

Certificate of Service

I HEREBY CERTIFY that a true copy of the foregoing was hand-delivered to the Clerk of the Court as required by the Local Rules of the Southern District of Florida and electronically mailed to all counsel of record identified on the following Service List on this 11th day of September, 2009.

Certificate of Service

Jane Doe No. 2 v. Jeffrey Epstein
Case No. 08-CV-80119-MARRA/JOHNSON

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Adam D. Horowitz, Esq.
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Page 11

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Respectfully submitted,

By: 

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rcrit@bclclaw.com

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Florida Bar #617296
mpike@bclclaw.com

BURMAN, CRITTON, LUTTIER & COLEMAN
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561/842-2820 Phone
561/515-3148 Fax
(Co-Counsel for Defendant Jeffrey Epstein)

03956-11004

DOJ-OGR-00030292

Robert D. Critton Jr.

From: Adam Horowitz [ahorowitz@sexabuseattorney.com]
Sent: Tuesday, September 15, 2009 11:43 AM
To: Michael J. Pike; Robert D. Critton Jr.
Cc: Stuart Mermelstein
Subject: Jane Does v. Epstein

Please allow this to confirm that Jeffrey Epstein will not attend tomorrow's deposition of Jane Doe No. 4 (in the absence of a Court order permitting him to attend). We understand you may wish to have your client listen in by telephone or view a videofeed of the deposition, but will not be seen by our client.

Regards,

Adam D. Horowitz, Esq.
www.sexabuseattorney.com
Mermelstein & Horowitz, P.A.
18205 Biscayne Boulevard
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Miami, FL 33160
ahorowitz@sexabuseattorney.com
Tel: (305) 931-2200
Fax: (305) 931-0877

From: Michael J. Pike [mailto:MPike@bcdclaw.com]
Sent: Tuesday, September 15, 2009 10:54 AM
To: Stuart Mermelstein; Adam Horowitz
Cc: Robert D. Critton Jr.; Jessica Cadwell
Subject: FW: Jane Does v. Epstein

Gentlemen:

I sent the e-mail below weeks ago. I have not heard back from you. I'm entitled to the questionnaires Kliman had your clients fill out and which he utilized to formulate his opinions. I need them by tomorrow since they are well over due. If not, I will have no other choice to file a motion, which I do not want to do given how we have worked together on these issues in the past. Let me know, pike.

From: Michael J. Pike
Sent: Tuesday, August 18, 2009 11:37 AM
To: Robert D. Critton Jr.; Stuart Mermelstein; Ashlie Stoken-Baring; Connie Zaguirre
Subject: Jane Does v. Epstein

From reviewing the transcripts, it seems Dr. Kliman utilized Questionnaire's with all of your clients. I need them. Please advise of your position. I'm sure you will produce since they are

EXHIBIT 3

9/15/2009

03956-11005

discoverable. Thanks.

Michael J. Pike, Esq.
Burman, Critton, Luttier & Coleman
515 N. Flagler Dr., Ste. 400
West Palm Beach, Florida 33401
Telephone: (561) 842-2820
Facsimile (561) 844-6929

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9/15/2009

03956-11006

DOJ-OGR-00030294

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA**

CASE NO.: 08-CV-80119-MARRA-JOHNSON

JANE DOE NO. 2,

Plaintiff,

v.

JEFFREY E. EPSTEIN,

Defendant.

Related Cases:

08-80232, 08-80380, 08-80381, 08-80994,
08-80993, 08-80811, 08-80893, 09-80469,
09-80581, 09-80656, 09-80802, 09-81092.

AFFIDAVIT OF JEFFREY E. EPSTEIN

STATE OF FLORIDA) SS
COUNTY OF PALM BEACH)

BEFORE ME, the undersigned authority, personally appeared Jeffrey E. Epstein having personal knowledge and being duly sworn, deposes and says:

1. My office is located at 250 Australian Avenue South, 14th Floor, West Palm Beach, Florida. Its location has been well publicized in the news.
2. I met with my attorneys, Robert D. Critton, Jr. and Mark T. Luttier, at 12:30 p.m. in preparation for the deposition of Jane Doe No. 4 which was to take place beginning at 1:00 p.m. on September 16, 2009.
3. I was aware of the motion for protective order which had been served in this case by counsel for Jane Doe No. 4 and the Emergency Motion To Strike Plaintiff's Motion For

EXHIBIT 4

03956-11007

Jane Doe No. 4 v. Epstein
Page 2

Protective Order And Emergency Motion To Allow The Attendance Of Jeffrey Epstein At The Deposition Of Plaintiffs And Response In Opposition To Plaintiffs', Jane Doe Nos. 2-8, Motion For Protective Order As To Jeffrey Epstein's Attendance At The Deposition Of Plaintiffs, With Incorporated Memorandum of Law, which had been filed on my behalf such that I could attend the deposition and assist my attorneys in my defense.

4. I also understood that as of 1:00 p.m. on September 16, after I had finished speaking with my attorneys that the court had not ruled regarding the above-referenced motions.

5. I was instructed by my attorneys that I could not attend the deposition and therefore a video feed was set up such that I could view the deposition from my home.

6. I also understood that my attorneys did not want me in the building after the deposition began.

7. At 1:04 p.m. after we assumed that everyone would be in the deposition room, my lawyers went down on one elevator and I went down on another elevator with my driver, Igor Zinoviev, both exiting at approximately the same time.

8. I asked Igor where he had parked, and he said "out front". We exited the elevator, I walked toward the front door. Near the front door, I saw a taller woman and a shorter woman who I thought might be Jane Doe No. 4 and immediately turned to my left and went out a separate exit to the garage.

9. At no time did I speak with or attempt to interact with either women.

FURTHER THE AFFIANT SAYETH NAUGHT.



Jeffrey B. Epstein

03956-11008


DOJ-OGR-00030296

Jane Doe No. 4 v. Epstein
Page 3

STATE OF FLORIDA
COUNTY OF PALM BEACH

I hereby Certify that on this day, before me, an officer duly authorized to administer oaths and take acknowledgments, personally appeared Jeffrey E. Epstein known to me to be the person described in and who executed the foregoing Affidavit, who acknowledged before me that he/she executed the same, that I relied upon the following form of identification of the above named person: Jeffrey Epstein, and that an oath was/was not taken.

WITNESS my hand and official seal in the County and State last aforesaid this day of Sept. 17, 2009.


PRINT NAME: Sheryl L. Mahoney (SEAL)
NOTARY PUBLIC/STATE OF FLORIDA
COMMISSION NO.:
MY COMMISSION EXPIRES:



03956-11009

DOJ-OGR-00030297

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

CASE NO.: 08-CV-80119-MARRA-JOHNSON

JANE DOE NO. 2,

Plaintiff,

v.

JEFFREY EPSTEIN,

Defendant.

Related Cases:

08-80232, 08-80380, 08-80381, 08-80994,
08-80993, 08-80811, 08-80893, 09-80469,
09-80581, 09-80656, 09-80802, 09-81092.

AFFIDAVIT OF IGOR ZINOVIEV

STATE OF FLORIDA) SS
COUNTY OF PALM BEACH)

BEFORE ME, the undersigned authority, personally appeared Igor Zinoviev having personal knowledge and being duly sworn, deposes and says:

1. I work for Jeffrey Epstein. I as well drive him from place to place.
2. At approximately 1:04 p.m., Mr. Epstein and I went down in the elevator from the 14th floor to the ground level. I was to drive Mr. Epstein to his home. His lawyers went down at approximately the same time in a separate elevator.
3. I parked the car at the front entrance. As I walked toward the front door and noticed that Mr. Epstein quickly turned to the left so as to exit through the door to the garage of the building rather than the front entrance.

EXHIBIT 5

03956-11010

Jane Doe No. 4 v. Epstein
Page 2

4. At no time did Mr. Epstein speak or gesture to anyone, including the individuals whom I saw near the front door.

5. At no time did I speak with the individuals at the main entrance.

FURTHER THE AFFIANT SAYETH NAUGHT.

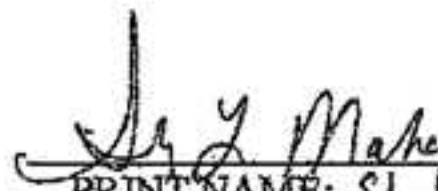

Igor Zinoviev

STATE OF FLORIDA
COUNTY OF PALM BEACH

I hereby Certify that on this day, before me, an officer duly authorized to administer oaths and take acknowledgments, personally appeared Igor Zinoviev known to me to be the person described in and who executed the foregoing Affidavit, who acknowledged before me that he/she executed the same, that I relied upon the following form of identification of the above named person: Jeffrey Epstein, and that an oath was/was not taken.

WITNESS my hand and official seal in the County and State last aforesaid this day of Sept. 17, 2009.





PRINT NAME: Sheryll L. Mahoney (SEAL)

NOTARY PUBLIC/STATE OF FLORIDA

COMMISSION NO.:

MY COMMISSION EXPIRES:

03956-11011

DOJ-OGR-00030299

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA**

CASE NO.: 08-CV-80119-MARRA-JOHNSON

JANE DOE NO. 2,

Plaintiff,

v.

JEFFREY EPSTEIN,

Defendant.

Related Cases:

08-80232, 08-80380, 08-80381, 08-80994,
08-80993, 08-80811, 08-80893, 09-80469,
09-80581, 09-80656, 09-80802, 09-81092.

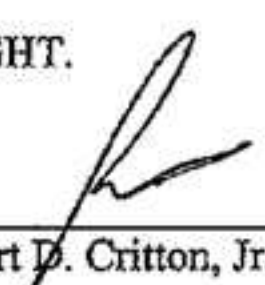
AFFIDAVIT OF ROBERT D. CRITTON, JR.

STATE OF FLORIDA) SS
COUNTY OF PALM BEACH)

BEFORE ME, the undersigned authority, personally appeared Robert D. Critton, Jr.,
having personal knowledge and being duly sworn, deposes and says:

1. I am counsel for Jeffrey Epstein in the above-styled matter and other civil lawsuits.
2. The information contained in motion, paragraphs 1 through 9, 11, 13, 14 and 16 is true and accurate based on my personal knowledge.
3. The costs and fees set forth in the motion are true, correct and reasonable.

FURTHER THE AFFIANT SAYETH NAUGHT.



Robert D. Critton, Jr.

EXHIBIT 6

03956-11012

DOJ-OGR-00030300

Jane Doe No. 4 v. Epstein
Page 2

STATE OF FLORIDA
COUNTY OF PALM BEACH

I hereby Certify that on this day, before me, an officer duly authorized to administer oaths and take acknowledgments, personally appeared Robert D. Critton, Jr., known to me to be the person described in and who executed the foregoing Affidavit, who acknowledged before me that he/she executed the same, that I relied upon the following form of identification of the above named person: personally known, and that an oath was/was not taken.

WITNESS my hand and official seal in the County and State last aforesaid this day of 17, September, 2009.




PRINT NAME: JESSICA CADWELL
NOTARY PUBLIC/STATE OF FLORIDA
COMMISSION NO.: DD 853529
MY COMMISSION EXPIRES: 04/19/13

03956-11013

DOJ-OGR-00030301

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

CASE NO.: 08-CV-80119-MARRA-JOHNSON

JANE DOE NO. 2,

Plaintiff,

v.

JEFFREY EPSTEIN,

Defendant.

Related Cases:

08-80232, 08-80380, 08-80381, 08-80994,
08-80993, 08-80811, 08-80893, 09-80469,
09-80581, 09-80656, 09-80802, 09-81092.

AFFIDAVIT OF MARK T. LUTTIER

STATE OF FLORIDA) SS
COUNTY OF PALM BEACH)

BEFORE ME, the undersigned authority, personally appeared Mark T. Luttier., having personal knowledge and being duly sworn, deposes and says:

1. I am counsel for Jeffrey Epstein in the above-styled matter and other civil lawsuits.

2. The information contained in motion, paragraphs 1 through 10, 11, 13, 14 and 16 is true and accurate based on my personal knowledge.

FURTHER THE AFFLANT SAYETH NAUGHT.

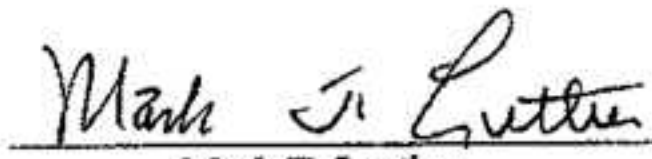

Mark T. Luttier

EXHIBIT 7

03956-11014

DOJ-OGR-00030302

Jane Doe No. 4 v. Epstein
Page 2

STATE OF FLORIDA
COUNTY OF PALM BEACH

I hereby Certify that on this day, before me, an officer duly authorized to administer oaths and take acknowledgments, personally appeared Mark T. Luttier, known to me to be the person described in and who executed the foregoing Affidavit, who acknowledged before me that he/she executed the same, that I relied upon the following form of identification of the above named person: personally known, and that an oath was/was not taken.

WITNESS my hand and official seal in the County and State last aforesaid this 17th
day of Sept., 2009.

Jessica Cadwell
PRINT NAME: JESSICA CADWELL

NOTARY PUBLIC/STATE OF FLORIDA

COMMISSION NO.: DD853529

MY COMMISSION EXPIRES: 04/19/13



03956-11015

DOJ-OGR-00030303

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

CASE NO. 08-CV-80119-MARRA/JOHNSON

JANE DOE NO.2,

Plaintiff,

-vs-

JEFFREY EPSTEIN,

Defendant.

Related cases:

08-80232, 08-08380, 08-80381, 08-80994,
08-80993, 08-80811, 08-80893, 09-80469,
09-80591, 09-80656, 09-80802, 09-81092

DEPOSITION OF JANE DOE #4

Wednesday, September 16, 2009
1:03 - 1:08 p.m.250 Australian Avenue South
Suite 115
West Palm Beach, Florida 33401Reported By:
Cynthia Hopkins, RPR, FPR
Notary Public, State of Florida
Prose Court ReportingEXHIBIT 8

Page 2

APPEARANCES:

On behalf of the Plaintiff:

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 MERMELSTEIN & HOROWITZ, P.A.
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 Phone: 305.931.2200

On behalf of the Defendant:

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 MARK T. LUTTIER, ESQUIRE
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 West Palm Beach, Florida 33401
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On behalf of Jeffrey Epstein:

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 Phone: 954.522.3456

On behalf of CMA:

JACK P. HILL, ESQUIRE
 SEARCY, DENNEY, SCAROLA,
 BARNHART & SHIPLEY, P.A.
 2139 Palm Beach Lakes Boulevard
 West Palm Beach, Florida 33409

Page 3

APPEARANCES CONTINUED...

