ATTERBURY GOLDBERGER AGRICHARDSON & WEISS, P.A. RW

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



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

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Public Records Request No.: 17-295

JOSEPH R. ATTERBURY\*

JACK A. GOLDBERGER\*†

SCOTT N. RICHARDSON\*

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.

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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 George 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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Lanna Belohlavek, Esquire Office of the State Attorney 401 North Dixie Highway West Palm Beach, FL 33401 '06 JUN 23 PM 12:09

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JOSEPH R. ATTERBURY\*

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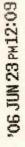
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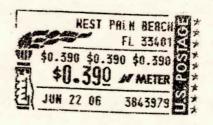
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07/26/17

Page 7 of 131

Public Records Request No.: 17-295

#### ATTERBURY GOLDBERGER RICHARDSON & WEISS, P.A.

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

Phone: (561) 659-8300 Fax: (561) 835-8691

#### 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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LAW OFFICES OF

#### GERALD B. LEFCOURT, P.C.

PROFESSIONAL COMPORATION
148 EAST 78<sup>TH</sup> STREET
NEW YORK, NEW YORK 10021

GERALD B. LEFCOURT lefcourt@lefcourt@w.com

TELEPHONE (212) 737-0400 FACSIMILE (212) 968-6192

SHERYL E. REICH
reich@lefcourtlew.com

RENATO C. STABILE
stabile@lefcourtlew.com

FAITH A. FRIEDMAN
filedman@lefcourtlew.com

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.virginislandsdaily news.com/index.pl/article\_home?id=17296624.

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.

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 <a href="legislature">legislature</a> 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 Smith 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 Hill Sex Offender Ordinance Upheld, Courier Post, June 1, 2006, at http://www.courierpostonline.com/apps/pbcs.dll/article?AID=/20060601/NEWS01/606010389/1 006; 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

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, parks, 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 Hill, 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, Smith 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.

More importantly, as noted, this crime clearly does not reflect what allegedly occurred since there has been no suggestion that a threat of serous 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.

The UCR divides its statistics into three major categories: violent crimes, property crimes, and hate crimes. "Violent crime is coroposed of four offenses: murder and nonnegligent manslaughter, forcible rape, robbery, and aggravated assault." "Violent Crime," Crime in the United States, 2004, at <a href="http://www.fbi.gov/ucr/cius\_04/offenses\_reported/violent\_crime/index.html">http://www.fbi.gov/ucr/cius\_04/offenses\_reported/violent\_crime/index.html</a>.

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). background, including a history of theft, confessions and repeated denials of stealing from employers and customers, lying about her age, sexual promiscuity, and prostitution; (iii boastful admission of drug use, underage drinking, sexual activity, shoplifting, wild 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 \_\_\_\_ 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

LAW OFFICES OF

#### GERALD B. LEFCOURT, P.C.

A PROFESSIONAL CORPORATION 148 EAST 78<sup>TH</sup> STREET NEW YORK, NEW YORK 10021

GERALD B. LEFCOURT lefcourt@lefcourtlaw.com

TELEPHONE (212) 737-0400 FACSIMILE (212) 988-6192

SHERYL E. REICH
reich@lefcourtlaw.com

RENATO C. STABILE
stabile@lefcourtlaw.com

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June 5, 2006

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07/26/17 Page 17 of 131

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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 <a href="legislature">legislature</a> 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 Smith 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 Hill Sex Offender Ordinance Upheld, Courier Post, June 1, 2006, at http://www.courierpostonline.com/apps/pbcs.dll/article?AID=/20060601/NEWS01/606010389/1006; 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

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, parks, 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 Hill, 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, Smith 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.<sup>3</sup>

More importantly, as noted, this crime clearly does not reflect what allegedly occurred since there has been no suggestion that a threat of serous 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.

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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 <a href="http://www.fbi.gov/ucr/cius\_04/offenses\_reported/violent\_crime/index.html">http://www.fbi.gov/ucr/cius\_04/offenses\_reported/violent\_crime/index.html</a>.

