

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

Complex Litigation, Fla. R. Civ. P. 1.201

Case No. 50 2009CA040800XXXXMB AG

JEFFREY EPSTEIN,

Plaintiff,

v.

SCOTT ROTHSTEIN, individually,
BRADLEY J. EDWARDS, individually, and
L.M., individually,

Defendants.

BANKRUPTCY TRUSTEE'S MOTION FOR PROTECTIVE ORDER

Pursuant to Rule 1.410, Herbert Stettin, Trustee of the Bankruptcy Estate of Rothstein Rosenfeld Adler, P.A., files this Motion for Protective Order and states:

1. On November 10, 2009, Rothstein Rosenfeldt Adler, P.A. ("RRA") was put into involuntary bankruptcy. That case is pending as *In Re Estate of Rothstein Rosenfeld Adler, P.A.* On November 20, 2009, Herbert Stettin was appointed Trustee of RRA. On November 30, 2009, an Order for Relief was entered by this Court.

2. On April 16, 2010, Plaintiff caused a subpoena *duces tecum* to be served on the Trustee for production of documents. A copy of the subpoena *duces tecum* is annexed hereto as Exhibit A.

3. The Trustee's responsibility under the involuntary bankruptcy filing is to wind-down the business affairs of RRA. In that regard, the Trustee has three (3) people in his employ

and has various professionals whose employment have been approved by the United States Bankruptcy County.

4. Additionally, Scott Rothstein, who apparently managed the affairs of the law firm, has been criminally charged by the United States of America with various violations of federal law to which he has pled guilty. Associated with those charges, the United States of America seized the law firm's bank accounts. *See Exhibit B annexed hereto.*

5. Consequently, the very limited financial resources are primarily devoted to trying to bring money into the estate as opposed to expending money on unrelated third party litigation, such as this one.

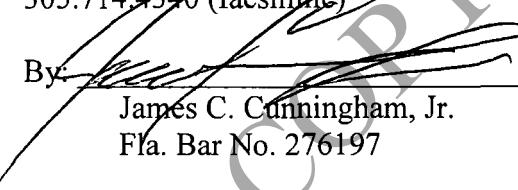
6. While the Trustee has indicated in a different lawsuit his willingness to try to produce to Mr. Epstein the documents he needs, in order that the Trustee's responsibility for winding-up the affairs of the Estate is not impeded and because of the limited finances available to the Trustee, he requests that the Court order that all costs associated with responding to Mr. Epstein's subpoena *duces tecum* be borne by Mr. Epstein and that at least 50% of the estimated costs be paid to the Trustee prior to any responsibility for undertaking a search for the documents.

7. The Trustee also requests that the time for responding to the subpoena *duces tecum* be adjourned until such time as this Court or Mr. Epstein and the Trustee are able to resolve the issues raised in this Motion for Protective Order.

Wherefore, for the foregoing reasons, the Trustee requests this Court to grant this motion.

Respectfully submitted,

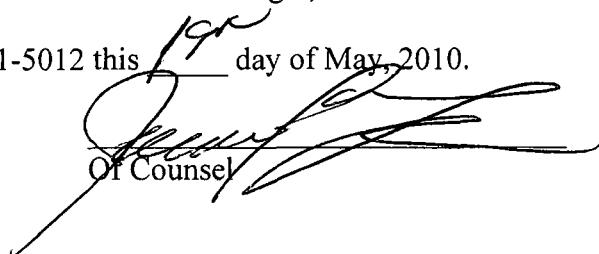
BERGER SINGERMAN
Counsel for the Trustee
200 S. Biscayne Blvd.
Tenth Floor
Miami, Florida 33131
305.755.9500
305.714.4340 (facsimile)

By: 
James C. Cunningham, Jr.
Fla. Bar No. 276197

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing was served by U.S.

Mail and facsimile on Mr. Robert D. Critton, Jr., 303 Banyan Blvd., Suite 400 West Palm Beach
Fl; Mr. Marc Nurik, One East Broward Blvd., Suite 700, Ft. Lauderdale, FL 33301; Mr. Jack
Scarola, 2139 Palm Beach Lakes Blvd., West Palm Beach, FL; Mr. Gary Farmer, 425 N.
Andrews Ave., Suite 2, Fort Lauderdale, FL 33301 and Mr. Jack Goldberger, 250 Australian
Ave. South, Suite 1400, West Palm Beach, FL 33401-5012 this 19 day of May, 2010.