On behalf of BB:

ADAM J. LANGINO, ESQUIRE
 LEOPOLD KUVIN
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 Suite 200
 Palm Beach Gardens, Florida 33410
 Phone: 561.515.1400

Page 4

PROCEEDINGS

MR. HOROWITZ: Adam Horowitz, counsel for Plaintiff, Jane Doe 4.

MR. CRITTON: Cindy, what time is it?

THE COURT REPORTER: It is 1:03.

MR. BERGER: William J. Berger for LM and EW.

MR. HILL: Jack Hill for CMA.

MR. LANGINO: Adam Langino from Leopold Kuvin on behalf of BB.

MR. LUTTIER: Mark Luttier on behalf of Burman, Critton, Luttier & Coleman for the Defendant.

MR. CRITTON: Robert Critton on behalf of Defendant, Jeffrey Epstein.

MR. HOROWITZ: This is Adam Horowitz. We're canceling today's deposition. Before appearing here today, we had a stipulation with Defense counsel that Mr. Jeffrey Epstein, the Defendant, would not be here. He would not cross paths with our client.

And immediately as we were approaching the deposition room, he made face-to-face contact with our client. He was just feet away from

Page 5

her and intimidated her, and for that reason we're not going forward.

MR. CRITTON: I didn't see any contact because I, obviously, was not out there. We started at about -- when you came in it was approximately 1:03. Mr. Epstein has an office here at the Florida Science Foundation. Had you been here at 1:00, your paths never would have crossed because Mr. Epstein was leaving the building. I instructed him to leave the building so that he would not be here.

He was going to appear by way of Skype so that he could be on a video camera so that he could see this.

(Mr. Goldberger entered the room.)

MR. CRITTON: Had you been here on time, and not faulting, I am just saying had you been here on time at 1:00, as everyone else seemed to be here at least get here before you did, Adam, you and your client, your paths never would have crossed.

I directed Mr. Epstein to leave the building so he would not be here so that there would be no way that your paths could have crossed. It was neither my intent nor was it

2 (Pages 2 to 5)

(561) 832-7500

PROSE COURT REPORTING AGENCY, INC.

(561) 832-7506

Electronically signed by cynthia hopkins (601-051-976-2934)

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03956-11017

DOJ-OGR-00030305

Page 6

1 my client's intent specifically, because I also
2 advised him that he was not to cross paths, not
3 to have any contact with your client, and
4 certainly by our agreement not to be here today
5 for the deposition.

6 MR. HOROWITZ: And at approximately 1:00
7 is exactly when my client crossed paths with
8 Jeffrey Epstein. And not only did he cross
9 paths but he proceeded to stare her down just
10 feet away from her. For that reason she became
11 an emotional wreck and cannot proceed with the
12 deposition. She's simply not in an emotional
13 state to do so.

14 And in addition Mr. Epstein violated the
15 agreement between counsel that he would not
16 cross paths or come into contact with our
17 client. And it will be also for the criminal
18 court judge to decide whether he has violated a
19 no-contact order. I have nothing else to say.

20 MR. CRITTON: Again I instructed
21 Mr. Epstein to leave the building so absolutely
22 no contact could occur between he and
23 Mr. Horowitz and his client nor anyone else.
24 Until the court, until either Judge Marra or
25 Judge Johnson ruled on the issue as to whether


Page 8

1 CERTIFICATE

2
3 STATE OF FLORIDA
4 COUNTY OF PALM BEACH

5
6
7 I, Cynthia Hopkins, Registered Professional
8 Reporter and Florida Professional Reporter, State of
9 Florida at large, certify that I was authorized to
10 and did stenographically report the foregoing
11 proceedings and that the transcript is a true and
12 complete record of my stenographic notes.

13 Dated this 16th day of September, 2009.

14
15 *Cynthia J. Hopkins*
16 Cynthia Hopkins, RPR 

Page 7

1 or not he could appear at the depositions of
2 not only Jane Doe 4 but any other individuals,
3 so you do what you need to do.

4 MR. HOROWITZ: Off the record.
5 (The Deposition was concluded.)
6
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3 (Pages 6 to 8)

(561) 832-7500

PROSE COURT REPORTING AGENCY, INC.

(561) 832-7506

Electronically signed by cynthia hopkins (601-051-976-2934)

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03956-11018

DOJ-OGR-00030306

Prose Court Reporting Agency, Inc

One Clearlake Centre
250 South Australian Avenue, Suite 1500
West Palm Beach, Florida 33401
(561) 832-7500 Phone (561) 832-7506 Fax
Tax ID: 26-3892897
www.prosecra.com

September 17, 2009

Robert Critton, Esquire
Burman, Critton, Luttier & Coleman - WPB
303 Banyan Boulevard
Suite 400
West Palm Beach, FL 33401

Invoice Number CH 411

Re: Jane Doe No. 2 vs. Jeffrey Epstein
9-16-09 Scheduled Deposition of Jane Doe No. 4
Statement for Record

Description of Services

Depo App NT - 1st Hr	Appearance 1st Hr	110.00
Depo Trans 0&1-Reg	Transcript Pages - 8	28.80
E-Transcript Emailed	Complimentary	

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EXHIBIT 9

03956-11019

DOJ-OGR-00030307



P.O. Box 6967 West Palm Beach, FL 33405

Invoice

Date	Number
9/17/2009	28616
Terms	
Due on receipt	

BURMAN, CRITTON & LUTTIER
 ROBERT CRITTON
 303 BANYAN BLVD
 SUITE 400
 WEST PALM BEACH, FL 33401

Case / Reference:		JANE DOE #2 v EPSTEIN	
Date	Services Rendered	Qty	Amount
9/16/2009	VIDEOTAPED DEPOSITION OF: JANE DOE # 4 Tech Time - 1ST 2 Hours Digital Tape Stock MASTER TAPE CONSISTS OF DISCUSSIONS BETWEEN ATTORNEYS PRIOR TO SWEARING IN REGARDING CANCELLATION OF DEPO.	1 1	275.00 15.00
9/17/2009	Delivery MASTER TAPES FORWARDED PER YOUR REQUEST. NO COPIES HAVE BEEN MADE OR KEPT ON FILE AT VISUAL EVIDENCE. SHOULD COPIES BE REQUIRED IN THE FUTURE PLEASE FORWARD MASTER TAPES TO OUR OFFICE FOR DUPLICATION. THANK YOU.	1	0.00

TOTAL: \$290.00

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Phone: (561) 655-2855

Fax: (561) 655-2896

03956-11020

DOJ-OGR-00030308

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

CASE NO.: 08-CV-80119-MARRA-JOHNSON

JANE DOE NO. 2,

Plaintiff,

v.

JEFFREY EPSTEIN,

Defendant.

Related Cases:

08-80232, 08-80380, 08-80381, 08-80994,
08-80993, 08-80811, 08-80893, 09-80469,
09-80581, 09-80656, 09-80802, 09-81092.

**ORDER ON DEFENDANT'S, JEFFREY EPSTEIN, MOTION FOR SANCTIONS
AND TO COMPEL DEPOSITION OF JANE DOE NO. 4
AND MEMORANDUM IN SUPPORT THEREOF**

This matter came before the Court on Defendant's, JEFFREY EPSTEIN, Motion For Sanctions and to Compel Deposition of Jane Doe No. 4. Having considered Defendant's motion, it is HEREBY ORDERED and ADJUDGED that:

Defendant's motion is hereby GRANTED: Plaintiff shall pay sanctions in the amount of \$ _____ in costs and \$ _____ in fees directly to Burman, Critton, Luttier and Coleman within 10 days, and further directs that the Plaintiff make herself available for deposition no later than October ____, 2009 beginning at 9:30 a.m. at the same location. Mr. Epstein shall not be present in the building on the day of the deposition absent a court order on pending motions.

03956-11021

DOJ-OGR-00030309

Jane Doe No. 4 v. Epstein
Page 2

DONE and ORDERED this ____ day of _____, 2009.

Kenneth A. Marra
United States District Judge

Courtesy Copies: Counsel of Record

03956-11022

DOJ-OGR-00030310

1 IN THE CIRCUIT COURT OF THE
2 FIFTEENTH JUDICIAL CIRCUIT
3 IN AND FOR PALM BEACH COUNTY, FLORIDA
4 CRIMINAL DIVISION

5 STATE OF FLORIDA)

6 vs)

7 JEFFREY EPSTEIN)

8 Defendant.)

CASE NO. 06 CF9454AMB
08 9381CFAMB

9 PLEA CONFERENCE

10
11 PRESIDING: H

12 APPEARANCES:

13 ON BEHALF
14 BAR
15 Sta
16 401
17 West
18 By:

19 ON BEHALF
20 ATTER
21 250 Al
22 Suite
23 West P. Florida 33401
24 By: JAM GOLDBERGER, ESQUIRE
25

CERTIFIED COPY

June 30, 2008
Palm Beach County Courthouse
West Palm Beach, Florida 33401
Beginning at 8:40 o'clock, a.m.

PHYLLIS A. DAMES, OFFICIAL COURT REPORTER

03956-11023

DOJ-OGR-00030311

1 regularly congregate?

2 MS. BELOHLAVEK: I personally do not
3 know.

4 THE COURT: Neither do I, which is
5 why I'm asking. Has that been
6 investigated?

7 MR. GOLDBERGER: We have done our due
8 diligence, for what it's worth, there is a
9 residential street. There are not children
10 congregating on that street. We think the
11 address applies, if it doesn't, we fully
12 recognize that he can't live there.

13 THE COURT: Okay. D is, you shall
14 not have any contact with the victim, are
15 there more than one victim?

16 MS. BELOHLAVEK: There's several.

17 THE COURT: Several, all of the
18 victims. So this should be plural. I'm
19 making that plural. You are not to have
20 any contact direct or indirect, and in this
21 day and age I find it necessary to go over
22 exactly what we mean by indirect. By
23 indirect, we mean no text messages, no
24 e-mail, no Face Book, no My Space, no
25 telephone calls, no voice mails, no

1 messages through carrier pigeon, no
2 messages through third parties, no hey
3 would you tell so and so for me, no having
4 a friend, acquaintance or stranger approach
5 any of these victims with a message of any
6 sort from you, is that clear?

7 THE DEFENDANT: Yes, ma'am

8 THE COURT: And then it states,
9 unless approved by the victim, the
10 therapist and the sentencing court. Okay.

11 THE DEFENDANT: I understand.

12 THE COURT: And the sentencing court.
13 So, if there is a desire which, I would
14 think would be a bit strange to have
15 contact with any of the victims the court
16 must approve it.

17 MS. BELOHLAVEK: Correct.

18 THE COURT: If the victim was under
19 the age of 18, which was the case, you
20 shall not until you have successfully
21 attended and completed the sex offender
22 program. So, is this sex offender program
23 becoming a condition of probation?

24 MS. BELOHLAVEK: That is not. I
25 don't believe I circled that one.

PHYLLIS A. DAMES, OFFICIAL COURT REPORTER

03956-11025

DOJ-OGR-00030313

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Barbara Burns

From: Barbara Burns
Sent: Thursday, April 01, 2010 8:49 AM
To: 'Jack Goldberger'
Cc: Michael McAuliffe
Subject: RE: Epstein

I shared your latest email with Mr. McAuliffe and we both agree that it is our position that he needs to honor his commitment and complete his community control as agreed. If you feel it necessary to file a motion to modify or early terminate on behalf of your client just let me know so I can have enough time to get the Det. and victims notified so they can appear for the hearing. Thanks!

From: Jack Goldberger [mailto:jgoldberger@agwpa.com]
Sent: Wednesday, March 31, 2010 5:03 PM
To: Barbara Burns
Subject: Epstein

Barbara

It is obvious you have spent a lot of time on my request for my client and I sincerely appreciate the thoroughness and the attention. As my clients case seems to lend itself to misunderstandings and miscommunications by others, I thought it important to clarify some facts assumed in error.

I have spoken to Mr. Gaines at probation and he confirmed the following: Yes termination of supervision on a sex offender is unusual, however a modification to probation from Community control is not uncommon when the probationer has been in compliance without violation. In fact the department's current policy on re-entry to the community dictates that an offender be stepped down as soon as possible. He was also under the misimpression, as others might have been, that Epstein's charges called for sex offender probation. They do not, he is eligible for normal probation. As with many of the issues in my clients case, sterile questions that may have been asked tend to lead to answers that though well meaning are not applicable.

As for the timeliness of the police reports of the attempted breakins, I wanted you to be aware that I confirmed with Wackenhut that they called the police each time and spoke to the captain on duty, there should be a record. I said to you it was my advice to the client that he not file a formal report.

You have suggested that to resolve all the issues my client move to transfer his community control and that your office would support his transfer. I appreciate that and spoke to Mr. Gaines about that and he doesn't believe that would be possible to New York. Mr. Gaines suggested an agreement to allow Mr. Epstein to travel for business purposes without the present 48 hour limitation but strictly at the **discretion and with the approval of probation** for the remaining short portion of his supervision would be appropriate. He advised me that the department would not object to such a modification. This to me is the fairest way to deal with the issues, and to insure Mr. Epstein is treated like others, Let me know and I can prepare some proposed language that I think would work for everyone

Jack Goldberger
561-659-8300 Phone
561-835-8691 Fax

4/1/2010

Public Records Request No. 19-372

DOJ-OGR-00033147

AW
G

Attorneys at Law & P.A.

Please note: Florida has a very broad public records law. Most written communications to or from state officials regarding state business are public records available to the public and media upon request. Your e-mail communications may therefore be subject to public disclosure.

