



FDLE

PUBLIC CORRUPTION UNIT

OFFICE OF EXECUTIVE INVESTIGATIONS INVESTIGATIVE SUMMARY

CASE NUMBER: EI-73-8674 **DATE:** March 18, 2021

CASE AGENT: Inspector Troy K. Cope

INCIDENT DATE: June 30, 2008 – July 22, 2009

INCIDENT LOCATION(S): Palm Beach County / Fifteenth Judicial Circuit

ALLEGATION(S) / CHARGE(S): Executive Order #19-183: Preliminary Inquiry into Jeffrey Epstein's Work-Release and Incarceration by the Palm Beach County Sheriff's Office

INVESTIGATIVE PREDICATE:

On August 6, 2019, Governor Ron DeSantis signed Executive Order #19-183 at the request of Palm Beach County Sheriff Ric Bradshaw. The Executive Order mandated for the Florida Department of Law Enforcement (FDLE) to assume the Palm Beach County Sheriff's Office's (PBSO) criminal investigation concerning Jeffrey Epstein. Additionally, Governor DeSantis requested FDLE initiate a preliminary inquiry "beyond the work release of Jeffrey Epstein and into other irregularities surrounding the prior state investigation and ultimate plea agreement." FDLE's Office of Executive Investigations (OEI) Public Corruption Unit (PCU) was assigned to conduct a preliminary inquiry pertaining to potential Florida State Statute criminal violation by PBSO members during the time period when PBSO oversaw Jeffrey Epstein's work-release and incarceration.

This summary specifically pertains to OEI's preliminary inquiry regarding to the aforementioned time period, as mandated by Executive Order #19-183.

Pursuant to the aforementioned Governor ordered preliminary inquiry, OEI reviewed all documents provided by PBSO, the Palm Beach County Clerk of the Court, the State Attorney's Office for the Fifteenth Judicial Circuit, the Town of Palm Beach, and DOC pertaining to Epstein's incarceration and work-release while in PBSO custody. Additionally, OEI Inspectors conducted interviews of identified PBSO personnel which were involved in the decision-making process for Epstein's time in the PBSO jail, work-release program and his off duty PBSO security detail (Permit Detail). It should be noted that OEI's preliminary inquiry pertained to determining if any criminal violations occurred on the part of PBSO members regarding Epstein's time while under PBSO's care, custody, control, and supervision. Additionally, during the course of this preliminary inquiry, it was ascertained that various requested records pertaining to Epstein's time under PBSO's care, custody, control, and supervision were destroyed pursuant to records retention schedules. As a result of this preliminary inquiry, the following facts were established:

Epstein's Sentencing

OEI Inspectors obtained and reviewed records from the Palm Beach County Clerk of the Court (PBCCC). Per the records, on June 30, 2008, Epstein was adjudicated guilty of the following:

- One (1) count of Felony Solicitation of Prostitution, in violation of Florida State Statute (F.S.S.) 796.07(2)(f) and (4)(c), a third-degree felony.
- One (1) count of Procuring a Person Under 18 for Prostitution, in violation of F.S.S. 796.03, a second-degree felony.

Pertaining to Epstein's sentencing, the following information was discerned from the PBCCC records:

- Epstein's Criminal Punishment Code Scoresheet detailed that his minimum prison sentence was 21.5 months.
- Epstein was sentenced to serve a total of 18 months in the Palm Beach County Detention Facility, followed by 12 months of Community Control 1 (house arrest – no GPS monitoring) with DOC.
- Additionally, per F.S.S. 943.0435, as a result of the aforementioned conviction for Procuring a Person Under 18 for Prostitution, Epstein was designated a sexual offender and was required to register as a sexual offender upon release from PBSO's custody.

It should be noted that OEI Inspectors conducted a preliminary inquiry pertaining to Epstein's Fifteenth Judicial Circuit prosecution, which resulted in a plea agreement. The information obtained pertaining to that inquiry will be detailed in a separate summary.