Of Counsel

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

JEFFREY EPSTEIN

Complex Litigation, Fla. R. Civ. Pro.1201

Plaintiff,

Case No. 50 2009CA040800XXXXMB AG

v.

SCOTT ROTHSTEIN, individually,
BRADLEY J. EDWARDS,
individually, and L.M., individually,

Defendants.

SUBPOENA DUCES TECUM FOR DEPOSITION – DOCUMENTS ONLY

THE STATE OF FLORIDA

TO: **Herbert Stettin, Trustee in Bankruptcy for Rothstein Rosenfeldt Adler, PA
C/O James C. Cunningham, Jr., Esq.
Berger Singerman, P.A.
200 South Biscayne Blvd., Suite 1000
Miami, FL 33131**

YOU ARE COMMANDED to appear at Prose Court Reporting, 101 NE 3rd Avenue,
Suite #1500, Ft. Lauderdale, FL 33301, on May 19, 2010, 4:00 p.m., bring with you the
following:

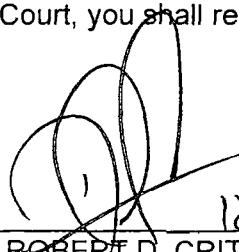
See attached Exhibit A

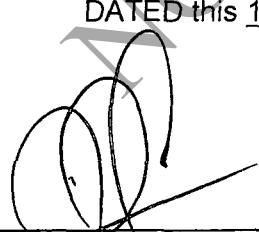
If you fail to appear, you may be in contempt of court.

You are subpoenaed by the attorney whose name appears on this subpoena and unless
excused from this subpoena by the attorney or the Court, you shall respond to this subpoena as
directed.

DATED this 16th day of April, 2010.

BY:


ROBERT D. CRITTON, JR., ESQ.
For the Court


ROBERT D. CRITTON, JR.
(Attorneys for Defendant Jeffrey Epstein)
Burman, Critton, Luttier & Coleman
303 Banyan Blvd., Suite 400
West Palm Beach, FL 33401
561-842-2820

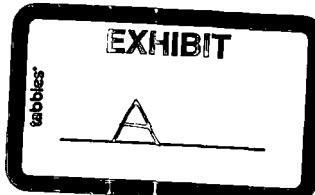


EXHIBIT A

DEFINITIONS AND INSTRUCTIONS

A. "Document" means any written or graphic matter or other means of preserving thought or expression, and all tangible things from which information can be processed or transcribed, including the **originals** and all non-identical copies, whether different from the original by reason of any notation made on such copy or otherwise, including, but not limited to, correspondence, memoranda, notes, messages, letters, purchase orders, telegrams, teletype, telefax bulletins, e-mails, electronic data, meetings, reports, or other communications, interoffice and intra-office telephone calls, diaries, chronological data, minutes, books, reports, charts, ledgers, invoices, worksheets, receipts, returns, trade information regarding fabric, carpets, samples etc..., computer printouts, prospectuses, financial statements, schedules, affidavits, contracts, cancelled checks, transcripts, statistics, surveys, magazine or newspaper articles, releases (and any and all drafts, alterations and modifications, changes and amendments of any of the foregoing), graphs or aural records or representations of any kind, including, without limitation, photographs, charts, graphs, microfiche, microfilm, video tape, recordings, motion pictures and electronic, mechanical or electric recordings or representations of any kind (including, without limitation, tapes, cassettes, discs and recordings), and including the file and file cover.

The term "Document" also means any and all computer records, data, files, directories, electronic mail, and information of whatever kind whether printed out or stored on or retrievable from floppy diskette, compact diskette, magnetic tape, optical or magnetic-optical disk, computer memory, hard drive, zip drive, jaz drive, orb drive,

microdisk, external memory stick, software, or any other fixed or removable storage media, including without limitation, all back-up copies, dormant or remnant files, and any and all miscellaneous files and/or file fragments, regardless of the media on which they reside and regardless of whether the data consists in an active file, deleted file, or file fragment.

B. "Communications" means any oral or written statement, dialogue, colloquialism, discussion, conversation or agreement.

C. "Plaintiff" means **L.M. (L.M. v. Jeffrey Epstein, Palm Beach County Case #502008CA028051XXXXMB), E.W. (E.W. v. Jeffrey Epstein, Palm Beach County Case #502008CA028058XXXXMB), Jane Doe¹ (Jane Doe v. Jeffrey Epstein, United States District Court Case #08-civ-80893-Marra/Johnson)**, and any other person who is or was represented by Rothstein Rosenfeldt & Adler that has not yet filed an action against Jeffrey Epstein, and any employee, agent or attorney for any plaintiff and/or any other person acting for or on behalf of any plaintiff, or under her authority and control.