Barbara Burns

From: Michael McAuliffe
Sent: Thursday, April 01, 2010 8:31 AM
To: Barbara Burns
Subject: RE: Epstein

I think, as you suggest, the defendant simply needs to finish his sentence as it was agreed to in the initial resolution. Thanks. MM

-----Original Message-----

From: Barbara Burns
Sent: Thursday, April 01, 2010 08:25 AM Eastern Standard Time
To: Michael McAuliffe; Paul Zacks
Subject: FW: Epstein

This dragon just keeps raising its ugly head! May I tell him to just file his motion to modify with the Court? I don't know how to convey to him anymore than I already have that his client is a registered sex offender that was fortunate to get the deal of the century, fortunate enough, even as a sex offender, to be granted work release while serving his jail sentences (I am not aware of that ever happening before) and certainly fortunate to plea at a time when it was not required by statute that he be placed on sex offender probation with all of the restrictive conditions that the vast majority of individuals in his similar situation would have been subjected to. Please advise.

From: Jack Goldberger [mailto:jgoldberger@agwpa.com]
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Subject: Epstein

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Jack Goldberger

561-659-8300 Phone

561-835-8691 Fax

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Barbara Burns

From: Barbara Burns
Sent: Friday, March 26, 2010 9:02 AM
To: Michael McAuliffe
Subject: FW: Confidential

As per your request I am forwarding the following summary:

Re: The Burglary/Attempted Burglary allegations, the Palm Beach PD were surprised to hear this and indicated that there has never been such complaint(s) since Epstein was placed on Community Control. I spoke further with Jack Goldberger and he indicated that Epstein employs private security through Wackenhut and they intercepted this person who was dressed in black like a Ninja and hiding in some bushes. They chased him to a dark Chrysler 300 and took down the tag info. From there they were able to find out that it was registered to a PI that has been associated/linked to Atty. Rothstein and the Gambino family. I spoke with DOC Community Control Supervisor, Ofc. Gaines, and he advised me that late last week Epstein informed him of a similar incident. Ofc. Gaines went on to say that he spoke with Epstein in late Sept. or possibly Oct. of last year and explained to him that he received "the best deal ever heard of for someone in his situation" and that he warned him to follow every condition by the letter so as not to get violated. If violated, he could very well be put on an ankle bracelet which would be even more of a restriction to him.

Re: Similar defendants on community control and early termination, drawing from my experience (8 ½ yrs. of doing these cases), Daliah Weiss, Chief of SVU, and DOC there is no known case where a Sex Offender on Community Control has ever been given early termination of Community Control by agreement from our office or DOC. There have been **rare** instances where a person who has been on a very long probation has been given early termination of probation after serving a considerable number of years on probation.

Re: The position of the U.S. Attorney's office on early termination of the State's case against Epstein, I again spoke with AUSA Villafana and inquired specifically of any knowledge that she had in reference to representations made by her or anyone associated with her office regarding Epstein's efforts to early term his Community Control on the State charges. She indicated that she had not made any such representations however her boss, interim U.S. Atty. Sloman may have. After checking she sent me a portion of the last letter sent to Epstein's attorneys. I have forwarded that to you by attachment.

Please let me know if there is anything else that I can provide to you.

From: Villafana, Ann Marie C. (USAFLS) [mailto:Ann.Marie.C.Villafana@usdoj.gov]
Sent: Thursday, March 25, 2010 4:20 PM
To: Barbara Burns
Subject: Confidential

Hi Barbara – Here is the relevant portion of the last letter to JE's attorneys regarding the termination of supervision:

In light of Mr. Acosta's prior statements to Mr. Epstein's counsel that Mr. Epstein would be eligible for any benefit available to other similarly-situated state defendants, the Office agrees that Mr. Epstein may apply for early termination or modification of community control in accordance with Fl. Stat. §§ 948.05 and 948.10(4), assuming that Mr. Epstein has completed "the sanctions imposed in the community control plan." The Office takes no position regarding such an application; it is entirely within the discretion of the State Attorney's Office and the Palm Beach County Circuit Court Judge as to whether it is in "the best interests of justice and the welfare of society" to allow Mr. Epstein to terminate prematurely his community control. Mr. Epstein and his counsel may not make a

representation to the State Attorney's Office, the Court, or any victim that the U.S. Attorney's Office agrees with, joins in, or does not oppose such a motion. In light of prior erroneous statements in court filings, we respectfully request that a copy of any court filing be provided to our office.

If such a motion is made, in accordance with your proposal, the U.S. Attorney's Office will notify the federal victims that the application was filed and, if a hearing is scheduled, the date, time, and location of such hearing. The communication will consist merely of a notification and will neither encourage nor discourage attendance or submission of materials related to the application.

A. Marie Villafañá

Assistant U.S. Attorney

500 S. Australian Ave, Suite 400

West Palm Beach, FL 33401

Phone 561 209-1047

Fax 561 820-8777

Please note: Florida has a very broad public records law. Most written communications to or from state officials regarding state business are public records available to the public and media upon request. Your e-mail communications may therefore be subject to public disclosure.

Barbara Burns

From: Sloane, Carmen [sloane.carmen@mail.dc.state.fl.us]
Sent: Wednesday, February 24, 2010 11:41 AM
To: Barbara Burns
Subject: RE: J. Epstein

Yeah – lot less stress

From: Barbara Burns [mailto:BBurns@sa15.state.fl.us]
Sent: Wednesday, February 24, 2010 11:34 AM
To: Sloane, Carmen
Subject: RE: J. Epstein

Ok, thanks!!! I hope that was a good thing for you!

From: Sloane, Carmen [mailto:sloane.carmen@mail.dc.state.fl.us]
Sent: Wednesday, February 24, 2010 11:32 AM
To: Barbara Burns
Subject: RE: J. Epstein

Hi,

His term date is 7-21-2010. I was recently transferred to the downtown office. If you have any further questions, you can contact his new officer Candice Elkins (Community Control Officer at 154 Lake Worth 434-3960). If you have any questions regarding his past supervision, please email or call me at 837-5175.

Carmen

From: Barbara Burns [mailto:BBurns@sa15.state.fl.us]
Sent: Wednesday, February 24, 2010 11:19 AM
To: Sloane, Carmen
Subject: J. Epstein

Good morning Carmen. I need to know what you have as the termination date of Mr. Epstein's community control. Thanks!!!

Please note: Florida has a very broad public records law. Most written communications to or from state officials regarding state business are public records available to the public and media upon request. Your e-mail communications may therefore be subject to public disclosure.

firm which has since filed bankruptcy as a result of massive fraud by one of its partners. It is alleged that they used their civil cases filed against Mr. Epstein as one of their more lucrative devices to perpetrate this fraud. Based on what I have learned and read, there have been false filings, forged judge's signatures, and forged Eleventh Circuit Opinions. It is also possible that other third parties have engaged in this conduct by falsely alleging Mr. Epstein has violated the terms of his probation.

With this in mind, It appears that Mr. Epstein could be a victim of fabricated attacks designed to do nothing more than question his compliance with his probation and community control requirements. I truly want my client, as I am sure you do, to complete his probation without continued false accusations being made against him. I would suggest a meeting so we may discuss these problems. Given the fact that false accusations are being made against my client, I would take the unusual step of producing my client for such a meeting if you think it would be helpful.

Please give me a call with your thoughts on this and whether those documents satisfy your request.

Very truly yours)

A handwritten signature in black ink, appearing to be 'JAG', written over the typed name 'Jack A. Goldberger'.

Jack A. Goldberger

JAG/slm

Invoice

2633 Lantana Road office 4 Suite 42
 Lantana FL 33462
 561-963-8821
 www.pbflight.com

Date	Invoice #
8/27/2009	73137

PAID

Bill To
Larry Visoski

Certificate Number	Type	BFR Due Date	MED/SPC DUE DATE
Pending	Private	08/2011	

Item	Qty	Description	Rate	Amount
N2435W	1.8	N2435W G1000 172 S/P	135.00	243.00T
Fuel Surcharge 01	1.8	Fuel Surcharge for all C152 & C172 Aircraft	5.00	9.00T
<p>CESSNA 172 Rental PBI - SIKORSKY PLANT Aug 27th 2009 <i>[Signature]</i> Visoski N2435W C172</p>				

Subtotal	\$252.00
Sales Tax (6.5%)	\$16.38
Total	\$268.38

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AIRCRAFT MODEL

SERIAL NO.

REGISTRATION NO.

OWNER

B407

53375

N491GM

Air Glislaine Inc

PILOT	DATE	TYPE OF FLIGHT	ACFT. HRS.	ENG. STARTS ENG. 1 ENG. 2	TORQUE EVENTS	LANDINGS	POWER ASSURANCE	ENG. 1	ENG. 2
Visoski MIA	8/15/09	VFR	1.1	2	2	2	TORQUE		
Visoski FVE	9/11/09	VFR	1.1	2	2	2	TOT/ITT		
Visoski PDMIA	9/18/09	VFR	1.2	3	3	3	N1		
Visoski FVE	9/16/09	VFR	.3	1	1	1	N2		
							OAT		
							PA		
TOTAL FOR THE DAY:			3.7	8	8	8			

AIRCRAFT & ENGINE FLIGHT HRS / CYCLES / RIN	AIRCRAFT HOURS	ENG. HOURS ENG. 1 ENG. 2	ENG. CYCLES ENG. 1 ENG. 2	TORQUE EVENTS	LANDINGS	I CERTIFY THAT THE DAILY INSPECTION WAS COMPLETED ACCORDING TO THE MAINTENANCE MANUAL
TOTALS BROUGHT FORWARD:	749.6	749.6	1545	2204	2194	
TOTALS FOR TODAY:	3.7	3.7	8	8	8	
ACCUMULATIVE TOTAL:	753.3	753.3	1553	2212	2202	
NEXT SCHEDULED INSPECTION DUE:						
TYPE INSPECTION (50, 100, ETC.)						
ANNUAL INSPECTION DUE DATE:						

NAME & CERTIFICATE NO.
9/16/09
DATE:

PILOTS AND MAINTENANCE RECORD

PILOTS ENTER DISCREPANCIES — MECHANICS ENTER ALL MAINTENANCE PERFORMED

FLIGHT DISCREPANCIES	REMARKS
1	LOGBOOK ENTRY: N491GM BELL 407 HOBBS 749.6 TESTED AMERIKING AK 350 S/N 35290240 ALTITUDE REPORTING MODE C AND FOUND 200 FEET LOW RE-ADJUSTED AND PERFORMED CORRELATION TEST FOUND SATISFACTORY INSPECTED I/A/W FAR43 APPENDIX F (FAR91.413) AND IS APPROVED FOR RETURN TO SERVICE. PERTINENT DETAILS OF THIS TEST IS ON FILE AT THIS REPAIR STATION UNDER W.O. 9204 DATE JUNE 9, 2009
CORRECTIVE ACTION	
2	SIGNATURE Mark B. Alencando INSP. (msa) TROPIC RADIO INC. 2695 N.W. 55TH ST. HANCER 53-A ST. LAUDERDALE FL 33309 FAA APPROVED REPAIR STATION #RLR510P1 ST. LAUDERDALE EXECUTIVE AIRPORT *ARCHER RAMP* TELEPHONE # 954-775-1838
CORRECTIVE ACTION	
3	
CORRECTIVE ACTION	
4	
CORRECTIVE ACTION	
5	

Public Records Request No. 19-372

P. 003

DEC-01-2009 TUE 05:57 PM

DOJ-OGR-00033160

SIGNATURE FLIGHT SUPPORT
MIAMI

Invoice: 2022
 Aircraft: N491GM
 Opened: 09/14/09 08:19:36
 Closed: 09/14/09 08:28:46
 Customer: N/A
 Employee: CLARA M

1 HANDLING CHARG	3101	65.000
Ref: MED HELI		
1 LANDING FEE	3000	17.700
1 RAMP PARKING	3204	44.000

Subtotal:	126.700
7.0 SALES TAX	3.080

Total:	129.78
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Auth: 145603	
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*****5014	