Epstein's Incarceration at the PBSO Stockade

OEI Inspectors reviewed F.S.S. 951.23(4)2 (2008) which governed the procedures within Florida jails pertaining to prisoner classification. Per the reviewed statute, Sheriffs were provided flexibility in the housing of inmates in their custody. The statute stated in part, "[t]he confinement of prisoners by classification and provide, whenever

possible, for classifications which separated males from females, juveniles from adults, felons from misdemeanants, and those awaiting trial from those convicted and, in addition, provide for the separation of special risk prisoners, such as the mentally ill, alcohol or narcotic addicts, sex deviates, suicide risks, and any other classification which the local unit may deem necessary for the safety of the prisoners and the operation of the facility pursuant to degree of risk and danger criteria.”

OEI Inspectors obtained and reviewed PBSO records pertaining to Epstein while he was in the custody of PBSO. The records detailed the following information:

- Per the records, Epstein was in the custody of PBSO from June 30, 2008, until July 22, 2009.
- Epstein’s housing records indicated he received a mental health evaluation on July 1, 2008 (one day after his incarceration), and was subsequently assigned to the T-Management area of the Stockade.
- PBSO Command Staff advised that Epstein was classified as a minimum-security inmate, which qualified him to be placed in a minimum-security dormitory.

OEI Inspectors conducted sworn recorded interviews of pertinent PBSO personnel regarding Epstein’s classification during his time in the PBSO Stockade. Per their statements, PBSO Command Staff determined that due to Epstein’s notoriety, he could not be safely housed with other inmates in an open, minimum-security dormitory (as per his determined classification assessment). Per their statements, the following safety concerns were noted:

- Per the PBSO Command Staff, Epstein was at risk of being extorted by other inmates and/or extorting other inmates himself.
- PBSO Corrections staff was also concerned that Epstein would put money into every inmate’s canteen and become “king of the dorms.”
- Epstein was at risk of being harmed by other inmates in an open-dorm setting because PBSO personnel could not identify boyfriends or associates of his victims who were incarcerated with Epstein who might want to harm him.

PBSO records reviewed by OEI Inspectors indicated that from July 1, 2008, until March 2, 2009, Epstein was housed in the T-Management area which was primarily used to house inmates who had received discipline for violating rules of the jail. Per PBSO records and personnel statements, the T-Management area of the Stockade was described as an area containing 16 individual cells, plus a room designated for meetings with attorneys. Due to the discipline issues associated with the inmates housed in the T-Management area, they were confined to their cells.

Per PBSO Command Staff, Epstein’s federal non-prosecution agreement allowed him “benefits, privileges, and rights of all other inmates,” which meant that although Epstein was housed in the T-Management area, he remained entitled to the same privileges afforded to the inmates housed in an open, minimum-security dormitory classification. Per PBSO Command Staff the following housing arrangements were authorized in order to comply with the aforementioned federal non-prosecution agreement:

- Epstein’s cell remained unlocked at all times which afforded him the ability to walk around the T-Management area.
- Epstein was given access to a television installed in the T-Management area attorney room. The television was installed outside the view of other T-Management area inmates, since they were being disciplined and were not authorized to watch television.
- Epstein was made the “houseman” for the T-Management area, which required him to sweep and mop the floors, clean the individual cells, and pick up the food trays from inmates that were on lock down.

Per PBSO records and Command Staff statements, on March 2, 2009, the T-Management area transitioned from an all-male housing unit to an all-female housing unit necessitating Epstein to be relocated. A review of housing records of the T-Management area for the dates of March 2, 2009, through July 22, 2009 (last date of Epstein in PBSO custody), corroborated that only female inmates were housed in the T-Management area during that time period.

