/24/05 at about 21:49 hours I went to 411 [REDACTED] Court in reference to a suspicious person. I met with [REDACTED] who stated she has two juvenile daughters. Tonight she noticed they went across the street to a vacant house with some boys. When she went to check on them she caught the boys drinking alcohol. She knew the boys were juveniles so she took the alcohol (tequila) from them she said a couple of the boys ran off. Juvenile one got in his silver Mitsubishi and went to the end of the street. He then stopped in front of her house. The juvenile stated he wanted his tequila back and he would come back at midnight.

[REDACTED] is concerned juvenile one might return and damage her guests vehicles. Mrs. [REDACTED] asked her juveniles who the subject was and they were unfamiliar. I gave Mrs. [REDACTED] a case card. I returned into service with no further incident. I informed morning watch of this address for an extra patrol for tonight only.

Report Officer	Printed At	Page 2 of 2
000202/BEDOYA, BROOKE	06/06/2006 11:21	

Incident Report CHEROKEE COUNTY SHERIFF'S OFFICE

498 CHATTIN DRIVE

(678) 493-4200

06-6702

Supplement No
ORIG

Reported Date
01/21/2006
Nature of Call
MIS PER
Officer
[REDACTED], [REDACTED]

Administrative Information

Agency CHEROKEE COUNTY SHERIFF'S OFFICE		Report No 06-6702		Supplement No ORIG		Reported Date 01/21/2006		Reported Time 09:08	
CAD Call No 060011543		Status INCIDENT REPORT		Nature of Call MISSING PERSON (ADULT)					
Location 411 [REDACTED] CT				City CANTON		ZIP Code CANTON			
From Date 01/20/2006		From Time 19:00		To Date 01/21/2006		To Time 13:00		Officer 000025 [REDACTED]	
2nd Officer [REDACTED]		Assignment ADULT DETENTION CENTER				Assignment ADULT DETENTION CENTER		Entered by 000025	
Assignment ADULT DETENTION CENTER		RMS Transfer Successful		Approving Officer 000455		Approval Date 01/23/2006			
Approval Time 07:00:19									

Person Summary

Inv#	Inv# No	Type	Name	MNI	Race	Sex	Date of Birth
CLR	2	I		264217	W	F	03/17/1969
JUV	1	See Confidential Page					

Report Officer 000025/[REDACTED]	Printed At 06/06/2006 11:12	Page 1 of 3
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Incident Report
CHEROKEE COUNTY SHERIFF'S OFFICE

06-6702

Supplement No
ORIG

CALLER/COMPLAINANT 2:

Involvement	Inv No	Type	Name	MNI
CALLER/COMPLAINANT	2	Individual	██████████, ██████████	264217
Race	Sex	Date of Birth	Age	Juvenile?
██████████	FEMALE	03/17/1969	36	No
Type	Address	City	State	
HOME	411 ██████████ CT	CANTON	GEORGIA	
ZIP Code	CANTON			
Type	SOCIAL SECURITY NUMBER		ID No	
Phone Type	Phone No			
HOME	(678) 880-2746			

JUVENILE 1: Confidential

Involvement	Inv No	Name
JUV	1	See Confidential Page

Narrative

While on patrol, I was dispatched to a missing person call at 411 ██████████ Court. I arrived and made contact with the caller/mother of the missing juvenile female, [██████████]. She stated her juvenile daughter left yesterday for school, and had not returned. ██████████ told me she had spoken with her daughter around 1900 and she was going to the high school basketball game. Later on that night, some of the juveniles's friends called the mother and informed her they had not seen the juvenile at the game.

When the juvenile didn't return this morning, ██████████ said she became worried and started to contact some of her daughter's friends. They told her they heard she was hanging hanging around with Mr. Byron Elrod in an area known as "The Cut" which is located off Old Donaldson and Highway 140. "The Cut" is a known drug area in the county. I completed a missing person's checklist and obtained a recent picture of the juvenile. I called Detective ██████████ and informed her of the situation. The mother did not want a juvenile complaint filed. I issued [██████████] a case card and asked her to call if she found any more information regarding her daughter. D/S Ballard and I left the residence and returned to service.

After patrolling Old Donaldson Rd and the Crissler Street area, we were unable to locate any additional information as to the whereabouts of the female. Around 1200, I received a telephone call from ██████████ stating that she had found her daughter, and she was located at Gregory Lane Apartments off Belts Ferry Rd. The mother told me a friend of the family was going to pick the female up, and escort her back to the parents house. I told [██████████] to call 911 when her daughter returned and a deputy would be sent out to check on the well being of the juvenile.

When the juvenile returned Sgt Thompson met with the juvenile and parents at the house. The Juvenile stated she had been drinking and had done some drugs last night, and that she had been scared to call her parents. She then went to a friends house located at Gregory Lane Apartments and spent the night.

Report Officer	Printed At	Page 2 of 3
000025 ██████████	06/06/2006 11:12	

Incident Report
CHEROKEE COUNTY SHERIFF'S OFFICE

498 CHATTIN DRIVE

(678) 493-4200

06-6702
DRAFT

Supplement No
0001

Reported Date
01/21/2006
Nature of Call

Officer
[REDACTED], AUTUMN

Administrative Information

Agency CHEROKEE COUNTY SHERIFF'S OFFICE	Report No 06-6702	Supplement No 0001	Reported Date 01/21/2006	Reported Time 15:30
Officer 000284 [REDACTED], AUTUMN	Assignment CID DAY SHIFT PERSONS UNIT		Entered by 000284	
Assignment CID DAY SHIFT PERSONS UNIT	Approving Officer	Approval Date		
Approval Time				

Narrative

On 012106 I was notified by dispatch to give B-43 a call. I called and spoke with D/S Ballard and he was taking a report of a missing juvenile age 15. He stated she was supposed to have went to a basketball game last night but she didn't. He stated she went off with some black males. He told they were stopped by some [REDACTED] friends of her and they fought with the black males. D/S Ballard said the mother had contact with her daughter around 8:00 last night but had not heard from her since then.

Report Officer 000284 [REDACTED], AUTUMN	Printed At 06/06/2006 11:12	Page 1 of 1
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Case Activity



- Index

Case Details

Incident No 060006702	Initial Date 01/23/2006	Officer Assigned	Division	Asgn Area P1	Assign Date 01/23/2006	Charge MIS JUV
Class 27	Case Control 27699	Solve C	Status C	Dispo CLOSED/CLEARED EXCEPTIONALLY ADULT		
Prosecute?		Insurance?		Last Activity 01/23/2006		Follow Up Due Dt
Made Date		Property Act		# Charges 0		Status Date 01/23/2006
E-Mail	Person	Property	Vehicle	Investigation		Booking

☒ New Case Activity

Case Activity

Details	Officer Assigned	Division	Asgn Area	Act Type	Amount	Next Type	Next Date	Property Act	# Hours	Minutes	Edit
102612			P1	IN	0				0	0	060006702
102613			P1	EA	0				0	0	060006702

Number of Activities: 2

Total Recovered Property: \$0

Total Hours: 0:0

Additional Information

- ☒ Associated Persons: 2
- ☒ ARS Narrative: 1
- ☒ ARS Report Summary: 1

End of document

ALAN M. DERSHOWITZ

1575 MASSACHUSETTS AVENUE
CAMBRIDGE • MASSACHUSETTS • 02138

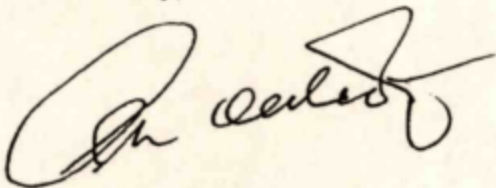
April 19, 2006

Ms. Lanna Belohlavek
Assistant State Attorney
401 North Dixie Highway
West Palm Beach, FL 33401

Dear Lanna:

Guy has asked me to provide you with the research on why it makes a difference whether Mr. Epstein pleads "nolo contendere" or "guilty". As you can see from the enclosed statute, a plea of "nolo contendere" is not admissible as an "admission against interest" in a subsequent civil case. A plea of guilty – even a so-called "best interest" plea of guilty – is admissible. That is the only real legal difference. If you need anything further, please do not hesitate to call me or Guy.

Sincerely,

A handwritten signature in black ink, appearing to read "Alan M. Dershowitz", with a large, stylized initial "A" and "D".

Enclosure: FL ST § 90.410

Effective: [See Text Amendments]

WEST'S FLORIDA STATUTES ANNOTATED
TITLE VII. EVIDENCE (CHAPTERS 90-92)
CHAPTER 90. EVIDENCE CODE

90.410. Offer to plead guilty; nolo contendere; withdrawn pleas of guilty

Evidence of a plea of guilty, later withdrawn; a plea of nolo contendere; or an offer to plead guilty or nolo contendere to the crime charged or any other crime is inadmissible in any civil or criminal proceeding. Evidence of statements made in connection with any of the pleas or offers is inadmissible, except when such statements are offered in a prosecution under chapter 837.

CREDIT(S)

Laws 1976, c. 76-237, § 1; Laws 1978, c. 78-361, § 8.

HISTORICAL AND STATUTORY NOTES

Amendment Notes:

Laws 1978, c. 78-361, deleted "for impeachment or" preceding "in a prosecution under chapter 837."

Federal Evidence Rules:

For rule relating to offer to plead guilty; nolo contendere; withdrawn plea of guilty, see Rule 410, Fed.Rules Evid., 28 U.S.C.A.

Uniform Rules of Evidence:

For rule relating to offer to plead guilty; nolo contendere; withdrawn plea of guilty, see Rule 410, Uniform Laws Annotated, [REDACTED] Edition, vol. 13.

West's F. S. A. § 90.410, FL ST § 90.410

Current through Chapter 362 (End) of the 2005 Special 'B' Session of the Nineteenth Legislature

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END OF DOCUMENT

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LAW OFFICE OF GUY FRONSTIN
515 N. FLAGLER DRIVE, SUITE 300 PAVILION
WEST PALM BEACH, FL 33401
(561) 447-4011 * (561) 802-4121 (Fax)

SENT VIA FACSIMILE TRANSMISSION

April 17, 2006

Lanna Belohlavek
Assistant State Attorney
Office of the State Attorney
401 N. Dixie Highway
West Palm Beach, FL 33401

Re: Jeffrey Epstein

Dear Lanna:

I am in receipt of your letter, of today's date, confirming the offer of settlement in the Jeffrey Epstein matter. Please allow this response to serve as my acceptance with the following clarifications:

1) You have agreed to allow Mr. Epstein to enter a Guilty Best Interest Plea. Additionally, you have agreed to review authority I provide concerning the effect a "guilty" plea has on a civil matter and in good faith consider allowing Mr. Epstein to plea "No Contest."

2) Regarding, the supervised contact, your letter refers to an "approved" adult. In our meeting today, you did not mention that the supervisor had to be approved. I agree that the supervision must be by an adult, other than [REDACTED], with knowledge of the underlying facts. Additionally, I need to confirm that Mr. Epstein may be with his goddaughter without supervision.

3) You agreed not to object to my selecting a duly licensed and experienced psychologist to conduct the evaluation.

4) I accept the provision for payment of the cost of investigation for the Palm Beach Police Department as long as the cost is reasonable.

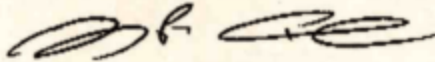
5) Although your correspondence does not mention travel, I am confirming your agreement to allow Mr. Epstein to travel for business purposes. In line with our discussions, I request that you agree to allow Mr. Epstein to travel for philanthropy as well.

- if approved
by DOC

not

Pursuant to this acceptance, I trust you will cancel presenting this matter to the Grand Jury tomorrow. Please contact me as soon as possible so we can continue to work through the filing, processing and plea resolution in this matter.

Very truly yours,



Guy P. Fronstin, Esq.

GPF/mw

Enclosures (as noted)

LAW OFFICE OF GUY FRONSTIN
515 N. FLAGLER DRIVE, SUITE 300 PAVILION
WEST PALM BEACH, FL 33401
(561) 447-4011 * (561) 802-4121 (Fax)

SENT VIA FACSIMILE TRANSMISSION

April 10, 2006

Daliah Weiss, ASA
Office of the State Attorney
401 N. Dixie Highway
West Palm Beach, FL 33401

Re: Jeffrey Epstein

Dear Daliah:

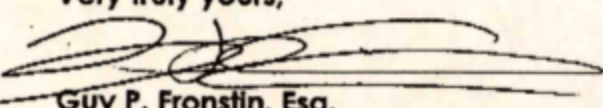
Pursuant to our recent conversation and my correspondence of January 13, 2006 (attached), please allow this letter to reconfirm that I am attorney of record for Mr. Epstein. Additionally, I am clarifying that Mr. Alan Dershowitz is also counsel for Mr. Epstein.

Currently, the structure of our representation is that I will be the one in communication with you, Lanna Belohlavek and Detective Recarey regarding the investigation and prosecution of this matter. Mr. Dershowitz remains involved however, at this point, I do not anticipate him contacting you, Ms. Belohlavek or Detective Recarey to discuss any issue relevant to this investigation. I will notify you if this structure changes.

Please call me if you have any questions or concerns about Mr. Epstein's representation. Additionally, I anticipate hearing back from you on Thursday regarding the opportunity for me to meet with you and Lanna prior to this case being presented to the Grand Jury.

I look forward to continuing to work with you on this matter.