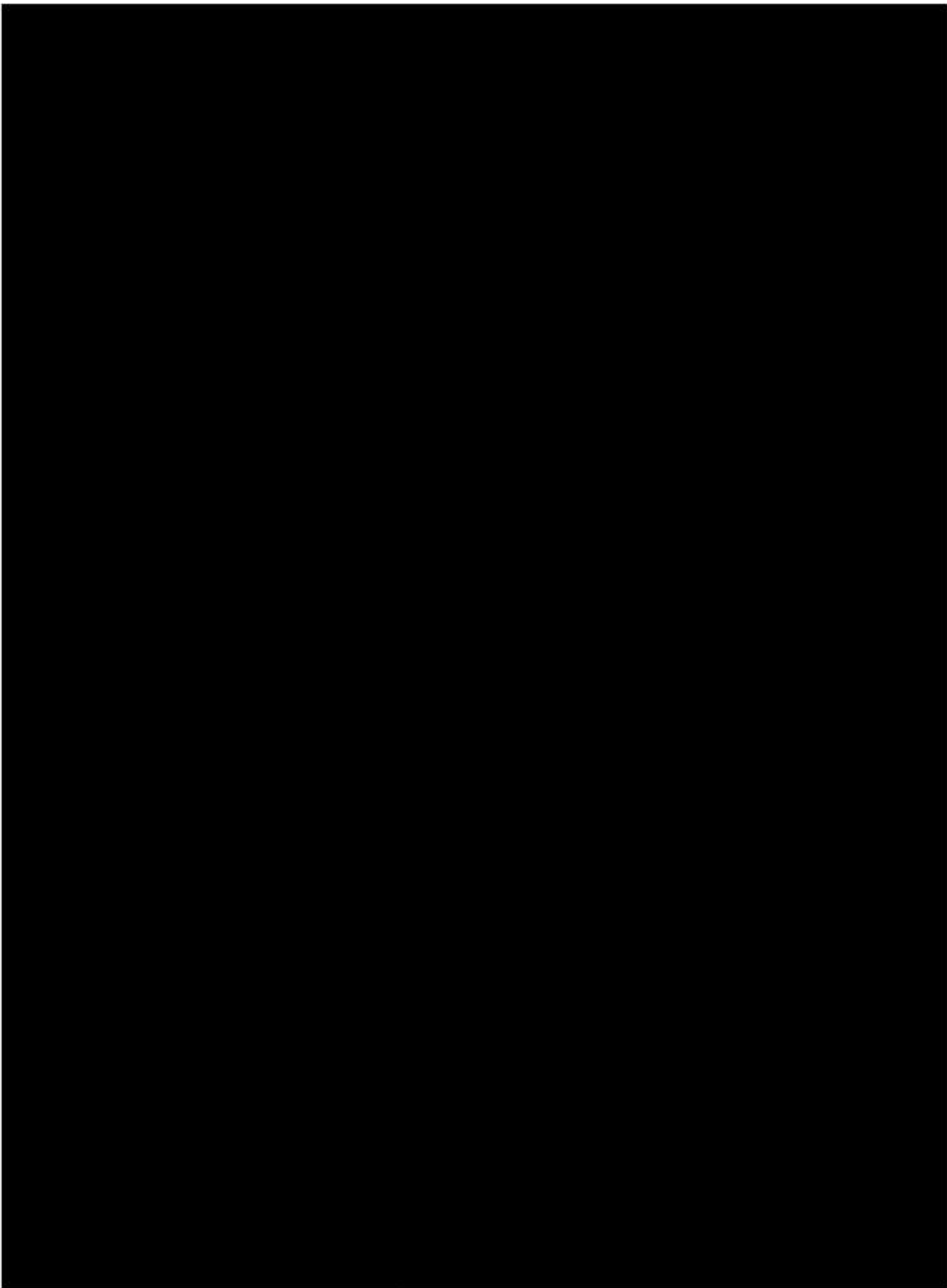
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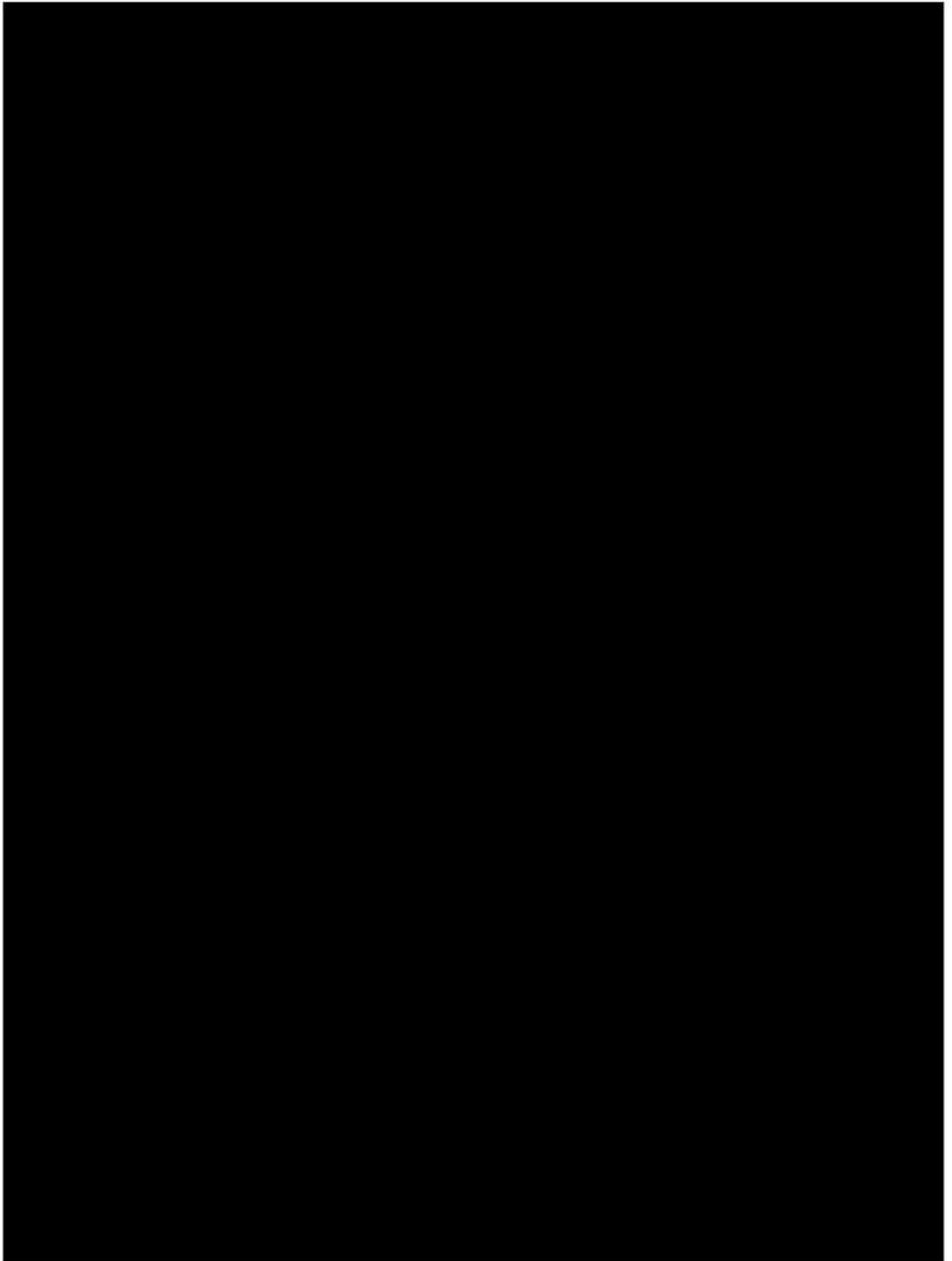
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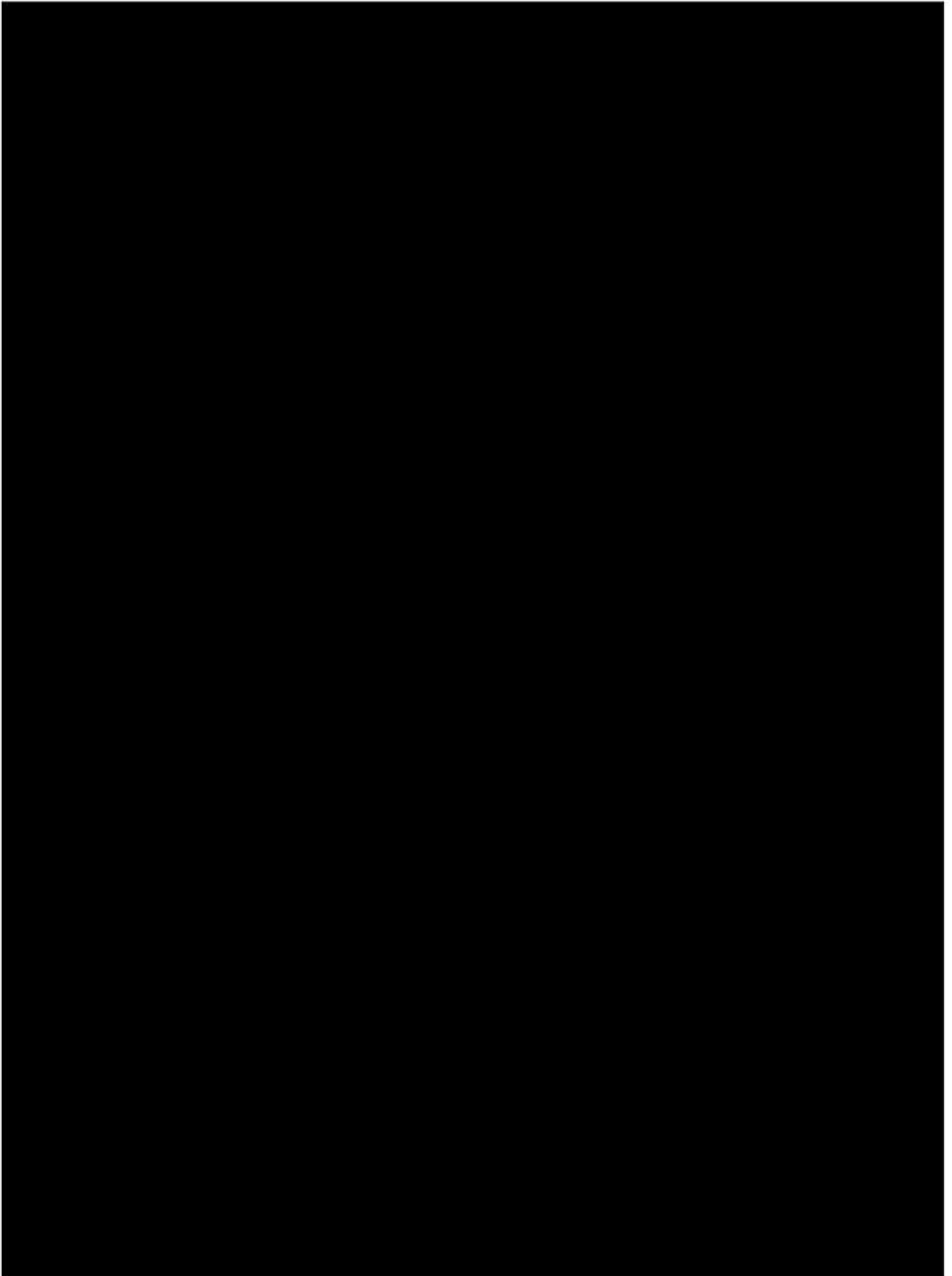
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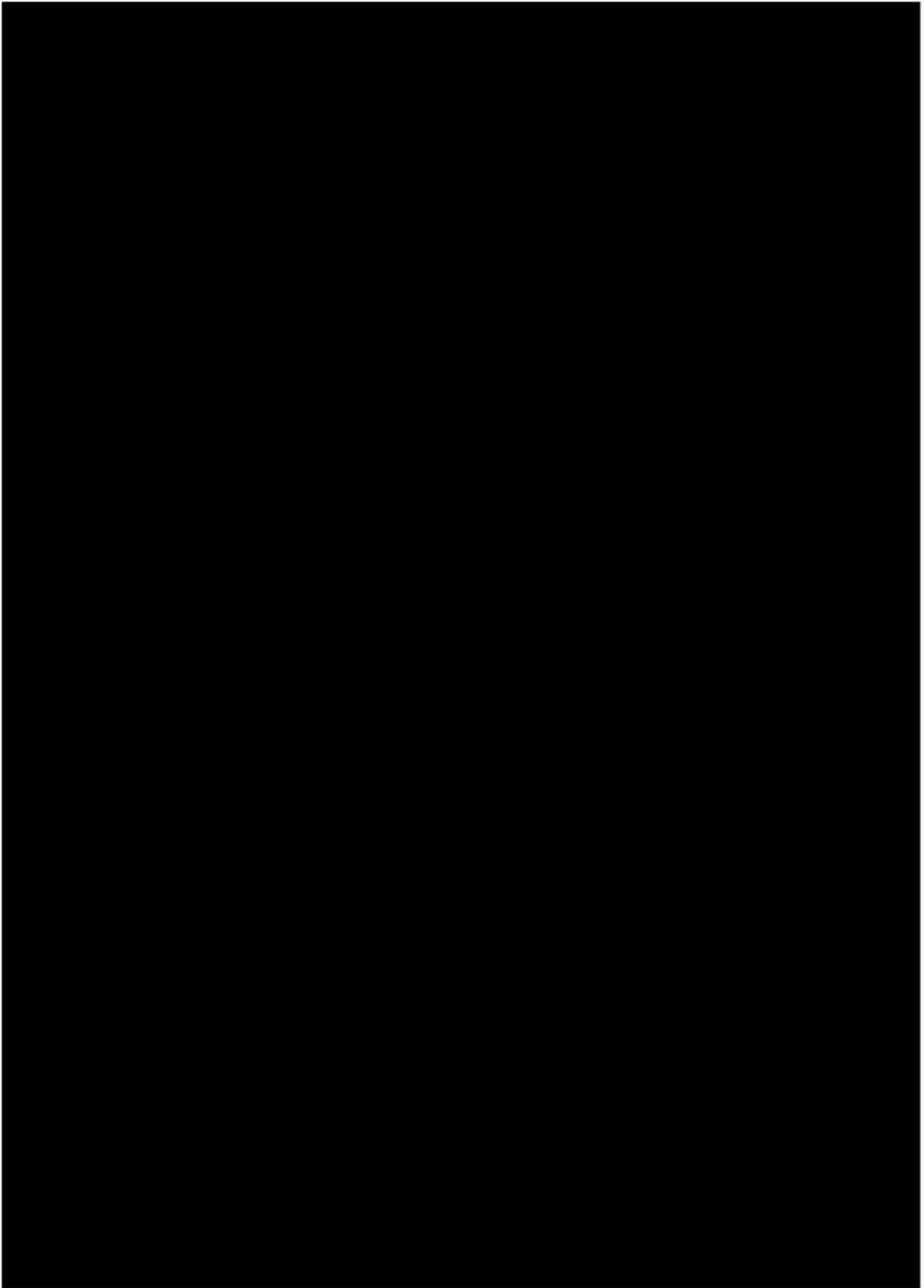
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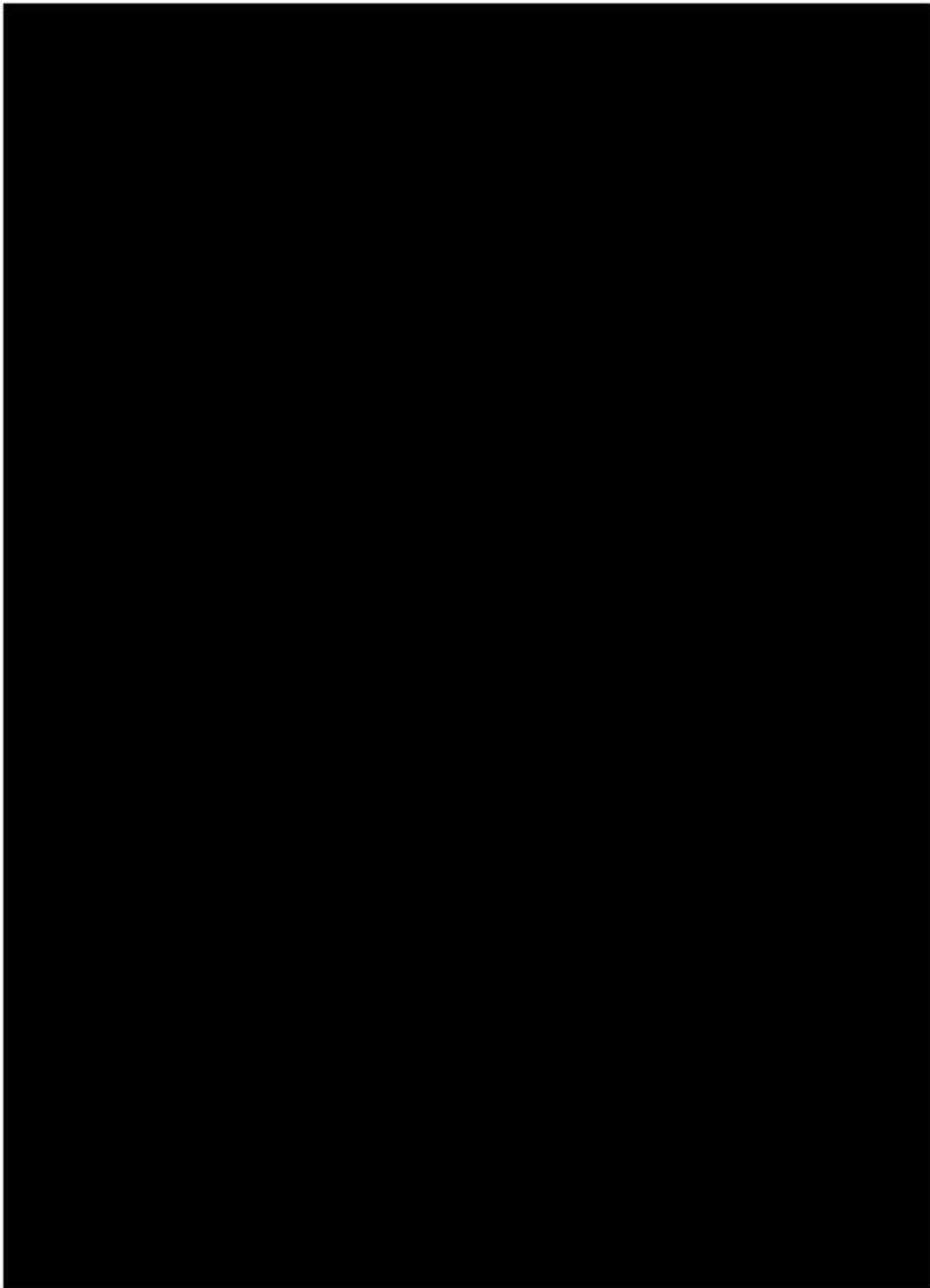


