

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

Case No. 50-2009CA040800XXXXMBAG

JEFFREY EPSTEIN,

Plaintiff/Counter-Defendant,

v.

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

Defendants/Counter-Plaintiff.

PLAINTIFF/COUNTER-DEFENDANT JEFFREY EPSTEIN'S
MOTION FOR COURT'S PERMISSION TO ALTER TRIAL EVIDENCE
BY REPLACING NAMES WITH INITIALS OF
EDWARDS' THREE CLIENTS ON TRIAL EXHIBITS

Plaintiff/Counter-Defendant, Jeffrey Epstein ("Epstein"), moves this Court for permission to replace on Epstein's trial exhibits the names of Defendant/Counter-Plaintiff, Bradley J. Edwards' ("Edwards") clients with the initials "L.M." and "E.W." for two of them and the pseudonym "Jane Doe" for the third client and states:

1. This matter is special set for a 10-day jury trial commencing on March 13, 2018.
2. In compliance with this Court's Pretrial Order, the parties have listed witnesses and exhibits, including Edwards identifying by full name his three clients on witness lists and various motions with attachments filed with the Court that may be used as exhibits.
3. In pretrial hearings, this Court has been cautious to protect the identity of Edwards' three clients, utilizing initials and a pseudonym - L.M., E.W., and Jane Doe - whenever possible.

4. Cognizant of this Court's intent to protect the identity of Edwards' three clients, Epstein has been careful not to reference names of Edwards' three clients on trial exhibits that Epstein **intends to seek admission into evidence and publication to the jury.**

5. Additionally, Florida Rule of Judicial Administration 2.425(a) requires parties to limit certain "designated sensitive information" filed with the Court.

6. As the parties move toward trial and are now presenting the Court's Clerk with actual exhibits to be published to the jury, Epstein requests permission to alter the evidence by replacing the names with initials of Edwards' three clients, L.M., E.W., Jane Doe, with the understanding of who the three individuals are and to the extent that testimony and evidence is introduced subject to this Court's evidentiary rulings.

7. In anticipation of this Court's review and by example, Epstein submits an Appendix which identifies some of Epstein's intended trial exhibits for publication to the jury. The Appendix filed with this motion replaces the actual names with initials and the pseudonym.

WHEREFORE, Plaintiff/Counter-Defendant, Jeffrey Epstein, requests that this Court grant this Motion for Court Permission to Redact Names of Edwards' Three Clients and replace with initials on Trial Exhibits.

CERTIFICATE OF SERVICE

I certify that the foregoing document has been furnished to the attorneys listed on the Service List below on March 2, 2018, through the Court's e-filing portal pursuant to Florida Rule of Judicial Administration 2.516(b)(1).

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ILLUSTRATIVE APPENDIX OF TRIAL EXHIBITS

L.M.

1. *State of Florida v. L.M.*, 15th Judicial Circuit, Palm Beach County Case No. 50-2012-MM-002316-AXXX-MB – **Soliciting another to commit prostitution. L.M. running escort service. “[L.M.] stated growing up her mother was in the escort business which caused her to become involved in it.”**
2. Palm Beach County Sheriff’s Office Offense Report Case No. 04-084433 – **L.M. and E.W. soliciting sex**
3. Palm Beach County Sheriff’s Office Offense Report Case No. 03-028781 – **L.M., at age of 14, having sexual relations with an 18-year-old. Mother knew of sexual relationship, but did not know it was illegal, could not control her, but did educate her on safe sex**
4. Palm Beach County Sheriff’s Office Offense Report Case No. 13-100174 – **Complaint that ex-boyfriend distributed a letter to her neighbors stating that she was a prostitute**
5. Palm Beach County Sheriff’s Office Offense Report Case No. 12-025901 – **Child abuse investigation into L.M.’s son being present during altercation she was involved in with her sister – L.M. was holding her sister by the back of the throat. L.M.’s father was holding L.M.’s sister’s boyfriend while L.M. beat on him and a friend choked him. Noted that L.M., her father and sister were abusing Xanax, marijuana and alcohol. L.M.’s father was in the moonshine business and L.M.’s mother owns a prostitution ring**
6. Palm Beach County Sheriff’s Office Offense Report Case No. 09-067050 – **Child abuse investigation into L.M.’s son being present during altercation she was involved in with her sister’s boyfriend**
7. *Lexine Turney v. L.M.*, 15th Judicial Circuit, Palm Beach County Case No. 50-2015-DR-010853-XXXX-NB; Palm Beach County Sheriff’s Office Offense Report No. 14-152173 – **Turney claimed her son’s father was living with L.M. and, when visiting him, was being abused by L.M. and L.M.’s son. Turney’s son claimed they had “sex parties” and “hurt him.”**
8. *L.M. Assessment*, 15th Judicial Circuit Court, Palm Beach County Case No. 04-MH-001376 – Marchman Act filed by father: **“Does not listen and has bad attitude. Comes home when she wants to and is in trouble with police for one reason or another. She is taking Xanax, cocaine and alcohol”**