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 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) boastful admission of drug use, underage drinking, sexual activity, shoplifting, wild 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

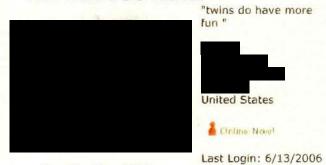
Under the circumstances of this case a plea to felony aggravated assault is both unwarranted and presents a grave risk the client will be brandished a sex offender, bearing the attendant burdens inherent with that classification. In light of this, and the credibility issues presented by the complaining 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

Public Records Request No.: 17-295

#### YA FUCK YOU 2!!!!!!



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MySpace URL:

http://www.myspace.com/lovelysaige

#### YA FUCK YOU 2!!!!!!'s Blurbs

#### About me:

| [ ] The full name is   |
|--|
| 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!!! [  ] ]   |
| am half cuban and half french/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 [  ] oh! yeah i was a ballerina for 10 years [  ]:   |
| love to danceno matter where i am at [  ] I miss you all in ga an  |
| ohwinslow 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 ♥

| General | [*]i love shopping [*] tanning [*] hanging out with friends[*] |  |  |  |  |  |  |
|---------|--|--|--|--|--|--|--|
|         | hanging out with friends[*] playing volleyball[*]sleeping in   |  |  |  |  |  |  |
| Music   | TELL ME ABOUT YOURSELF - The<br>Survey                         |  |  |  |  |  |  |
|         | Name:  |  |  |  |  |  |  |
|         | Birthday:  |  |  |  |  |  |  |
|         | Birthplace:  |  |  |  |  |  |  |
|         | Current<br>Location:   |  |  |  |  |  |  |
|         | Eye Color:   |  |  |  |  |  |  |
|         | Hair Color:  |  |  |  |  |  |  |
|         | Height:  |  |  |  |  |  |  |
|         | Right Handed or Left Handed:                                   |  |  |  |  |  |  |
|         | Your Heritage:   |  |  |  |  |  |  |
| 8       | The Shoes  |  |  |  |  |  |  |
|         | You Wore   |  |  |  |  |  |  |
|         | Today:<br>Your   |  |  |  |  |  |  |
|         | Weakness:  |  |  |  |  |  |  |
|         | Your Fears:  |  |  |  |  |  |  |
|         | Your Perfect<br>Pizza:   |  |  |  |  |  |  |
|         | Goal You   |  |  |  |  |  |  |
|         | Would Like To<br>Achieve This                                  |  |  |  |  |  |  |
|         | Year:  |  |  |  |  |  |  |
|         | Your Most  |  |  |  |  |  |  |
|         | Overused<br>Phrase On an                                       |  |  |  |  |  |  |
|         | instant  |  |  |  |  |  |  |
|         | messenger:   |  |  |  |  |  |  |
|         | Thoughts First Waking Up:                                      |  |  |  |  |  |  |
|         | Your Best  |  |  |  |  |  |  |
|         | Physical<br>Feature:   |  |  |  |  |  |  |
|         | Your Bedtime:  |  |  |  |  |  |  |
|         | Your Most  |  |  |  |  |  |  |
|         | Missed   |  |  |  |  |  |  |
|         | Memory:  |  |  |  |  |  |  |
|         | Pepsi or Coke:<br>MacDonalds or                                |  |  |  |  |  |  |
|         | Burger King:   |  |  |  |  |  |  |
|         | Single or<br>Group Dates:                                      |  |  |  |  |  |  |
|         | Lipton Ice Tea<br>or Nestea:                                   |  |  |  |  |  |  |
|         | Chocolate or Vanilla:  |  |  |  |  |  |  |
|         | Cappuccino or Coffee:  |  |  |  |  |  |  |
|         | Do you Smoke:  |  |  |  |  |  |  |
|         | Do you Swear:  |  |  |  |  |  |  |
|         | Do you Sing:   |  |  |  |  |  |  |
|         | Do you<br>Shower Daily:  |  |  |  |  |  |  |
|         | Have you<br>Been in Love:                                      |  |  |  |  |  |  |

Do you want to go to College: Do you want to get Married: Do you belive 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 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 a 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: Take This Survey **CREATE YOUR OWN! - or - GET** PAID TO TAKE SURVEYS! Movies this layout is from whateverlife.com!



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Back to Picture Index Back to Profile



Listing 1 - 2 of 2

| rom                    | Comment                               |
|------------------------|---------------------------------------|
| vThe Lucky Onev        | June 11, 2006 8:23 AM                 |
| im that [x] SuNSHiNE ▼ | June 10, 2006 6:44 PM sweetie PDA lol |

MySpace com | Home

The Web ( MySpace (

Search



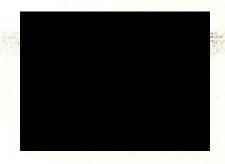
When was the last time your doctor paid YOU for a check-up?