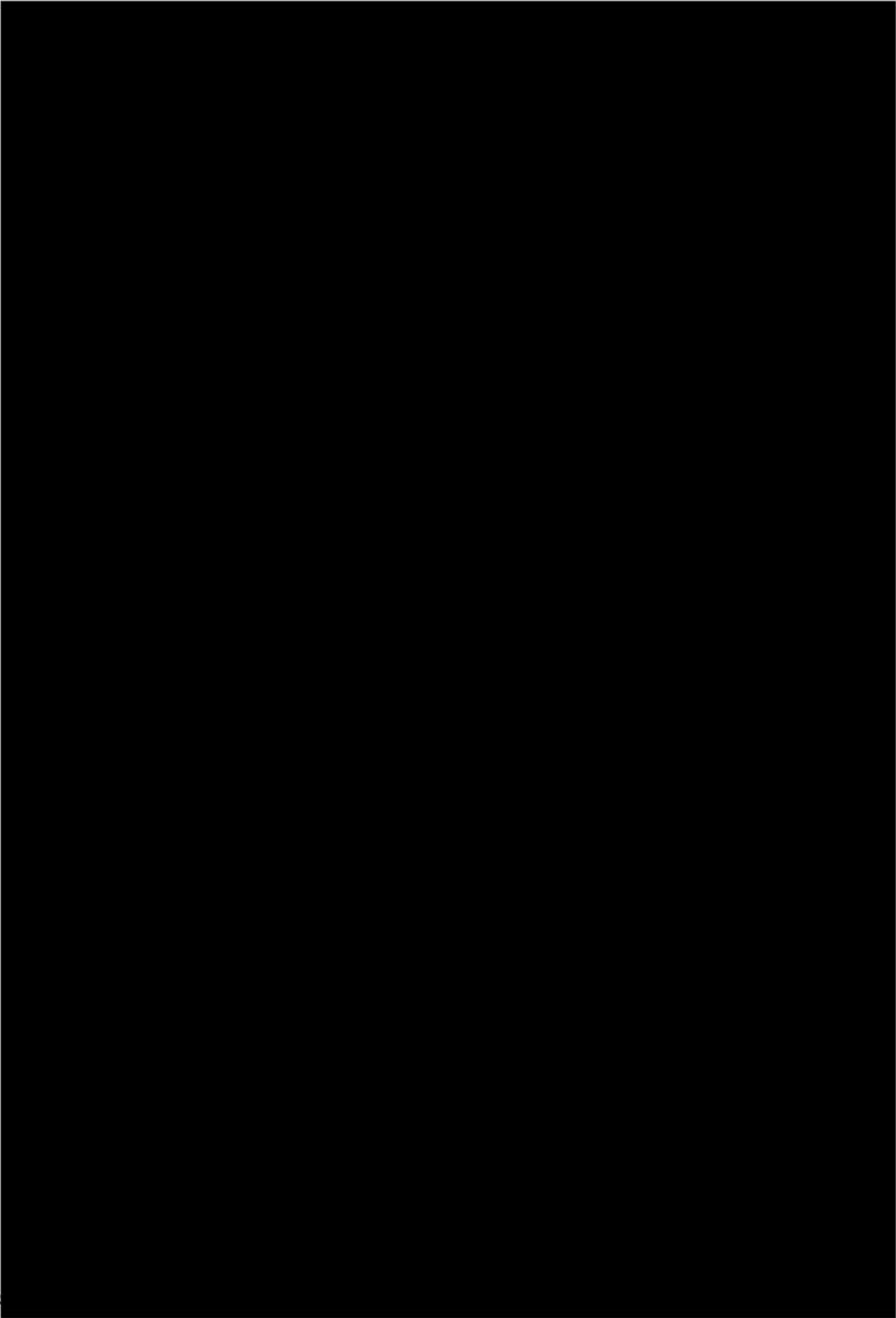


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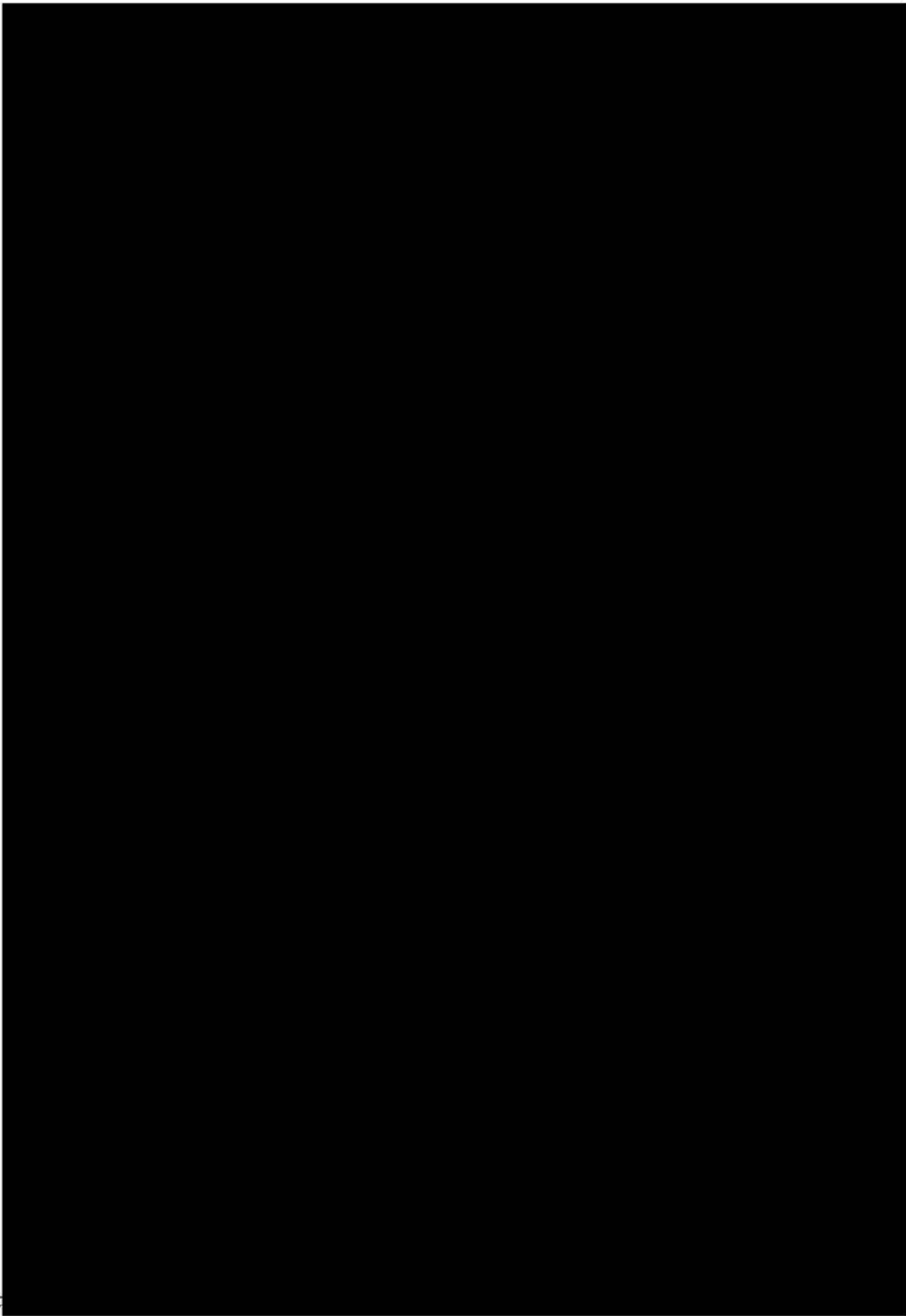