9. Palm Beach County Sheriff's Office Offense Report Case No. 07-605242 – **Simple battery**
10. Palm Beach County Sheriff's Office Offense Report Case No. 09-044965 – **Battery**
11. *Anna Terry v. Scott Miller*, 15th Judicial Circuit Case No. 50-2004-DR-001691-XXX-MB; Palm Beach County Sheriff's Office Offense Report No. 04-030740 – **L.M. threatened to kill another student, threw things at her and attempted to run her over with a golf cart; restraining order issued**
12. *State of Florida v. L.M.*, 15th Judicial Circuit, Palm Beach County Case No. 50-2010-MM-017555-AXXX-MB – **Criminal mischief / road rage – throwing item at another vehicle**
13. Palm Beach County Sheriff's Office Offense Report Case No. 03-084114 – **Sliced neighbor's tires**
14. *State of Florida v. L.M.*, 15th Judicial Circuit, Palm Beach County Case No. 50-2013-MM-000924-AXXX-MB – **Retail theft**
15. Palm Beach County Sheriff's Office Offense Report Case No. 04-091683 – **Runaway**
16. Palm Beach County Sheriff's Office Offense Report Case No. 07-048173 – **Alleged child neglect**
17. Palm Beach County Sheriff's Office Offense Report Case No. 03-104546 – **Witness to assault in front of Baby Dolls establishment**
18. Palm Beach County Sheriff's Office Offense Report Case No. 04-019468 – **Victim of assault**
19. Palm Beach County Sheriff's Office Offense Report Case No. 04-086777 – **Domestic disturbance; fight with father**
20. Palm Beach County Sheriff's Office Offense Report Case No. 14-056185 – **Domestic disturbance; failed to cooperate with police**
21. Palm Beach County Sheriff's Office Offense Report Case No. 14-080955 - **Domestic disturbance; failed to cooperate with police**
22. Palm Beach County Sheriff's Office Offense Report Case No. 17-047135 – **Domestic disturbance; failed to cooperate with police – would not put dogs away**