Very truly yours,



Guy P. Fronstin, Esq.
GPF/mw
Attachment

LAW OFFICE OF GUY FRONSTIN
515 N. FLAGLER DRIVE, SUITE 300 PAVILION
WEST PALM BEACH, FL 33401
(561) 447-4011 * (561) 802-4121 (Fax)

SENT VIA FACSIMILE TRANSMISSION

January 13, 2006

Lanna Belohlavek, ASA
Office of the State Attorney
401 N. Dixie Highway
West Palm Beach, FL 33401

Re: Jeffrey Epstein

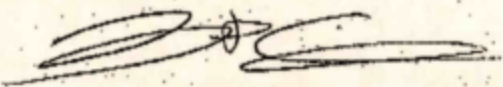
Dear Lanna:

Please allow this letter to serve as formal notice that I represent Mr. Jeffrey Epstein in regard to the investigation your office is conducting of Mr. Epstein. Additionally, Alan Dershowitz, Esq., who is a close friend of Mr. Epstein's, is serving as counsel to me in my representation of Mr. Epstein. Mr. Dershowitz is working closely with me on this matter and, in the event charges are filed, will likely petition to enter an appearance Pro Hac Vice along with other counsel.

I appreciate the dialogue you have permitted throughout this investigation. I trust you will still invite me for a pre-filing interview in the event the State decides it has enough evidence to charge Mr. Epstein with a crime.

I look forward to continuing to work with you on this matter.

Very truly yours,



Guy P. Fronstin, Esq.
GPF/mw

LAW OFFICE OF GUY FRONSTIN
515 N. FLAGLER DRIVE, SUITE 300 PAVILION
WEST PALM BEACH, FL 33401
(561) 447-4011 * (561) 802-4121 (Fax)

SENT VIA HAND DELIVERY

February 17, 2006

Lanna Belohlavek
Assistant State Attorney
Office of the State Attorney
401 N. Dixie Highway
West Palm Beach, FL 33401

Re: Jeffrey Epstein

Dear Lanna:

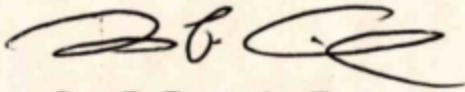
Thank you for meeting yesterday and allowing Alan and me to address your investigation of Jeffrey Epstein. Pursuant to our discussion, I am enclosing an Incident Report from Victoria Secret outlining three (3) recent incidents of theft committed by [REDACTED]

I am submitting this Incident Report with the express understanding that it will be kept in strict confidence. Specifically, since the Report only concerns [REDACTED] I believe there is no good faith reason, in any contact you may have with the store to mention Mr. Epstein's name or the investigation (especially in light of reports from multiple witnesses indicating Detective Recarey is providing damaging mis-information). Please let me know if you have any questions about the report and I will do whatever I can to immediately resolve your concerns.

Additionally, I am enclosing a credit card receipt (with non-relevant information redacted) confirming the purchase of the strap-on dildo that [REDACTED] purchased at Guys and Dolls. It will make clear that when the dildo was purchased, [REDACTED] was over 18 years old and she charged the purchase on [REDACTED] credit card. [REDACTED] had never before been to Guys and Dolls and was taken there by [REDACTED] who indicated it was her favorite sex shop.

I hope by presenting this meaningful information it will bring us closer to a resolution. If you have any questions before our next meeting on Thursday February 23, at 11:00 AM, please do not hesitate to contact me.

Very truly yours,

A handwritten signature in black ink, appearing to read 'Guy P. Fronstin', with a stylized flourish at the end.

Guy P. Fronstin, Esq.

GPF/mw

Enclosures (as noted)



OFFICE OF THE

STATE ATTORNEY

FIFTEENTH JUDICIAL CIRCUIT OF FLORIDA
IN AND FOR PALM BEACH COUNTY

BARRY KRISCHER

STATE ATTORNEY

February 9, 2006

Guy Fronstin, Esq.
515 North Flagler Drive
Suite 300 Pavilion
West Palm Beach, FL 33401

Dear Mr. Fronstin:

This is to notify you that certain matters suggesting possible criminal conduct on the part of your client, Jeffrey Epstein, will be presented for consideration by the current session of the Palm Beach County Grand Jury. You and your client are invited to appear before the Grand Jury in the Palm Beach County Courthouse on **March 7, 2006 at 9:00 AM**, or as soon thereafter as they are able to hear you.

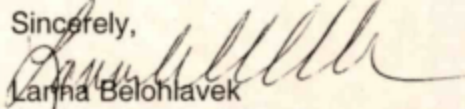
The invitation is extended to provide an opportunity for your client to present any personal testimony you may think proper. You should understand, however, that anything your client testifies to may be used against him in a subsequent criminal prosecution.

In the event you and your client wish to present evidence or testimony of other witnesses you must submit a written list of names and addresses of potential witnesses by **February 16, 2006** and make them available by **February 21, 2006** for a sworn statement at the State Attorney's Office. Copies of potential physical evidence must be supplied by **February 16, 2006**. **Keep in mind that only evidence that is relevant to the incident will be presented to the Grand Jury.**

This invitation to your client is not an offer of immunity nor is it an effort to compel your client to participate in the Grand Jury proceedings in any way. Any participation on his part must be entirely voluntary, and a decision not to participate cannot be used to raise an unfavorable presumption against your client.

Thank you for your cooperation in this matter.

Sincerely,


Larina Belohlavek

Assistant State Attorney
Grand Jury/Crimes Against Children

lb/lb

xc: Clerk's File
SAO File

Alan Dershowitz
1525 Massachusetts Avenue
Cambridge, Massachusetts 02138
617-939-6001

██████ Recarey
Detective
Palm Beach Police Department
345 S. County Road
Palm Beach, FL 33480

Re: Epstein matter

Dear Detective Recarey:

I am sending you this letter in response to the serious concern you raised at our meeting regarding an alleged claim that one of our investigators had misrepresented himself as a police officer and in fact had actually attempted to impersonate you. As I told you neither I nor my client would ever tolerate any such conduct on the part of our investigators. With that in mind, I immediately began an inquiry of our staff, and believe that the contemporaneous notes taken by our investigator, while attempting to interview ████████ will provide the necessary explanation for your thoroughly justified consternation. It will also, I believe, provide a more troublesome and telling illustration of her character. At our meeting, you may recall, I also advised you that our investigation had discovered at least one of her web sites and I am enclosing some examples. You will note that she, herself, has chosen to go by the nickname of "pimp juice" and the site goes on to detail, including photos, her apparent fascination with marijuana. This will come as no surprise to you as I'm sure you are already aware of her recent Palm Beach arrest for both possession of marijuana and drug paraphernalia.

The following raw notes were taken by investigators (one who suffers from a quite distinct speech impediment, making, therefore, a truly innocent claim of impersonation virtually impossible). Both of them have many years experience in conducting defense investigations and debriefing witnesses. They are both well versed in the law and extremely sensitive to any potential allegations of wrongdoing especially from witnesses who may have their own agendas. In this instance, they were instructed to take ████████ statement verbatim because we feared that she, an accomplished drama student, might try to mislead them as successfully as she had misled others. They were instructed to ask detailed questions to further elucidate her previous pronouncements regarding the extreme lengths she would go to as she put it "to be rich, no, I mean really, really rich". But as you will read, they never got a chance to ask even a single question, and could not for a moment be thought of, as attempting to misrepresent themselves as police officers. In fact even though, they are both well prepared and seasoned investigators, they were quite shocked at the overwhelming, non-stop barrage of profanity being hurled at them at a furious pace and volume from what initially appeared

only to be a young woman of slight build and soft demeanor. The following is an excerpt from the investigator's report detailing her extremely short but none the less pungent statements;

"11.21.2005, my partner, Steve Kiraly, and I traveled to Orange Park (Jacksonville), Florida, in order to attempt to interview [REDACTED]. The purpose of having two people present was to act as witnesses as to whatever might have been said by [REDACTED] during the course of our interview. [REDACTED] lives with her 18 year old boyfriend, William, and his mother and boyfriend at 2768 Kiowa Avenue, Orange Park, FL. At approximately 6:30pm [REDACTED] arrived home. We waited about 10 minutes and approached the residence. I knocked on the door and a woman, who I now know as Mary [REDACTED], answered the door. I told her that we would like to speak with [REDACTED]. She said there was no [REDACTED] there. I said there must be because her Jeep was parked out front. She then said, "I'm sorry, you mean [REDACTED]" and I said yes. [REDACTED] then came to the door. The following conversation took place.

[REDACTED]: my name is Bill [REDACTED] (as I handed her my business card) and this is my partner Steve Kiraly. We are investigators from Miami working on behalf of Jeffrey Epstein.

[REDACTED]: I don't talk to fucking cops and I'm not talking to you.

[REDACTED]: [REDACTED], we're not cops.

[REDACTED]: You need to leave. Get the fuck off my property, leave now.

[REDACTED]: [REDACTED], there is no need to be hostile. We are not cops. We are just trying to learn the truth.

[REDACTED]: Get the fuck off my property. What, you're still standing here?

[REDACTED]: We're leaving but we don't understand why you're so hostile.

[REDACTED]: You have no right to be here. I moved. All that shit is behind me in another world so get the fuck out of here.

[REDACTED] goes back inside the house and Mary [REDACTED] came outside on the porch

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[REDACTED]: Look, [REDACTED] is a good girl and she left down there. We're trying to sort things out now and hire her an attorney.

[REDACTED]: I understand but we're not the bad guys and we're not cops.

[REDACTED]: Okay, but she doesn't want to talk with you and you really have no right being here on my property this time of night.

[REDACTED]: I'm sorry we're here at 6:45pm but your son, Will, told us we could come back.

[REDACTED]: He doesn't own this property.

[REDACTED] came back outside

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As you can gather from this, we believe her to be the source of your concern.

Our other, but we believe, less likely alternative source for the potential misunderstanding could be a close friend of Miss [REDACTED] named [REDACTED], who goes by the more outlandish self chosen moniker and complete web name of "[REDACTED] Fucking [REDACTED]", whose web page I also enclose.

In the event that the source of the allegation is neither of the two women mentioned above, if you would provide me with the name of the person, or persons, making the claim, I will check with the relevant investigators and follow through until we are satisfied that we have gotten to the bottom of this matter.

I trust the information provided in this letter is helpful to you as we all try to bring this difficult period to a close.

Sincerely,

Alan Dershowitz
(GF)

Alan Dershowitz

cc: Enclosures
Barry Krischer
Lanna Belohlavek
Daliah Weiss

Alan Dershowitz
1525 Massachusetts Avenue
Cambridge, Massachusetts 02138
617-939-6001

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Alan Dershowitz
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Lanna Belohlavek
Daliah Weiss

LAW OFFICE OF GUY FRONSTIN
515 N. FLAGLER DRIVE, SUITE 300 PAVILION
WEST PALM BEACH, FL 33401
(561) 447-4011 * (561) 802-4121 (Fax)

SENT VIA FACSIMILE TRANSMISSION

January 13, 2006

Lanna Belohlavek, ASA
Office of the State Attorney
401 N. Dixie Highway
West Palm Beach, FL 33401

Re: Jeffrey Epstein

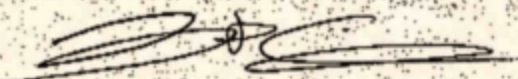
Dear Lanna:

Please allow this letter to serve as formal notice that I represent Mr. Jeffrey Epstein in regard to the investigation your office is conducting of Mr. Epstein. Additionally, Alan Dershowitz, Esq., who is a close friend of Mr. Epstein's, is serving as counsel to me in my representation of Mr. Epstein. Mr. Dershowitz is working closely with me on this matter and, in the event charges are filed, will likely petition to enter an appearance Pro Hac Vice along with other counsel.

I appreciate the dialogue you have permitted throughout this investigation. I trust you will still invite me for a pre-filing interview in the event the State decides it has enough evidence to charge Mr. Epstein with a crime.

I look forward to continuing to work with you on this matter.

Very truly yours,



Guy P. Fronstin, Esq.
GPF/mw

Law Offices of
SALNICK & FUCHS, P.A.

Michael Salnick*
Jack K. Fuchs
Flynn P. Bertisch

- Board Certified Criminal Trial Lawyer
- Member of Colorado, District of Columbia
and New York Bars

Jennifer L. Shand
Certified Legal Assistant

ONE CLEARLAKE CENTRE
250 SOUTH AUSTRALIAN AVENUE
SUITE 1203
WEST PALM BEACH, FLORIDA 33401-5014

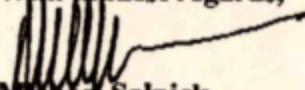
(561) 471-1000
Fax: (561) 659-0793
E-mail: SalnickLaw@aol.com
Fuchslaw@bellsouth.net
Fbertisch@bellsouth.net

MEMO

DATE: JANUARY 11, 2006
FROM: MICHAEL SALNICK
TO: Daliah Weiss
RE: Our Client: Janusz Banasiak

One more thing: Can my client pick up his computer and related equipment before our meeting on Tuesday? Please advise and thank you.

With kindest regards,



Michael Salnick

Law Offices of
SALNICK & FUCHS, P.A.

Michael Salnick*
Jack K. Fuchs
Flynn P. Bertisch

- Board Certified Criminal Trial Lawyer
- Member of Colorado, District of Columbia and New York Bars

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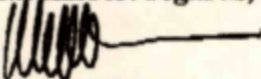
MEMO

DATE: JANUARY 11, 2006
FROM: MICHAEL SALNICK
TO: Daliah Weiss
RE: Investigation Re: Jeffrey Epstein
Our Client: Janusz Banasiak

This shall confirm the rescheduling of the meeting with my client until Tuesday, January 17, 2006 at 11:00 a.m. at your office. In one of our conversations earlier this morning, you indicated that you would be inclined to issue him a subpoena. I would please ask that you fax a copy of that subpoena to my office prior to our meeting.

Thank you for your attention to this matter.

With kindest regards,


Michael Salnick

**LAW OFFICE OF GUY P. FRONSTIN
515 N. FLAGLER DRIVE, SUITE 300 PAVILION
WEST PALM BEACH, FL 33401
(561) 447-4011 * (561) 802-4121 (Fax)**

***TIME SENSITIVE MATERIAL*
*PLEASE DELIVER IMMEDIATELY***

FAX COVER SHEET

TO: Lanna Belohlavek, ASA
RE: Jeff Epstein
DATE: January 11, 2006
FROM: Guy P. Fronstin, Esq.