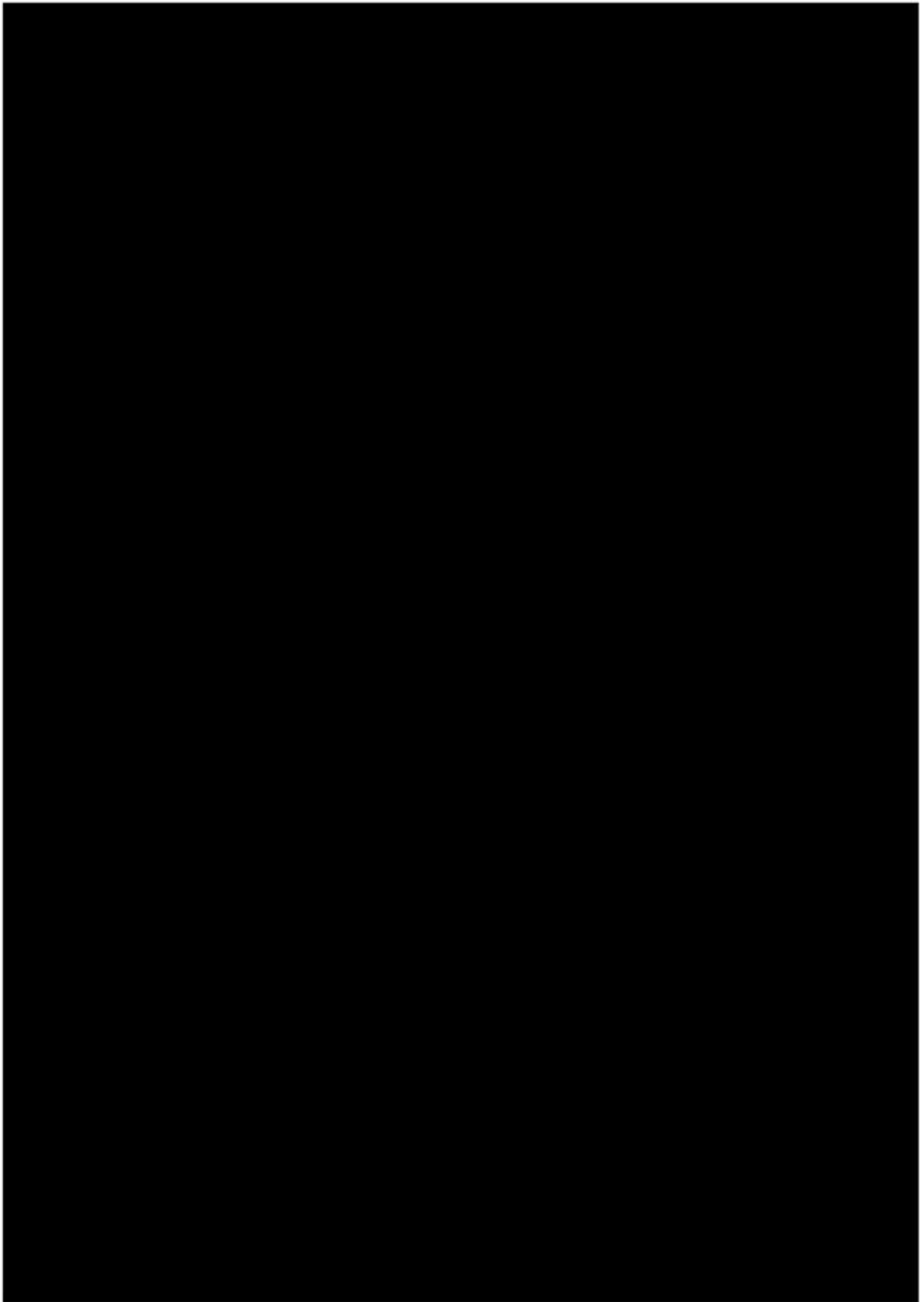


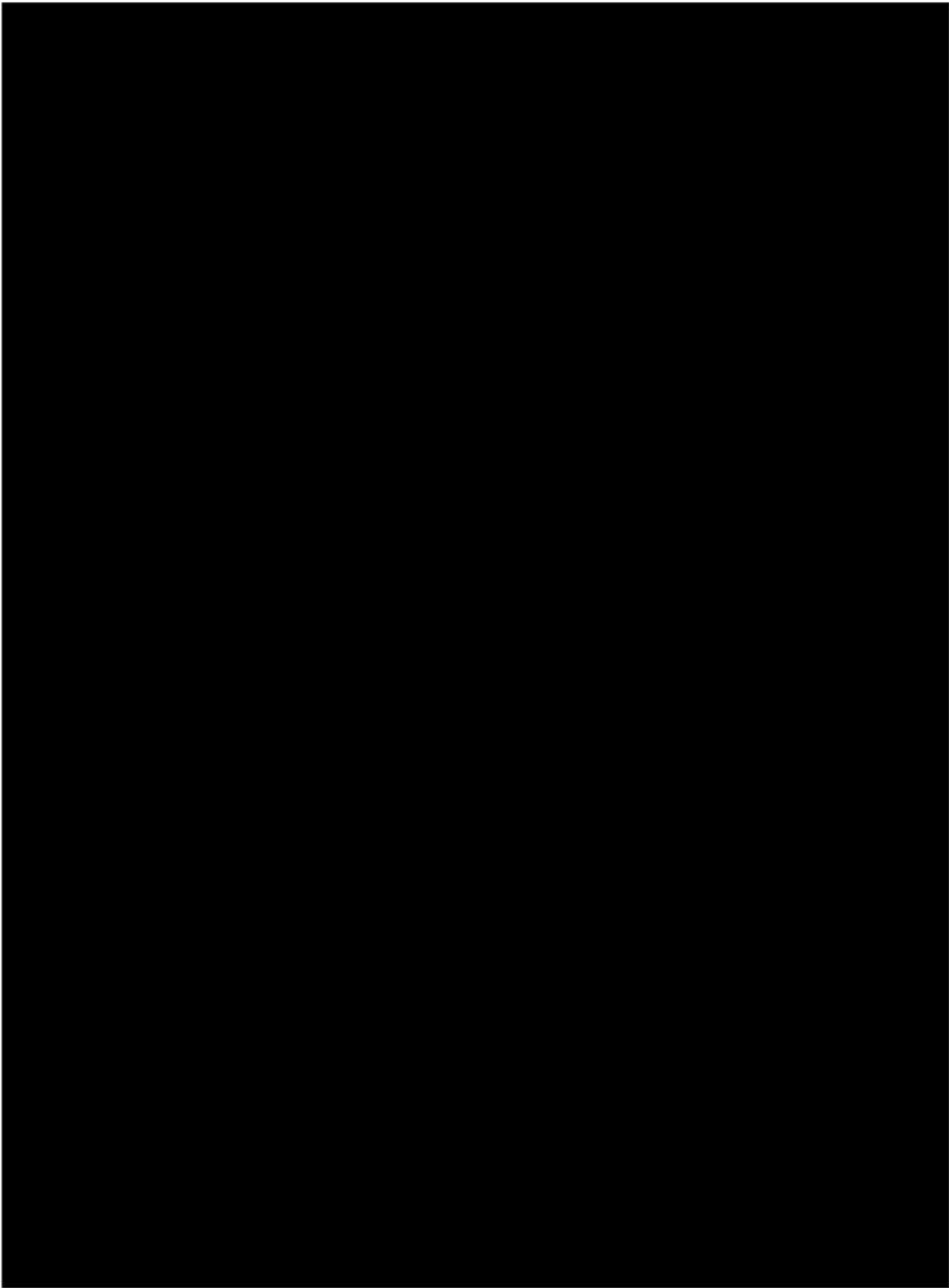


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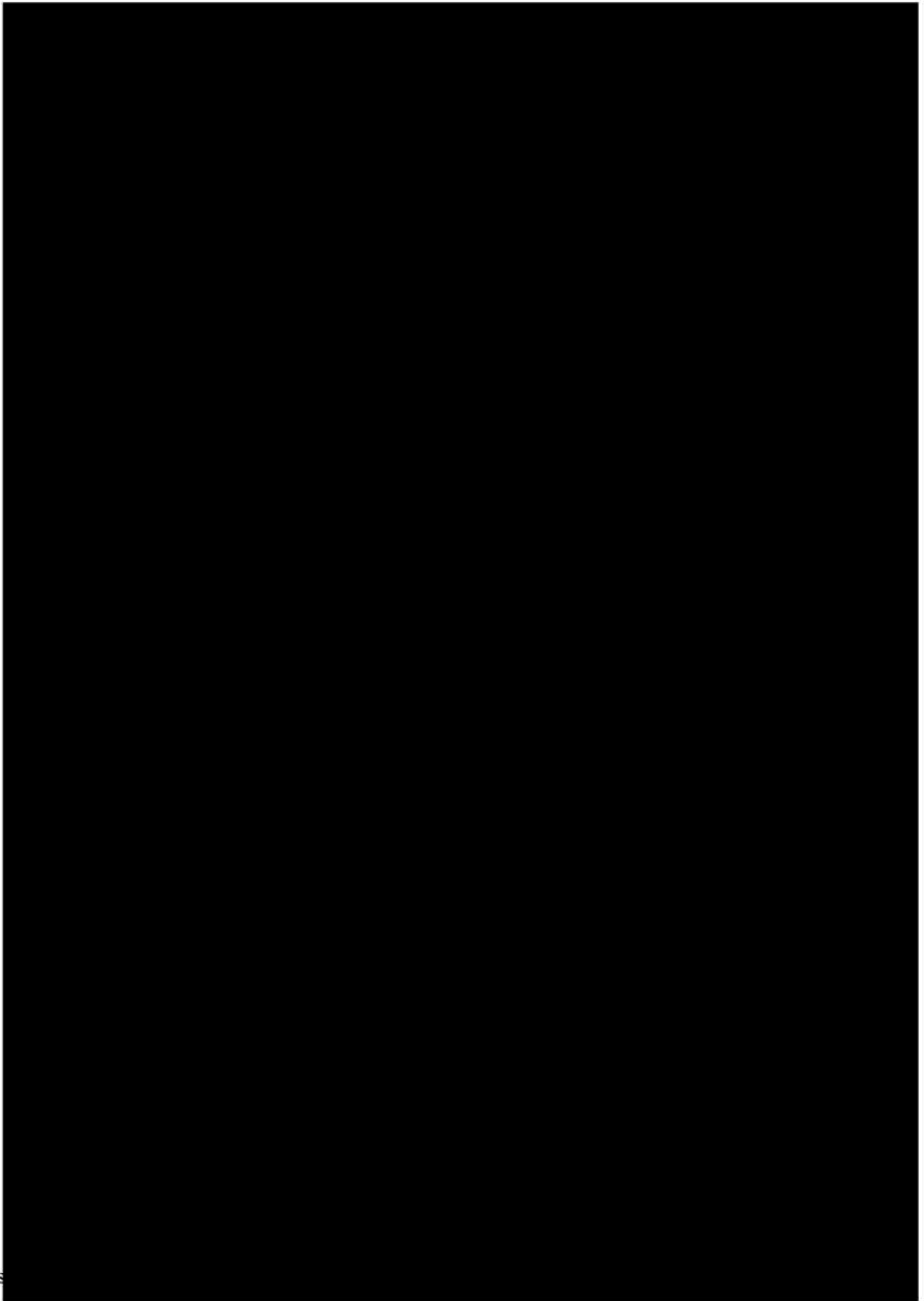
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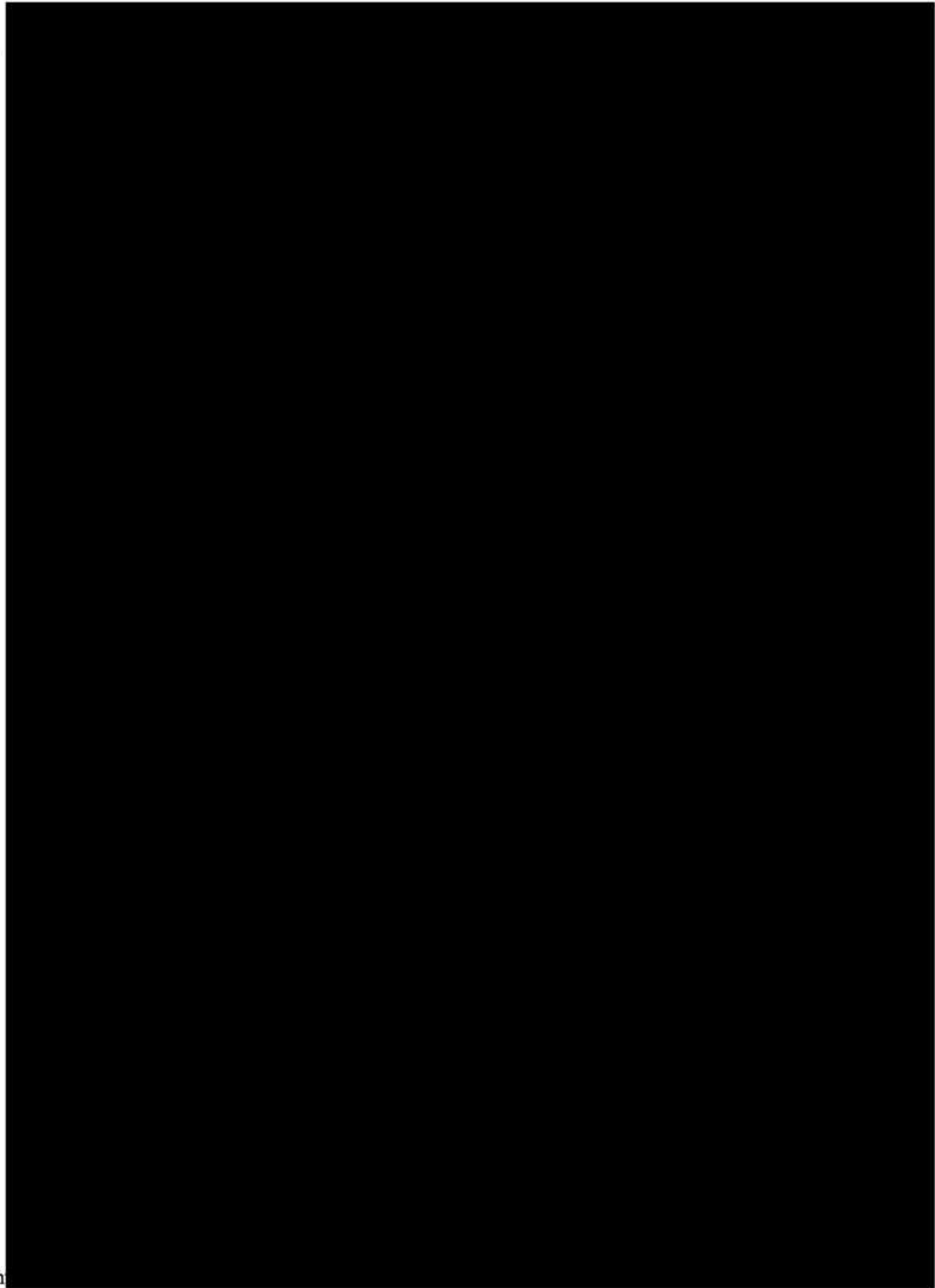