D. "RRA" means Rothstein Rosenfeldt & Adler, P.A.

E. "Money" means any tangible thing of value.

F. "Costs" include, but are not limited to, court costs, filing fees, Sheriff's service and any other necessary service of legal papers or notices or subpoenas, court reporters' charges, long distance telephone charges, postage, courier services or Federal Express or UPS, investigative costs, photocopies, faxes, Westlaw computerized research, travel expenses, and witness fees and expert witness fees and costs.

¹ If you are unable to identify each Plaintiff, please contact Robert D. Critton, Jr. at their names will be provided pursuant to a confidentiality agreement.

G. "Trustee" means Herbert Stettin as bankruptcy trustee for RRA.

DUCES TECUM²

1. For the time period from March 1, 2009 to present, any and all documents between, or on behalf of RRA, its employees or agents or clients, and any third party regarding a purported settlement of any litigation between Jeffrey Epstein and a RRA client or Plaintiff, or the financing of any litigation between Jeffrey Epstein and a RRA client or Plaintiff, (whether existing clients or fabricated clients), including but not limited to:

- a. Documents indicating that litigation with Jeffrey Epstein has been settled;
- b. Soliciting or receiving money in return for settlement funds allegedly paid or to be paid by Jeffrey Epstein;
- c. Soliciting money to help finance ongoing litigation against Jeffrey Epstein;
- d. Soliciting money to be given to, or used on behalf of, the Plaintiffs in litigation against Jeffrey Epstein;
- e. Communication between third party investors or potential investors and the Plaintiffs or their attorneys involved in litigation against Jeffrey Epstein;
- f. Payments made by RRA to or on behalf of any Plaintiff.

2. Any and all fee agreements that exist or have existed between the following:

- a. Any Plaintiff and Bradley J. Edwards or any entity with which he has been associated;
- b. Any Plaintiff and the law firm RRA.

3. All emails, data, correspondence, memos, or similar documents between Bradley J. Edwards, Scott W. Rothstein, William Berger and Russell Adler and/or any attorney or representative of RRA and any investor or third party (person or entity) regarding Jeffrey Epstein or which mentions Jeffrey Epstein (including Mike Fisten, Kenneth Jenne, Patrick Roberts or Rick (Rich) Fandrey).

4. All emails, data, correspondence, memos, or similar documents between Bradley J. Edwards, Scott W. Rothstein, and/or any attorney or representative of RRA regarding Jeffrey Epstein or which mentions Jeffrey Epstein (including Mike Fisten, Kenneth Jenne, Patrick Roberts or Rick (Rich) Fandrey).

² Due to the potential volume of documents involved, the parties and the Court should consider appointment of a special master and/or an in camera inspection to address any objections, claims of privilege and generally manage the production of documents.

5. All agreements or documents of any nature which were provided to or received from an investor or potential investor relating to any case (real or fabricated) involving Jeffrey Epstein and any of the following:

- a. Scott W. Rothstein;
- b. Bradley J. Edwards;
- c. RRA;
- e. any entity formed by RRA or Bradley J. Edwards or Scott W. Rothstein to create investment opportunities for third party investors to invest in any plaintiff's case against Jeffrey Epstein.

6. All fee sharing agreements between Bradley J. Edwards, RRA, or Scott W. Rothstein and/or any other attorney or investor relating to any aspect of any Plaintiff's case.

7. All documents made available to any investor or potential investor by Bradley J. Edwards, RRA, Scott W. Rothstein or any of Scott W. Rothstein's entities to solicit "investors" for any case involving Jeffrey Epstein.

8. All document reflecting the names and addresses of all individuals or entities who invested or purported to invest in any aspect of any case against Jeffrey Epstein.

9. All documents evidencing payment of any bill or cost in each Plaintiff's case against Jeffrey Epstein, and the source(s) for said payments of any Costs.

10. All documents wherein the Trustee of RRA has asserted a lien for attorney's fees or Costs arising out of work done and Costs incurred related to the Plaintiffs' cases during the time Plaintiffs' cases were represented by RRA.

11. All documents and tangible things retrieved from the trash at 358 El Brillo Way, Palm Beach, Florida which is alleged to be the home of Jeffrey Epstein.