NUMBER OF PAGES INCLUDING COVER SHEET: 2

Please see attached letter.

THANK YOU FOR YOUR ASSISTANCE IN THIS MATTER.

THIS MESSAGE IS INTENDED ONLY FOR THE USE OF THE INDIVIDUAL OR ENTITY TO WHICH IT IS ADDRESSED AND MAY CONTAIN INFORMATION THAT IS PRIVILEGED, CONFIDENTIAL, AND EXEMPT FROM DISCLOSURE UNDER APPLICABLE LAW. If the reader of this message is not the intended recipient or the employee or agent responsible for delivery of the message to the intended recipient, you are hereby notified that any dissemination, distribution, or copying of this communication is strictly prohibited. If you have received this communication in error, please notify us immediately by telephone, and return the original message to us at the above address.

LAW OFFICE OF GUY FRONSTIN
515 N. FLAGLER DRIVE, SUITE 300 PAVILION
WEST PALM BEACH, FL 33401
(561) 447-4011 * (561) 802-4121 (Fax)

SENT VIA FACSIMILE TRANSMISSION

January 11, 2006

Lanna Belohlavek
Assistant State Attorney
Office of the State Attorney
401 N. Dixie Highway
West Palm Beach, FL 33401

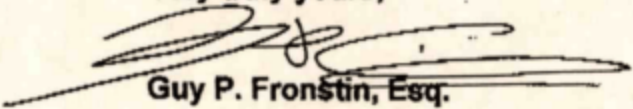
Re: Jeff Epstein
Third Party Attorney Fee Payment

Dear Ms. Belohlavek:

As you know I represent Mr. Jeff Epstein. Mr. Epstein's house manager, Yanush Banasiak, was asked to speak with your office regarding the matter that I represent Mr. Epstein on. In anticipation of Mr. Banasiak's meeting with your office he decided to retain legal counsel. Yesterday, he met with and retained, attorney Michael Salnick, who will be attending Mr. Banasiak's statement in your office today at 1:30 p.m.

Since your questioning of Mr. Banasiak concerns information that he may have that arises out of his employment with Mr. Epstein, Mr. Epstein will be paying Mr. Banasiak's attorneys fees. I felt it important to notify you of this third party attorney fee payment structure and confirm that you have no objection. Mr. Epstein would like to wire the payment for Mr. Salnick's representation to Mr. Salnick as soon as possible. Therefore, I would appreciate your getting back to me today on this issue.

Very truly yours,



Guy P. Fronstin, Esq.

GPF/mw
cc: Daliah Weiss
Michael Salnick

**LAW OFFICE OF GUY P. FRONSTIN
515 N. FLAGLER DRIVE, SUITE 300 PAVILION
WEST PALM BEACH, FL 33401
(561) 447-4011 * (561) 802-4121 (Fax)**

***TIME SENSITIVE MATERIAL*
*PLEASE DELIVER IMMEDIATELY***

FAX COVER SHEET

TO: Daliah Weiss, ASA
RE: Jeff Epstein
DATE: January 11, 2006
FROM: Guy P. Fronstin, Esq.

NUMBER OF PAGES INCLUDING COVER SHEET: 2

Please see attached letter.

THANK YOU FOR YOUR ASSISTANCE IN THIS MATTER.

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LAW OFFICE OF GUY FRONSTIN
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WEST PALM BEACH, FL 33401
(561) 447-4011 * (561) 802-4121 (Fax)

SENT VIA FACSIMILE TRANSMISSION

January 11, 2006

Lanna Belohlavek
Assistant State Attorney
Office of the State Attorney
401 N. Dixie Highway
West Palm Beach, FL 33401

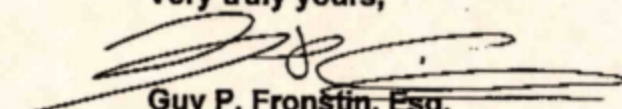
Re: Jeff Epstein
Third Party Attorney Fee Payment

Dear Ms. Belohlavek:

As you know I represent Mr. Jeff Epstein. Mr. Epstein's house manager, Yanush Banasiak, was asked to speak with your office regarding the matter that I represent Mr. Epstein on. In anticipation of Mr. Banasiak's meeting with your office he decided to retain legal counsel. Yesterday, he met with and retained, attorney Michael Salnick, who will be attending Mr. Banasiak's statement in your office today at 1:30 p.m.

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Very truly yours,


Guy P. Fronstin, Esq.

GPF/mw
cc: Daliah Weiss
Michael Salnick

FEL W

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

CASE NO.: 2006CF009454AXX

STATE OF FLORIDA

vs.

NOTICE OF DEPOSITION

JEFFREY EPSTEIN,
Defendant.

TO: Lanna Belohlavek, Esquire
Office of the State Attorney
401 N. Dixie Hwy
West Palm Beach, Florida 33401

RECEIVED BY
MAR 26 2008
COUNTY COURTS

PLEASE TAKE NOTICE that pursuant to the Florida Rules of Criminal Procedure that on April 2, 2008 beginning at the hour of 1:30 P.M., at the Palm Beach County Courthouse, 4th Floor, 205 North Dixie Highway, West Palm Beach, Florida 33401:

before Consor & Associates who is authorized by law to take depositions in the State of Florida, the Plaintiffs will, upon oral examination, take the deposition of the following named via telephone, to wit:

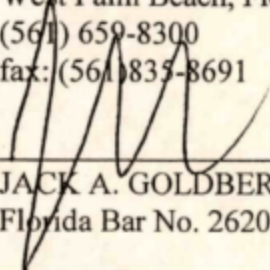
[REDACTED] -
COURTNEY WILDE & [REDACTED]

Such oral examination will continue from day to day until completed. You are hereby notified to phone in and take part in said examination as you may be advised, and as shall be fit and proper.

This deposition is being taken for the purposes of discovery, for use as primary evidence or for such other purposes as are permitted under the applicable Statutes or Rules of Court.

I HEREBY CERTIFY that a copy of the foregoing Notice of Taking Deposition has been furnished to the above named addressee and Michael R. Tein, Esquire, 3059 Grand Avenue, Suite 340, Coconut Grove, Florida 33133 by via fax & mail this 25th day of March, 2008.

ATTERBURY, GOLDBERGER, & WEISS, P.A.
250 Australian Avenue South, Suite 1400
West Palm Beach, Florida 33401
(561) 659-8300
fax: (561) 835-8691



JACK A. GOLDBERGER, ESQUIRE
Florida Bar No. 262013

2008
IN THE CIRCUIT COURT OF THE FIFTEENTH
JUDICIAL CIRCUIT, IN AND FOR PALM BEACH
COUNTY, FLORIDA

CASE NO.: 2006CF009454AXX

STATE OF FLORIDA

vs.

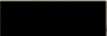
NOTICE OF DEPOSITION

JEFFREY EPSTEIN,
Defendant.

TO: Lanna Belohlavek, Esquire
Office of the State Attorney
401 N. Dixie Hwy
West Palm Beach, Florida 33401

PLEASE TAKE NOTICE that pursuant to the Florida Rules of Criminal Procedure that on March 24, 2008 beginning at the hour of 1:30 P.M., at the Palm Beach County Courthouse, 4th Floor, 205 North Dixie Highway, West Palm Beach, Florida 33401:

before Consor & Associates who is authorized by law to take depositions in the State of Florida, the Plaintiffs will, upon oral examination, take the deposition of the following named via telephone, to wit:

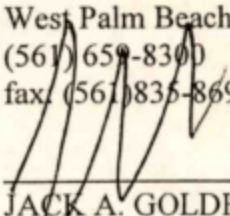
 COURTNEY WILDE,
BRITANNY 

Such oral examination will continue from day to day until completed. You are hereby notified to phone in and take part in said examination as you may be advised, and as shall be fit and proper.

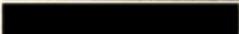
This deposition is being taken for the purposes of discovery, for use as primary evidence or for such other purposes as are permitted under the applicable Statutes or Rules of Court.

I HEREBY CERTIFY that a copy of the foregoing Notice of Taking Deposition has been furnished to the above named addressee and Michael R. Tein, Esquire, 3059 Grand Avenue, Suite 340, Coconut Grove, Florida 33133 by via fax & mail this 17th day of March, 2008.

ATTERBURY, GOLDBERGER, & WEISS, P.A.
250 Australian Avenue South, Suite 1400
West Palm Beach, Florida 33401
(561) 659-8300
fax: (561) 835-8691



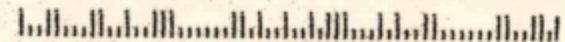
JACK A. GOLDBERGER, ESQUIRE
Florida Bar No. 262013

ATTEBURY GOLDBERGER 
 & WEISS, P.A. 

250 Australian Avenue South, One Clearlake Centre
Suite 1400, West Palm Beach, FL 33401

State Attorney's Office
Circuit Court Division
401 North Dixie Highway
West Palm Beach, FL 33401

33401+4209 C021



Lanna

✓

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

CASE NO.: 2006CF009454AXX

STATE OF FLORIDA

vs.

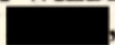
NOTICE OF DEPOSITION

JEFFREY EPSTEIN,
Defendant.

TO: Lanna Belohlavek, Esquire
Office of the State Attorney
401 N. Dixie Hwy
West Palm Beach, Florida 33401

PLEASE TAKE NOTICE that pursuant to the Florida Rules of Criminal Procedure that on March 24, 2008 beginning at the hour of 1:30 P.M., at the Palm Beach County Courthouse, 4th Floor, 205 North Dixie Highway, West Palm Beach, Florida 33401:

before Consor & Associates who is authorized by law to take depositions in the State of Florida, the Plaintiffs will, upon oral examination, take the deposition of the following named via telephone, to wit:

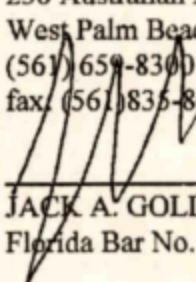
 COURTNEY WILDE,
BRITANNY 

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This deposition is being taken for the purposes of discovery, for use as primary evidence or for such other purposes as are permitted under the applicable Statutes or Rules of Court.

I HEREBY CERTIFY that a copy of the foregoing Notice of Taking Deposition has been furnished to the above named addressee and Michael R. Tein, Esquire, 3059 Grand Avenue, Suite 340, Coconut Grove, Florida 33133 by via fax & mail this 17th day of March, 2008.

ATTERBURY, GOLDBERGER, & WEISS, P.A.
250 Australian Avenue South, Suite 1400
West Palm Beach, Florida 33401
(561) 659-8300
fax: (561) 835-8691



JACK A. GOLDBERGER, ESQUIRE
Florida Bar No. 262013

Lanna
VCTF

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

CASE NO.: 2006CF009454AXX

STATE OF FLORIDA

vs.

NOTICE OF DEPOSITION

JEFFREY EPSTEIN,
Defendant.

TO: Lanna Belohlavek, Esquire
Office of the State Attorney
401 N. Dixie Hwy
West Palm Beach, Florida 33401

PLEASE TAKE NOTICE that pursuant to the Florida Rules of Criminal Procedure that on April 2, 2008 beginning at the hour of 1:30 P.M., at the Palm Beach County Courthouse, 4th Floor, 205 North Dixie Highway, West Palm Beach, Florida 33401:

before Consor & Associates who is authorized by law to take depositions in the State of Florida, the Plaintiffs will, upon oral examination, take the deposition of the following named via telephone, to wit:

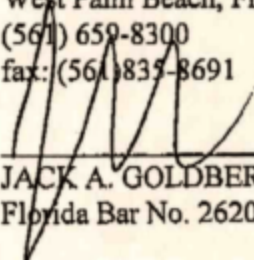
HALEY ROBSON
COURTNEY WILDE

Such oral examination will continue from day to day until completed. You are hereby notified to phone in and take part in said examination as you may be advised, and as shall be fit and proper.

This deposition is being taken for the purposes of discovery, for use as primary evidence or for such other purposes as are permitted under the applicable Statutes or Rules of Court.

I HEREBY CERTIFY that a copy of the foregoing Notice of Taking Deposition has been furnished to the above named addressee and Michael R. Tein, Esquire, 3059 Grand Avenue, Suite 340, Coconut Grove, Florida 33133 by via fax & mail this 25th day of March, 2008.

ATTERBURY, GOLDBERGER, & WEISS, P.A.
250 Australian Avenue South, Suite 1400
West Palm Beach, Florida 33401
(561) 659-8300
fax: (561) 835-8691


JACK A. GOLDBERGER, ESQUIRE
Florida Bar No. 262013

Lanna
VCTF

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

CASE NO.: 2006CF009454AXX

STATE OF FLORIDA

vs.

NOTICE OF DEPOSITION

JEFFREY EPSTEIN,
Defendant.

TO: Lanna Belohlavek, Esquire
Office of the State Attorney
401 N. Dixie Hwy
West Palm Beach, Florida 33401

PLEASE TAKE NOTICE that pursuant to the Florida Rules of Criminal Procedure that on February 6, 2008 beginning at the hour of 9:30 A.M., at the Palm Beach County Courthouse, 4th Floor, 205 North Dixie Highway, West Palm Beach, Florida 33401:

before Consor & Associates who is authorized by law to take depositions in the State of Florida, the Plaintiffs will, upon oral examination, take the deposition of the following named via telephone, to wit:

9:30 A.M.

Such oral examination will continue from day to day until completed. You are hereby notified to phone in and take part in said examination as you may be advised, and as shall be fit and proper.

This deposition is being taken for the purposes of discovery, for use as primary evidence or for such other purposes as are permitted under the applicable Statutes or Rules of Court.

I HEREBY CERTIFY that a copy of the foregoing Notice of Taking Deposition has been furnished to the above named addressee(s) by mail this 29th day of January, 2008.

