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August 27, 2019

VIA EMAIL and OVERNIGHT MAIL

State Attorney Dave Aronberg
401 N. Dixie Highway
West Palm Beach, Florida 33401
Email: daronberg@sa15.state.fl.us

Re: Your No. 2019PR000389AMB – Jeffrey Epstein/*The Palm Beach* Post Records Request

Dear State Attorney Aronberg:

Greenberg Traurig, P.A. represents *The Palm Beach Post* in connection with its public records requests for Jeffrey Epstein documents compiled during your predecessor Barry Krischer's tenure.

You may not be aware that on July 15, 2019, *The Palm Beach Post* reporter Jane Musgrave submitted an initial Florida Public Records Law request for Epstein documents to the Office of State Attorney. A copy of her request is enclosed. Also on July 15, 2019, Lulu Ramadan, who is also a reporter for the newspaper, made a second request, which is enclosed as well.

We understand that on July 22, 2019, your office provided a thumb drive to *The Palm Beach Post* containing 24 numbered files. After a review of these documents, the newspaper determined that certain documents responsive to its reporters' requests have not been produced, although your office has not asserted a statutory exemption. On August 6, 2019, Ms. Musgrave emailed Public Information Officer Mike Edmondson and advised that specific documents in your files have not been produced. Her email is enclosed. Unfortunately, she has not received a response. On August 14, 2019, Ms. Musgrave emailed Mr. Edmondson and asked for copies of (1) a memo purportedly written by Epstein attorney Alan Dershowitz to Mr. Krischer or his assistants, and (2) a "close-out-memo" in reference to Jane Doe 3 (Virginia Roberts Giuffre). A copy of this email is enclosed. On August 19, 2019, your office sent Ms. Musgrave a form letter indicating that it was "diligently" working on her August 14th request, and assigned it the above number.

Because of the public importance of this matter, we reiterate *The Palm Beach Post's* request that the following documents be produced as expeditiously as possible:

Party **JOINT**

ID# J01 EV# J01

DATE ADMITTED: 9/6/2022

Case No. **2019-CA-014681**

SEPH ABRUZZO CLERK
CIRCUIT COURT

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Albany, Amsterdam, Atlanta, Austin, Berlin, Boca Raton, Boston, Chicago, Dallas, Delaware, Denver, Fort Lauderdale, Houston, Las Vegas, LA, K6
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San Francisco, Seoul, Shanghai, Silicon Valley, Tallahassee, Tampa, Tel Aviv, Tokyo, Warsaw, Washington, D.C., West Palm Beach, Westchester County.

[illegible]

Joint Exhibit

J01

- Memos, emails, communications in any form from the State Attorney's Office describing a plea offered to Epstein in April 2006.
- Memo from Alan Dershowitz to Barry Krischer that alleges that most men in South Florida charged with crimes similar to Jeffrey Epstein have received probation.
- Emails exchanged between Barry Krischer, Assistant State Attorneys and the attorneys within the office of the United States Attorney for the Southern District of Florida or the United States Department of Justice concerning Jeffrey Epstein.
- Deposition transcripts of Courtney Wilde, Vanesa Zalis, Jennifer Siciliano, Daniel Gonzalez, Jennifer Laduke and Brittany Beale.

Moreover, the following documents were not part of your office's production, but we have reason to believe that they should be in its files:

- Notes, records and related correspondence of February 6, 2006, February 16, 2006 and June 1, 2006 meetings with attorneys from Barry Krischer's office and Jeffrey Epstein's defense attorneys.
- Notes, records and related correspondence concerning the FBI's visit to Barry Krischer in November or December 2007 where the FBI purportedly sought to have Mr. Krischer take steps to render Epstein ineligible for work release.
- Notes and records of meetings and communications concerning Jeffrey Epstein with Palm Beach Police Chief Michael Reiter, Palm Beach Detective Joseph Recarey, and Epstein defense attorneys including but not limited to Guy Fronstin, Alan Dershowitz, Jack Goldberger, Roy Black, Jay Lefkowitz and Gerald Lefcourt.
- Notes and records of meetings and communications concerning Jeffrey Epstein with AUSA Marie Villafana, AUSA Matthew Menchel, AUSA Andrew Lourie and US Attorney Alex Acosta.
- Notes and records of meetings and communications with Epstein victims and/or accusers.
- Communications between Barry Krischer and Assistant State Attorney Lanna Belohlavek and other State Attorneys concerning plea negotiations and a possible plea deal with Jeffrey Epstein, as well as communications concerning the submission of the case to a grand jury.
- Copies of drafts of Palm Beach Detective Joseph Recarey's arrest warrants for Jeffrey Epstein.

- Correspondence or documents pertaining to Mr. Krischer's knowledge of and/or participation in the Epstein non-prosecution agreement negotiated by federal prosecutors.
- Correspondence or documents concerning communications between the State Attorney's Office and Kirkland & Ellis attorneys pertaining to the investigation, prosecution, and sex offender classification of Jeffrey Epstein.
- Correspondence or documents concerning communications between the State Attorney's Office and Manhattan (New York) prosecutors Jennifer Gaffney and Patrick Egan pertaining to the investigation, prosecution, and sex offender classification of Jeffrey Epstein.

Finally, *The Palm Beach Post* has also asked for the age of the victim who was the basis for the charge against Epstein of solicitation of a minor for prostitution. The newspaper was told by your office that her date of birth is in the records produced, but a careful search by our client has not uncovered that date. As we understand that your office gave this date to the Washington Post, we request that it be provided to our client as well.

We thank your office for the effort it has made in producing the documents to date, but are compelled to reiterate the newspaper's request for the remaining documents and ask that they be produced as soon as practicable given the important public issues they implicate and, presumably, will illuminate.

We appreciate your cooperation.

Very truly yours,



Stephen Mendelsohn

Enclosures

cc: Mr. Joel Engelhardt
Investigative Team Editor
The Palm Beach Post

Ms. Holly Baltz
Senior Editor, Investigations
The Palm Beach Post