23. Palm Beach County Sheriff's Office Offense Report Case No. 06-06692 – **Domestic disturbance**
24. Palm Beach County Sheriff's Office Offense Report Case No. 06-073437 – **Domestic disturbance**
25. Palm Beach County Sheriff's Office Offense Report Case No. 06-087957 – **Domestic disturbance**
26. Palm Beach County Sheriff's Office Offense Report Case No. 06-138285 – **Domestic disturbance**
27. Palm Beach County Sheriff's Office Offense Report Case No. 07-047967 – **Domestic disturbance**
28. Palm Beach County Sheriff's Office Offense Report Case No. 07-605437 – **Domestic disturbance**
29. Palm Beach County Sheriff's Office Offense Report Case No. 07-601764 – **Domestic disturbance**
30. Palm Beach County Sheriff's Office Offense Report Case No. 12-022380 – **Domestic violence**
31. Palm Beach County Sheriff's Office Offense Report Case No. 14-110038 – **Domestic violence**
32. Palm Beach County Sheriff's Office Offense Report Case No. 14-143988 – **Domestic violence**
33. Palm Beach County Sheriff's Office Offense Report Case No. 14-149652 – **Domestic violence**
34. Palm Beach County Sheriff's Office Offense Report Case No. 14-150902 – **Domestic dispute / potential theft**
35. *L.M. v. Wayne Seaman*, 15th Judicial Circuit, Palm Beach County Case No. 50-2014-DR-011327-XXXX-NB – **Domestic violence**
36. Palm Beach County Sheriff's Office Offense Report Case No. 12-121047 – **Domestic disturbance**
37. Palm Beach County Sheriff's Office Offense Report Case No. 13-047084 – **Domestic disturbance**

38. Palm Beach County Sheriff's Office Offense Report Case No. 17-169751 – **Domestic disturbance**
39. Palm Beach County Sheriff's Office Offense Report Case No. 16-160017 – **Domestic disturbance**
40. Palm Beach County Sheriff's Office Offense Report Case No. 95-099109 – **Domestic dispute between L.M.'s parents**
41. *Justin Sprague v. L.M.*, Lee County Case No. 08-DR3141 – **Custody dispute – Father of L.M.'s son: "She has moved a number of times, partys to much, multiple abusive boyfriends."** [Typographical errors in original]
42. *L.M. v. John T. Riedel*, 15th Judicial Circuit, Palm Beach County Case No. 50-2007-DR-003304-XXXX-NB – **Petition for injunction for dating violence; boyfriend on cocaine**
43. *L.M. v. John T. Riedel*, 15th Judicial Circuit, Palm Beach County Case No. 50-2007-DR-004824-XXXX-NB -- **Petition for injunction for dating violence; boyfriend intoxicated / violent**
44. Palm Beach County Sheriff's Office Offense Report Case No. 13-081178 – **Reported theft then would not cooperate with police**
45. Palm Beach County Sheriff's Office Offense Report Case No. 12-106910 – **Witness to battery upon boyfriend at Cheetah's Nightclub**
46. *L.M. v. Justin Sprague*, 15th Judicial Circuit Court, Palm Beach County Case No. 2006-DR-015889-XXXX-MB – **Child support dispute**
47. *Justin Lee Sprague v. L.M.*, 15th Judicial Circuit, Palm Beach County Case No. 50-2013-DR-001053-XXXX-MB – **Custody dispute**
48. *State of Florida v. L.M.*, 15th Judicial Circuit Court, Palm Beach County Case No. 50-2007-TR-003759-AXXX-MB – **Driving citation; failure to stop at red light**
49. *State of Florida v. L.M.*, 15th Judicial Circuit Court, Palm Beach County Case No. 50-2007-TR-024102-AXXX-MB – **Driving citation; unlawful speed**
50. *State of Florida v. L.M.*, 15th Judicial Circuit Court, Palm Beach County Case No. 50-2007-TR-033050-AXXX-MB - **Driving citation; proof of insurance**
51. *State of Florida v. L.M.*, 15th Judicial Circuit Court, Palm Beach County Case No. 50-2007-TR-045627-AXXX-MB - **Driving citation; no lamps or illuminating devices**