LAWN \* DOCTOR



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Post a Comment

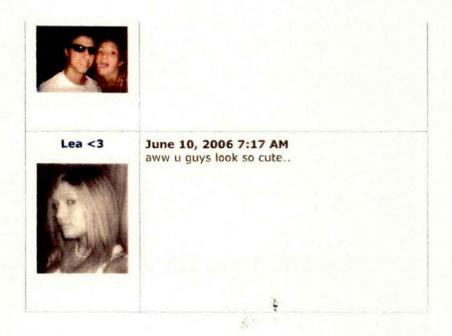
E-Mail to a Friend

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 ONESdamm casey be looking goodd lol jkjkjk i mean u.  |
| vlove'n a choquette v | June 11, 2006 9:12 AM aw how cute and who introduced you guys????? haha that would be me! lol love you bothomg casey is actually kinda smiling holy shit lol |
| ♥The Lucky<br>One♥    | June 11, 2006 8:21 AM<br>CuTe  |



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Listing 1-40 of 41

1 2 of 2

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











































HEATH ...

Lea <3

Anthony

LiL Wee Cor

Kyle

Public Records Request No.: 17-295

im that [...

MySpace.com Page 2 of 2



Listing 1-40 of 41

1 2 of 2

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# Incident Report CHEROKEE COUNTY SHERIFF'S OFFICE

05-104607

Supplement No ORIG

498 CHATTIN DRIVE

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

(678) 493-4200

| Adı  | minis             | trati | ve In     | for             | mation       |                            |                             |                           |                  |             | MARIE                  | Tarra Sine Si               | 7           |
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| Agency CHEROKEE COUNTY SHERIFF'S OFFICE                            |                   |       |           |                 |              |                            | Report No<br>05-104607      | Supplement No<br>ORIG     | Reported 1       | Date 1/2005 | Reported Time<br>21:49 |                             |             |
| CAD Call No Status 050174770 MISCELLANEOUS REPORT                  |                   |       |           |                 |              | 1000                       | ture of Call<br>NFORMATION  |                           | 1                |             |                        |                             |             |
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## **Incident Report**

05-104607

Supplement No ORIG

| JUVENILE :   | 1: JAMES               |       |         |               |                 |             |             |
|--|------------------------|-------|---------|---------------|-----------------|-------------|-------------|
| Involvement Involvement JUVENILE 1 Juvenile? Yes   | No Type<br>Individual  | JAMES |         | MNI<br>2589   | 04 WH           | ITE         | Sex<br>MALE |
| Phone Type Phone No<br>OTHER (404)   | 316-3145               |       |         |               |                 |             |             |
| OTHER 1:   |                        |       |         |               |                 |             |             |
| OTHER 1  | Individual _           | ame   |         | MNI<br>258903 | Race<br>WHITI   | Sex<br>E FE | MALE        |
|  | Age Juvenile?<br>36 No |       |         |               |                 |             |             |
| A DESCRIPTION OF THE PROPERTY OF THE PARTY O | RISTOPHER CT           |       | WALESKA |               | State<br>GEORGI | A           |             |
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| Phone Type Phone No<br>HOME (678)  | 880-2746               |       |         |               |                 |             |             |

Report Officer
000202/BEDOYA, BROOKE

Printed At 06/06/2006 11:21

Page 2 of 2

# Incident Report CHEROKEE COUNTY SHERIFF'S OFFICE

06-6702

Supplement No ORIG

498 CHATTIN DRIVE

Reported Date
01/21/2006
Nature of Call
MIS PER
Officer
BRYANT, CHRISTOPHER

(678) 493-4200

|                   |                 |             |        |                  |                    |                           | Report No<br>06-6702     | S      | Supplement No ORIG |        | Reported Date<br>01/21/2006 |  | ne l                 |
|-------------------|-----------------|-------------|--------|------------------|--------------------|---------------------------|--------------------------|--------|--------------------|--------|-----------------------------|--|----------------------|
| 0600              | II No<br>011543 | INC         |        | T REPO           |                    | Nature of Call<br>MISSING | PERSON                   | (ADUL  | JT)                |        |                             |  |                      |
| Location<br>411   | CHRIS           | TOPH        | ER'S   | CT               |                    |                           |                          | CANT   | ON                 | 1.000  | Code<br>ANTON               |  |                      |
| The second second | 20/200          |             | m Time | To Date<br>01/21 | /2006              | To Time<br>6 13:00        | Officer<br>000025        | /BRYAI | NT, CHRI           | STOPHE | R                           |  |                      |
| 2nd Offi<br>BRY!  | NT, CH          | RIST        | OPHER  | Assign<br>ADU    |                    | ETENTION                  | CENTER                   | Assign |                    | ENTION | CENTE                       | R 0000                                   | Commence of the last |
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| invi<br>CLR       | Invi No<br>2    | Type        | Name   |                  |                    |                           |                          |        | MNI<br>264217      | Race   | Sex<br>F                    | 03/17/                                   | 1969                 |
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Report Officer
000025/BRYANT, CHRISTOPHER

Printed At 06/06/2006 11:12

Page 1 of 3

Public Records Request No.: 17-295

## **Incident Report**

06-6702

Supplement No.