Per PBSO records and PBSO personnel statements, the following was ascertained pertaining to Epstein’s time period housed in the Stockade Infirmary:

- On March 2, 2009, Epstein was moved from the T-Management area to the Stockade’s Infirmary, where he remained housed for the duration of his sentence until July 22, 2009.
- At the time Epstein was moved to the Infirmary, the location was not staffed nor being utilized by PBSO.
- Epstein was the only inmate housed in the Stockade’s Infirmary from March 2, 2009, through July 22, 2009 (last date of Epstein in PBSO custody).
- Epstein continued to have the treatment and accommodations he was afforded while housed in the T-Management area.

OEI Inspectors reviewed records that detailed discussions of Epstein paying for permit deputies from Corrections to staff the Infirmary post. Per PBSO Command Staff statements, the Infirmary was staffed as a regular function of the Stockade’s operation, and no permit deputies were used to staff the location.

It should be noted that per PBSO records and PBSO personnel statements, PBSO Chief Deputy Michael Gauger was the highest-ranking officer in PBSO’s Chain of Command involved in the approval process for the matters related to Epstein as detailed in this summary: Stockade housing, work-release program, and permit deputies’ contract. Per Chief Gauger’s statement to OEI Inspectors, the housing of an inmate was a classification issue and an inmate’s safety was a part of jail standards to which they had to adhere. Chief Gauger stated that the PBSO staff made the right decision in how they housed Epstein at the Stockade and reiterated that the decisions were made in order to ensure Epstein’s safety as an inmate in their custody.

Pursuant to the aforementioned review of F.S.S. 951.23(4)2 (2008), PBSO records, and PBSO member statements, although it appeared Epstein was the recipient of differential treatment while being housed at the PBSO Stockade, no evidence was developed to indicate that any PBSO member engaged in any criminal activity in the performance of their duties as they related to Epstein’s housing in the PBSO Stockade.

Epstein's Participation in the PBSO Work-Release Program

OEI Inspectors reviewed F.S.S. 951.24 (2008) which established that PBSO was allowed to operate a work-release program. Furthermore, the statute authorized Florida counties to enact a work-release program upon the agreement of the county's board of county commissioners and the sheriff. Per the statute, work-release was available for inmates, "... to work at paid employment, conduct his or her own business or profession, or participate in an educational or vocational training program, while continuing as an inmate of the county facility in which he or she shall be confined except during the period of his or her authorized release." Additionally, the statute granted sentencing courts the authority to allow an inmate to participate in the work-release program at the time of sentencing or at any time the inmate was in the custody of the county jail. The only crime excluding an inmate from participation in a work-release program was a conviction of Sexual Battery, in violation of F.S.S. 794.011.

OEI Inspectors obtained and reviewed Palm Beach County Board of County Commissioners' Resolution #94-152 (Palm Beach County's work-release program in accordance with F.S.S. 951.24) and PBSO Corrections Operating Procedure (C.O.P.) #926.01 effective October of 2007, which governed the "Work Release and In-House Arrest Program" for PBSO during the time period Epstein was under PBSO care, custody and, control. Per the C.O.P., participants in the work-release program were either admitted by an order from the 15th Judicial Circuit or approved by PBSO. Per the records reviewed, PBSO's authority to authorize work-release to an inmate resulted from "...Standing Orders written by Judges in the 15th Judicial Circuit."

OEI Inspectors obtained and reviewed a court order for Division W (division Epstein was sentenced), effective February 17, 2005, which stated:

"The Sheriff of Palm Beach County is authorized to establish criteria for the consideration and review of inmates requesting the Work Release and In-House Arrest Programs while serving time in the Palm Beach County Detention Center or Stockade have been sentenced in this Division. Persons admitted to either program shall be at the sole discretion of the Sheriff and his staff in determining their suitability.

The undersigned takes no position with respect to the eligibility of any inmate sentenced in this Division unless specifically stated at time of sentencing."