52. *State of Florida v. L.M.*, 15th Judicial Circuit Court, Palm Beach County Case No. 50-2007-TR-097995-AXXX-NB – **Driver’s license not carried / exhibited on demand**
53. *State of Florida v. L.M.*, 15th Judicial Circuit Court, Palm Beach County Case No. 50-2007-TR-097991-AXXX-NB – **Driving citation; failure to use seat belt**
54. *State of Florida v. L.M.*, 15th Judicial Circuit Court, Palm Beach County Case No. 50-2007-TR-261718-AXXX-NB – **Driving citation; unlawful speed**
55. *State of Florida v. L.M.*, 15th Judicial Circuit Court, Palm Beach County Case No. 50-2008-CT-001998-AXXX-MB – **Driving citation; license plate not assigned; proof of insurance**
56. *State of Florida v. L.M.*, 15th Judicial Circuit Court, Palm Beach County Case No. 50-2008-TR-067444-XXX-SB – **Driving citation; proof of insurance**
57. *State of Florida v. L.M.*, 15th Judicial Circuit Court, Palm Beach County Case No. 50-2008-TR-067445-AXXX-SB – **Driving citation; unknowingly operating a vehicle while driver’s license suspended**
58. *State of Florida v. L.M.*, 15th Judicial Circuit Court, Palm Beach County Case No. 50-2008-TR-195830-AXXX-MB – **Driving citation; proof of insurance**
59. *State of Florida v. L.M.*, 15th Judicial Circuit Court, Palm Beach County Case No. 50-2008-TR-338340-AXXX-WB – **Driving citation; following too closely**
60. *State of Florida v. L.M.*, 15th Judicial Circuit Court, Palm Beach County Case No. 50-2008-TR-338339-AXXX-WB – **Driving citation; failing to carry driver’s license**
61. *State of Florida v. L.M.*, 15th Judicial Circuit Court, Palm Beach County Case No. 50-2008-TR-340662-AXXX-SB – **Driving citation; speeding**
62. *State of Florida v. L.M.*, 15th Judicial Circuit Court, Palm Beach County Case No. 50-2010-TR-082840-AXXX-NB – **Driving citation; speeding**
63. *State of Florida v. L.M.*, 15th Judicial Circuit Court, Palm Beach County Case No. 50-2010-TR-098843-AXXX-MB – **Driving citation; speeding**
64. *State of Florida v. L.M.*, 15th Judicial Circuit Court, Palm Beach County Case No. 50-2011-TR-173416-AXXX-MB - **Driving citation; failure to use seat belt**
65. *State of Florida v. L.M.*, 15th Judicial Circuit Court, Palm Beach County Case No. 50-2011-TR-173415-AXXX-MB – **Driving citation; proof of insurance**

66. *State of Florida v. L.M.*, 15th Judicial Circuit Court, Palm Beach County Case No. 50-2011-TR-173563-AXXX-NB – **Driving citation; failure to carry driver's license**
67. *State of Florida v. L.M.*, 15th Judicial Circuit Court, Palm Beach County Case No. 50-2011-TR-175658-AXXX-NB – **Driving citation; speeding**
68. *State of Florida v. L.M.*, 15th Judicial Circuit Court, Palm Beach County Case No. 50-2012-TR-093785-AXXX-NB – **Driving citation; improper / defective equipment on golf cart**
69. *State of Florida v. L.M.*, 15th Judicial Circuit Court, Palm Beach County Case No. 50-2015-TR-140544-AXXX-MB – **Driving citation; expired registration**
70. *State of Florida v. L.M.*, 15th Judicial Circuit Court, Palm Beach County Case No. 50-2015-TR-140545-AXXX-MB – **Driving citation; failure to carry driver's license**
71. *State of Florida v. L.M.*, 15th Judicial Circuit Court, Palm Beach County Case No. 50-2016-TR-007216-AXXX-MB - **Driving citation; unknowingly operating a vehicle while driver's license suspended**
72. *State of Florida v. L.M.*, 15th Judicial Circuit Court, Palm Beach County Case No. 50-2017-TR-045479-AXXX-MB – **Driving citation; proof of insurance**
73. *State of Florida v. L.M.*, 15th Judicial Circuit Court, Palm Beach County Case No. 50-2017-TR-045493-AXXX-MB – **Driving citation; speeding**
74. *State of Florida v. L.M.*, 17th Judicial Circuit Court, Broward County Case No. 2008-TR-102448 – **Driving citation; failure to yield the right of away**

E.W.