### CHEROKEE COUNTY SHERIFF'S OFFICE

| CALLER/COMPLA                             | INAN          | T 2:    |      |      |        |                 |               |
|---|---------------|---------|------|------|--------|-----------------|---------------|
| involvement<br>CALLER/COMPLAINANT         | Invi No.      | Type    | dual | Name |        |                 | MNI<br>264217 |
| Race Sex Date of B                        | Age Juver     |         |      |      |        |                 |               |
| Type Address HOME 411 CHRISTOPH           | ER CT         |         |      |      | CANTON | State<br>GEORGI | A             |
| ZIP Code<br>CANTON                        |               |         |      |      |        |                 |               |
| Type<br>SOCIAL SECURITY NU                | MBER          | ID No   |      |      |        |                 |               |
| Phone Type Phone No<br>HOME (678) 880-274 | 16            |         |      |      |        |                 |               |
| <b>JUVENILE 1: Con</b>                    | fident        | ial     |      |      |        |                 |               |
| Involvement Invi No Name                  | Market Market | tial Pa | ge   |      |        |                 |               |
| Narrative                                 |               |         |      |      |        |                 |               |

While on patrol, I was dispatched to a missing person call at 411 Christopher 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 handing 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 Allen and informed her of the situation. The mother did not want a juvenile complaint filed. I issued \(\Gamma\) 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 Bells 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.

| X .                        |                              | -   |
|----------------------------|------------------------------|-----|
| Report Officer             | Printed At                   | 1   |
|                            | 06/06/2006 11:12 Page 2 of 3 | - 1 |
| 000025/BRYANT, CHRISTOPHER | 00/00/2006 II.12 Fage 2 OL 5 | _   |

### Incident Report CHEROKEE COUNTY SHERIFF'S OFFICE

498 CHATTIN DRIVE

06-6702 DRAFT Supplement No.

0001

Reported Date
01/21/2006
Nature of Call

Officer ALLEN, AUTUMN

(678) 493-4200

| Administrative Information                      |                      |                       |              | 1. 19 年 1. 19 1 · 19 1 · 19 1 · 19 1 · 19 1 · 19 1 · 19 1 · 19 1 · 19 1 · 19 1 · 19 1 · 19 1 · 19 1 · 19 1 · 19 |  |
|---|----------------------|-----------------------|--------------|---|--|
| Agency CHEROKEE COUNTY SHERIFF'S OFFICE         | Report No<br>06~6702 | Supplement No<br>0001 | 01/21/2006   | Reported Time<br>15:30  |  |
| Officer<br>000284/ALLEN, AUTUMN                 | Assignment<br>CID D  |                       | PERSONS UNIT | Entered by 000284   |  |
| Assignment Approving CID DAY SHIFT PERSONS UNIT | Officer              | Approval              |              |   |  |
| Approval Time                                   |                      |                       |              |   |  |
| Narrative                                       | AND THE              |                       | A MARKAN     |   |  |

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 white 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/ALLEN, AUTUMN

06/06/2006 11:12

Page 1 of 1

### **Case Activity**

W 3

· Index

### Case Details

| Incident No Initial 060006702 01/23/ |                 | A STATE OF THE PARTY OF THE PAR |                             | Assigned    | Division        | Asgn Are                  | a Assign Date<br>01/23/2006 | Charge<br>MIS JUV |    |
|--------------------------------------|-----------------|--|-----------------------------|-------------|-----------------|---------------------------|-----------------------------|-------------------|----|
| Class<br>27                          | Case C<br>27699 | Control  | Solve                       | Status<br>C | Dispo<br>CLOSED | /CLEAREI                  | EXCEPTI                     | ONALLY ADU        | LT |
| Prosecute? Insurance                 |                 | e?   | Last Activity<br>01/23/2006 |             | Foll            | Follow Up Due Dt          |                             |                   |    |
| Made Date Property Act               |                 |  |                             | # Cha       | rges            | Status Date<br>01/23/2006 |                             |                   |    |
| E-Mail Person                        |                 | Property   |                             | Veh         | nicle           | Investigation             | on B                        | ooking            |    |