Per the review of the C.O.P., the following exclusions were related to eligibility of the PBSO work-release program:

- Inmates convicted of certain offenses and/or extensive or violent criminal histories were excluded from the program.
- Inmates convicted of Prostitution (F.S.S. 796) who had received "three guilt's within the past five (5) years" were ineligible to participate in the work-release program.
- The C.O.P. did not differentiate between the subsections of F.S.S. 796 or between felonies and misdemeanors.
- The C.O.P. (10/2007) did not exclude registered sexual offenders from being placed on work-release by PBSO without a court order.

OEI Inspectors obtained and reviewed PBSO documents pertaining to Epstein's participation in the PBSO work-release program. Per the reviewed documents, the following facts were ascertained:

- Epstein applied for PBSO's work-release program administered by the Alternative Custody Unit on October 1, 2008.
- Epstein was ultimately authorized to begin the program on October 10, 2008.
- Per Epstein's work-release, he would work "full time as President of The Florida Science Foundation" located at 250 South Australian Avenue Suite 1404 in West Palm Beach.

OEI Inspectors obtained and reviewed documents associated to The Florida Science Foundation in relation to Epstein's work-release application. Per the documents, on July 10, 2008, The Florida Science Foundation was registered through the Florida Department of State Division of Corporations as the fictitious name of The C.O.U.Q. Foundation, Inc. Additional documents disclosed The C.O.U.Q. Foundation, Inc. was incorporated in the state of Delaware in March of 1998. A W-2VI form was provided to PBSO, indicating Epstein received a salary from the Financial Trust Company in 2007. Furthermore, Epstein later advised PBSO Command Staff via letter that, "I am doing both my financial consulting business, which includes investment advice and planning, as well as managing my private foundation investments and giving."

OEI Inspectors conducted sworn interviews of PBSO personnel involved in the approval process for Epstein's work-release. Per the interviews, Epstein's ability to qualify was determined by a review of the C.O.P. and his criminal history. A review of PBSO records and PBSO personnel interviews indicated that the PBSO chain-of-command reviewed Epstein's application for work-release and determined that Epstein had two (2) convictions for prostitution; thus, Epstein qualified for work-release. A review of Epstein's criminal history confirmed that, in 2008, Epstein had two (2) convictions within F.S.S. 796 which fell short, according to the C.O.P., of the three (3) convictions required for disqualification of the PBSO work-release program.

OEI Inspectors obtained and reviewed the federal non-prosecution agreement signed on September 24, 2007, and October 29, 2007, pertaining to Epstein's non-prosecution agreement with federal prosecutors. A review of the documents noted that it did not grant nor prohibit Epstein from participating in a work-release program. It should be noted that during OEI's inquiry, they identified and reviewed communications (email 07/03/2008 and by letter 12/11/2008) between federal officials and PBSO Command staff, in which the federal officials expressed concerns about Epstein being allowed on work-release, but further indicated that work-release was "... completely within the discretion of the Sheriff's Office."

OEI Inspectors conducted sworn interviews of pertinent personnel from the Fifteenth Judicial Circuit Office of the State Attorney (SAO) who could provide information pertaining to Epstein's authorization to participate in the PBSO work-release program. Per their statement, work-release was controlled by the jail (PBSO) and the standing administrative order, and was not routinely addressed by the SAO. Furthermore, they advised that the SAO had no input in authorizing Epstein to participate in the PBSO work-release program.

OEI Inspectors obtained and reviewed the transcript of Epstein's sentencing on June 30, 2008. Per the reviewed records, no discussion or determination related to Epstein being placed on work-release while he was in the custody of PBSO occurred. Per the transcript, no restrictions were discussed pertaining to Epstein while under PBSO custody. The only restrictions discussed during Epstein's sentencing were regarding Epstein's sentence portion under the supervision of the Florida Department of Corrections (DOC) Community Control.

It should be noted that a review of PBSO records identified three (3) instances in which inmates were authorized to participate in the work-release program, who like Epstein, were designated sexual offenders per F.S.S. 943.0435. A review of the inmates' records confirmed they were registered sexual offenders at the time they were court ordered into the work-release program (June of 2005, March of 2011, and July of 2011, respectively).