12. All conversations recorded from any telephones which purported to be that of Jeffrey Epstein that are contained in any media (audio tapes, CDs, DVDs, zip drives, hard drives or any other electronic format and any written transcriptions)

13. All conversations recorded from any telephones which purported to be from Jeffrey Epstein's attorneys including Roy Black, Alan Dershowitz or Jack Goldberger, that are contained in any media (audio tapes, CDs, DVDs, zip drives, hard drives or any other electronic format and any written transcriptions)

14. All intercepted phone conversations authorized by RRA including but not limited to any one of its attorneys or investigators or anyone retained by or working for RRA related to Jeffrey Epstein that are contained in any media (audio tapes, CDs,

DVDs, zip drives, hard drives or any other electronic format and any written transcriptions).

15. All intercepted or acquired electronic mail (e-mails) to and from Jeffrey Epstein authorized by RRA including but not limited to any one of its attorneys or investigators or anyone retained by or working for RRA.

16. All intercepted or acquired electronic mail (e-mails) to and from the attorneys for Jeffrey Epstein including but not limited to: Roy Black, Alan Dershowitz or Jack Goldberger, authorized by RRA including but not limited to any one of its attorneys or investigators or anyone retained by or working for RRA.

17. All documents related to the amount of Costs that were incurred by RRA in its representation of Jane Doe, L.M. and E.W. and is claiming or has claimed

18. All documents which purport to evidence any transfer of funds or property from Jeffrey Epstein to RRA, Rothstein or any Rothstein-related entity for the settlement of any case (real or fabricated) against Jeffrey Epstein.

19. All documents which purport to mention any transfer of funders or property from Jeffrey Epstein to RRA, Rothstein or any Rothstein-related entity for the settlement of any case (real or fabricated) against Jeffrey Epstein.

20. All documents relating to any investment, joint-venture or business enterprise involving RRA, Rothstein or a Rothstein-related entity that reference any claim (real or fabricated) against Epstein.

21. All emails exchanged between any of the following individuals wherein Epstein, a Palm Beach billionaire or similar reference was mentioned:

- a. Scott Rothstein
- b. Russell Adler
- c. William Berger
- d. Michael Fisten
- e. Kenneth Jenne
- f. David Boden
- g. Deborah Villegas
- h. Andrew Barnett
- i. Patrick Roberts
- j. Richard (Rick) Fandry
- k. Christina Kitterman
- l. Brad Edwards

22. All documents related to or referencing potential deponents in the Jane Doe, L.M. or E.W. cases.

23. All Q-Task "Projects" that refer to Jeffrey Epstein.

24. All Q-Task Projects that refer to L.M., E.W., or Jane Doe.

25. All documents that identify all individuals who were granted access (invited guests) or who had access to the Q-Task Projects referred to in request nos. 23 and 24.

26. All documents, communications and letters sent by you assessing liens against the recoveries in:

- a. L.M. v. Epstein, Case No. 502008CA028051XXXXMB
- b. E.W. v. Epstein, Case No. 502008CA028058XXXXMB
- c. Jane Doe v. Epstein, Case No. 08-CV-80119-MARRA/JOHNSON

27. All documents related to the Costs that you, as bankruptcy Trustee, are claiming related to L.M., E.W. and Jane Doe's cases against Epstein. This includes any data or electronic printout of Costs which the Trustee of RRA is claiming.

28. Any employment agreements or letters describing compensation and benefits for Bradley Edwards during his employment with RRA.

29. All documents from the "Fortress" software program that refer or relate to Jeffrey Epstein.

30. All documents from the "Fortress" software program that refer or relate to L.M., E.W., or Jane Doe.

31. For the time period April 1, 2009 through November 5, 2009, all emails to and from any employee, partner, shareholder, attorney, agent or client of RRA that reference any of the following:

- a. A.J. DiScala;
- b. D3 Capital Club, LLC
- c. Bill Clinton;
- d. Alan Dershowitz;
- e. David Copperfield;
- f. Kevin Spacey;
- g. Chris Tucker;
- h. Prince Andrew
- i. Jean-Luc Brunel;
- j. Tommy Motolla;
- k. Bill Richardson;
- l. Donald Trump.

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

CASE NO. 09-61780-CIV-ZLOCH/ROSENBAUM

UNITED STATES OF AMERICA,

Plaintiff,

v.