### New Case Activity

### Case Activity

| Details | Officer<br>Assigned | Division | Asgn<br>Area | Act<br>Type | Amount | Next<br>Type | Property<br>Act | #<br>Hours | Minutes | Edit      |
|---------|---------------------|----------|--------------|-------------|--------|--------------|-----------------|------------|---------|-----------|
| 102612  |                     |          | P1           | IN          | 0      |              |                 | 0          | 0       | 060006702 |
| 102613  |                     |          | P1           | EA          | 0      |              | X.              | 0          | 0       | 060006702 |

Number of Activities: 2 Total Recovered Property: \$0

Total Hours: 0:0

### Additional Information

Associated Persons: 2

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,

Enclosure: FL ST § 90.410

In certin

FL ST S 90.410 West's F.S.A. § 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, Master 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 Ms. Marcinkova and Ms. Kellen, 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.

the Journal

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)

07/26/17

Page 42 of 131

## 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 Dershowltz, Esq., who is a close friend of Mr. Epstein's, is serving as counsel to me in my representation of Mr. Epstein. Mr. Dershowltz 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

I am submitting this Incident Report with the express understanding that it will be kept in strict confidence. Specifically, since the Report only concerns

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 purchased at Guys and Dolls. It will make clear that when the dildo was purchased was over 18 years old and she charged the purchase on Nadia Marcinkova's credit card. Ms. Marcinkova had never before been to Guys and Dolls and was taken there by 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,

Guy P. Fronstin, Esq.

GPF/mw Enclosures (as noted)

07/26/17

Page 46 of 131



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.

Assistant State Attorney

Grand Jury/Crimes Against Children

lb/lb

xc: Clerk's File SAO File

07/26/17

Page 47 of 131

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

Joseph 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 a 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 The purpose of having two people present was to act as witnesses as to whatever might have been said by during the course of our interview. It was with her 18 year old boyfriend, William, and his mother and boyfriend at 2768 Kiowa Avenue, Orange Park, FL. At approximately 6:30pm 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 Parker, answered the door. I told her that we would like to speak with there was no there. I said there must be because her Jeep was parked out front. She then said, "I'm sorry, you mean and I said yes. then came to the door. The following conversation took place.

[Riley] \_\_\_\_, my name is Bill Riley (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.

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

[Riley] , we're not cops.

[^1-] You need to leave. Get the fuck off my property, leave now.

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[Riley] Ma'am we're not being hostile. We're here just to learn the truth.

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

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

[Parker] 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.

[Riley] I'm sorry we're here at 6:45pm but your son, Will, told us we could come back. [Parker] He doesn't own this property.

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learn the truth from you about what knowledge you may or may not have."

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 \_\_\_\_\_\_ named \_\_\_\_\_ who goes by the more outlandish self chosen moniker and complete web name of " \_\_\_\_\_ rucking \_\_\_\_\_", 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

alan Dershowitz

Enclosures
cc: Barry Krischer
Lanna Belohlavek
Daliah Weiss

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1525 Massachusetts Avenue
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617-939-6001

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alan Dershowitz

cc: Barry Krischer
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)

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Re: Jeffrey Epstein

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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 Bers

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
Fibertisch@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,

Nichael Salnick

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Fbertisch@bellsouth.net

**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.

EROM : ..

### 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 FROM :

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

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### FROM :

# 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:

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Very truly yours,

Guy P. Fronstin, Esq.

GPF/mw

cc: Daliah Weiss Michael Salnick

CASE NO.: 2006CF009454AXX

STATE OF FLORIDA

VS.

07/26/17

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 2 6 2008

PLEASE TAKE NOTICE that pursuant to the Florida Rules of Criminal Pocedure 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:

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

Page 64 of 131

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, 4<sup>th</sup> 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 BEALE,

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.