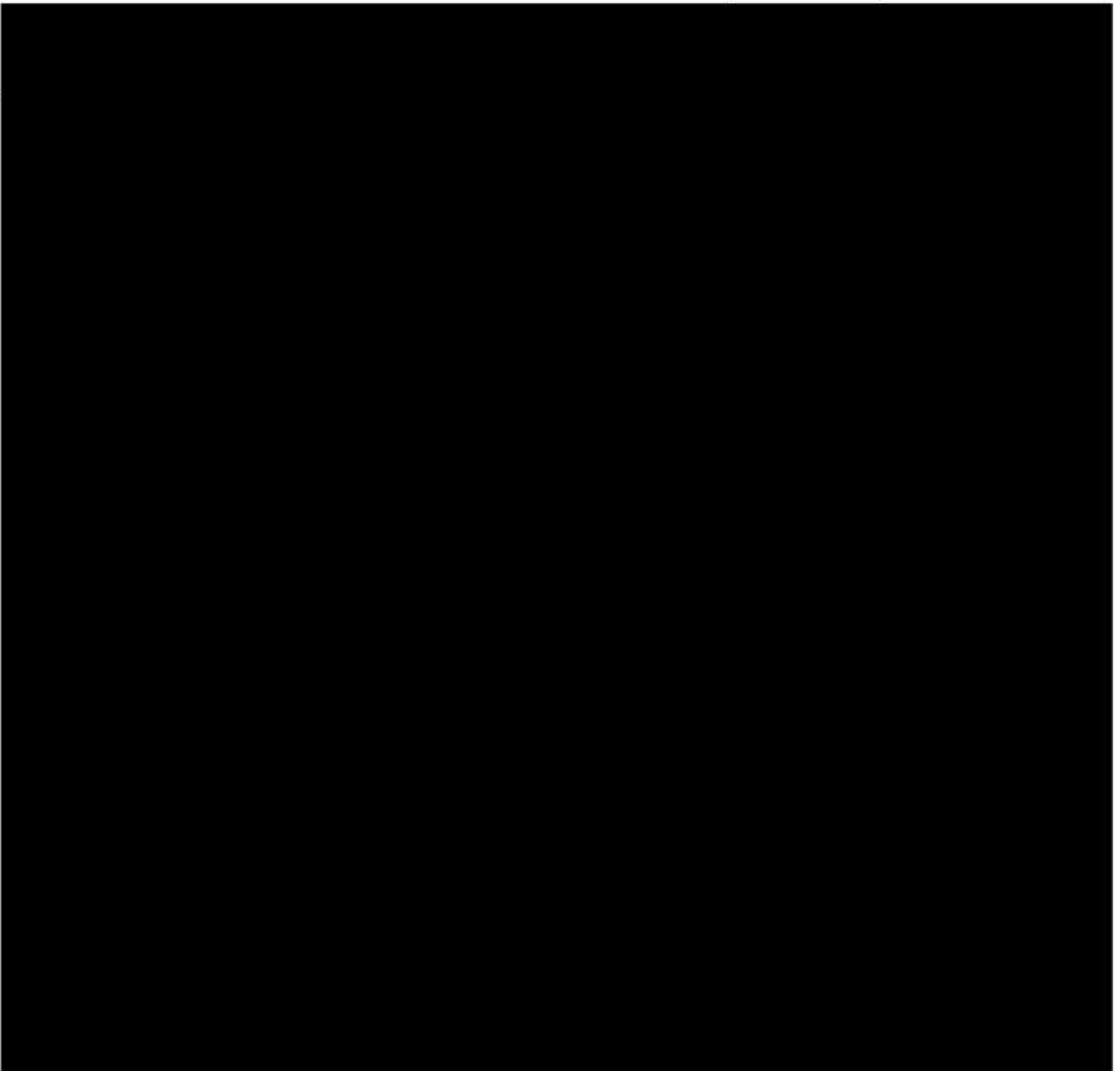
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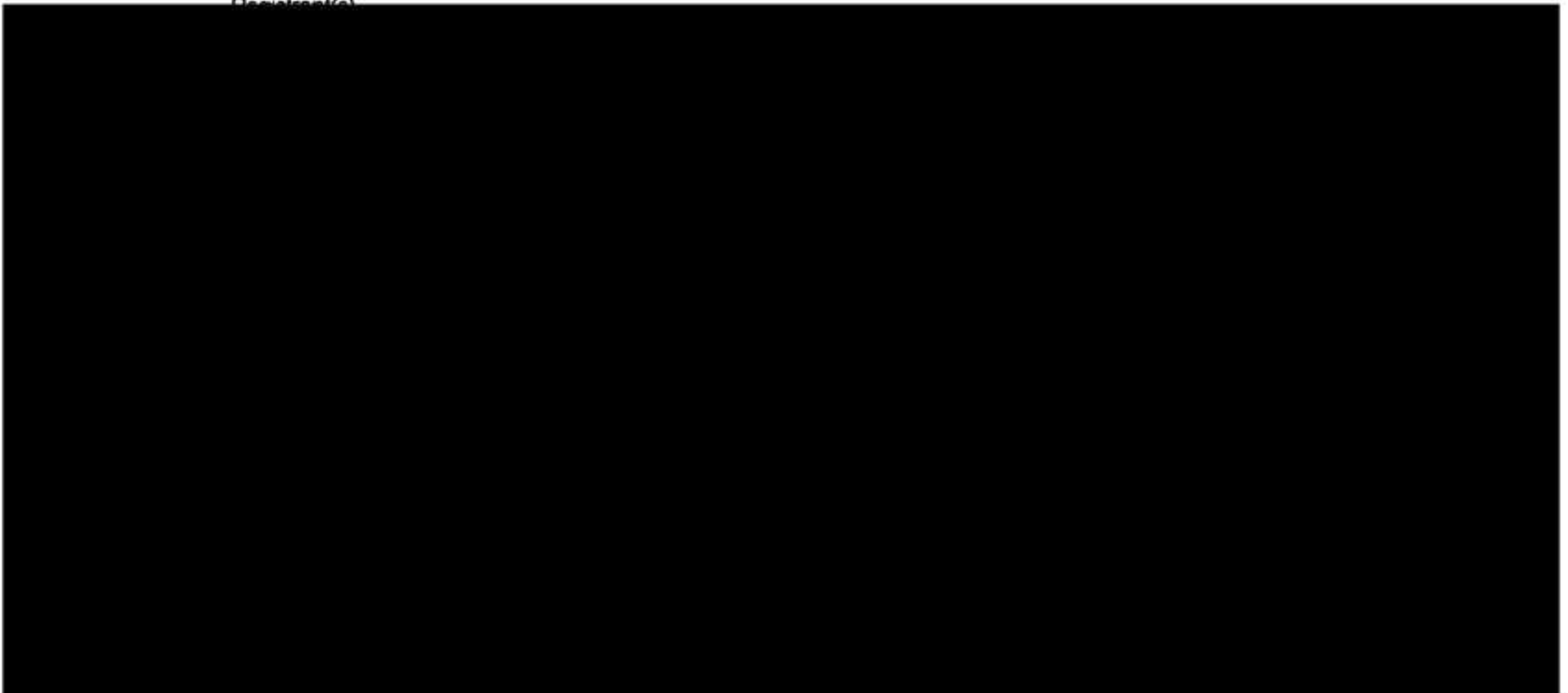


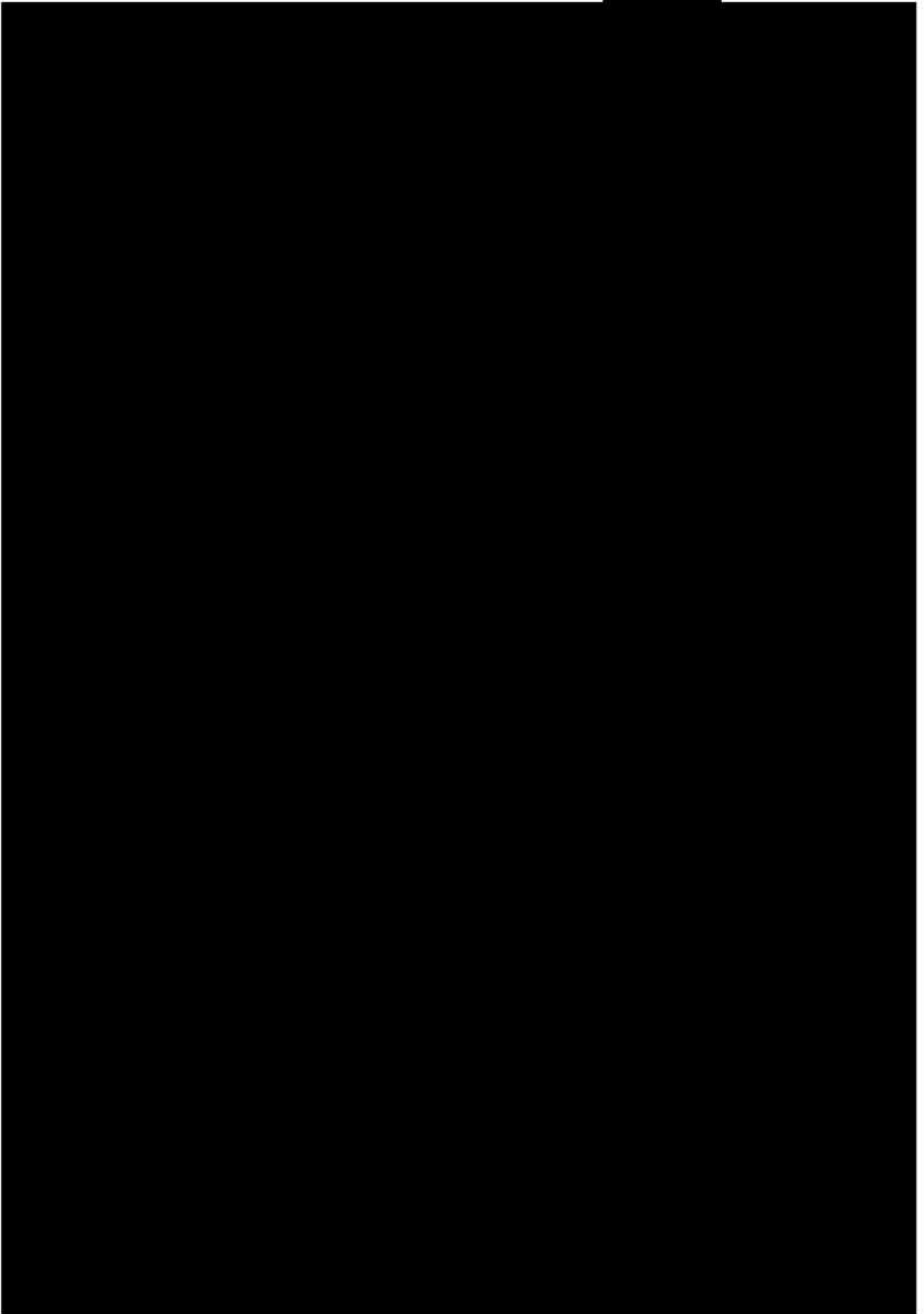


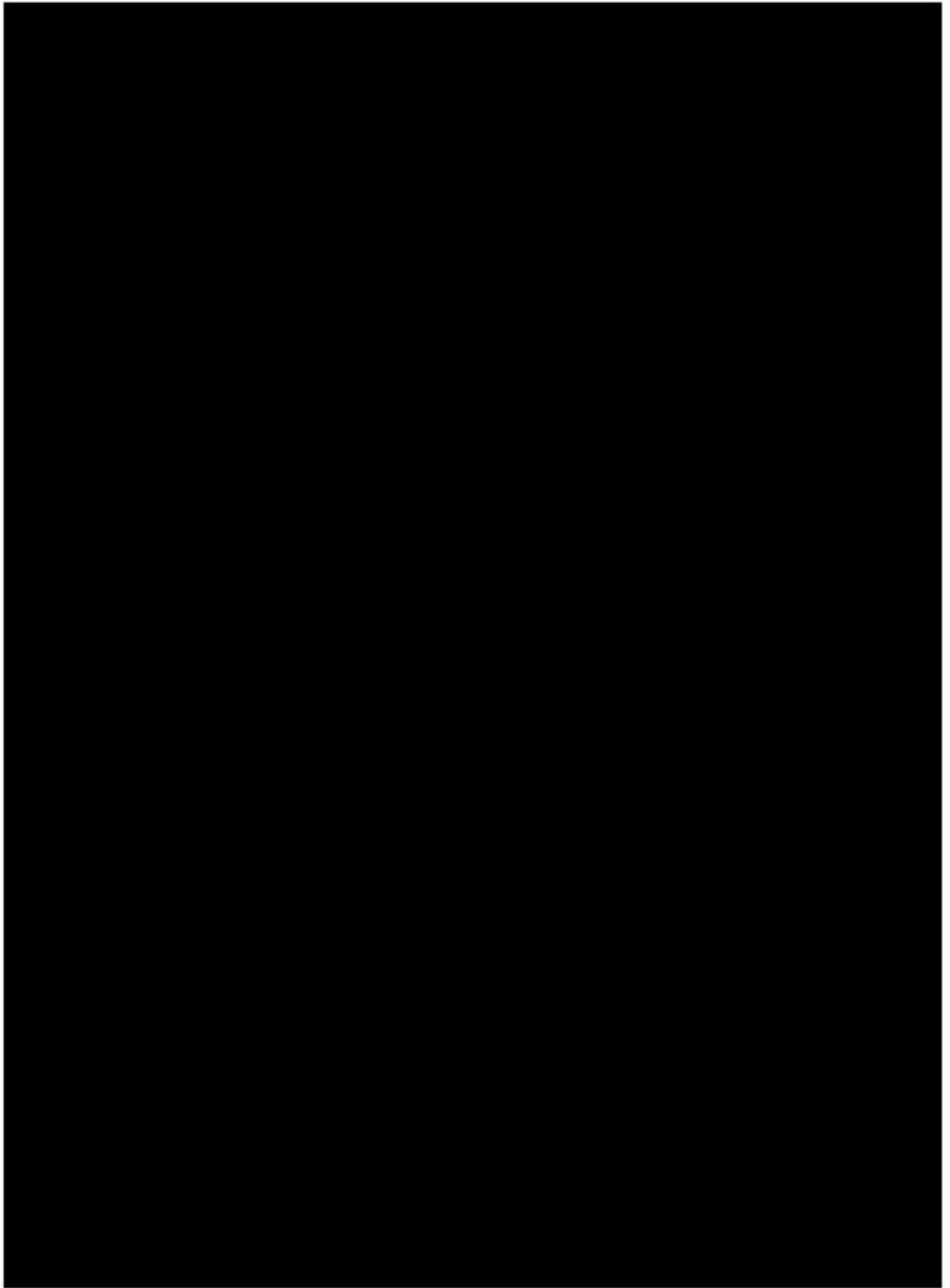
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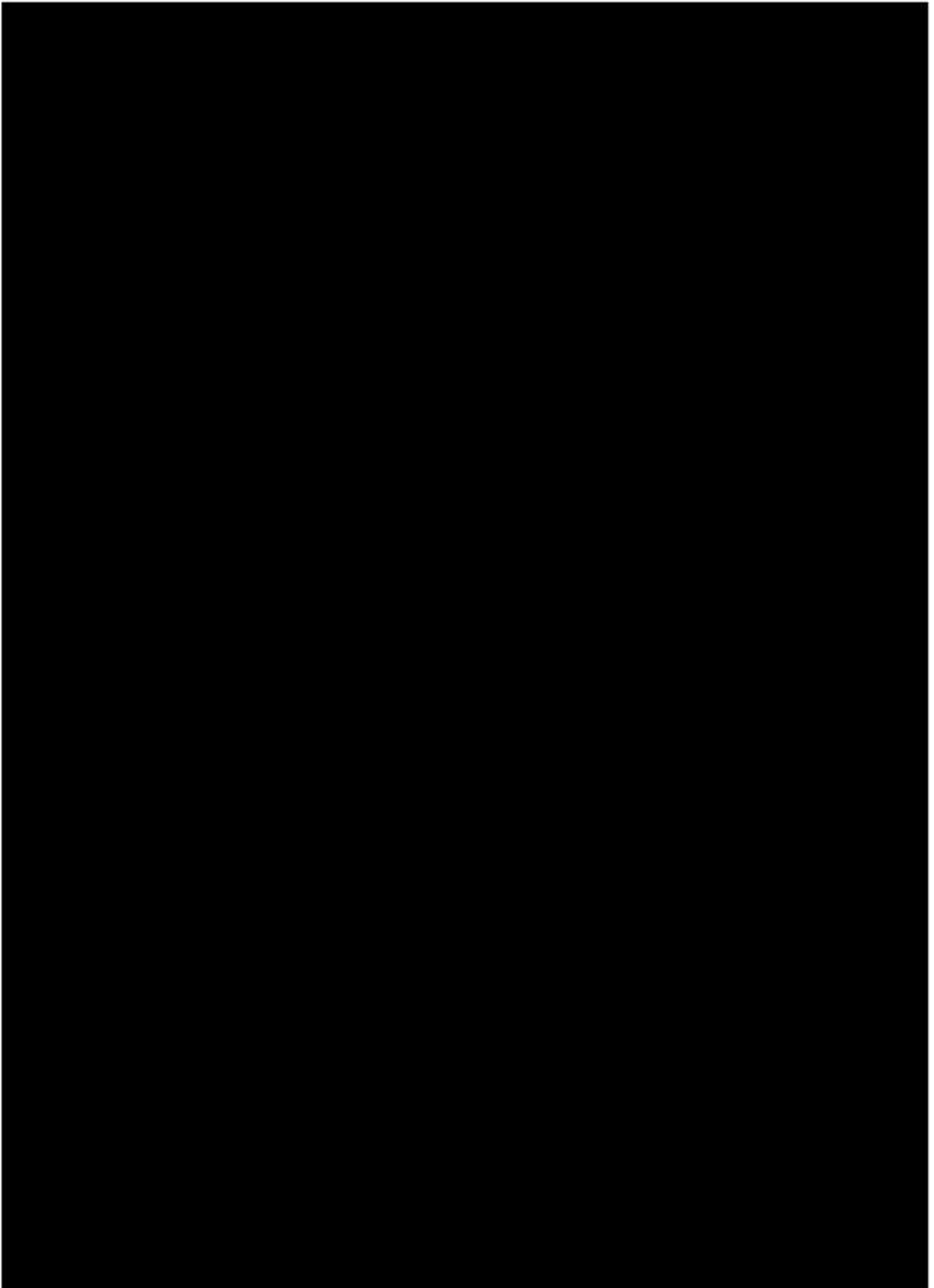