ATTERBURY, GOLDBERGER, & WEISS, P.A.
250 Australian Avenue South, Suite 1400
West Palm Beach, Florida 33401
(561) 659-8300
fax: (561) 835-8691

JACK A. GOLDBERGER, ESQUIRE
Florida Bar No. 262013

Dive

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

CASE NO.: 2006CF009454AXX

STATE OF FLORIDA

vs.

NOTICE OF DEPOSITION

JEFFREY EPSTEIN,
Defendant.

TO: Lanna Belohlavek, Esquire
Office of the State Attorney
401 N. Dixie Hwy
West Palm Beach, Florida 33401

PLEASE TAKE NOTICE that pursuant to the Florida Rules of Criminal Procedure that on April 11, 2008 beginning at the hour of 10:00 A.M., at the Palm Beach County Courthouse, 4th Floor, 205 North Dixie Highway, West Palm Beach, Florida 33401:

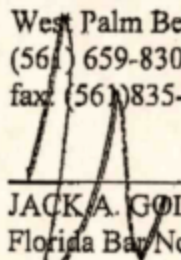
before Consor & Associates who is authorized by law to take depositions in the State of Florida, the Plaintiffs will, upon oral examination, take the deposition of the following named via telephone, to wit:

Such oral examination will continue from day to day until completed. You are hereby notified to phone in and take part in said examination as you may be advised, and as shall be fit and proper.

This deposition is being taken for the purposes of discovery, for use as primary evidence or for such other purposes as are permitted under the applicable Statutes or Rules of Court.

I HEREBY CERTIFY that a copy of the foregoing Notice of Taking Deposition has been furnished to the above named addressee and Michael R. Tein, Esquire, 3059 Grand Avenue, Suite 340, Coconut Grove, Florida 33133 and Jeffrey M. Herman, Esquire, 18205 Biscayne Boulevard, Suite 2218, Miami, Florida, 33160 by via fax & mail this 20th day of March, 2008.

ATTERBURY, GOLDBERGER & WEISS, P.A.
250 Australian Avenue South, Suite 1400
West Palm Beach, Florida 33401
(561) 659-8300
fax (561) 835-8691



JACK A. GOLDBERGER, ESQUIRE
Florida Bar No. 262013

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

CASE NO.: 2006CF009454AXX

STATE OF FLORIDA

vs.

JEFFREY EPSTEIN,
Defendant.

NOTICE OF DEPOSITION

(Time change only pursuant to the request of Theodore J. Leopold, Esquire)

TO: Lanna Belohlavek, Esquire
Office of the State Attorney
401 N. Dixie Hwy
West Palm Beach, Florida 33401

PLEASE TAKE NOTICE that pursuant to the Florida Rules of Criminal Procedure that on **February 20, 2008** beginning at the hour of **2:00 P.M.**, at the **Palm Beach County Courthouse, 4th Floor, 205 North Dixie Highway, West Palm Beach, Florida 33401**:

before Consor & Associates who is authorized by law to take depositions in the State of Florida, the Plaintiffs will, upon oral examination, take the deposition of the following named via telephone, to wit:

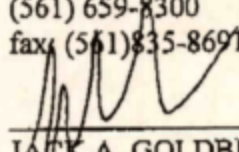
2:00 P.M.

Such oral examination will continue from day to day until completed. You are hereby notified to phone in and take part in said examination as you may be advised, and as shall be fit and proper.

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I HEREBY CERTIFY that a copy of the foregoing Notice of Taking Deposition has been furnished to the above named addressee, Theodore J. Leopold, Esquire, 2925 PGA Boulevard, Suite 200, Palm Beach Gardens, Florida 33410 and Jeffrey Herman, Esquire, 18205 Biscayne Boulevard, Suite 2218, Miami, Florida, 33160 by via fax & mail this 8th day of February, 2008.

ATTERBURY, GOLDBERGER, & WEISS, P.A.
250 Australian Avenue South, Suite 1400
West Palm Beach, Florida 33401
(561) 659-8300
fax (561) 835-8691



JACK A. GOLDBERGER, ESQUIRE
Florida Bar No. 262013

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

CASE NO.: 2006CF009454AXX

STATE OF FLORIDA

vs.

NOTICE OF DEPOSITION

(Time change only pursuant to the request of Theodore J. Leopold, Esquire)

JEFFREY EPSTEIN,
Defendant.

TO: Lanna Belohlavek, Esquire
Office of the State Attorney
401 N. Dixie Hwy
West Palm Beach, Florida 33401

PLEASE TAKE NOTICE that pursuant to the Florida Rules of Criminal Procedure that on February 20, 2008 beginning at the hour of 2:00 P.M., at the Palm Beach County Courthouse, 4th Floor, 205 North Dixie Highway, West Palm Beach, Florida 33401:

before Consor & Associates who is authorized by law to take depositions in the State of Florida, the Plaintiffs will, upon oral examination, take the deposition of the following named via telephone, to wit:

2:00 P.M.

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ATTERBURY, GOLDBERGER, & WEISS, P.A.
250 Australian Avenue South, Suite 1400
West Palm Beach, Florida 33401
(561) 659-8300
fax: (561) 835-8691

JACK A. GOLDBERGER, ESQUIRE

Florida Bar No. 262013

Public Records Request No.: 17-295

07/26/17

EFTA02854776

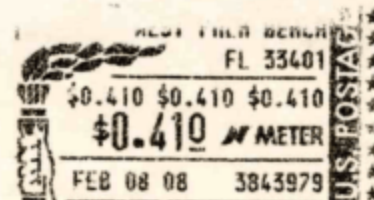
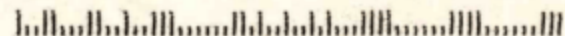
AW
G
ATTERBURY GOLDBERGER WEISS, P.A.

One Clearlake Centre, Suite 1400
250 Australian Avenue South West Palm Beach, FL 33401

2008 FEB 11 AM 8 58

Office of the State Attorney
Lanna Belohlavek, Esquire
410 North Dixie Highway
West Palm Beach, Florida 33401

33401\$4210 C021



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

JANE DOE, by and through
JANE DOE'S MOTHER as parent and natural
guardian,

CASE NO:

Plaintiff,

vs.

JEFFREY EPSTEIN, [REDACTED]
and SARAH [REDACTED]

Defendants.

COMPLAINT

Plaintiff, JANE DOE, by and through JANE DOE'S MOTHER as parent and natural
guardian of JANE DOE, brings this Complaint against Defendants JEFFREY EPSTEIN,
[REDACTED], and SARAH KELLEN, and states as follows:

Parties, Jurisdiction and Venue

1. Jane Doe is a citizen and resident of the State of Florida. She is a minor under the age of 18 years.
2. Jane Doe's Mother brings this action by and through her Mother who is parent and natural guardian of Jane Doe.
3. This Complaint is brought under fictitious names to protect the identity of the Minor Plaintiff because this Complaint makes sensitive allegations of sexual assault and abuse upon a minor.
4. Defendant Jeffrey Epstein is a citizen and resident of the State of New York.
5. Defendant [REDACTED] is a citizen and resident of Palm Beach County, Florida.

Formatted Indent:
Left: 0", First: 0"

6. Defendant [REDACTED] is a citizen and resident of the State of New York.

7. This is an action for damages in excess of Fifteen Thousand Dollars (\$15,000), exclusive of interest and costs.

8. Venue is proper in this Court under section 47.011, Florida Statutes, because the causes of action brought herein accrued in Palm Beach County, Florida and one or more Defendants resides in Palm Beach County, Florida.

Factual Allegations

9. At all relevant times, Defendant Jeffrey Epstein was an adult male. Epstein is a financier and money manager with a secret clientele limited exclusively to billionaires. He is a man of tremendous wealth, power and influence. He maintains his principal home in New York and also owns residences in New Mexico, St. Thomas and Palm Beach, Florida. The allegations herein concern Epstein's conduct while at his lavish estate in Palm Beach.

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10. Upon information and belief, Epstein has a sexual preference and obsession for minor girls. He engaged in a plan, scheme, and/or enterprise in which he gained access to primarily economically disadvantaged minor girls in his home, sexually assaulted these girls or coerced or attempted to coerce them to engage in prostitution, and then gave them money. In or about 2005, Jane Doe, then 14 years old, fell into Epstein's trap and became one of his victims.

11. Upon information and belief, Jeffrey Epstein carried out this scheme/enterprise and assaulted girls in Florida, New York and on his private island, known as Little St. James, in St. Thomas.

12. An integral player in Epstein's Florida scheme/enterprise was [REDACTED], an assistant of Epstein's, from New York, New York and Haley Robson, a Palm Beach Community College student from Loxahatchee, Florida. They recruited girls ostensibly to give a wealthy man a massage for monetary compensation in his Palm Beach mansion. Under Epstein's plan/enterprise, Ms. Robson was contacted shortly before or soon after Epstein was at his Palm Beach residence. Epstein, Kellen,

or someone on their behalf directed Ms. Robson to bring one or more underage girls to the residence.

██████████ upon information and belief, generally sought out economically disadvantaged underage girls from Loxahatchee and surrounding areas who would be enticed by the money being offered - generally \$200 to \$300 per "massage" session - and who were perceived as less likely to complain to authorities or have credibility if allegations of improper conduct were made. This was an important element of Epstein's plan/enterprise.

13. Epstein's plan, scheme, and/or enterprise reflected a particular pattern and method. Upon arrival at Epstein's mansion, Ms. Robson would introduce each victim to Sarah Kellen, Epstein's assistant, who gathered the girl's personal information, including her name and telephone number. ██████████ would then bring the girl up a flight of stairs to a bedroom that contained a massage table in addition to other furnishings. There were photographs of nude women lining the stairway ██████████ and in the bedroom. ██████████ would then leave the girl alone in this room, whereupon Epstein would enter wearing only a towel. He would then remove his towel, lay down naked on the massage table, and direct the girl to remove her clothes. He then would perform one or more lewd, lascivious and sexual acts, including masturbation, touching the girl's vagina with a vibrator, or digitally penetrating the girl's vagina, and coerce or attempt to coerce the girl to engage in lewd acts and/or prostitution.

14. Consistent with the foregoing plan, scheme, and/or enterprise, ██████████ recruited Jane Doe to give Epstein a massage for monetary compensation. Ms. Robson brought Jane Doe to Epstein's mansion in Palm Beach. Jane was introduced to Sarah ██████████ who led her up the flight of stairs to the room with the massage table. ██████████ set up the massage table and laid out massage oils and told Jane Doe that Epstein would be in shortly, and then left the room. Jane Doe was alone in the room when Epstein arrived. Epstein told her to remove her clothes and left the room. When Epstein returned he was wearing only a towel. He removed his towel, and laid down on his stomach on the massage table. Epstein again told Jane Doe to remove her clothes. In shock, fear

and trepidation, Jane Doe complied, removing her clothes except for her panties and bra. Shortly after starting to rub Epstein's back, Epstein told Jane Doe to sit on his back. Jane Doe, out of fear and trepidation, complied. After a period of time Epstein got up from the table and went behind the door. For several minutes Jane Doe heard loud noises and moans and believes that Epstein was masturbating. Thereafter Epstein, naked, returned to the massage table and laid face up on the table. Epstein then told Jane Doe to continue with the massage and told her to sit on top of him. Out of fear and trepidation she complied. As Jane Doe rubbed Epstein's chest Epstein began to use a vibrator on Jane Doe's vagina. Thereafter Epstein began to digitally stimulate and attempt to penetrate Jane Doe's vagina. At this same time, Epstein was masturbating. Upon reaching orgasm, Epstein got up from the massage table and told Jane Doe to write down her name and phone number and then left the room.

15. Jane Doe was then able to get dressed, leave the room and go back down the stairs and into the kitchen. Epstein, [REDACTED] and [REDACTED] were waiting for Jane Doe. Epstein paid Jane Doe \$300. [REDACTED] was paid \$200 by Epstein for bringing Jane to him. [REDACTED] brought Jane Doe home.

16. As a result of this encounter with Epstein, the 14-year old Jane Doe experienced confusion, shame, humiliation, embarrassment and the assault sent her life into a downward spiral.

COUNT I
Sexual Assault against Defendant Epstein

17. [REDACTED] Jane Doe, by and through her Mother, as parent and natural guardian, repeats and realleges paragraphs 1 through 16 above.

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18. Defendant Epstein tortiously assaulted Jane Doe sexually in or about 2005.

19. This sexual assault was in violation of Chapter 800 of the Florida Statutes, which recognizes as a crime the lewd and lascivious acts committed by Epstein upon Jane Doe.

20. As a direct and proximate result of Epstein's assault on Jane Doe, she has suffered and will continue to suffer severe and permanent traumatic injuries, including mental, psychological and emotional damages.

WHEREFORE, Plaintiff Jane Doe, by and through her Mother, as parent and natural guardian, demands judgment against Defendant Jeffrey Epstein for compensatory damages, costs, attorney's fees, and such other and further relief as this Court deems just and proper. Further, Plaintiff reserves the right to amend this Complaint to add a claim for punitive damages pursuant to Florida Law.

COUNT II
Civil Conspiracy against Defendants Epstein, [REDACTED] and [REDACTED]

21. Plaintiff Jane Doe, by and through her Mother, as parent and natural guardian, repeats and realleges paragraphs 1 through 16 above.

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22. Defendants Epstein, [REDACTED] and [REDACTED] conspired to subject Jane Doe to the sexual assault of Defendant Epstein.

23. Each of the Defendants committed an overt act in pursuance of this conspiracy: Defendant [REDACTED] used false pretenses to lure Jane Doe to the home of Defendant Epstein so that Epstein could sexually assault Jane Doe; Defendant [REDACTED] delivered Jane Doe to Defendant Epstein's bedroom so that Epstein could sexually assault Jane Doe, and Defendant Epstein actually committed sexual assault against Jane Doe.

24. As a direct and proximate result of Defendants' civil conspiracy, Jane Doe has suffered and will continue to suffer severe and permanent traumatic injuries, including mental, psychological and emotional damages.