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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 Page 65 of 131

Public Records Request No.: 17-295

07/26/17



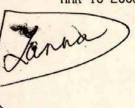
250 Australian Avenue South, One Clearlake Centre 1400, West Palm Beach, FL 33401

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

33401+4209 CO21

07/26/17

Page 66 of 131



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:

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### COURTNEY WILDE, BRITANNY BEALE,

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ATTERBURY, GOLDBERGER, & WEISS, P.A. 250 Australian Avenue South, Suite 1400 West Palm Beach, Florida 33401

(561) 659-8300

fax (56) 835-8691

JACK A GOLDBERGER, ESQUIRE

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:

### COURTNEY WILDE

HALEY ROBSON

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

P. 01/01

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 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

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

(56) 659-8300 fax: (56) 835-8691

JACK A. GOLDBERGER, ESQUIRE

Florida Bar No. 262013

Page 70 of 131

Public Records Request No.: 17-295

10/10 'd 07/26/17

CASE NO.: 2006CF009454AXX

STATE OF FLORIDA

VS.

### NOTICE OF DEPOSITION

(Time change only pursuant to the request of Theodore ). 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.

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, Thedore 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<sub>4</sub> (5§1)\$35-8691

JACK A. GOLDBERGER, ESQUIRE

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:

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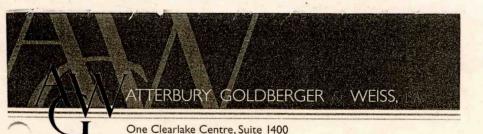
ATTERBURY, GOLDBERGER, & WEISS, P.A. 250 Australian Avenue South, Suite 1400 West Palm Beach, Florida 33401

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fax (5/1) \$35-8691

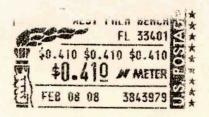
JAKK A. GOLDBERGER, ESQUIRE

FP499d72 B143 No. 262013



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

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07/26/17

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:

Plaintiffs,

TS.

JEFFREY EPSTEIN, HALEY ROBSON, and SARAH KELLEN,

Defendants.

### COMPLAINT

Plaintiffs, JANE DOE, by and through JANE DOE'S MOTHER as parent and natural guardian of JANE DOE, brings this Complaint against Defendants JEFFREY EPSTEIN, HALEY ROBSON, and SARAH KELLEN, and states as follows:

### Parties, Jurisdiction and Venue

 Jane Doe is a citizen and resident of the State of Florida. She is a minor under the age of 18 years. Formatted indents Left: 0", First lines

- Jame Doe Doe's Mother brings this action by and through her Mother who is patent and natural guardian of Jane Doe.
- 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 Haley Robson is a citizen and resident of Palm Beach County, Florida.

- 6. Defendant Sarah Kellen is a citizen and resident of the State of New York.
- This is an action for damages in excess of Fifteen Thousand Dollars (\$15,000), exclusive of interest and costs.
- 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 Altegations

- 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.
- 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.
- 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 Sarah Kellen, an assistant of Epstein's, from New York New York and Haley Robson, a Palm Beach Community College student from Loxalistchee, Florida. They recruited girls ostensibly to give a wealthy man a massage for monetary compensation in his Palm Beach mansion. Under Epstein's plan/esterprise, Ms. Robson was contacted shortly before or soon after Epstein was at his Palm Beach residence. Epstein, Kellen.

Page 2 of 9

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

Ms. Robson, upon information and belief, generally sought out economically disadvantaged underage girls from Loxaliatchee and surrounding areas who would be entired 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 Epistein's plan/enterprise.

13. Epstein's plan, scheme, and/or enterprise reflected a particular pattern and method. Upon arrival at Epstein's mansion, Mr. Robson would introduce each victim to Sarah Kellen, Epstein's assistant, who gathered the girl's personal information, including her name and telephone number. Ms. Kellen 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 hall and in the bedroom. Ms. Kellen 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, Ms. Robson recruited Jane Doe to give Epstein a massage for monetary compensation. Ms. Robson brought Jane Doe to Epstein's massion in Palm Beach. Jane was introduced to Sarah Kellen, who led her up the flight of stairs to the room with the massage table. Ms. Kellen set up the message table and laid out message oils and told Jane Doe that Epstein would be in shortly, and than 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

Page 3 of 9

and trepidation. Jane Doe compiled, 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, compiled. 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 than 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, Robson and Kellen were waiting for Jane Doe. Epstein paid Jane Doe \$300. Ms. Robson was paid \$200 by Epstein for bringing Jane to him. Ms. Robson 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. 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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18. Defendant Epstein tortiously assaulted Jane Doe sexually in or about 2005.