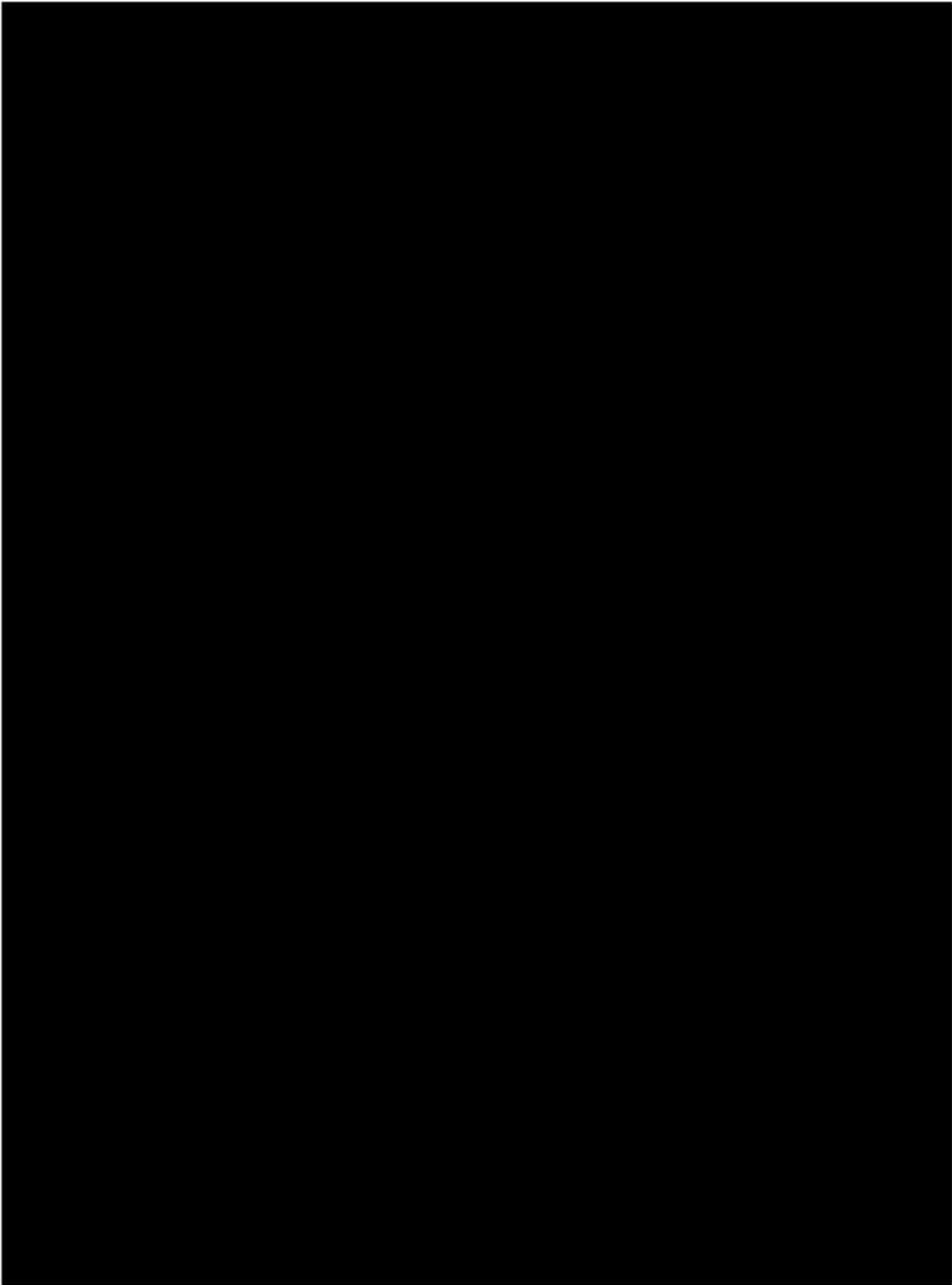
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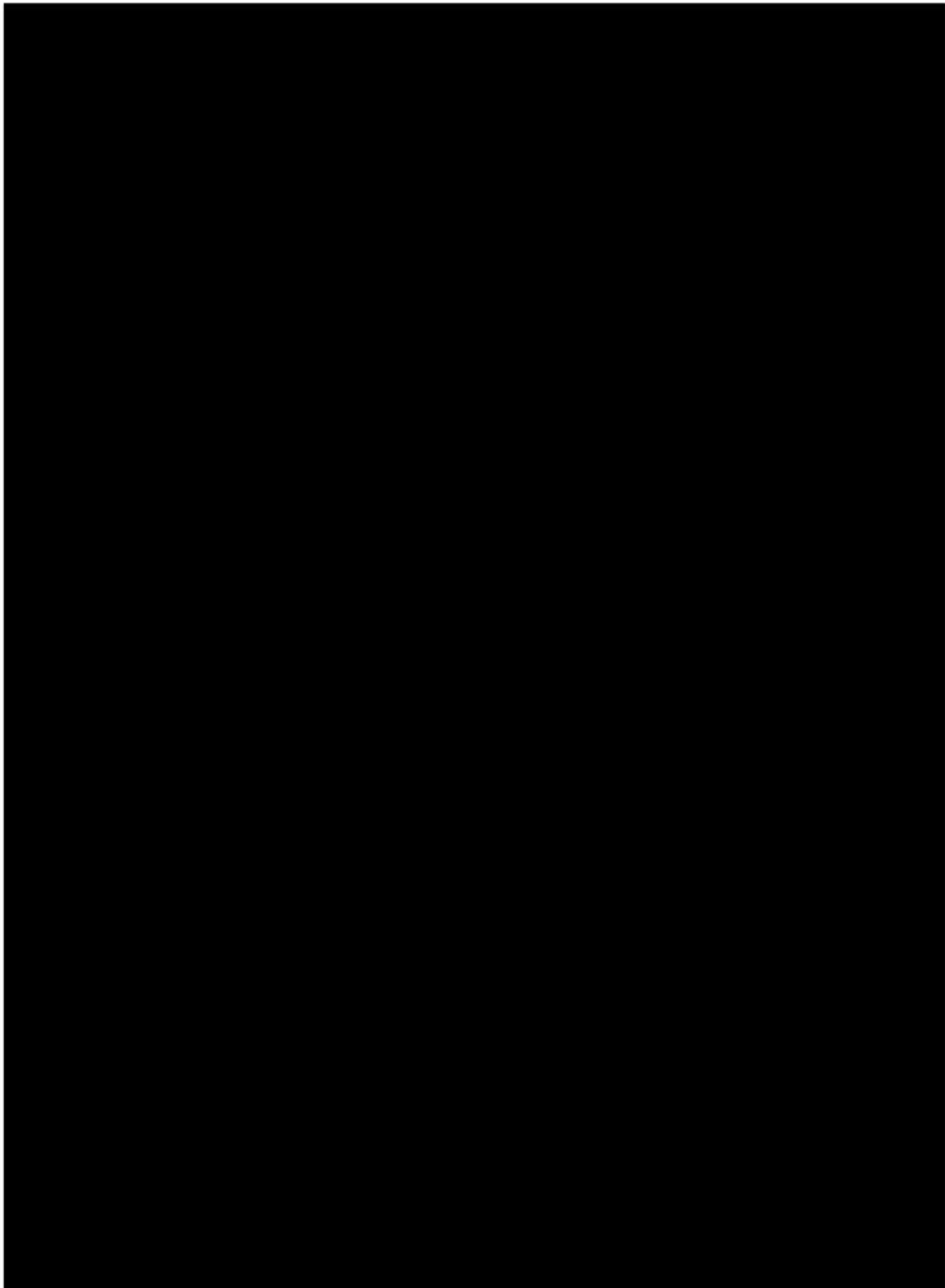














LEOPOLD-KUVINTM
CONSUMER JUSTICE ATTORNEYS

appeals

Friday, November 20, 2009

Maureen Hackett
Office of the State Attorney
401 N. Dixie Highway
West Palm Beach, FL 33401

Re: B.B. v. JEFFREY EPSTEIN
OUR FILE NO.: 080303

Dear Ms. Hackett,

As we discussed, I have agreed to cancel the deposition of ASA Daliah Weiss at this time. Based on the conversations with Ms. Weiss and you, I do not foresee the need at this time to reset this deposition, but I cannot completely foreclose the possibility of deposition in the future pending further discovery in the Epstein cases. As I mentioned to you, if I believe there is additional information that develops in these cases that would require me to reset Mrs. Weiss for deposition, I will provide you with notice prior resetting this deposition so that you will have an opportunity to address the court in a timely manner.

Should you have any additional questions please do not hesitate to contact me at your convenience.

Sincerely,


SPENCER T. KUVIN

U.S. Department of Justice
United States Attorney
Southern District of Florida
500 Australian Ave., Suite 400
West Palm Beach, FL 33401
Official Business
Penalty for Private Use \$300



State Attorney's Office
401 N. Dixie Highway
West Palm Beach, FL 33401-4209

Public Records Request No. 19-372

27 11 112 1 200 8705

DOJ-OGR-00033193

OFFICE OF THE STATE ATTORNEY
INTER-OFFICE MEMORANDUM

TO: Chief Michael Waites

FROM: Investigator Glenn Wescott

RE: State Attorney's Investigation 09-002456

DATE: August 24, 2009

On 08/21/09 I was assigned to obtain copies of the security cameras and log in sheets for 1 Clearlake Plaza in West Palm Beach, FL which is the business address for Jeffrey Epstein. On 08/21/09 I received the copies of the log in sheet and noted that Mr. Epstein's name does not appear on the log in sheet which he would only be required to do if he were in the building after 1900 per the Property Manager, Mrs. Michelle Horn.

On 08/24/09 I received the security camera videos which were formatted to DVD. I could not discern Mr. Epstein on the CD's but the camera angle is poor and does not allow one to see the entire area, just the door area.

The DVD's and Log In Sheets were TOT ASA Burns per her request.

Investigator Glenn A. Wescott
Office of the State Attorney
15th Judicial Circuit
401 North Dixie Highway
West Palm Beach, Florida 33401
561-355-7118

Visitors' Register

DATE	NAME	FIRM	ADDRESS	TO SEE
8/19	Rita Palacios	Compass Party	STREET CITY STATE	8:45 TIME IN TIME OUT
8/19	Cathy Ann	PaperTex	STREET CITY STATE	8:45 TIME IN TIME OUT
8/19	Irene	BC	STREET CITY STATE	9:03 TIME IN TIME OUT
8/19	Juan	KGR	STREET CITY STATE	9:05 TIME IN TIME OUT
8/19	Andrew	Fuchs	STREET CITY STATE	9:10 TIME IN TIME OUT
8/19	Leslie McKenna	Paychex	STREET CITY STATE	9:12 TIME IN TIME OUT
8/19	CKCS	Paychex	STREET CITY STATE	9:45 TIME IN TIME OUT
8/19	Donna Dair	Paychex	STREET CITY STATE	9:46 TIME IN TIME OUT
8/19	Don Neil White	Greenstein Warden	STREET CITY STATE	9:50 TIME IN TIME OUT
8/19	K. Newell	Anderson Telecom	STREET CITY STATE	9:54 TIME IN TIME OUT
8/19	Bob	601	STREET CITY STATE	10:14 TIME IN TIME OUT
8/19	Silvane	Isae	STREET CITY STATE	10:45 TIME IN TIME OUT
8/19	K. Kulan	MetLife Dob	STREET CITY STATE	10:44 TIME IN TIME OUT
8/19	M. Mann	Press	STREET CITY STATE	10:52 TIME IN TIME OUT
8/19	K. de la Costa	NG Compass	STREET CITY STATE	10:53 TIME IN TIME OUT

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DATE	NAME	FIRM	ADDRESS		TO SEE	
			STREET	CITY STATE	TIME IN	TIME OUT
8/19	William Whit	Calby Rat			10:53	
8/19	M Boranventura	Met Life			10:57	
8/19	Ed Turner	MSC			11:25	4:00
8/19	Luke Lewis	Dempsey Paladino			11:35	12:07
8/19	Rock	Katzman			11:44	
8/19	Taukel	K 127			11:55	
8/19	Sheila Brown	met life			12:35	
8/19	Garry L. Evans	Acich			12:16	
8/19	Elaine Manini	Sulnick			12:30	
8/19	Gilbert Roman	Selmanek			12:31	
8/19	Kevin McKenna	CEMEX			12:47	
8/19	Bruce Phil	Division			12:49	
8/19	Fidel Monjaraz	1203			12:54	1:00
8/19	Adam Merrill	EY			10:2pm	1:37pm
8/19	Kim Train	EY			1:52	
					1:52	