VARIOUS REAL PROPERTIES PURCHASED BY
OR WITH OR ON BEHALF OF SCOTT W. ROTHSTEIN,
SPECIFICALLY:

(1) REAL PROPERTY AND APPURTENANCES,
LOCATED AT 2307 CASTILLA ISLE, FORT
LAUDERDALE, FLORIDA;

(2) REAL PROPERTY AND APPURTENANCES,
LOCATED AT 2308 CASTILLA ISLE, FORT
LAUDERDALE, FLORIDA;

(3) REAL PROPERTY AND APPURTENANCES,
LOCATED AT 2316 CASTILLA ISLE,
FORT LAUDERDALE, FLORIDA;

(4) REAL PROPERTY AND APPURTENANCES,
LOCATED AT 30 ISLA BAHIA DRIVE,
FORT LAUDERDALE, FLORIDA;

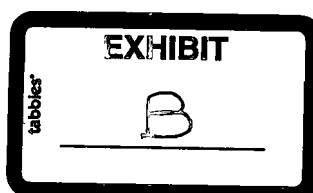
(5) REAL PROPERTY AND APPURTENANCES,
LOCATED AT 29 ISLA BAHIA DRIVE,
FORT LAUDERDALE, FLORIDA;

(6) REAL PROPERTY AND APPURTENANCES,
LOCATED AT 350 SE 2ND STREET, UNIT 2840,
FORT LAUDERDALE, FLORIDA;

(7) REAL PROPERTY AND APPURTENANCES,
LOCATED AT 380 CARRINGTON DRIVE,
WESTON, FLORIDA;

(8) REAL PROPERTY AND APPURTENANCES,
LOCATED AT 2133 IMPERIAL POINT DRIVE,
FORT LAUDERDALE, FLORIDA;

AND INCLUDING THE FOLLOWING
REAL PROPERTIES ("RP"), VEHICLES &
VESSELS ("VV"), TANGIBLES ("T"),
BANK ACCOUNTS ("BA"), BUSINESS



INTERESTS ("B") AND CONTRIBUTIONS ("C"),
SPECIFICALLY:

(RP9) REAL PROPERTY AND APPURTENANCES,
LOCATED AT 2627 CASTILLA ISLE,
FORT LAUDERDALE, FLORIDA;

(RP10) REAL PROPERTY AND APPURTENANCES,
LOCATED AT 10630 NW 14TH STREET, APT. 110,
PLANTATION, FLORIDA;

(RP11) REAL PROPERTY AND APPURTENANCES,
LOCATED AT 227 GARDEN COURT,
LAUDERDALE BY THE SEA, FLORIDA;

(RP12) REAL PROPERTY AND APPURTENANCES,
LOCATED AT 708 SPANGLER BOULEVARD,
BAY 1, HOLLYWOOD, FLORIDA;

(RP13) REAL PROPERTY AND APPURTENANCES,
LOCATED AT 1012 EAST BROWARD BOULEVARD,
FORT LAUDERDALE, FLORIDA;

(RP14) REAL PROPERTY AND APPURTENANCES,
LOCATED AT 950 N FEDERAL HIGHWAY,
FORT LAUDERDALE, FLORIDA;

(RP15) REAL PROPERTY AND APPURTENANCES,
LOCATED AT 350 LAS OLAS BOULEVARD,
COMMERCIAL UNIT 2,
FORT LAUDERDALE, FLORIDA;

(RP16) REAL PROPERTY AND APPURTENANCES,
LOCATED AT 361 SE 9TH LANE, BOCA RATON,
FLORIDA;

(RP17) REAL PROPERTY AND APPURTENANCES,
LOCATED AT 1198 N. OLD DIXIE HIGHWAY,
BOCA RATON, FLORIDA;

(RP18) REAL PROPERTY AND APPURTENANCES,
LOCATED AT 1299 N. FEDERAL HIGHWAY,
BOCA RATON, FLORIDA;

(RP19) REAL PROPERTY AND APPURTENANCES,
LOCATED AT 151 EAST 58 STREET, APARTMENT 42D,
NEW YORK, NEW YORK;

(RP20) REAL PROPERTY AND APPURTENANCES,
LOCATED AT 11 BLUFF HILL COVE FARM,

NARRAGANSETT, RHODE ISLAND;

(RP21) REAL PROPERTY AND APPURTENANCES,
LOCATED AT 15 BLUFF HILL COVE FARM,
NARRAGANSETT, RHODE ISLAND;

(VV1) 1990 RED FERRARI F40 COUPE,
VIN: ZFFMN34A5L0087066;

(VV2) 2009 WHITE BENTLEY CONVERTIBLE,
VIN: SCBDR33W29C059672;

(VV3) 2008 YELLOW McLAREN MERCEDES BENZ SLR,
VIN: WDDAK76F98M001788;

