

IN THE CIRCUIT COURT OF THE FIFTEENTH JUDICIAL CIRCUIT,
IN AND FOR PALM BEACH COUNTY, FLORIDA

STATE OF FLORIDA

CASE NO.: 2006CF009454AXX
DIVISION: "W"

vs.

JEFFREY EPSTEIN,

Defendant.

2008 JUL 23 PM 2:24
SHARON R. BOCK, CLERK
PALM BEACH COUNTY, FL
CIRCUIT CRIMINAL

FILED

DEFENDANT'S MOTION FOR RETURN OF PROPERTY

COMES NOW the Defendant, JEFFREY EPSTEIN, by and through his undersigned attorney, and moves this Honorable Court to enter an Order for return of property seized on October 20, 2005 during execution of a search warrant at the Defendant's residence. In support thereof the Defendant states as follows:

1. On October 20, 2005, the Palm Beach Police Department executed a search warrant at the Defendant's residence. During the execution of the warrant, numerous items of the Defendant's personal property were seized and impounded by the Palm Beach Police Department. A copy of the search warrant return is attached to this motion (Exhibit A).

2. On June 30, 2008, the criminal charges arising from the search warrant were resolved through a negotiated plea agreement.

3. No legal justification exists for the continued impoundment of the Defendant's personal property. The Defendant is entitled to the return of all personal property listed in Exhibit A.

WHEREFORE, the Defendant, JEFFREY EPSTEIN, respectfully requests this Honorable Court to enter an Order for the return of his personal property.

SCANNED

JUL 24 2008

EXHIBIT 1

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing Motion was sent via FAX and U.S. MAIL to Lanna Belohlavek, Esq., Assistant State Attorney, 401 North Dixie Highway, West Palm Beach, Florida 33401, this 21st day of July, 2008.

ATTERBURY, GOLDBERGER & WEISS, P.A.
250 Australian Avenue South, Suite 1400
West Palm Beach, Florida 33401
(561) 659-8300

JACK A. GOLBERGER, ESQUIRE
Florida Bar Number 262013

MIRAGE BEACH POLICE DEPARTMENT

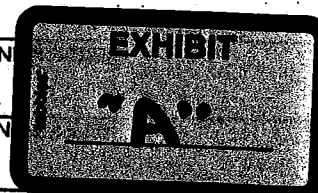
PROPERTY RECEIPT

DETECTIVE BUREAU

PBFD Form #52

SEARCH WARRANT RETURN

☐ PROPERTY	☐ FOUND	☐ DECEASED (Probated)	☐ PERSONAL	☐ CONFISCATED	☐ DESTROY
☒ EVIDENCE	☒ TRIAL	☐ LABORATORY	☐ STOLEN/RECOVERED	☐ OTHER	
INCIDENT/CITATION NUMBER 05-368	DATE/TIME RECOVERED 10-20-2005	PROPERTY NUMBER (Leave Blank) 05-1024	BIN NUMBER (Leave Blank)		
ADDRESS WHERE PROPERTY IMPOUNDED 258 FL-Brillo					
DISCOVERED BY / D.O.B.	ADDRESS Street City Zip	PHONE NUMBER			
OWNER / VICTIM'S NAME / D.O.B.	ADDRESS Street City Zip	PHONE NUMBER			
SUSPECT'S NAME / D.O.B. Einstein Jeff	ADDRESS Street City Zip 358 FL Brillo	PHONE			
ADDITIONAL SUSPECT / D.O.B.	ADDRESS Street City Zip	PHONE			
SPECIAL INSTRUCTIONS				FOUND PROPERTY. CLAIM ☐ 90 DAYS NOT CLAIM ☐	



ITEM #	QUANTITY	VALUE	DESCRIPTION
1	1		Phone message book (kitchen)
2	3		Phone message book (office off kitchen)
3	3		file folder (messager) w/ 2 more files (Purp)
4	1		shredded paper marked amber + cher
5	1		orange file folder marked message
6	✓		* items 2-5 from office off kitchen
7	✓		Big massage table off from closet
8	✓		Brown massage table → foyer
9	1		Black Framed Photo of nude girl
10	99		Pictures in frame → 10-12-08 from [unclear]
11	1		→ from yellow/blue room off kitchen (off foyer)
12	8		Photos from office off pool area
13	2		Photos from table on left → living room
14	2		Photos table on right → pool area
TOTAL PACKAGE WEIGHT			

I hereby acknowledge that the above list represents all property taken from me and that I have received a copy of this receipt.

I hereby acknowledge that the above list represents all property impounded by me in the official performance of my duty as a police officer.

SIGNATURE

DATE

SIGNATURE

ID#

UNIT

RECEIVED BY

REASON

DATE/TIME RECEIVED

I, Joseph Recarey, the officer by whom this warrant was executed, do swear that the above inventory contains a true and detailed account of all the property taken by me, under the authority of this warrant.