Page 4 of 9

- 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, Robson and Kellen

- 21. Plaintiff Jane Doe, by and through her Mother, as parent and natural guardian, repeats<sup>4</sup> and realleges paragraphs 1 through 16 above.
- Defendants Epstein, Robson and Kellen conspired to subject Jane Doe to the sexual assault of Defendant Epstein.
- 23. Each of the Defendants committed an ovent act in pursuance of this conspiracy:

  Defendant Robson used false pretenses to lure Jane Doe to the home of Defendant Epstein so
  that Epstein could sexually assault Jane Doe; Defendant Kellen 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.

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Page 5 of 9

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, Haley Robson, and Sarah Kellen 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. Plantiff Jane Doe, by and through her Mother, as parent and natural guardian, repeats\* and realleges paragraphs I through 16 above.
  - 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.

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, Haley Robson, and Sarah Kellen for compensatory damages, costs, attorney's fees, and such other and further relief as this Court deems just and proper Further, Plaintiff

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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, Robson and Kellen

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

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

34. Plainliff Jane Doe was the victim of Defendants' plan, scheme and enterprise. Defendant Robson took Jane Doe to Epstein's home under the pretense that Jane Doe would be paid to give Epstein a massage. Defendant Kellen delivered Jane Doe to a noom 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 musturbating. 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.

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35. Jane Doe was then able to get dressed, leave the room and go back down the stairs and into the kitchen. Epstein, Robson and Kellen were waiting for Jane Doe. Epstein paid Jane Doe \$300. Ms. Robson 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, Haley Robson, and Sarah Kellen 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 Palm Beach Gardene, FL 33410 Phone: 561-684-6500 Fax: 561-697-2383

By:

THEODORE J. LEOPOLD Florida Bar No.: 705608

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Juan Alessi

07/26/17 Page 83 of 131 Public Records Request No.: 17-295

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|----|---|--------|
| 1  | APPEARANCES:  |        |
| 2  | On behalf of the State: DALIAH H. WEISS, Esquire ASSISTANT STATE ATTORNEY |        |
| 4  | 401 North Dixie Highway West Palm Beach, Florida 33401 561.355.7100       |        |
| 5  | On behalf of the Witness:<br>DONNIE MURRELL, Esquire                      |        |
| 7  | L.D. MURRELL, P.A. 400 Executive Center Drive Suite 201                   |        |
| 9  | West Palm Beach, Florida 33409<br>561.686.2700                            |        |
| 10 | ALSO PRESENT:   | 17     |
| 11 | DETECTIVE JOE RECAREY Palm Beach Police Department                        |        |
| 12 | raim beach rolice bepartment  |        |
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| 1  | INDEX   |        |
| 2  | WITNESS:                                      | PAGE:  |
| 3  | JUAN P. ALESSI<br>EXAMINATION BY DET. RECAREY | 4      |
| 4  |   |        |
| 5  | NO EXHIBITS MARKED                            |        |
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- 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,
- 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
- that was served on Mr. Alessi, although it was
- 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.
- I just spoke with your wife and she told me
- 23 you guys worked for Mr. Epstein for eight years?
- A. Yes, she did work for eight years. I
- 25 worked longer. I was there before my wife came.

- 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 butler 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.
- Q. We are talking about Jeffrey Epstein?
- 19 A. Of course.
- 20 Q. Do you remember the address of the house?
- A. 558 El Brillo.
- 22 Q. Was it in the beginning of the street --
- A. At the end of the street, on the left-hand
- 24 side.
- 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?
- 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.
- 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.
- Q. Why would you stay at the house, then?
- 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.
- Q. When he was in town, did he receive a lot
- 25 of guests at the house?

- 1 girlfriend. She was our immediate superior.
- Q. Did he have girls come over to give
- 3 massages?
- A. Yes.
- 5 Q. How many massages would he have in a day?
- 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?
- 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.
- A. But I imagine she was 16, 17. In my
- 23 judgment, she was 16, 17.
- Q. Where would these massages take place?
- 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?
- 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?
- 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.
- 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.
- Q. Based on the cleanup?
- 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.
- 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 --
- Q. Where would he keep these massagers?
- 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.
- 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. Oh, 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?
- 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.
- 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.
- 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?
- A. Yeah, we settled that.
- 12 Q. That was settled?
- 13 A. That was settled with him between us.
- 14 Q. Was that --
- 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.
- 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.
- Q. The guest quarters?
- A. Yeah, the guest quarters.
- 24 Before, we had an apartment upstairs.
- Q. They have the laundry and a little office

- 1 and the bedroom?
- A. Yes. That was 2001. Before that, we had
- 3 an apartment upstairs in their house, in the main house.
- Q. In the little rooms upstairs across from
- 5 his master 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.
- 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.
- Q. I'm sorry if I gave you that impression.
- A. That's why I called him. That's the only
- 25 reason that I called.