(VV4) 2007 BLACK LIMOUSINE FORD EXPEDITION,
VIN: 1F1FK15557LA59223;

(VV5) 2009 RED FERRARI 430 SPIDER,
VIN: ZFFEW59A380163011;

(VV6) 2007 SILVER ROLLS ROYCE CONVERTIBLE,
VIN: SCA1L68557UX23044;

(VV7) 2006 SILVER HUMMER H1,
VIN: 137PH84396E220665;

(VV8) 2008 CADILLAC ESCALADE,
VIN: 1GYEC63858R234458;

(VV9) 1967 RED CONVERTIBLE CORVETTE,
VIN: 194677S104745;

(VV10) 2009 BLACK BUGATTI VEYRON EB 16.4,
VIN: VF9SA25C28M795153;

(VV11) 2008 BLUE ROLLS ROYCE DROPHEAD CONVERTIBLE,
VIN: SCA2D68528UX16071;

(VV12) 2006 RED FERRARI F430 SPIDER,
VIN: ZFFEW59A560148863;

(VV13) 2008 CHEVROLET CORVETTE,
VIN: 1G1YY26W485120085;

(VV14) 2009 CHEVROLET CORVETTE Z06,
VIN: 1G1YZ26E995111923;

(VV15) 2009 BLUE GRAY MASERATI GRANTURISMO COUPE,
VIN: ZAMGJ45A090042326;

(VV16) 2009 WHITE MERCEDES BENZ,
VIN: WDBSK71F159F49477;

(VV17) 2007 87' WARREN,
HULL # WAR87777B707;

(VV18) 33' AQUARIVA,
HULL # XFA33R74G405;

(VV19) 2009 11' YAMAHA JET SKI,
HULL # YAMA3661I809;

(VV20) 2009 11' YAMAHA VS,
HULL # YAMA3626I809;

(VV21) 2009 11' YAMAHA VS,
HULL # YAMA2679G809;

(VV22) 1999 55' SEA RAY 540 SUNDANCER,
HULL # SERY001899;

(VV23) 2009 YAMAHA JET SKI,
HULL # YAMA4288K809.

(VV 24) 2010 WHITE LAMBORGHINI LP-670SV,
VIN: ZHWBU8AHXALA03837;

(VV25) MERCEDES BENZ S65 VR BYTURBO,
VIN: WDDEJ79XX8A015189,
FLORIDA TAG RHV490;

(VV26) 2009 RED BMW CONVERTIBLE,
VIN: WBALM53529E160836;

(VV27) 2009 MERCEDES BENZ SLK 350
CONVERTIBLE, VIN: WDBWK58F19F190779;

(T1) 304 PIECES OF JEWELRY;

(T2) 16 DU PONT LIGHTERS;

(T3) 3 PIECES SPORTS MEMORABILIA;

(T4) \$271,160 IN UNITED STATES CURRENCY;

(T5) \$1,500 IN UNITED STATES CURRENCY;

(T6) \$30,000 IN AMERICAN EXPRESS
GIFT CARDS;

(T7) \$50,000 IN AMERICAN EXPRESS
GIFT CARDS;

(T8) 5 ADDITIONAL WATCHES;

(T9) GUITAR COLLECTION;

(BA1) FIDELITY INVESTMENTS STOCK ACCOUNT,
IN THE NAME OF SCOTT W. ROTHSTEIN,
VALUED AT APPROXIMATELY \$1,263,780;

(BA2) GIBRALTAR BANK ACCOUNT [REDACTED]
IN THE NAME OF WAWW 3 LLC, IN THE
APPROXIMATE AMOUNT OF \$117,032.76;

(BA3) GIBRALTAR BANK ACCOUNT [REDACTED]
IN THE APPROXIMATE AMOUNT OF \$53,448.51;

(BA4) GIBRALTAR BANK ACCOUNT [REDACTED]
IN THE APPROXIMATE AMOUNT OF \$71,793.06;

(BA5) GIBRALTAR BANK ACCOUNT [REDACTED]
IN THE APPROXIMATE AMOUNT OF \$995,521.426;

(BA6) BANK POPULAIRE, MOROCCO, BANK
ACCOUNT 178780211819923220000187,
IN THE NAME OF SCOTT ROTHSTEIN, IN THE
APPROXIMATE AMOUNT OF \$12,000,000;

(BA7) BANK POPULAIRE, MOROCCO, ACCOUNT
IN THE NAME OF AHNICK KHALID,
UP TO THE AMOUNT OF \$2,000,000;