Pursuant to the aforementioned review of F.S.S. 951.24 (2008), PBSO records, and PBSO personnel statements, no evidence was developed to indicate that any PBSO member engaged in any criminal activity in the performance of their duties as they related to Epstein's authorization to participate in the PBSO work-release program.

Work-Release Employment and Schedule

Per a review of PBSO document and emails, Epstein requested and was granted changes to his work itinerary while in the PBSO work-release program based on working needs he articulated to the PBSO Alternative Custody Unit personnel. The following work-release schedule for Epstein was determined from the reviewed documents:

- On October 10, 2008, Epstein began his work-release. Epstein worked Monday through Saturday, 1000 to 2200 hours.
- On October 30, 2008, Epstein's schedule was approved to change his day off from Sunday to Thursday beginning November 6, 2008.
- On December 17, 2008, Epstein's schedule was approved to be adjusted on December 20, 2008, to Monday through Friday, 0800 to 2000 hours. Saturday and Sunday were the designated days off.
- On February 19, 2009, Epstein's schedule was approved to add Saturday as a working day for Epstein with Sunday remaining a day off. The change was effective on February 21, 2009.
- On May 7, 2009, Epstein's working hours were approved to be changed to 0700 to 2300 hours effective May 9, 2009.
- On June 3, 2009, Epstein's work schedule was approved to expand from six (6) days a week to seven (7) days, effective June 14, 2009.
- On June 30, 2009, Epstein was authorized to visit his personal residence for two (2) hours per day (1230 hours to 1430 hours) effective July 4, 2009.

Per PBSO Command Staff, Epstein requested time at his residence to set up his home office as he was transitioning to house arrest under DOC Community Control, which PBSO Command deemed as a reasonable request due to the short duration of time remaining in PBSO custody. Furthermore, per PBSO personnel statements, work-release did not prohibit an individual who was self-employed or was the owner of a business to participate in the program; inmates were eligible to participate in work-release even if their office was at their personal residence.

It should be noted that per a review of the C.O.P., PBSO's work-release agreement, and interviews of PBSO personnel, Epstein's schedule could be adjusted with the approval of the Command Staff. Per statements from

PBSO personnel, the above noted fluctuation / changes to Epstein's work-release schedule were approved by PBSO Command Staff. Additionally, one of the aforementioned inmates (registered sexual offender) was granted a court order that modified their work schedule from six (6) days a week to seven (7) days a week.

Pursuant to the aforementioned review of PBSO records and PBSO personnel statements, although it appears that Epstein was the recipient of differential treatment pertaining to his authorized work-release program schedule, no evidence was developed to indicate that any PBSO member engaged in any criminal activity in the performance of their duties as they related to Epstein's work-release schedule authorization.

PBSO Alternative Custody Unit Supervision of Epstein

OEI Inspectors obtained and reviewed PBSO records pertaining to Epstein's restrictions while in the PBSO work-release program, which was administered by the PBSO Alternative Custody Unit. Per PBSO personnel, they routinely conducted unannounced checks (referred to as job checks) to ensure that work-release inmates were located at their assigned work location. Furthermore, PBSO personnel advised that all inmates assigned to work-release were required to wear an ankle monitor and GPS transmitting device which allowed their location to be continually tracked. The system tracked inmates via satellite and displayed their location on a map (similar to mobile phone map applications). Per PBSO records and personnel statements, the following protocols and procedures were established pertaining to Epstein's work-release program:

- Epstein could only meet with business associates and forbade contact with family members, friends, girlfriends, and minors.
- Epstein was required to remain in the pre-determined area of his assigned work location or an area approved by the PBSO Alternative Custody Unit.
- Epstein was required to wear an ankle monitor equipped with GPS, which would alert the PBSO Alternative Custody unit if he was located outside his pre-approved geographical areas.
- Alternative Custody Unit personnel did not monitor Epstein's computer activity or review his email correspondence as part of their duties.
- PBSO documents and PBSO Alternative Custody personnel provided no indication (GPS alert records / permit deputy reports) that Epstein traveled outside Palm Beach County while under PBSO work-release.