Sworn to and subscribed before me

this 21 day of October 2005.

7915 DZ

 ID# 7915
 UNIT DZ

 Joseph A. Burns

PALM BEACH POLICE DEPARTMENT

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PROPERTY RECEIPT
SEARCH WARRANT RETURN

DETECTIVE BUREAU

PSPD Form #52

☐ PROPERTY	☐ FOUND	☐ DECEASED (Probated)	☐ PERSONAL	☐ CONFISCATED	☐ DESTROY
☒ EVIDENCE	☒ TRIAL	☐ LABORATORY	☐ STOLEN/RECOVERED	☐ OTHER	
INCIDENT/CITATION NUMBER 05-368	DATE/TIME RECOVERED 10-20-05	PROPERTY NUMBER (Leave Blank) 05-1024	BIN NUMBER (Leave Blank) 6-16		
ADDRESS WHERE PROPERTY IMPOUNDED 358 EL-Brillo					
DISCOVERED BY / D.O.B.	ADDRESS Street City Zip	PHONE NUMBER			
OWNER / VICTIM'S NAME / D.O.B.	ADDRESS Street City Zip	PHONE NUMBER			
SUSPECT'S NAME / D.O.B. Foster, Jeff 01-20-53	ADDRESS Street City Zip 358 EL Brillo	PHONE NUMBER			
ADD'L SUSPECT / D.O.B.	ADDRESS Street City Zip	PHONE NUMBER			
SPECIAL INSTRUCTIONS				FOUND PROPERTY 90 DAYS CLAIM ☐ NOT CLAIM ☐	

ITEM #	QUANTITY	VALUE	DESCRIPTION
13	2	✓	VHS tapes from (credit) By Paul
14	2	*	CD's packed Huggs Birthday ↑ Credit card 2nd
15	3		Photos framed from Cabana
16	1	✓	message book 1st floor 5/w corner (top)
17	1	✓	message book (from inside)
18	3	✓	CD's from desk
19	1	*	DVD from desk (Items # 18-19, 20, 21)
20	unframed		Photos from desk from 1st floor 5/w
21	2		Framed Photos from desk
22	2	✓	Framed Photos from table in 5/w corner office
23	3		Soap on Rope (NE Bedroom) (with 6 room)
24	2		Twin Torpedo in Brown box
25	2		Soap on Rope (middle Bedroom) (with 6 room)
26	1		Large framed Picture (from foyer into Master Bedroom)
TOTAL PACKAGE WEIGHT			

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PALM BEACH POLICE DEPARTMENT

PAGE 3 OF 6

PROPERTY RECEIPT
SEARCH WARRANT RETURN

DETECTIVE BUREAU

PBPD Form #52

☐ PROPERTY	☐ FOUND	☐ DECEASED (Probated)	☐ PERSONAL	☐ CONFISCATED	☐ DESTROY
☒ EVIDENCE	☒ TRIAL	☐ LABORATORY	☐ STOLEN/RECOVERED	☐ OTHER	Lab
INCIDENT/CITATION NUMBER 05-368		DATE/TIME RECOVERED 10-20-05		PROPERTY NUMBER (Leave Blank) 05-1024	
BIN NUMBER (Leave Blank)					
ADDRESS WHERE PROPERTY IMPOUNDED 358 EL Brillo					
DISCOVERED BY / D.O.B.		ADDRESS Street City Zip		PHONE NUMBER	
OWNER / VICTIM'S NAME / D.O.B.		ADDRESS Street City Zip		PHONE NUMBER	
SUSPECT'S NAME / D.O.B. 01-20-53 Epstein Jeff		ADDRESS 358 EL Brillo Street City Zip		PHONE NUMBER	
ADD'L SUSPECT / D.O.B.		ADDRESS Street City Zip		PHONE NUMBER	
SPECIAL INSTRUCTIONS				FOUND PROPERTY 90 DAYS CLAIM ☐ NOT CLAIM ☐	

ITEM #	QUANTITY	VALUE	DESCRIPTION
27	1	NCV	School TRANSCRIPT, ALEXANDER HALL, MASTER BEDROOM DESK
28	1	NCV	BOTTLE OF TOY TOLLY, MASTER BEDROOM CROWNED MASTER BEDROOM
29	3	NCV	VIDEOTAPES 1/2", SEXIN CITY, LATIN JANINE, I LOVE LESBIANS FOUR, MASTER R. BEDROOM
30	6	NCV	FRAMED PHOTOS FROM MEN'S BATHROOM - MASTER BEDROOM
31	1	NCV	GREEN MASSAGE TABLE, MEN'S BATHROOM - MASTER BEDROOM → DNA test 3 Green
32	1	NCV	THRIFTY RENTAL AGREEMENT FROM CHELSEA SURBURBAN (COPIED)
33	1	NCV	NOTE FROM JOHANNA FROM CHELSEA SURBURBAN.
34	11	NCV	CD'S from office of kitchen
35	6	NCV	ZIP CD'S from Bookcase RETURN
36	2	NCV	8mm Video tapes from Bookcase RETURN
37	4	NCV	Compact flash cards from Bookcase RETURN
38	1	NCV	Flash card from Camera on book case - RETURN TO OWNER
39	3	NCV	ZIP CD'S from Bookcase RETURN
40	30	NCV	CD'S from Bookcase (items 35-40 from Guest house) RETURN
TOTAL PACKAGE WEIGHT			