1. Palm Beach County Sheriff's Office Offense Report, Case No. 04-084433 – **L.M. and E.W. soliciting sex**
2. *State v. E.W.*, 11th Judicial Circuit, Miami Dade County Case No. 2012-CF-029832 – **Prostitution and possession of a controlled substance**
3. *State of Florida v. E.W.*, 15th Judicial Circuit, Palm Beach County Case No. 50-2006-CF-016146-AXXX-MB – **Aggravated battery**
4. *State of Florida v. E.W.*, 15th Judicial Circuit, Palm Beach County Case No. 50-2007-MM-021940-AXXX-SB – **Simple battery**

5. *State of Florida v. E.W.*, 6th Judicial Circuit, Pinellas County Case No. 52-2013-CT062524 – **DUI causing damage to person or property**
6. Palm Beach County Sheriff's Office Offense Report Case No. 03-098088 – **Theft of Xanax pills**
7. Palm Beach County Sheriff's Office Offense Report Case No. 06-133067 – **Landlord report of suspected drug activity**
8. *State of Florida v. E.W.*, 13th Judicial Circuit Court, Hillsborough County Case No. 2016-CF-004732000AHC – **Drug trafficking in amphetamine 28 to 200 grams**
9. *State of Florida v. E.W.*, 15th Judicial Circuit, Palm Beach County Case No. 50-2007-CF-008710-AXXX-MB – **Possession of cocaine**
10. *State of Florida v. E.W.*, 15th Judicial Circuit, Palm Beach County Case No. 50-2009-CF-011288-AXXX-MB – **Possession of schedule IV substance, possession of marijuana, possession of narcotic equipment**
11. *State of Florida v. E.W.*, 15th Judicial Circuit, Palm Beach County Case No. 50-2010-CF003921-AXXX-MB – **Possession of schedule II substance, possession of schedule IV substance, possession of marijuana**
12. *State of Florida v. E.W.*, 15th Judicial Circuit, Palm Beach County Case No. 50-2007-MM-013914-AXXX-MB – **Possession of marijuana**
13. *State of Florida v. E.W.*, 15th Judicial Circuit, Palm Beach County Case No. 50-2009-MM-018257-AXXX-NB – **Possession of marijuana**
14. Palm Beach County Sheriff's Office Offense Report Case No. 04-070605 – **Grand Theft**
15. Palm Beach County Sheriff's Office Offense Report Case No. 06-049448 – **Possession of marijuana and outstanding warrant for grand theft**
16. *State of Florida v. E.W.*, 15th Judicial Circuit, Palm Beach County Case No. 50-2012-CF-005135-AXXX-MB – **Grand theft**
17. *State of Florida v. E.W.*, 15th Judicial Circuit, Palm Beach County Case No. 50-2012-CF-007118-AXXX-MB – **Grand theft**
18. *State of Florida v. E.W.*, 15th Judicial Circuit, Palm Beach County Case No. 50-2009-MM-010876-AXXX-MB – **Retail theft**