Per PBSO records and personnel statements, the PBSO Alternative Custody Unit conducted 32 job checks pertaining to Epstein without incident. Additionally, no violations of the work-release program related to Epstein's whereabouts occurred per the records or PBSO personnel.

Pursuant to the aforementioned review of PBSO records and PBSO personnel statements, no evidence was developed to indicate that any PBSO member was coerced, bribed or engaged in any criminal activity in the performance of their duties as they related to Epstein's supervision in the work-release program.

PBSO Permit Deputies for Epstein's Work-Release

During the review of PBSO records, OEI Inspectors identified a letter from Epstein's attorney concerning their request to contract PBSO deputies to provide Epstein personal security while he was outside the PBSO Stockade

in work-release. The letter stated in part, “Out of an abundance of caution I am requesting that I be allowed to hire off duty deputies to secure Mr. Epstein’s office location. While this is not a requirement of the program, I want to take every step to ensure Mr. Epstein’s safety and to also ensure his work area will not be intruded upon by any unauthorized individuals.” It should be noted that per F.S.S. 30.2905(1) (2008), the sheriff had the authority to “...administer a program to contract for employment of sheriff’s deputies, during off-duty hours, for public or private security services.” In PBSO, these contracted deputies for off-duty work were known as permit deputies.

OEI Inspectors conducted sworn interviews of PBSO personnel involved in the approval process for Epstein’s PBSO permit detail. Per PBSO Command Staff, Epstein was required to hire the permit deputies to participate in the work-release program out of concern for the public-at-large. Per PBSO Command Staff, although Epstein qualified for work-release, they were concerned due to the nature of Epstein’s offenses; thus, the permit deputies added an extra level of monitoring in addition to the standard monitoring by the Alternative Custody Unit.

Per the review of PBSO records and PBSO personnel statements, OEI Inspectors noted the following information pertaining to Epstein’s contract and requirements of PBSO permit deputies:

- On October 1, 2008, Epstein completed the standard application to hire PBSO permit deputies for his personal security.
- PBSO permit deputies began providing Epstein with personal security on October 10, 2008.
- PBSO permit deputies were to provide Epstein with personal security while he was outside of the Stockade on work-release.
- PBSO permit deputies did not accompany or supervise Epstein while he was transported to and from his work-release location.
- The permit deputy was required to wear a suit (plain clothed detail).
- PBSO permit deputies were required to record inmate Epstein’s time of arrival and departure time, along with the name, date and time of each visitor that came in contact with inmate Epstein.
- A log was secured in a safe at the office location and the permit deputy was responsible for securing the log after each shift.
- PBSO permit deputies were to remain at their post for their entire shift, which was located in the lobby area of Epstein’s office suite.
- PBSO permit deputies’ primary function was to provide Epstein with personal security and to ensure the parameters outlined in the contract were followed by Epstein.
- No discrepancies were identified between Epstein’s work-release schedule and the hours/times worked by the permit deputies.

Epstein’s stipulations pertaining to the permit detail contract were coordinated with the Command Staff of the Alternative Custody Unit and were as follows:

- The permit deputy was required to meet Epstein upon his arrival at his office in the morning.
- Epstein was not to leave his designated workplace for any reason, with the exception of returning to the Stockade or attending approved doctor appointments.
- Inmate Epstein was permitted to have contact with business associates (only) while at the designated workplace.
- Visitors were to be documented in the log and their identity confirmed by identification.
- Epstein was not permitted to have contact with family members, girlfriends, children, friends or minors (this type of visitation is prohibited and a violation of his work-release status.)
- Epstein was not to use, possess or have on the premises any drugs, alcohol or mind-altering substances.
- Epstein was not to possess or have weapons of any kind on the premises.
- Epstein was to adhere to all the terms of his work-release program agreement (the permit deputies were required to be aware of Epstein's work-release requirements.)
- The late shift permit deputy was required to escort Epstein to his car at the end of the day.