- Before I even spoke to you.
- Q. Just when you found the card?
- 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?
- 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.
- 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 --
- A. It's the date after I contacted you.
- 5 Q. -- Paul, first name Paul?
- 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?
- A. Absolutely not. I would not take it.
- 12 Q. Did he tell you not to speak to me?
- 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.
- And he says, If you hire a lawyer, you make
- 17 that decision.
- 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.
- 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.
- 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.
- I think his name was Paul. I only met him
- 4 for about fifteen minutes, ten minutes.
- 5 Q. You met at your house?
- 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 O. 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.
- 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?
- Q. As many as you can remember.
- A. As many as I can remember.
- 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.
- There also were men masseuses.
- 14 O. 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.
- 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.
- Q. Would you clean his plane too?
- 3 A. No, no.
- 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?
- A. I can't think of anything. Basically it's
- 25 the same questions that the other investigator asked me.

- 1 Exactly the same.
- I wish I could give you more names.
- 3 Allison --
- 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.
- 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.
- MR. MURRELL: Packages? Are we expecting a
- delivery of something?
- DET. RECAREY: No. I'm just saying --
- MR. MURRELL: Okay. Just making sure there
- 18 wasn't something I didn't know about.
- 19 DET. RECAREY: I.e., gifts, et cetera.
- That kind of thing.
- 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.

| THE ! | Page 24                              |
|-------|--------------------------------------|
| 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.)              |
| 5     |                                      |
| 6     |                                      |
| 7     |                                      |
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| 25    |                                      |

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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.   |  |  |  |
| 11 |  |  |  |  |
| 12 |  |  |  |  |
| 13 |  |  |  |  |
| 14 | Susan Shelling, RPR  |  |  |  |
| 15 | Notary Public - State of Florida My Commission No. DD 098441 |  |  |  |
| 16 | / My Commission expires 3/7/2006                             |  |  |  |
| 17 |  |  |  |  |
| 18 | Expires March 7, 2006 Bonded Thru                            |  |  |  |
| 19 | Atlantic Bonding Co., Inc.                                   |  |  |  |
| 20 |  |  |  |  |
| 21 |  |  |  |  |
| 22 |  |  |  |  |
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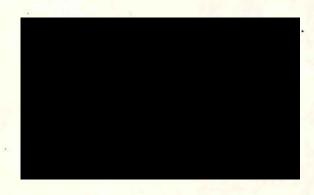
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Public Records Request No.: 17-295



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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 kest Christmas. I have always blind both gracious and generous in forgiving the last have alleged by. You and I have a last but, a unique understanding.

The project would be complete by the end of July, when in fact, for the second second

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

I would hope that you will retreated to the big boase Island project. As you know, we have made to make the project and have incurred great expense to get permits and in Morocco. If you choose not to move forward, I think at a minimum, my have been been to the state of disrepair in which it currently sits and should be brought to make the best only an employee and as I have my total relationship not with Jean, and Cabinet Pinto, the obligation falls on you personally. This is only right, you know it is, to you're aware, I was told repeatedly that you would call me upon return on the youth a bod visit and finish the project. You and I have more of a friendship than my testing, in a

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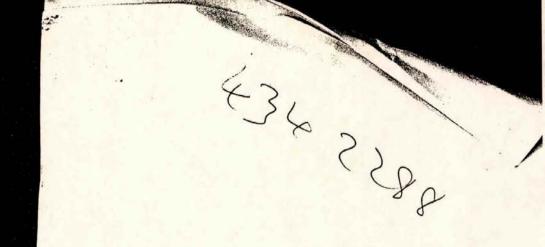


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Alberto.

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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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9/21/2005

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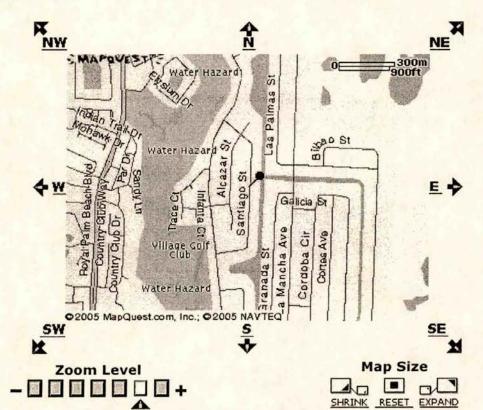
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