



OFFICE OF THE STATE ATTORNEY

FIFTEENTH JUDICIAL CIRCUIT
IN AND FOR PALM BEACH COUNTY



DAVID ARONBERG
STATE ATTORNEY

October 1, 2019

Ms. Jane Musgrave
The Palm Beach Post

Via Electronic Mail: jmusgrave@pbpost.com

RE: Response to Public Records Request
Our Public Record No.: 2019PR000372AMB

Dear Ms. Musgrave:

We have completed your public records request received by our office on July 30, 2019 for "a copy of:

"1- Any emails or other correspondence sent by Palm Beach County State Attorney Barry Krischer concerning the case of Jeffrey Epstein from January 2006 through December 2008. These would include, but not be limited to, emails or correspondence he sent to Palm Beach Police Chief Michael Reiter, Assistant State Attorney Lana Belohlavek, Michael Edmondson or any prosecutors in the office.

2- I would also like any communication with federal officials, including, but not limited to, U.S. Attorney Alex Acosta and assistant U.S. attorneys A. Marie Villafana, Jeffrey Sloman, Andrew Lourie.

3- Further, I would like any emails sent to Epstein's defense team, including, but not limited to, Alan Dershowitz, Jack Goldberger, Roy Black, Jay Lefkowitz, Ken Starr or Gerald Lescourt,

and

4- The personnel file of former Assistant State Attorney Lanna Belohlavek".

Please be advised that in response to your requests 1 through 3, our office does not retain emails electronically prior to 2012. The only emails now existing are the physical copies of emails maintained within the state's files and copies of the state's files, including any emails have already been provided to you. Further, our office previously responded to you request of December 5th, 2018, for a copy of the files pertaining to Jeffrey Epstein, et. al., in Public Records Request No.: 2018PR000460AMB. The request was fulfilled and closed on December 5th, 2018.

Your colleague reporter Lulu Ramadan made another request for the state's on July 15th, 2019 which was assigned Public Records Request No.: 2019PR000328AMB. Our office provided to both yourself and reporter LuLu Ramadan via the SAO's CIP Portal and by hand delivery a 32gb

Party JOINT

401 North Dixie Highway, West Palm Beach, Florida 33401
Phone: (561)355-7100
www.sa15.org

ID# J03 EV# J03
DATE ADMITTED: 9/6/2022

Case No. 2019-CA-014681

Joint Exhibit

J03

thumb drive containing Audio and Redacted Control Calls, Walkthrough Video, Audio from Cassettes Part 1, Audio from Cassettes Part 2, Video Interviews Part 1, Video Interviews Part 2, Video Interview Part 3, and a copy of the State's files containing 2,833 electronic pages of information. In an abundance of caution and to ensure the thoroughness of our earlier disclosures, our office conducted an additional review of the close states files and executive records of former State Attorney Barry Krischer. This search revealed an additional 134 pages of information and two (2) videos, which are subject to release. The following redactions were applied to these items:

- a) All social security numbers, pursuant to Fla. Sta. §119.071(4) and §119.071(5) (a) 5.
- b) All driver license numbers, pursuant to Fla. Stat. §119.0712 (2) (a) and 18 U.S.C.A. §2725.
- c) Any information, including, name, address, date of birth, school which reveals the identity of the victim of crime under 796.07 2e and 4c and 800.04(6)(2b), pursuant to Fla. Sta. §119.071 (3) (c).
- d) All biometric identification, pursuant to Fla. Sta. §119.071(5)(g).
- e) All home addresses, telephone numbers, dates of birth and photographs of a current or former assistant state attorney, spouses and children, pursuant to Fla. Sta. §119.071(4) (d)2.d.(I).
- f) All information revealing the photographs of active or former sworn law enforcement personnel, pursuant to Fla. Stat. §119.07(4)2.a.(1).
- g) Furthermore, in accordance with Art. 1 §16, Fla. Const. (2018) any and all identifying victim information is redacted

Lastly, in response to the 4th part of your request for a copy the personnel file of former Assistant State Attorney Lanna Belohlavek, the records consist of approximately 265 pages of information.

There will be a special service charge based on the labor cost of the personnel providing the service incurred by this agency pursuant to Fla. Stat. §119.07(4)(d). The information will need to be reviewed for possible exemptions or necessary redactions from public disclosure pursuant to Florida Statute Section 119, by an employee whose hourly rate is \$37.26. It is *estimated* that it will take 5 hours of man power to retrieve, scan, review, and redact the records, for an estimated total of **\$186.30**.

A 50% deposit from the final estimated cost will be required in order for us to begin with the processing of your request, as authorized under *Board of County Commissioners of Highlands County v. Colby*, 976 So2d 31 (Fla. 2d DCA 2008), and *Morris Publishing Group, LLC v. State*, 154 So.3d 528, 534 (Fla. 1st DCA 2015). Please provide cash in the exact amount, check or money order payable to the Office of the State Attorney for the Fifteenth Judicial Circuit in the amount of **\$93.15** as a deposit towards the estimated cost of the first part of your request. Once we receive the deposit, we will process your public records request in a timely manner.

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Any subsequent requests for information will be assigned a new public records number and be processed in accordance with Florida Public Records Law. If you have further questions, please feel free to contact me by e-mail at ncruz@sa15.org or directly at (561)355-7247.

Sincerely,
Natalie Cruz
Executive Secretary

NOT A CERTIFIED COPY

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