WHEREFORE, Plaintiff Jane Doe, by and through her Mother, as parent and natural guardian, demands judgment against Defendants Jeffrey Epstein, [REDACTED], and [REDACTED] for compensatory damages, costs, attorney's fees, and such other and further relief as this Court deems just and proper. Further, Plaintiff reserves the right to amend this Complaint to add a claim for punitive damages pursuant to Florida Law.

COUNT III
Intentional Infliction of Emotional Distress against Defendant Epstein

25. Plaintiff Jane Doe, by and through her Mother, as parent and natural guardian, repeats and realleges paragraphs 1 through 16 above.

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26. Epstein's conduct was intentional or reckless.

27. Epstein's conduct was outrageous, going beyond all bounds of decency.

28. Epstein's conduct caused severe emotional distress not only to Jane Doe. Epstein knew or had reason to know that his intentional and outrageous conduct would cause emotional trauma and damage to Jane Doe and her mother.

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29. As a direct and proximate result of Epstein's intentional or reckless conduct, Jane Doe will continue to suffer severe mental anguish and pain.

WHEREFORE, Plaintiff Jane Doe, by and through her Mother as parent and natural guardian, demands, and Jane Doe's Mother, individually, demand judgment against Defendants Jeffrey Epstein, [REDACTED], and [REDACTED] for compensatory damages, costs, attorney's fees, and such other and further relief as this Court deems just and proper. Further, Plaintiff

reserves the right to amend this Complaint to add a claim for punitive damages pursuant to Florida Law.

COUNT IV
Civil Remedy for Violation of Florida Statute Section 772.103 against
Defendants Epstein, [REDACTED] and [REDACTED]

30. Plaintiff Jane Doe, by and through her Mother, as parent and natural guardian, repeats and realleges paragraphs 1 through 16 above.

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31. Defendants participated in an enterprise, or conspired or endeavored to so participate, through a pattern of criminal activity in violation of Florida Statute section 772.103(3)-(4).

32. Defendants engaged in this pattern of criminal activity by engaging in at least two of the following incidents of criminal activity with the same or similar intents, results, accomplices, victims, and methods of commission within a 5 year period:

- a. Procuring for prostitution, or causing to be prostituted, any person who is under the age of 18 years in violation of Florida Statute section 796.03;
- b. Soliciting, inducing, enticing, or procuring another to commit prostitution, lewdness, or assignation in violation of Florida Statute section 796.07(2)(f), or aiding, abetting or participating in such acts in violation of Florida Statute section 796.07(2)(h);
- c. Knowingly recruiting, enticing, harboring, transporting, providing, or obtaining by any means a person, knowing that force, fraud, or coercion will be used to cause that person to engage in prostitution in violation of Florida Statute section 796.045; or
- d. Forcing, compelling, or coercing another to become a prostitute in violation of Florida Statute section 796.04.

33. Under Defendants' plan, scheme and enterprise, Defendant Epstein paid Defendant [REDACTED] to repeatedly find and bring him underage girls, who were delivered to Epstein by Defendants Robson and [REDACTED] in order for Epstein to solicit, induce, coerce, entice, compel or force such girls to engage in acts of prostitution and/or lewdness.

34. Plaintiff Jane Doe was the victim of Defendants' plan, scheme and enterprise. Defendant [REDACTED] took Jane Doe to Epstein's home under the pretense that Jane Doe would be paid to give Epstein a massage. Defendant [REDACTED] delivered Jane Doe to a room with a massage table and told that Epstein would be in shortly. Jane Doe was alone in the room when Epstein arrived. Epstein told her to remove her clothes and left the room. When Epstein returned he was wearing only a towel. He removed his towel, and laid down on his stomach on the massage table. Epstein again told Jane Doe remove her clothes. In shock, fear and trepidation, Jane Doe complied, removing her clothes except for her panties and bra. Shortly after starting to rub Epstein's back, Epstein told Jane Doe to sit on his back. Jane Doe, out of fear and trepidation, complied. After a period of time Epstein got up from the table and went behind the door. For several minutes Jane Doe heard loud noises and moans and believes that Epstein was masturbating. Thereafter Epstein, naked, returned to the massage table and laid face up on the table. Epstein then told Jane Doe to continue with the massage and told her to sit on top of him. Out of fear and trepidation, she complied. As Jane Doe rubbed Epstein's chest, Epstein began to use a vibrator on Jane Doe's vagina. Thereafter, Epstein began to digitally stimulate and attempt to penetrate Jane Doe's vagina. At this same time, with his other hand, Epstein was masturbating. Upon reaching orgasm, Epstein got up from the massage table and told Jane Doe to write down her name and phone number and then left the room.

35. Jane Doe was then able to get dressed, leave the room and go back down the stairs and into the kitchen. Epstein, [REDACTED] and [REDACTED] were waiting for Jane Doe. Epstein paid Jane Doe \$300. [REDACTED] was paid \$200 by Epstein for bringing Jane Doe to him. Ms. Robson brought Jane Doe home.

WHEREFORE, Plaintiff Jane Doe, by and through her Mother, as parent and natural guardian, demands judgment against Defendants Jeffrey Epstein, [REDACTED], and [REDACTED] for compensatory damages, treble damages under Florida Statute section 772.104, costs and attorney's fees under Florida Statute section 772.104, and such other and further relief as this Court deems just and proper. Further, Plaintiff reserves the right to amend this Complaint to add a claim for punitive damages pursuant to Florida Law.

JURY TRIAL DEMAND

Plaintiffs demand a jury trial in this action.

Dated: March _____, 2008

Respectfully submitted,

RICCI-LEOPOLD, P.A.
2925 PGA Blvd., Suite 200
Falm Beach Gardens, FL 33410
Phone: 561-684-6500
Fax: 561-697-2383

By: _____
THEODORE J. LEOPOLD
Florida Bar No.: 705608

Juan Alessi

1 APPEARANCES:

2 On behalf of the State:
 3 DALIAH H. WEISS, Esquire
 4 ASSISTANT STATE ATTORNEY
 5 401 North Dixie Highway
 6 West Palm Beach, Florida 33401
 7 561.355.7100

8 On behalf of the Witness:
 9 DONNIE MURRELL, Esquire
 10 L.D. MURRELL, P.A.
 11 400 Executive Center Drive
 12 Suite 201
 13 West Palm Beach, Florida 33409
 14 561.686.2700

15 ALSO PRESENT:

16 DETECTIVE JOE RECAREY
 17 Palm Beach Police Department

18 - - -

I N D E X

WITNESS:
JUAN P. ALESSI
EXAMINATION BY DET. RE CAREY

PAGE:

4

- - -

N O E X H I B I T S M A R K E D

- - -

1 Sworn statement taken before Susan
2 Shelling, Registered Professional Reporter and Notary
3 Public in and for the State of Florida at Large, in the
4 above cause.

5 - - -

6 Thereupon,

7 JUAN P. ALESSI,
8 having been first duly sworn or affirmed, was examined
9 and stated as follows:

10 MR. MURRELL: I just want to repeat that
11 we're here under the State investigative subpoena
12 that was served on Mr. Alessi, although it was
13 dated for, I believe, Wednesday or something.
14 This is Monday the 21st, and we are here by
15 agreement.

16 EXAMINATION

17 BY DET. RECAREY:

18 Q. Mr. Alessi, I'm Detective Joe Recarey with
19 the Palm Beach P.D. As I explained to you on the
20 telephone, I am conducting an investigation on a former
21 employer of yours.

22 I just spoke with your wife and she told me
23 you guys worked for Mr. Epstein for eight years?

24 A. Yes, she did work for eight years. I
25 worked longer. I was there before my wife came.

1 Q. Before your wife came.

2 A. I started full-time with him on January 1,
3 1991, and we both left December 31, 2002. So I worked
4 eleven years exactly. Prior to that, prior to working
5 full-time for him, I worked part-time for him, on-and-off
6 basis.

7 Q. What were your responsibilities?

8 A. In the full-time basis, I started as a
9 houseman, and I became a major domo and [REDACTED] and
10 everything else, driver, and did everything. We both did
11 all the chores in the house, but I was in charge of the
12 house. I was above my wife and above the cleaning crew,
13 the gardners, pool people. So I was house manager, major
14 domo.

15 Q. You would have been the go-to guy for the
16 house?

17 A. Yes. And the one who would get the blame.

18 Q. We are talking about Jeffrey Epstein?

19 A. Of course.

20 Q. Do you remember the address of the house?

21 A. 558 El Brillo.

22 Q. Was it in the beginning of the street --

23 A. At the end of the street, on the left-hand
24 side.

25 Q. We're talking about the same house.

1 Q. During the time that he was here, you
2 prepared the house, did all the chores.

3 Did you do any of the cleaning?

4 A. Sometimes. Many times. I did -- last two
5 or three years the work was so much that we have to
6 hire -- we hire a clean-up crew that they came twice a
7 week or once a week, then it was twice a week. Depends
8 upon his schedule, because he did not allow anybody at
9 the house except us when he was in town. So when he was
10 in town, it was just us doing the cleaning and the
11 cooking, the driving, shopping, everything else.

12 Q. Did you stay on property in the guest
13 house?

14 A. Yes and no. We had an apartment right
15 across the bridge. We had an apartment in Tower 1515 on
16 Flagler, and we had an apartment at the house.

17 Q. Why would you stay at the house, then?

18 A. We stay at the house mostly when he was
19 there. When he was not in town, we went home. We went
20 to our apartment. When he was there, it was -- the job
21 was just too much to go home 9 o'clock, 10 o'clock and
22 come back 5 o'clock in the morning. We would just stay
23 and sleep and get up and work.

24 Q. When he was in town, did he receive a lot
25 of guests at the house?

1 girlfriend. She was our immediate superior.

2 Q. Did he have girls come over to give
3 massages?

4 A. Yes.

5 Q. How many massages would he have in a day?

6 A. Sometimes one, sometimes two, three.

7 Q. Was it the same girl that would come back
8 to do the massages?

9 A. Yeah, yeah. Not the same girl -- I mean
10 during eleven years, I probably saw a hundred, two
11 hundred different massage therapists.

12 Q. Did they seem young to you?

13 A. No, sir. Mostly no. We saw one or two
14 young ones in the last year. Before that, it was all
15 adults.

16 Q. During your last year when you were working
17 with him, what do you mean that they looked young? Did
18 they look like they were still in high school?

19 A. I remember one girl was young. We never
20 asked how old she was. It was not in my job.

21 Q. Right. I understand.

22 A. But I imagine she was 16, 17. In my
23 judgment, she was 16, 17.

24 Q. Where would these massages take place?

25 A. All the time it was in his room. Sometimes

1 it was in the balcony of his quarters. His room has a
2 wraparound balcony facing the pool. So the massages were
3 in the balcony outside in the sun, or inside in his
4 bathroom or her bathroom.

5 Q. Would you set up the room for the massages?

6 A. Many times. Yes, he will tell me, Set up
7 the room inside my bathroom or in the bedroom or in
8 Elaine's bathroom, or outside on the balcony. And I
9 would go and set up or my wife would go and set up the
10 table.

11 We had a table in every room of the house,
12 the massage tables, for the different guests. Because
13 not only he got massages, all the other guests got
14 massages too. So we have a table -- massage table in
15 basically every room, guest room.

16 Q. The girls that would come over to do
17 massages, they would massage him first or massage guests?

18 A. Different times. There were -- mostly they
19 was his massage. Mostly he would get massages.

20 Q. Would Ms. Maxwell be in the room with him
21 while he was getting the massage?

22 A. We don't know. Apparently we saw her going
23 upstairs, because it was -- when they went upstairs, they
24 closed -- his quarters, it had a double door, so it was a
25 door on top of the stairs -- I don't know if you've been

1 in the house -- and then there's another door going into
2 his room. So it was a long corridor. So everything was
3 closed and nobody saw anything.

4 Q. Would you clean up after?

5 A. Once in a while, yes, I did. Most of the
6 times I did. I did the cleanup.

7 Q. Did it appear as if there was going to be
8 more than one massage going on in the room?

9 A. More than one massage? I don't know. It
10 was massages. There was massages, because it was a hot
11 oil, and it was -- you know this vibrator, the neck
12 vibrators with the long handles. And towels, a lot of
13 towels. We used a lot of towels in the house. Used like
14 maybe 40, 50 towels a day, because every time he go in
15 into the pool, it was two or three towels. Everything
16 had to be cleaned up. I went most of the time to pick up
17 the room and get it ready.

18 Q. Did it ever appear to you that more went on
19 in the room other than a massage?

20 A. I just imagine. I never saw anything. But
21 I imagine there was more than -- I never saw anything
22 because it was closed doors. It was never done outside.

23 Q. Based on the cleanup?

24 A. Based on the cleanup -- at the end, I
25 cannot say there was. At the end, it was a few times

1 that the bed was undone. You know, we make the beds
2 three or four times a day. And sometimes we went to
3 clean up the massage to put it back, the massage table,
4 to pick up the towels, but the bed was undone again. So
5 either he took a nap or he went for a nap, I don't know.

6 Q. Or something else occurred?

7 A. Or something else. I cannot.

8 Q. Did the girls, would they bring their own
9 stuff or they would use his stuff?

10 A. No. We had everything. We had gallons of
11 stuff, different stuff.

12 Q. Different massage oils?

13 A. Different, all kinds.

14 Q. Different massagers?

15 A. Different stuff.

16 They would buy all over the world different
17 types of -- for different --

18 Q. Did any of these massagers look like sex
19 toys?

20 A. At the end, at the last year that we were
21 there they had like sex toys, some of them. I can say
22 maybe three or four occasions that I saw in the sink,
23 they were left out on the sink, and just --

24 Q. Where would he keep these massagers?

25 A. When I was there, we keep all the stuff in

1 a basket inside Ms. Maxwell's closet. It was a big
2 basket, about this round (indicating), with a cover on
3 it. And we used to pick up from the towel and just dump
4 it in there. That's it. That's the standard we went
5 through.