Per the review of PBSO records, 91 different PBSO deputies worked the permit detail from October 10, 2008, through July 21, 2009. Written "Extra Duty Permit Overtime Report Forms" (permit detail timesheets) filed by the permit deputies (494) were reviewed, and no violations of Epstein's work-release were reported. Per PBSO personnel, the visitor logs, detailing who visited Epstein, were destroyed by PBSO pursuant to records retention schedules.

It should be noted that, per PBSO personnel, Epstein had a private office in the back where he worked and met with business associates. Epstein had employees that worked with him and were routinely observed during unannounced job checks by the Alternative Custody Unit. PBSO permit deputies were not required as part of their duties to sweep Epstein's office prior to his workday or his residence when he was granted approval to work from home for two (2) hours per day in July of 2009. Furthermore, PBSO permit deputies were not required as part of their duties to monitor Epstein's meetings, activity on his work computer, or review his email correspondence.

OEI Inspectors reviewed payment records and invoices from PBSO pertaining to payments made to PBSO pursuant to Epstein's contract for security permit deputies. Additionally, OEI Inspectors reviewed the ledger card from Epstein's attorney which corroborated the information obtained from PBSO records. From the review of the aforementioned documents, the following was determined:

- Epstein's attorney paid on behalf of The Florida Science Foundation a total of \$128,136.00, through 11 checks.
- The dates and times worked that were reported by the permit deputies matched the dates and times in accordance with the aforementioned schedule.

- Permit deputies received their payments via direct deposit from PBSO and were not paid directly by either The Florida Science Foundation or Epstein.

It should be noted that during the review of the C.O.P., OEI Inspectors identified a policy in the “Procedures” Section V. A-4, which stated in part: “PBSO employees or their families will not have any business transactions with inmates or their families while they are in the custody or supervision of the Sheriff and for at least one (1) calendar year after termination of their sentence.” Per PBSO personnel, the aforementioned policy was not considered or reviewed before approving permit deputies for Epstein’s personal security, while he was an inmate in their custody. As described, the lack of review and any potential policy issues were determined not be a criminal matter, thus fell outside the scope of OEI’s preliminary inquiry.

Pursuant to the aforementioned review of PBSO records and PBSO personnel statements, no evidence was developed to indicate that any PBSO permit deputy engaged in any criminal activity in the performance of their duties as they related to providing personal security to Epstein through the PBSO permit contract.

SECTION II

INVESTIGATIVE FINDINGS

The following findings are based on the evidence, documentation, and information obtained during OEI’s preliminary inquiry:

- Per PBSO records, Jeffrey Epstein was in the custody and control of PBSO from June 30, 2008, to July 22, 2009, as a result of two (2) felony state charges.
- Per PBSO records, while under PBSO care, custody, and control, Jeffrey Epstein was housed in the PBSO jail building known as the Stockade.
- Per PBSO records and PBSO personnel statements, Jeffrey Epstein was classified by PBSO as a minimum-security inmate, to be housed in an open-dorm area.
- Per PBSO personnel statements, based on Jeffrey Epstein’s notoriety, PBSO’s Command Staff were concerned he could be at risk of being extorted by other inmates and/or extorting other inmates himself, influencing and controlling other inmates through canteen payments, and the risk of being harmed by other inmates, to include boyfriends or associates of his victims potentially incarcerated with Epstein.
- Per PBSO records, Jeffrey Epstein was housed in the T-Management area from July 30, 2008, until March 2, 2009.
- Per PBSO records, Epstein’s federal non-prosecution agreement allowed him “benefits, privileges, and rights of all other inmates,” which meant that although Epstein was housed in the T-Management area, he remained entitled to the same privileges afforded to the inmates housed in an open, minimum-security dormitory (as per his assessment).
- Per PBSO personnel statements, while housed in the T-Management area, Epstein’s cell remained open, and he was allowed access to a television, in order to comply with the stipulation of his federal non-

prosecution agreement to afford him the same “benefits, privileges, and rights of all other inmates” who were housed in an open, minimum-security dormitory.