19. *State of Florida v. E.W.*, 13th Judicial Circuit Court, Hillsborough County Case No. 2014-MM-012614 – **Petit theft**
20. *State of Florida v. E.W.*, 13th Judicial Circuit Court, Hillsborough County Case No. 2014-MM-015507000AHC – **Petit theft**
21. *State of Florida v. E.W.*, 13th Judicial Circuit Court, Hillsborough County Case No. 2014-MM-01601800 – **Petit theft (second conviction)**
22. *State of Florida v. E.W.*, 13th Judicial Circuit Court, Hillsborough County Case No. 2015-CF-16193000 – **Petit theft; felony third degree**
23. *State of Florida v. E.W.*, 13th Judicial Circuit Court, Hillsborough County Case No. 2016-CF-004733000AHC – **Felony petit theft; resisting officer without violence**
24. Boynton Beach Police Incident Report #2040097 – **Shoplifting**
25. Palm Beach County Sheriff's Office Offense Report Case No. 09-085397 – **Shoplifting**
26. Palm Beach County Sheriff's Office Offense Report Case No. 07-604687 – **Possession of stolen equipment**
27. *State of Florida v. E.W.*, Pinellas County Circuit Court Case No. 16-02415-OC-CF – **Arrest hold by U.S. Marshall for processing; Felony 1st degree**
28. *State of Florida v. E.W.*, Pinellas County Circuit Court Case No. 16-02416-OC-CF – **Arrest hold by Hillsborough County for processing; Felony 1st degree**
29. Palm Beach County Sheriff's Office Offense Report No. 03-067249; *Eva Ford v. James R. Gebbia*, 15th Judicial Circuit, Palm Beach County Case No. 03-1633 – **Allegations of lewd or lascivious molestation upon E.W. by mother's boyfriend; mother crack addict**
30. Palm Beach County Sheriff's Office Offense Report Case No. 03-091886 – **Altercation with mother; mother arrested for battery**
31. Boynton Beach Police Department Incident Report No. 7028375 – **Altercation with another employee at Platinum Gold**
32. Palm Beach County Sheriff's Office Offense Report Case No. 03-096606 – **Runaway**
33. West Palm Beach Police Department Case No. 03-19767 – **Runaway**

34. West Palm Beach Police Department Case No. 03-21604 – **Runaway**
35. *State of Florida v. E.W.*, Pinellas County Case No. 52-2013-CA021127XXXXNO – **Driving while license suspended; arrested for outstanding warrants relating to DUI**
36. *State of Florida v. E.W.*, 6th Judicial Circuit Pinellas County Case No. 52-2013-CA-128504 – **Felony; driving while license permanently suspended**
37. *State of Florida v. E.W.*, 15th Judicial Circuit, Palm Beach County, Case No. 50-2010-CT-010505-AXXX-NB – **Operating vehicle while license suspended/revoked, unregistered motor vehicle, unassigned plate/tag; failure to appear arrests**
38. *State of Florida v. E.W.*, 15th Judicial Circuit, Palm Beach County, Case No. 50-2010-CT-029906-AXXX-MB – **Operating vehicle while license suspended/revoked, speeding, failing to display registration and insurance; failure to appear arrest**
39. *State of Florida v. E.W.*, 15th Judicial Circuit, Palm Beach County, Case No. 50-2010-TR-227746-AXXX-MB – **Unknowingly operating vehicle while driver's license suspended, cancelled or revoked**
40. *State of Florida v. E.W.*, 15th Judicial Circuit, Palm Beach County Case No. 02-26985TCA02 – **Driving citation; violation of probation**
41. *State of Florida v. E.W.*, 15th Judicial Circuit, Palm Beach County Case No. 50-2007-TR-163488-AXXX-MB – **Driving vehicle in unsafe condition**
42. *State of Florida v. E.W.*, 15th Judicial Circuit, Palm Beach County Case No. 50-2007-TR-166340-AXXX-MB – **Driving vehicle in unsafe condition**
43. *State of Florida v. E.W.*, 15th Judicial Circuit, Palm Beach County, Case No. 5020077-TR-204547-AXXX-MB – **Driving citation; not wearing seat belt**
44. *State of Florida v. E.W.*, 15th Judicial Circuit, Palm Beach County Case No. 50-2009-TR-144682-AXXX-MB – **Driving citation; not wearing seat belt**
45. *State of Florida v. E.W.*, 15th Judicial Circuit, Palm Beach County Case No. 50-2009-TR-233639-AXXX-NB – **Driving citation; speeding**
46. *State of Florida v. E.W.*, 15th Judicial Circuit, Palm Beach County, Case No. 50-2010-TR-227747-AXXX-MB – **Driving citation; failure to provide proof of insurance**

