

Michael J. Grygiel
Tel: 518.689.1406
Fax: 518.689.1499
grygielm@gtlaw.com

October 9, 2019

**VIA ELECTRONIC MAIL AND
UPS OVERNIGHT DELIVERY**

State Attorney David Aronberg
401 North Dixie Highway
West Palm Beach, Florida 33401
Email: aronberg@sa15.state.fl.us

Re: *The Palm Beach Post's* Public Records Law Requests – Jeffrey Epstein

Dear State Attorney Aronberg:

As you know from my colleague Steve Mendelsohn's previous correspondence dated August 27, 2019, and September 17, 2019, our firm represents *The Palm Beach Post* ("PBP" or the "Newspaper") in connection with its Florida Public Records Law requests for documents concerning your office's investigation of deceased serial sex abuser Jeffrey Epstein.

The Newspaper has carefully reviewed the supplemental disclosures provided in the State Attorney's October 1, 2019, response to reporter Jane Musgrave. Based on PBP's examination of these materials, significant information apparently remains undisclosed. We specifically call your attention to the following, which we submit would be maintained by the State Attorney's office in the ordinary course:

1. Case Journal -- we understand that, as a matter of policy and practice, Florida State prosecutors routinely compile and maintain this document, which functions as a comprehensive ledger that keeps track of all investigative activities in a given criminal prosecution, on a step-by step, chronological basis.
2. STAC System -- the Newspaper advises that documents from this system, which is also routinely utilized by Florida State Attorneys and provides a repository for any and all investigative notes, including those of any witness interviews, have not been provided.

These omissions are conspicuous given the high profile and public importance of the investigation and prosecution of Jeffrey Epstein. Indeed, and with all due respect, the absence of *any* investigative notes -- including those of witness interviews -- from your office's previous disclosures raises a serious question as to its good faith compliance with its disclosure obligations under the Florida Public Records Law. We respectfully request expedited production of the above information, and in any event no later than COB (5:00 p.m. Eastern) on October 16, 2019. If the

Party JOINT

ID# J37 EV# J37

DATE ADMITTED: 9/6/2022

Case No. 2019-CA-014681

JOSEPH ABRUZZO CLERK

RECORDED

Joint Exhibit

J37

FILED: OCT 27 2023 4:20:48 PM

State Attorney David Aronberg
October 9, 2019
Page 2

State Attorney's position is that the foregoing categories of documents do not exist, we respectfully request certification to that effect from appropriate personnel in your office.

In making this request, we are mindful of and thank your office for producing responsive documents to date. Nevertheless, I am compelled to emphasize the extreme public interest in the information requested herein, as well as the extreme importance of the public issues it implicates, in requesting that it be produced by the above date in order to avoid litigation.

Thank you for your continuing consideration in this matter.

Very truly yours,

GREENBERG TRAURIG, LLP

Michael J. Grygiel
Michael J. Grygiel

MJG/lmd
ACTIVE 46491241v1

State Attorney David Aronberg
October 9, 2019
Page 3

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

Mr. Joel Engelhardt
Investigative Team Editor
The Palm Beach Post

Edwin M. Larkin, Esq.
Chief Litigation Counsel
GateHouse Media, LLC

NOT A CERTIFIED COPY