(BA8) BANK POPULAIRE, MOROCCO, ACCOUNT
IN THE NAME OF STEVE CAPUTI,
UP TO THE AMOUNT OF \$1,000,000;

(BI1) STOCK CERTIFICATES OR BENEFICIAL
INTEREST IN 50,000 SHARES OF CAPITAL
STOCK IN GIBRALTAR PRIVATE BANK & TRUST;

(BI2) SCOTT W. ROTHSTEIN'S EQUITY INTEREST IN QTASK;

(BI3) SCOTT W. ROTHSTEIN'S EQUITY INTEREST IN
BROWARD BANK OF COMMERCE;

(BI4) SCOTT W. ROTHSTEIN'S EQUITY INTEREST IN
BOVA RISTORANTE;

(BI5) SCOTT W. ROTHSTEIN'S EQUITY INTEREST IN

BOVA CUCINA;

(BI6) SCOTT W. ROTHSTEIN'S EQUITY INTEREST IN
BOVA PRIME;

(BI7) SCOTT W. ROTHSTEIN'S EQUITY INTEREST IN
CAFÉ IGUANA, PEMBROKE PINES, FLORIDA;

(BI8) SCOTT W. ROTHSTEIN'S EQUITY INTEREST IN
CART SHIELD USA, LLC;

(BI9) SCOTT W. ROTHSTEIN'S EQUITY INTEREST IN
RENATO WATCHES;

(BI10) SCOTT W. ROTHSTEIN'S EQUITY INTEREST IN
EDIFY LLC;

(BI11) SCOTT W. ROTHSTEIN'S EQUITY INTEREST IN
V GEORGIO VODKA;

(BI12) SCOTT W. ROTHSTEIN'S EQUITY INTEREST IN
SEA CLUB;

(BI13) SCOTT W. ROTHSTEIN'S EQUITY INTEREST IN
NORTH STAR MORTGAGE;

(BI14) SCOTT W. ROTHSTEIN'S EQUITY INTEREST IN
KIP HUNTER MARKETING;

(BI15) SCOTT W. ROTHSTEIN'S EQUITY INTEREST IN
RRA SPORTS AND ENTERTAINMENT, LLC;

(BI16) SCOTT W. ROTHSTEIN'S EQUITY INTEREST IN
VERSACE MANSION/CASA CASUARINA, INCLUDING
10 YEAR OPERATING AGREEMENT WITH 2 TEN YEAR OPTIONS;

(BI17) SCOTT W. ROTHSTEIN'S EQUITY INTEREST, AND
LICENSING RIGHTS, IN ALTERNATIVE BIOFUEL COMPANY;

(BI18) SCOTT W. ROTHSTEIN'S EQUITY INTEREST IN
RRA GOAL LINE MANAGEMENT;

(BI19) SCOTT W. ROTHSTEIN'S EQUITY INTEREST IN
IRON STREET MANAGEMENT, LLC;

(BI20) SCOTT W. ROTHSTEIN'S EQUITY INTEREST IN,
AND LOAN TO, AFRICAT EQUITY IG DECIDE;

(BI21) SCOTT W. ROTHSTEIN'S EQUITY INTEREST IN,
AND RENTS DERIVED FROM BUCKY'S BBQ, LOCATED

AT 1198 N. OLD DIXIE HIGHWAY, BOCA RATON,
FLORIDA;

(BI22) SCOTT W. ROTHSTEIN'S EQUITY INTEREST IN,
AND RENTS DERIVED FROM THE CAR WASH LOCATED
AT 1299 FEDERAL HIGHWAY, BOCA RATON, FLORIDA

(BI23) PROMISSORY NOTE BY UNIGLOBE
IN FAVOR OF SCOTT W. ROTHSTEIN;

(BI24) ALL EQUITY INTEREST HELD BY OR ON BEHALF
OF SCOTT W. ROTHSTEIN, IN VARIOUS CORPORATIONS
AND ENTITIES;

(C1) \$6,000 IN CAMPAIGN CONTRIBUTIONS MADE
TO ALEX SINK; AND VOLUNTARILY OFFERED,
AND TURNED OVER, TO THE UNITED STATES
ON BEHALF OF ALEX SINK;

(C2) \$40,000 IN CAMPAIGN CONTRIBUTIONS TO
REPUBLICAN PARTY OF FLORIDA, "FLORIDA" ACCOUNT
AND VOLUNTARILY OFFERED, AND TURNED OVER, TO
THE UNITED STATES BY THE REPUBLICAN PARTY OF FLORIDA;