6 Q. What sink would you find those massagers
7 in?

8 A. Mostly in his sink, in his bathroom sink.

9 Q. His bathroom sink?

10 Was Ms. Maxwell still his girlfriend at
11 that time?

12 A. ■, yeah.

13 Q. Still his girlfriend that you know of right
14 now?

15 A. Yeah. We left, she was still his
16 girlfriend. I don't know now, but she was still there.

17 Q. Why did you leave at the end?

18 A. It was a hard job. It was an incredible
19 hard job. So demanding. Hours were terrible, from
20 5 o'clock in the morning to 10 o'clock at night.
21 Constantly on your feet.

22 I got very sick. My health went down the
23 drain. I was diagnosed with cancer, polycythemia, a kind
24 of blood cancer, and we had to leave. It was just too
25 much for me.

1 Q. Sounds like a lot.

2 A. Yeah. For me and my wife, we both left.

3 Q. It was very demanding when he was here in
4 town?

5 A. It was terrible. Bad job. Pay was good,
6 but we had enough.

7 Q. I know you guys had a falling out a couple
8 of years ago; I guess you weren't working with him
9 anymore. This would have been in 2003. You guys had a
10 falling out, remember?

11 A. Yeah, we settled that.

12 Q. That was settled?

13 A. That was settled with him between us.

14 Q. Was that --

15 A. It was an amicable -- it was an agreement,
16 mutual agreement. It was a mistake on my part.

17 Q. Are there any questions you have of me?

18 A. No. I told you the truth.

19 We just imagined things that could have
20 happened. I used to talk to my wife all day, working and
21 under that environment. But we didn't know for sure what
22 was going on.

23 We never heard anything. We never heard a
24 complaint, or a girl crying.

25 Q. Would these massage girls, especially

1 towards the end, would they come alone or would they come
2 with other people?

3 A. Mostly they would come alone. It was one
4 girl, one of the young girls, the one I can't think of
5 it, she would bring somebody else. She'd bring other
6 girls. But I didn't even know the names.

7 Q. All of them would go downstairs?

8 A. Yes.

9 Q. Or would one stay downstairs?

10 A. Most of the times when that girl came, it
11 was at night. So after dinner -- after dinner, they went
12 to the movies. And by the time they went to the movies,
13 we clean up right away and tried to get out of there.
14 And that was about 8, 9 o'clock at night.

15 After, when they come back, I don't know
16 what happened. Our quarters were a different -- I don't
17 know if you've been in the house, but our quarters were
18 separate.

19 Q. It's separate.

20 A. Separate. Before -- that building is new.
21 They build the building in 2001.

22 Q. The guest quarters?

23 A. Yeah, the guest quarters.

24 Before, we had an apartment upstairs.

25 Q. They have the laundry and a little office

1 and the bedroom?

2 A. Yes. That was 2001. Before that, we had
3 an apartment upstairs in their house, in the main house.

4 Q. In the little rooms upstairs across from
5 his [REDACTED] bedroom?

6 A. Right.

7 Q. Was there ever any photographs that you can
8 recall around the house?

9 A. Girls, girls' photographs and guests'
10 photographs, yes.

11 Q. Were they dressed or were they naked?

12 A. Most of them were dressed. It was a lot of
13 entertainment in the pool, around the pool area. But
14 most of them were dressed.

15 Q. When was the last time you spoke with
16 Mr. Epstein?

17 A. The last time I spoke with Mr. Epstein was
18 about a week ago, when you left me the card. I got
19 scared because of that fallout that we had, and I thought
20 it was a consequence of that. And I called and says,
21 Jeffrey, what's going on, what's happening? Because I
22 thought it was an investigation against me on his part.

23 Q. I'm sorry if I gave you that impression.

24 A. That's why I called him. That's the only
25 reason that I called.

1 Before I even spoke to you.

2 Q. Just when you found the card?

3 A. When I find the card, I get scared. I
4 said, What's going on now? Why are you bothering me now
5 in my house?

6 That's why I called him.

7 He said, John, there is an investigation
8 going on. I have nothing to talk to you. That's it.

9 I said, Okay.

10 Q. He didn't give you any information as to --

11 A. No, not a word.

12 Q. Has anybody else contacted you from
13 Mr. Epstein or his organization, his assistants, his
14 attorney?

15 A. No, no, no.

16 Q. Anyone that works for his attorney?

17 A. For his attorney? Yes. For his attorney,
18 the present attorney? Yes. That was an investigator
19 that it was investigated on his side, I can't remember
20 his name, but I understand it was from Roy Black's
21 office. That was his attorney. And he -- this
22 investigator basically asked me the same questions,
23 exactly the same questions: What did I know, what did I
24 know.

25 Q. When did this happen?

1 A. This happened about ten days ago -- about a
2 week ago, ten days ago. I'm not sure what date.

3 Q. Was his investigator's name --

4 A. It's the date after I contacted you.

5 Q. -- Paul, first name Paul?

6 A. Paul, Paul, yes.

7 You have the last name?

8 Q. No.

9 A. He asked me exactly the same questions.

10 Q. Did he offer you any money?

11 A. Absolutely not. I would not take it.

12 Q. Did he tell you not to speak to me?

13 A. No. He says -- no, he told me not to speak
14 to you. He didn't say that to me. He says, It's your
15 choice. You make that decision.

16 And he says, If you hire a lawyer, you make
17 that decision.

18 And we feel that was important for us. I
19 don't want to be involved with this thing. I'm out of
20 the job three years ago, and that's why we hired
21 Mr. Murrell. He suggested that.

22 Q. Did he ask you if anybody else has been
23 contacted?

24 A. No.

25 Q. Did he tell you that to call him back after

1 our meeting?

2 A. No, no.

3 Q. Were you to have any contact with him at
4 any time after our meeting?

5 A. If I will have a contact? I have no reason
6 for it. I have no reason to call Jeffrey or anybody
7 else. This is over, I hope.

8 Q. Well, Mr. Alessi, this is basically an
9 ongoing investigation, so obviously anything that we
10 discuss hopefully will stay between us. Because it is
11 still ongoing, I wouldn't want this out until the
12 investigation is complete.

13 A. It's not going anywhere. Even my kids
14 don't know it.

15 Q. He contacted you after you called
16 Mr. Epstein?

17 A. Yes.

18 When I call him and I said, Jeffrey, what's
19 going on?

20 He said, John, I don't know what's going
21 on. There's an investigation against me.

22 So then I said, Whew, thank God. I don't
23 know what's happening.

24 And then he says, I have an investigator
25 that is investigating, the same thing the police

1 department is doing. He's going to contact you.

2 And that was the end of it.

3 I think his name was Paul. I only met him
4 for about fifteen minutes, ten minutes.

5 Q. You met at your house?

6 A. No, no. I don't want him at my house. We
7 met at Carrabas restaurant, but it was not open, so we
8 met outside Carrabas. It took about ten minutes.

9 Q. Going back to the items that were found in
10 the sink, can you describe any of those massagers?

11 A. I only saw two things: It was a big,
12 big -- I think a vibrator. Big (indicating). And it was
13 a long -- I hate to -- I'm sorry. It was a long dick, I
14 think. Rubber thing. And there was a thing you used it
15 in the back, the vibrator in the back.

16 Q. What color?

17 A. We always had those. Not those toys.
18 Vibrators, we have different types, one for the neck, one
19 for the back. You know the one that has a battery and
20 they move, with balls on it, vibrator. That's it.
21 That's what I find there. I never find anything else.
22 Those two things.

23 Q. Do you remember any names of the girls that
24 might have come over for massages?

25 A. Yes. I remember some of them. From the

1 beginning? From the end?

2 Q. As many as you can remember.

3 A. As many as I can remember.

4 Q. I know it's been a while.

5 A. It was Jody. It was Donna. And it was --
6 it was Virginia. It was -- how many? Virginia, Lana.

7 It was also a young girl, but she was not a
8 massage therapist. She came to the house as a friend, I
9 think. I don't think she was a massage therapist. Her
10 name was -- as a matter of fact, she's in a soap opera
11 now, she's a star. Just give me a minute.

12 Nadya Jorlin, J-O-R-L-I-N.

13 There also were men masseuses.

14 Q. There were men too?

15 A. There were men. A few. Not that many. A
16 few. I can't remember.

17 Allison. There was an Allison. There was
18 a Dina. I think every name -- girls' names. In
19 eleven years, I cannot remember.

20 Q. That's fine.

21 A. There were girls coming and going. There
22 were girls traveling with him as massage therapists.
23 They would travel with him all over the world, because he
24 was in the plane, he got massages on the plane,
25 because -- I know because I used to supply the oils and

1 the towels for the plane.

2 Q. Would you clean his plane too?

3 A. No, no.

4 Q. Did you ever travel with him anywhere?

5 A. No, no.

6 Q. When he went to New York or Arizona or his
7 private island?

8 A. I've been on his island. I've been as a
9 guest, as a vacation. We just took vacations, and I went
10 to his island in the Caribbean. And I've been in New
11 Mexico. I've been at his house in London. But not as a
12 worker, just vacation.

13 Q. As a vacation?

14 A. Uh-huh.

15 We went to New Mexico for -- it was kind of
16 a symposium about how to clean homes. It was this lady
17 who make -- teach all the house people, housemen, and
18 they invited us to Santa Fe, New Mexico, to teach us how
19 to clean homes. That was kind of stupid.

20 Q. How he wanted it to be cleaned?

21 A. Yes. We didn't get that much.

22 Q. Can you think of anything that I haven't
23 asked you that might be relevant to this?

24 A. I can't think of anything. Basically it's
25 the same questions that the other investigator asked me.

1 Exactly the same.

2 I wish I could give you more names.

3 Allison --

4 Q. I'm not going to ask you to do that because
5 I know it's been a long time. I can't think of stuff I
6 did last week.

7 A. It's been a long time.

8 Q. If by any chance you are contacted again by
9 his investigator again for any more questions or anything
10 or any packages that he may deliver to you --

11 A. They have to go to Mr. Murrell.

12 Q. I was going to say, have him contact your
13 attorney.

14 MR. MURRELL: Packages? Are we expecting a
15 delivery of something?

16 DET. RECAREY: No. I'm just saying --

17 MR. MURRELL: Okay. Just making sure there
18 wasn't something I didn't know about.

19 DET. RECAREY: I.e., gifts, et cetera.
20 That kind of thing.

21 THE WITNESS: No.

22 DET. RECAREY: I would appreciate a phone
23 call just to give me a heads up.

24 THE WITNESS: I do not intend to contact
25 him at all.

1 DET. RECAREY: Okay. I appreciate it.
2 And that's it.

3 (Thereupon, the sworn statement was
4 concluded at 1:05 p.m.)

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1 THE STATE OF FLORIDA,)
2 COUNTY OF PALM BEACH.)

3

4

5 I, the undersigned authority, certify that Juan
6 P. Alessi personally appeared before me and was duly
7 sworn.

8

9 WITNESS my hand and official seal this 5th day
10 of December, 2005.

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Susan Shelling, RPR
Notary Public - State of Florida
My Commission No. DD 098441
My Commission expires 3/7/2006



Commission # DD098441
Expires March 7, 2006
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C E R T I F I C A T E

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County Of Palm Beach.)

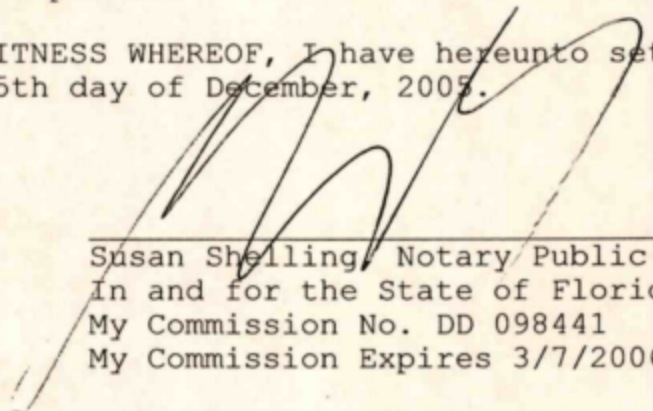
I, Susan Shelling, Registered Professional Reporter and Notary Public in and for the State of Florida at Large, do hereby certify that Juan P. Alessi was by me first duly sworn to testify the whole truth; that I was authorized to and did report said sworn statement in stenotype; and that the foregoing pages, numbered from 1 to 24, inclusive, are a true and correct transcription of my shorthand notes of said sworn statement.

I further certify that said sworn statement was taken at the time and place hereinabove set forth and that the taking of said sworn statement was commenced and completed as hereinabove set out.

I further certify that I am not an attorney or counsel of any of the parties, nor am I a relative or employee of any attorney or counsel of party connected with the action, nor am I financially interested in the action.

The foregoing certification of this transcript does not apply to any reproduction of the same by any means unless under the direct control and/or direction of the certifying reporter.

IN WITNESS WHEREOF, I have hereunto set my hand and seal this 5th day of December, 2005.