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REASON

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PALM BEACH POLICE DEPARTMENT

PAGE 4 of 6

PROPERTY RECEIPT

DETECTIVE BUREAU

PBPD Form #52

SEARCH WARRANT RETURN

☐ PROPERTY	☐ FOUND	☐ DECEASED (Probated)	☐ PERSONAL	☐ CONFISCATED	☐ DESTROY
☒ EVIDENCE	☒ TRIAL	☐ LABORATORY	☐ STOLEN/RECOVERED	☐ OTHER	Lab
INCIDENT/CITATION NUMBER 05-368		DATE/TIME RECOVERED 10-20-05		PROPERTY NUMBER (Leave Blank) 05-1024	
ADDRESS WHERE PROPERTY IMPOUNDED 258 E1 Brillo					
DISCOVERED BY / D.O.B.		ADDRESS Street City Zip		PHONE NUMBER	
OWNER'S NAME / D.O.B.		ADDRESS Street City Zip		PHONE NUMBER	
SUSPECT'S NAME / D.O.B. Epstein, Jeff		ADDRESS Street City Zip 350 E1 Brillo		PHONE NUMBER	
ADDTNL SUSPECT / D.O.B.		ADDRESS Street City Zip		PHONE NUMBER	
SPECIAL INSTRUCTIONS				FOUND PROPERTY CLAIM ☐ 90 DAYS NOT CLAIM ☐	

ITEM #	QUANTITY	VALUE	DESCRIPTION
41	1	✓	Floppy disks from desk middle shelf Return
42	1	✗	Zip Drive disk from guest room Return
43	1		Power Cord for CPU from guest room
44	1		CPU from Guest Bedroom
45	10	✓	8mm video Tapes in Guest Bedroom Return
46	1	✓	maxell CD-R in guest bedroom Return
47	8.10	✗	Disks in clear Box Return (COPIES)
48	7		ZIP Disks from guest room Return
49	1		items # 35-48 from guest bedroom
50	1		message book from guest house office Return
51	2		compact flash cards from
52	6		CD's Return #49-51 from guest house office
53	1		CPU from guest house office Return
TOTAL PACKAGE WEIGHT			

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SIGNATURE

DATE

SIGNATURE

ID#

UNIT

RECEIVED BY

REASON

DATE/TIME RECEIVED

DETECTIVE BUREAU

~~SEARCH WARRANT RETURN~~

DATE/TIME RECEIVED

PALM BEACH POLICE DEPARTMENT
PROPERTY RECEIPT

PME 6 of 6

DETECTIVE BUREAU

PBPD Form #52

S/W RETURN

☐ PROPERTY	☐ FOUND	☐ DECEASED (Probated)	☐ PERSONAL	☐ CONFISCATED	☐ DESTROY
☒ EVIDENCE	☒ TRIAL	☐ LABORATORY	☐ STOLEN/RECOVERED	☐ OTHER	(ab)
INCIDENT/CITATION NUMBER 05-	DATE/TIME RECOVERED 10 2005 1410	PROPERTY NUMBER (Leave Blank) 05-1024	BIN NUMBER (Leave Blank)		
ADDRESS WHERE PROPERTY IMPOUNDED 358 EL BULLO					
DISCOVERED BY / D.O.B.	ADDRESS Street City Zip	PHONE NUMBER			
OWNER'S NAME / D.O.B.	ADDRESS Street City Zip	PHONE NUMBER			
SUSPECT'S NAME / D.O.B. / 1-20-53 KESTEN JEFF	ADDRESS 358 EL BULLO Street City Zip	PHONE NUMBER			
ADD'L. SUSPECT / D.O.B.	ADDRESS Street City Zip	PHONE NUMBER			
SPECIAL INSTRUCTIONS			FOUND PROPERTY 90 DAYS CLAIM ☐ NOT CLAIM ☐		
ITEM #	QUANTITY	VALUE	DESCRIPTION		
1	1	*	GREEN PHOTO FRAME with NAKED GIRL		
			Return		
			Return		
			Return		
			Return		
			Return		
			Return		
			Return		
			Return		
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			Return		
TOTAL PACKAGE WEIGHT					
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SIGNATURE		DATE	SIGNATURE		ID# UNIT
APB 8328		6	7915		DZ
RECEIVED BY		REASON	DATE/TIME RECEIVED		
			10-20-05 1500h		