(C3) \$10,000 IN CAMPAIGN CONTRIBUTIONS TO
REPUBLICAN PARTY OF FLORIDA, "FEDERAL" ACCOUNT
AND VOLUNTARILY OFFERED, AND TURNED OVER, TO
THE UNITED STATES BY THE REPUBLICAN PARTY OF FLORIDA;

(C4) \$90,000 IN CAMPAIGN CONTRIBUTIONS TO
REPUBLICAN PARTY OF FLORIDA AND VOLUNTARILY
OFFERED, AND TURNED OVER, TO THE UNITED STATES
BY THE REPUBLICAN PARTY OF FLORIDA;

(C5) \$5,000 IN CAMPAIGN CONTRIBUTIONS TO
REPUBLICAN PARTY OF FLORIDA BY ROTHSTEIN
BUSINESS ENTITY KNOWN AS WAWW AND
VOLUNTARILY OFFERED, AND TURNED OVER, TO THE
UNITED STATES BY THE REPUBLICAN PARTY OF FLORIDA;

(C6) \$800,000 CHARITABLE DONATION TO
JOE DiMAGGIO CHILDREN'S HOSPITAL, WHICH
HOSPITAL ADVISED THE UNITED STATES OF THE
DONATION FROM THE ROTHSTEIN FAMILY FOUNDATION;

(C7) \$1,000,000 CHARITABLE DONATION TO
HOLY CROSS HOSPITAL, WHICH HOSPITAL ADVISED THE
UNITED STATES OF THE DONATION FROM THE
ROTHSTEIN FAMILY FOUNDATION;

(C8) \$9,600 IN CAMPAIGN CONTRIBUTIONS TO GOVERNOR CHARLIE CRIST AND VOLUNTARILY OFFERED, AND TURNED OVER, TO THE UNITED STATES BY THE OFFICE OF CHARLIE CRIST;

AND

(C9) ALL FUNDS VOLUNTARILY TURNED OVER TO THE UNITED STATES (IRS/FBI) SINCE IN OR ABOUT OCTOBER 28, 2009 IN RESPONSE TO PUBLICITY INVOLVING SCOTT W. ROTHSTEIN,

Defendants.

WARRANT OF ARREST *IN REM* FOR NON-REAL PROPERTIES

TO: THE INTERNAL REVENUE SERVICE, THE UNITED STATES MARSHALS OR ANY OTHER AUTHORIZED FEDERAL LAW ENFORCEMENT OFFICER

WHEREAS, on November 27, 2009, the United States of America filed an Amended Verified Complaint for Forfeiture in Rem against the above-named defendants, also referred to as "defendant properties," for the violations of law enumerated in said Complaint [DE #19]; and

WHEREAS, the Court has found that probable cause exists that the defendants are subject to forfeiture;

NOW THEREFORE, you are hereby commanded to take the defendants into your possession for safe custody. If the character or situation of the property is such that the taking of actual possession is impracticable, you shall execute this process by affixing a copy thereof to the property in a conspicuous place and/or by leaving a copy of the Amended Verified Complaint and process with the person having possession or his agent.

YOU ARE FURTHER commanded to cite and admonish the owner and/or possessor of the defendants, and any person or firm known to claim any interest therein, to file in the United States District Court, 400 North Miami Avenue, Miami, Florida 33128-7788, within thirty (35) days

following receipt of this Warrant, a Verified Claim in accordance with Rule G(5), Supplemental Rules for Admiralty or Maritime Claims and Asset Forfeiture Actions, and to therewith or within twenty (20) days thereafter file an Answer or other responsive pleading to the Amended Verified Complaint, a copy of which Complaint you shall supply with this Warrant, and to serve copies of said Claim and Answer upon the United States Attorney, 99 NE 4th Street, Miami, Florida 33132, Attention: **Alison W. Lehr**, Assistant United States Attorney, and that upon failure of the owner, possessor or any party claiming an interest in the defendant properties to do so, that the defendant properties may then be forfeited to the United States by default and without further notice or hearing.

AND YOU ARE FURTHER commanded to make due and prompt return of this Warrant to this Court upon its execution.

WITNESS THE HONORABLE



WILLIAM J. ZLOCH
UNITED STATES DISTRICT JUDGE

DATE: 12/17/09

STEVEN LARIMORE, CLERK
UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

BY:


Barbara L. Coats
DEPUTY CLERK