Susan Shelling, Notary Public
In and for the State of Florida
My Commission No. DD 098441
My Commission Expires 3/7/2006

A Absolutely 18:11 action 26:14,14 Adam 8:11 address 5:20 adults 9:15 affirmed 4:8 ago 6:5 14:8 16:18 18:1,2,2,20 agreement 4:15 14:15,16 Alessi 1:6 3:2 4:7 4:12,18 19:8 25:6 26:6 Allison 21:17,17 23:3 allow 7:8 amicable 14:15 and/or 26:16 Annie 8:20 anybody 7:8 17:12 18:22 19:6 anymore 14:9 apartment 7:14 7:15,16,20 15:24 16:3 Apparently 10:22 appear 11:7,18 APPEARANCES 2:1 appeared 25:6 apply 26:16 appreciate 23:22 24:1 area 16:13 Arizona 22:6 arrangements 6:24 asked 9:20 17:22 18:9 22:23,25 assistant 2:3 8:5 8:18,19,22 assistants 8:3,4 17:13 Associates 1:24 attorney 2:3 17:14,16,17,17 17:18,21 23:13 26:12,13 authority 25:5	authorized 26:7 B B 3:5 back 7:22 9:7 12:3 15:15 18:25 20:9,15 20:15,19 Bad 14:5 balcony 10:1,2,3 10:8 balls 20:20 Based 11:23,24 basically 6:7 8:24 10:15 17:22 19:8 22:24 basis 5:6,8 basket 13:1,2 bathroom 10:4,4 10:7,8 13:8,9 battery 20:19 Beach 1:1,4,11 2:4,8,11 4:19 25:2 26:3 bed 12:1,4 bedroom 10:7 16:1,5 beds 12:1 beginning 5:22 21:1 behalf 2:2,5 believe 4:13 big 13:1 20:11,12 20:12 Black's 17:20 blame 5:17 blood 13:24 boss 6:14 8:25 bothering 17:4 bridge 7:15 Brillo 5:21 bring 12:8 15:5,5 build 15:21 building 15:20,21 5:9 buy 12:16 C C 26:1,1 call 18:25 19:6,18 23:23 called 16:20,24,25	17:6 19:15 cancer 13:23,24 card 16:18 17:2,3 Caribbean 22:10 Carrabas 20:7,8 cause 4:4 Center 2:7 certification 26:15 certify 25:5 26:6 26:10,12 certifying 26:17 cetera 23:19 chance 23:8 charge 5:11 chef 8:7,7,13,15 chef's 8:9 choice 18:15 chores 5:11 7:2 clean 11:4 12:3 15:13 22:2,16 22:19 cleaned 11:16 22:20 cleaning 5:12 7:3 7:10 cleanup 11:6,23 11:24 clean-up 7:6 closed 10:24 11:3 11:22 closet 13:1 color 20:16 come 6:21 7:22 8:17,17 9:2,7 10:16 15:1,1,3 15:15 20:24 coming 6:22 21:21 commenced 26:11 Commission 25:15,16 26:22 26:22 complaint 14:24 complete 19:12 completed 26:11 concluded 24:4 conducting 4:20 connected 26:13 consequence 16:20	Consort 1:24 Constantly 13:21 contact 19:3,5 20:1 23:12,24 contacted 17:12 18:4,23 19:15 23:8 control 26:16 cooking 7:11 correct 6:19 26:8 corridor 11:2 counsel 26:13,13 County 1:1 25:2 26:3 couple 14:7 course 5:19 cover 13:2 crew 5:12 7:6 crying 14:24 D D 3:1,5 DALIAH 2:2 date 18:2,4 dated 4:13 day 9:5 11:14 12:2 14:20 25:9 26:18 days 18:1,2 DD 25:15 26:22 deal 6:8,14 December 5:3 25:10 26:18 decision 18:15,17 deliver 23:10 delivery 23:15 demanding 13:19 14:3 department 2:11 20:1 Depends 7:7 describe 20:10 DET 3:3 4:17 23:16,19,22 24:1 Detective 2:11 4:18 diagnosed 13:23 dick 20:13 Didier 8:13 different 9:11 10:12,18 12:11	12:12,13,14,15 12:16,17 15:16 20:18 Dina 21:18 dinner 15:11,11 direct 26:16 direction 26:16 directly 6:8,15 discuss 19:10 Dixie 1:10 2:3 doing 7:10 20:1 domo 5:9,14 Donna 21:5 DONNIE 2:6 door 10:24,25 11:1 doors 11:22 double 10:24 downstairs 15:7,9 drain 13:23 dressed 16:11,12 16:14 Drive 2:7 driver 5:10 driving 7:11 duly 4:8 25:6 26:6 dump 13:3 E E 3:1,5,5 26:1,1 eight 4:23,24 either 12:5 EI 5:21 Elaine 6:17 Elaine's 10:8 eleven 5:4 6:21 9:10 21:19 employee 26:13 employer 4:21 English 8:15,20 entertainment 16:13 environment 14:21 Epstein 4:23 5:18 6:9 16:16,17 17:13 19:16 especially 14:25 Esquire 2:2,6 et 23:19 exactly 5:4 17:23 18:9 23:1
---	---	--	---	--

J. CONSOR & ASSOCIATES REPORTING & TRANSCRIPTION
561.835.9738

EXAMINATION 3:3 4:16 examined 4:8 Executive 2:7 expecting 23:14 expires 25:16 26:22 explained 4:19	girls 9:2 10:16 12:8 14:25 15:4 15:6 16:9,9 20:23 21:18,21 21:22 give 9:2 17:10 21:11 23:2,23 go 7:21 8:17,17 10:9,9 11:14 15:7 23:11 God 19:22 going 6:7 10:22 11:1,7,8 14:22 16:21 17:4,8 19:13,19,20 20:1,9 21:21 23:4,12 good 14:5 gourmet 8:7 go-to 5:15 guess 14:8 guest 7:12 10:15 15:22,23 22:9 guests 7:25 8:1,2 10:12,13,17 16:9 guy 5:15 guys 4:23 14:7,9	22:19 hope 19:7 hopefully 19:10 hot 11:10 Hours 13:19 house 5:11,12,13 5:16,20,25 6:24 7:2,9,13,16,17 7:18,25 10:11 11:1,13 15:17 16:3,3,8 17:5 20:5,6 21:8 22:11,17 households 6:11 houseman 5:9 housemen 22:17 hundred 9:10,11	Le 23:19 J January 5:2 Jeffrey 5:18 16:21 19:6,18 job 7:20 9:20 13:18,19 14:5 18:20 Jody 21:5 Joe 2:11 4:18 John 17:7 19:20 Jorlin 21:12 Juan 1:6 3:2 4:7 25:5 26:6 judgment 9:23 J-O-R-L-I-N 21:12	look 9:18 12:18 looked 9:17 lot 7:24 8:21 11:12,13 14:1 16:12 L.D 2:6 M M 3:5 main 16:3 major 5:9,13 making 23:17 manager 5:13 6:11,11 massage 9:11 10:12,14,17,17 10:19,21 11:8,9 11:19 12:3,3,12 14:25 21:8,9,22 massagers 12:14 12:18,24 13:6 20:10 massages 9:3,5,8 9:24 10:2,5,13 10:14,17,19 11:10,10 20:24 21:24 masseuses 21:13 16:5 matter 21:10 Maxwell 6:17,18 8:22 10:20 13:10 Maxwell's 13:1 mean 9:9,17 means 26:16 meeting 19:1,4 men 21:13,14,15 met 20:3,5,7,8 Mexico 22:11,15 22:18 minute 21:11 minutes 20:4,4,8 mistake 14:16 Monday 1:8 4:14 money 18:10 morning 7:22 13:20 move 20:20 movies 15:12,12 Murrell 2:6,6 4:10 18:21
F F 26:1 facing 10:2 fact 21:10 falling 14:7,10 fallout 16:19 Fe 22:18 feel 18:18 feet 13:21 fifteen 20:4 financially 26:14 find 13:6 17:3 20:21,21 fine 21:20 first 4:8 10:17 18:5 26:6 Flagler 7:16 Florida 1:1,11,23 2:4,8 4:3 25:1 25:15 26:2,6,21 fly 8:19 follows 4:9 foregoing 26:7,15 former 4:20 forth 26:10 found 17:2 20:9 four 12:2,22 8:13 friend 21:8 full-time 5:2,5,8 further 26:10,12	H H 2:2 3:5 hand 25:9 26:18 handles 11:12 happen 17:25 happened 14:20 15:16 18:1 happening 16:21 19:23 hard 13:18,19 hate 20:13 heads 23:23 health 13:22 heard 14:23,23 hereinabove 26:10,11 hereunto 26:18 high 9:18 Highway 1:10 2:3 hire 7:6,6 18:16 hired 18:20 home 7:19,21 homes 6:12 22:16	I imagine 9:22 11:20,21 imagined 14:19 immediate 9:1 important 18:18 impression 16:23 inclusive 26:8 incredible 13:18 indicating 13:2 20:12 inform 6:22 information 17:10 inside 10:3,7 13:1 intend 23:24 interested 26:14 investigated 17:19 investigating 19:25 investigation 1:4 4:20 16:22 17:7 19:9,12,21 investigative 4:11 investigator 17:18 17:22 19:24 22:25 23:9 investigator's 18:3 invited 22:18 involved 18:19 island 22:7,8,10 items 20:9	K K 3:5 keep 12:24,25 kids 19:13 kind 13:23 22:15 22:19 23:20 kinds 12:13 know 8:11,14 10:22,25 11:9 11:11 12:1,5 13:13,16 14:7 14:21 15:6,15 15:17 17:23,24 19:14,20,23 20:19 21:4,25 23:5,18	L lady 22:16 Lana 21:6 Large 4:3 26:6 laundry 15:25 lawyer 18:16 leave 13:17,24 left 5:3 6:5 12:23 13:15 14:2 16:18 left-hand 5:23 little 15:25 16:4 London 22:11 long 11:2,12 20:13,13 23:5,7 longer 4:25
G gallons 12:10 gardners 5:13 getting 10:21 gifts 23:19 girl 8:20 9:7,9,19 14:24 15:4,10 21:7 girlfriend 6:10,18 8:25 9:1 13:10 13:13,16				

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561.835.9738

23:11,14,17 mutual 14:16	11:22 20:8 o'clock 7:21,21,22 13:20,20 15:14	P-E-R-R-Y 8:11 P.A 2:6 P.D 4:19 p.m 1:9,9 24:4	Roy 17:20 RPR 1:22 25:14 Rubber 20:14	24:3 26:7,9,10 26:11 stay 7:12,17,18,22 8:7 15:9 19:10 stenotype 26:7 street 5:22,23 stuff 12:9,9,11,11 12:15,25 23:5 stupid 22:19 subpoena 4:11 suggested 18:21 Suite 2:7 sun 10:3 superior 9:1 supply 21:25 sure 14:21 18:2 23:17 Susan 1:22 4:1 25:14 26:5,21 sworn 1:6 4:1,8 24:3 25:7 26:6,7 26:8,10,11 symposium 22:16
N	P	Q	S	T
N 1:10 3:1,5 Nadya 21:12 naked 16:11 name 8:9,14 17:20 18:3,5,7 20:3 21:10,18 names 15:6 20:23 21:18 23:2 nap 12:5,5 neck 11:11 20:18 never 8:2 9:19 11:20,21,22 14:23,23 20:21 new 8:12 15:20 22:6,10,15,18 night 13:20 15:11 15:14 North 2:3 Notary 1:23 4:2 25:15 26:5,21 notes 26:8 November 1:8 number 6:2 numbered 26:8	P 1:6 3:2 4:7 25:6 26:6 packages 23:10 23:14 PAGE 3:2 pages 26:7 Palm 1:1,4,11 2:4 2:8,11 4:19 25:2 26:3 part 14:16 16:22 parties 26:13 party 26:13 part-time 5:5 Paul 18:5,5,6,6 20:3 Pay 14:5 people 5:13 15:2 22:17 8:11 personal 8:19,21 personally 25:6 phone 1:25 23:22 phonetic 8:14 photographs 16:7 16:9,10 pick 11:16 12:4 13:3 place 9:24 26:10 plane 21:24,24 22:1,2 police 2:11 19:25 polycythemia 13:23 pool 5:13 10:2 11:15 16:13,13 prepared 7:2 present 2:10 17:18 prior 5:4,4 private 22:7 probably 9:10 Professional 4:2 26:5 property 7:12 Public 1:23 4:3 25:15 26:5,21 put 12:3	quarters 10:1,24 15:16,17,22,23 questions 6:7 14:17 17:22,23 18:9 22:25 23:9 quickly 8:16 quite 8:10	S 3:5 Santa 22:18 saw 9:10,13 10:22 11:3,20,21 12:22 20:11 saying 23:16 says 16:20 18:13 18:14,16 19:24 scared 16:19 17:3 schedule 7:8 school 9:18 seal 25:9 26:18 separate 15:18,19 15:20 served 4:12 set 10:5,6,9,9 26:10,11,18 settled 14:11,12 14:13 sex 12:18,21 Shelling 1:22 4:2 25:14 26:5,21 She'd 15:5 shopping 7:11 shorthand 26:8 sick 13:22 side 5:24 17:19 sink 12:22,23 13:6 13:8,8,9 20:10 sir 9:13 sleep 7:23 soap 21:10 somebody 15:5 sorry 16:23 20:13 Sounds 14:1 speak 18:12,13 spoke 4:22 16:15 16:17 17:1 stairs 10:25 standard 13:4 star 21:11 started 5:2,8 State 1:1,23 2:2,3 4:3,11 25:1,15 26:2,5,21 stated 4:9 statement 1:6 4:1	24:3 26:7,9,10 26:11 stay 7:12,17,18,22 8:7 15:9 19:10 stenotype 26:7 street 5:22,23 stuff 12:9,9,11,11 12:15,25 23:5 stupid 22:19 subpoena 4:11 suggested 18:21 Suite 2:7 sun 10:3 superior 9:1 supply 21:25 sure 14:21 18:2 23:17 Susan 1:22 4:1 25:14 26:5,21 sworn 1:6 4:1,8 24:3 25:7 26:6,7 26:8,10,11 symposium 22:16
O		R		
O 3:5 obviously 19:9 occasions 12:22 occurred 12:6 offer 18:10 office 15:25 17:21 official 25:9 13:12 oil 11:11 oils 12:12 21:25 Okay 17:9 23:17 24:1 old 9:20 once 7:7 11:5 ones 9:14 ongoing 19:9,11 on-and-off 5:5 open 20:7 opera 21:10 organization 17:13 outside 10:3,8		R 3:5 26:1 ready 6:24 11:17 reason 16:25 19:5 19:6 recall 16:8 Recarey 2:11 3:3 4:17,18 23:16 23:19,22 24:1 receive 7:24 Registered 4:2 26:5 relative 26:13 relevant 22:23 remember 5:20 8:9 9:19 14:10 17:19 20:23,25 21:2,3,16,19 repeat 4:10 report 26:7 Reported 1:21 reporter 4:2 26:5 26:17 Reporting 1:24 reproduction 26:16 responsibilities 5:7 restaurant 20:7 right 6:13,23,25 7:14 9:21 13:13 15:13 16:6 room 9:25 10:1,5 10:7,11,15,15 10:20 11:2,8,17 11:19 rooms 16:4 round 13:2		