- Per PBSO records and PBSO personnel statements, the T-Management area transitioned from an all-male housing unit to an all-female housing unit necessitating Jeffrey Epstein to be relocated.
- Per PBSO records, Jeffrey Epstein was relocated from the T-Management area to the Infirmary from March 2, 2008, until his release on July 22, 2009.
- Per PBSO records and PBSO personnel statements, no other PBSO inmates were housed in the Infirmary with Jeffrey Epstein.
- Per F.S.S. 951.24 (2008), work-release was available for inmates, “...to work at paid employment, conduct his or her own business or profession, or participate in an educational or vocational training program, while continuing as an inmate of the county facility in which he or she shall be confined except during the period of his or her authorized release.”
- Per PBSO records and PBSO personnel statements, Epstein’s convictions did not exclude him from participation in the work-release program based on the eligibility guidelines noted in the Florida State Statutes and the PBSO C.O.P. #926.01.
- Per Florida State Statutes, standing orders with the Fifteenth Judicial Circuit judge, and PBSO operating procedures, Jeffrey Epstein qualified to participate in PBSO’s work-release program.
- Per PBSO records and PBSO personnel statements, Epstein participated in the PBSO work-release program from October 10, 2008, through July 21, 2009.
- Per PBSO personnel, the PBSO Command Staff was aware that Jeffrey Epstein was working for The Florida Science Foundation and conducting a financial consulting business outside the scope of The Florida Science Foundation.
- Per PBSO Personnel, the PBSO Command Staff approved all changes to Jeffrey Epstein’s work-release schedule (hours and days) to include visiting his residence for two (2) hours a day during the final (2) weeks of his work-release.
- Per PBSO records and PBSO personnel statement, there were no reported violations of Jeffrey Epstein’s work-release to include unauthorized contact with individual(s) or GPS location violation.
- Per a letter from Epstein’s attorney, they requested to contract PBSO deputies in an off-duty capacity (permit deputies) to provide personal security to Epstein while he was on work-release.
- Per F.S.S. 30.2905(1) (2008), the sheriff had the authority to “...administer a program to contract for employment of sheriff’s deputies, during off-duty hours, for public or private security services.”
- Per PBSO Command Staff, Jeffrey Epstein was required to contract permit deputies in order to participate in the work-release program.

- Per PBSO records and PBSO personnel statements, there were no noted reports of violations by Jeffrey Epstein of his work-release.

Based on the review of Florida State Statutes, PBSO records, and PBSO personnel statements, no evidence was developed to substantiate that any identified PBSO member engaged in criminal activity during the performance of their duties associated with PBSO's housing and supervision of Jeffrey Epstein. No financial intelligence was developed to substantiate any claim that undue financial influence was received by any individual member of PBSO to benefit Epstein. Although the inquiry detailed instances in which, while in the care, custody and control of PBSO, Epstein was provided differential treatment (affording an inmate different treatment in order to equalize their rights to those of other inmates) these actions were explained by PBSO and were determined not be a criminal matter, thus fell outside the scope OEI's preliminary inquiry.

SECTION III

STATE ATTORNEY

On March 15, 2021, OEI Inspectors provided this summary to the State Attorney's Office for the Nineteenth Judicial Circuit. On March 17, 2021, the State Attorney's Office for the Nineteenth Judicial Circuit advised that after their review, they agreed with the findings outlined in this summary and stated the preliminary inquiry addressed the concerns in the Governor's Executive Order.