J. CONSOR & ASSOCIATES REPORTING & TRANSCRIPTION
561.835.9738

22:24 23:5	V	X 3:1,5	400 2:7
thought 16:19,22	vacation 22:9,12	Y	401 1:10 2:3
three 6:5 7:5 9:6	22:13	yeah 6:1 9:9,9	5
11:15 12:2,22	vacations 22:9	13:12,15 14:2	5 7:22 13:20
18:20	vibrator 11:11	14:11 15:23	5th 25:9 26:18
time 6:6,8 7:1 8:6	20:12,15,20	year 8:4 9:14,16	50 11:14
8:22,23 9:25	vibrators 11:12	12:20	558 5:21 6:3,3
11:14,16 13:11	20:18	years 4:23,24 5:4	561.355.7100 2:4
15:12 16:15,17	Virginia 21:6,6	6:5,21 7:5 8:6	561.686.2700 2:8
19:4 23:5,7	W	9:10 14:8 18:20	561.835.9738 1:25
26:10	want 4:10 18:19	21:19	8
times 7:4 10:6,18	19:11 20:6	York 8:12 22:6	8 15:14
11:6,25 12:2	wanted 22:20	young 9:12,14,17	9
15:10	wasn't 23:18	9:19 15:4 21:7	9 7:21 15:14
told 4:22 14:18	Wednesday 4:13	0	
18:13	week 7:7,7,7	098441 25:15	
top 10:25	16:18 18:2 23:6	26:22	
towel 13:3	WEISS 2:2	1	
towels 11:12,13	went 7:19,19 8:16	1 5:2 26:8	
11:13,14,15	10:23 11:16,18	1:05 1:9 24:4	
12:4 22:1	12:2,5 13:4,22	10 7:21 13:20	
Tower 7:15	15:11,12 22:6,9	12:25 1:9	
town 7:9,10,19,24	22:15	1515 7:15	
14:4	weren't 14:8	16 9:22,23	
toys 12:19,21	West 1:11 2:4,8	17 9:22,23	
20:17	we're 4:11 5:25	1991 5:3	
transcript 26:15	WHEREOF	2	
transcription 1:24	26:18	2001 15:21 16:2	
26:8	Whew 19:22	2002 5:3	
travel 8:5,8,21	wife 4:22,25 5:1	2003 14:9	
21:23 22:4	5:12 6:2 10:9	2005 1:8 25:10	
traveled 8:23	14:2,20	26:18	
traveling 21:22	wish 23:2	201 2:7	
tried 15:13	Witness 2:5 3:2	21 1:8	
true 26:8	23:21,24 25:9	21st 4:14	
truth 14:18 26:6	26:18	24 26:8	
twice 7:6,7	word 17:11	3	
two 7:4 8:6 9:6,10	work 4:24 7:5,23	3/7/2006 25:16	
9:13 11:15	worked 4:23,25	26:22	
20:11,22	5:3,5	31 5:3	
types 12:17 20:18	worker 22:12	33401 1:11 2:4	
U	working 5:4 9:16	33409 2:8	
Uh-huh 22:14	14:8,20	358 6:3,4	
Um-hum 6:20	works 17:16	4	
undersigned 25:5	world 6:12 12:16	4 3:3	
understand 6:6	21:23	40 11:14	
9:21 17:20	wouldn't 19:11		
undone 12:1,4	wraparound 10:2		
upstairs 10:23,23	X		
15:24 16:3,4			
use 12:9			

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-TRASH PULL ON
9-21-05 -

DAY AFTER
TRASH LEFT



Jeffrey E. Epstein

BICE RISTORANTE

Time: 17:39:38

9/19/2005 1 CUSTOMER

TELE

1

---Customer 1---

1 PROSCIUTTO

1 PAPPARDELE

1 GNOCCHI PESTO

1 VEAL PARMESIAN

W P.M.

12 GO

170 GO

TO GO

#####

Larry recommends
leaving

Jeffrey E. Epstein

Carbs * Henry page - Tailor
Don't - Can't
- Acid & L.

Then - B.I.

Doris Barlett
Born
(County - Hester) - Cesar
Tenny # 6

BARD !!

Magnate

After Son Ch Pa
 } Ejj
Zinda } 4 - TTC Se

Kossly Schdu . PT
 mv. 40

Jeffrey E. Epstein

Danielle
646 226 7463

Jeffrey E. Epstein

I would like to...

Jeffrey E. Epstein

Alberto,

I received your short letter with great disappointment. Unfortunately, today, I cannot accept your "resignation". I'm sorry, but it is not that simple to abandon a "family member", no matter how frustrating or good-looking he may be.

If my appreciation for both you and your talent has not been adequately expressed as you and I have not spoken directly, I apologize.

I am sure you have forgotten, but you had initially assured me that the island project would be done for last Christmas. I have always been both gracious and generous in forgiving the times that have slipped by. You and I have, I thought, a unique understanding.

Jean, who assured me the project would be complete by the end of July, when in fact, for example, till this day there are still wooden packing crates for side tables in the living room, has yet to contact me. Furniture was supposed to arrive, but even until today, I have not been told what and when to expect the balance.

Alberto, it is your right to take on only jobs you want. It is both unfair, unfriendly and reprehensible to simply leave a job undone in the middle. This is not your way. I don't believe that you would treat a less friendly client with the same disregard.

I would hope that you will reconsider the big house island project. As you know, we have bought many things for the interior and have incurred great expense to get permits and drawings in a Moroccan style, but if you choose not to move forward, I think at a minimum, my house should not be left in the state of disrepair in which it currently sits and should be brought to completion as soon as possible. If Jean, who I have great respect for, does not want to complete it as I believe he is only an employee and as I have my total relationship not with Jean, but with Cabinet Pinto, the obligation falls on you personally. This is only right, you know it is.

As you are aware, I was told repeatedly that you would call me upon return from your vacation and both visit and finish the project. You and I have more of a friendship than my arriving, in a

My
Dad

- NAD

Eric

Hand

Jer

Woffion May

7

Rosely

Ken Dext

Kosel

Jeffrey E. Epstein

From: Origin ID: (212)750-9895

JEFFREY E. EPSTEIN
457 MADISON AVENUE
4TH FLOOR
NEW YORK, NY 10022

FedEx



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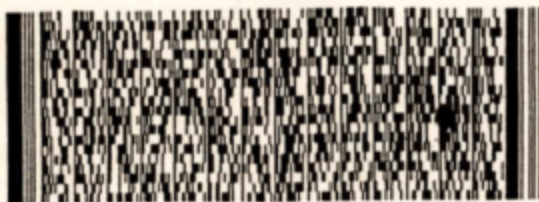
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Jeffrey E. Epstein

122 of 131

Public Records Request No.

Alberto,

I received your short letter with great disappointment. Unfortunately, today, I cannot accept your "resignation". I'm sorry, but it is not that simple to abandon a "family member", no matter how frustrating or good-looking he may be.

If my appreciation for both you and your talent has not been adequately expressed as you and I have not spoken directly, I apologize.

I am sure you have forgotten, but you **had initially assured** me that the island project would be done for *last Christmas*. I have **always been both gracious** and generous in forgiving the dates that have slipped by. You and I **have, I thought, a unique understanding**.

Jean, **who assured me the project would be complete by the end of July**, when in fact, for example, **till this day there are still wooden packing crates for side tables** in the living room, has yet to contact me. **Furniture was supposed to arrive**, but even until today, I have not been told what and when to **expect the balance**.

Alberto, **it is your right** to take on only jobs you want. It is both unfair, unfriendly and unprofessional **to simply** leave a job undone in the middle. This is not your way. I don't believe that you would **treat a less friendly client** with the same disregard.

I would hope that you will reconsider the big house Island project. As you know, we have bought many things for the interior and have incurred great expense to get permits and drawings in a Moroccan style, but if you choose not to move forward, I think at a minimum, my house should not be left in the state of disrepair in which it currently sits and should be brought to completion as soon as possible. If Jean, who I have great respect for, does not want to complete it as I believe he is only an employee and as I have my total relationship not with Jean, but with Cabinet Pinto, the obligation falls on you personally. This is only right, you know it is. As you are aware, I was told repeatedly that you would call me upon return from your vacation and both visit and finish the project. You and I have more of a friendship than my receiving, in a

frankly impolite way, only a letter and not even the phone call I was repeatedly promised.

(However, I know you don't like tension) Please call me at your earliest convenience.

I remain your friend

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Jeffrey E. Epstein

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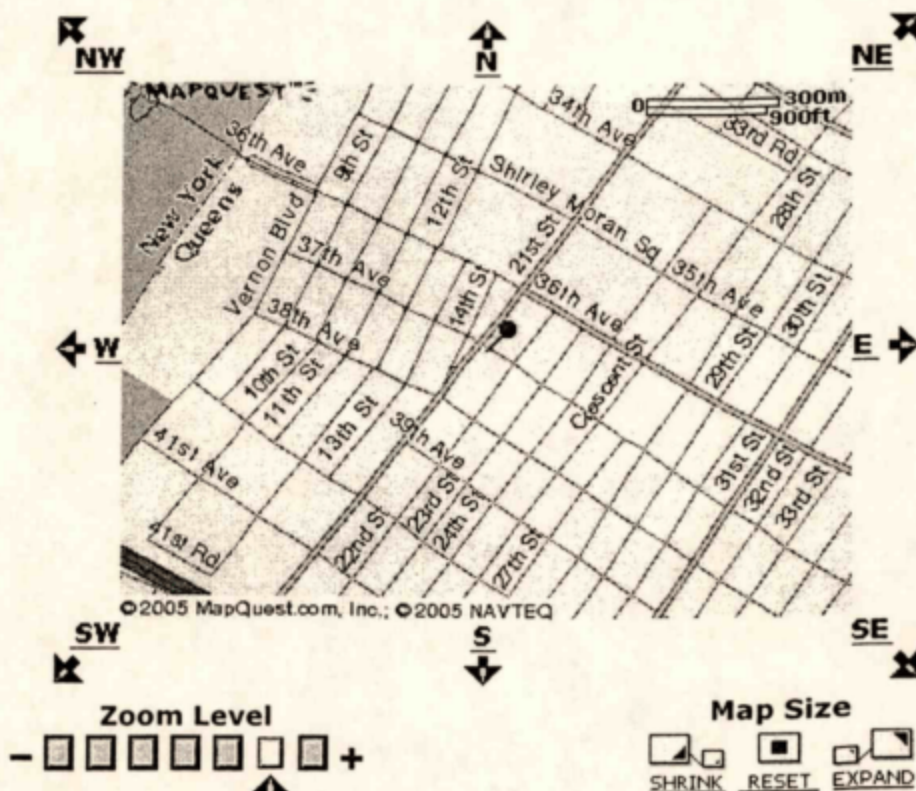
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IMPORTANT MESSAGE

FOR J. E.
DATE 8/20/05 TIME 8:45 ^{AM} ~~P.M.~~
M Tony

OF _____
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TELEPHONED	PLEASE CALL	☒
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WANTS TO SEE YOU	RUSH	☐
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MESSAGE _____

SIGNED J.   1184

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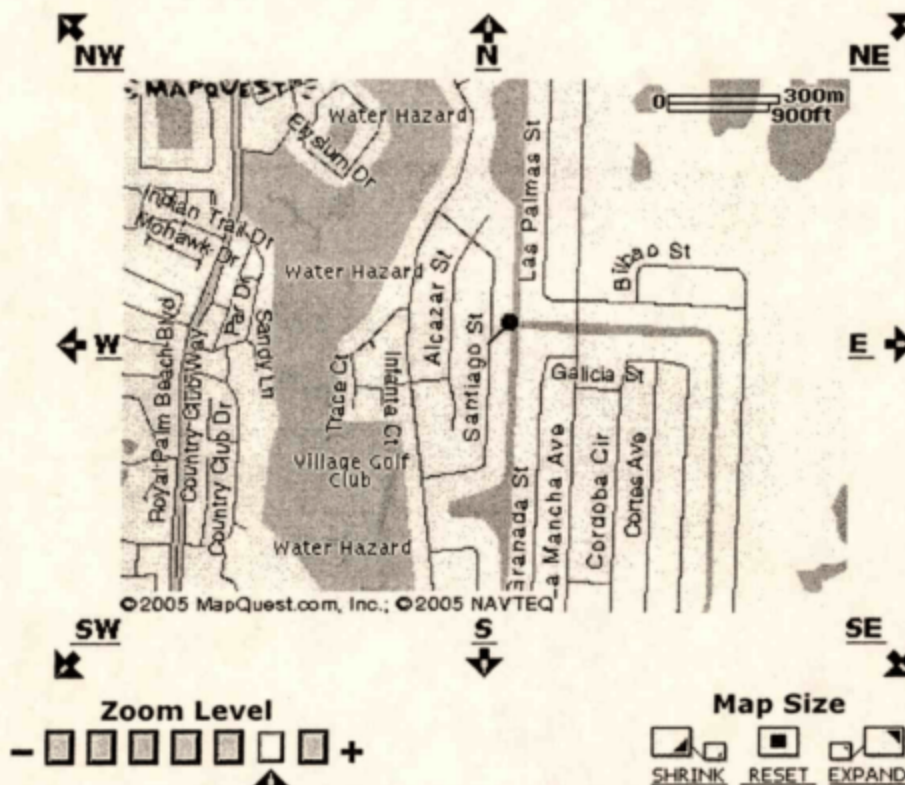
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time
call

635-3454

↓

Jeffrey E. Epstein *J. Epstein*

[REDACTED]
can not
come at 7pm
tomorrow b/c
of soccer