47. *State of Florida v. E.W.*, 15th Judicial Circuit, Palm Beach County Case No. 50-2011-CT-014746-AXXX-SB – **Driving with a suspended driver's license; failing to drive in single lane**
48. *State of Florida v. E.W.*, 15th Judicial Circuit, Palm Beach County Case No. 50-2012-CT-000557-AXXX-MB – **Driving with a suspended driver's license; probation revoked**
49. Palm Beach County Sheriff's Office Offense Report Case No. 11-076192 – **Driving with a suspended license; lied to officer and gave false name**
50. *State of Florida v. E.W.*, 6th Judicial Circuit, Pinellas County Case No. 522013TR062559 – **Careless driving**
51. *State of Florida v. E.W.*, 18th Judicial Circuit, Broward County Case No. 62010TR074209A88830 – **Evasion; failure to pay toll**
52. *State of Florida v. E.W.*, 6th Judicial Circuit, Pinellas County Case No. 522013TR062943 – **Failure to show proof of insurance**
53. *State of Florida v. E.W.*, 13th Judicial Circuit Court, Hillsborough County Case No. 2015TR009235000 – **Operating a motor vehicle with expired registration**
54. *State of Florida v. E.W.*, 13th Judicial Circuit Court, Hillsborough County Case No. 2015TR009236000 – **Driving on suspended license with knowledge**
55. *Andrew Pastor v. E.W.*, 15th Judicial Circuit, Palm Beach County Case No. 50-2009-CC-014838-XXXX-MB – **Tenant eviction**
56. *Arocket 1, LLC v. E.W.*, 13th Judicial Circuit Court, Hillsborough County Case No. 2014-CC030790A001HC – **Tenant eviction**
57. Palm Beach County Sheriff's Office Offense Report Case Nos. 07-603908, 07-603909, 07-603910, 07-603911 and 07-603912 – **Roommate arrested for burglary**

Jane Doe

1. *State of Florida v. Jane Doe*, 15th Judicial Circuit Court, Palm Beach County Case No. 2011-CF-001160-AXXX-MB; Palm Beach County Sheriff's Office Report No. 11-033106 – **Child neglect; Jane Doe was pregnant and using needles to shoot up opiates; Jane Doe's child was attacked by pit bull when unattended**

2. *Jamie Neil Capalbo v. Jane Doe*, Palm Beach County Case No. 50-2011-DR-001907-XXXX-MB – **Alleged Jane Doe had an I.V. drug use addiction; while pregnant with his child, she was shooting up using heroin and Roxicodone**
3. *Mine Park v. Jane Doe and Batu Ibrahim Tonaroglu*, 15th Judicial Circuit, Palm Beach County Case No. 50-2016-DR-011161-XXXX-MB – **Turned custody of child over to grandmother**
4. *State of Florida v. Jane Doe*, 15th Judicial Circuit Court, Palm Beach County Case No. 50-2010-MM-015821-AXXX-SB – **Possession of narcotics equipment**
5. *State of Florida v. Jane Doe*, 15th Judicial Circuit, Palm Beach County Case No. 2010-MM-021516-AXXX-MB – **Possession of drug paraphernalia; Jane Doe admitted to shooting up pills and she informed officers where she kept her needles**
6. Palm Beach County Sheriff's Office Offense Report Case No. 05-035619 – **Grand theft auto**
7. Palm Beach County Sheriff's Office Offense Report Case No. 04-140336 – **Elderly abuse**
8. *State v. Jane Doe*, 15th Judicial Circuit Court, Palm Beach County Case No. 2006-MM-029242-AXXX-MB; Palm Beach County Sheriff's Office Offense Report Case No. 06-150364 – **Retail theft**
9. *State of Florida v. Jane Doe*, 15th Judicial Circuit Court, Palm Beach County Case No. 50-2007-MM-008444-AXXX-MB; Palm Beach County Sheriff's Office Offense Report No. 07-067112 – **Retail theft**
10. Palm Beach County Sheriff's Office Offense Report Case No. 05-019158 – **Possession of tobacco by a minor**
11. *State of Florida v. Jane Doe*, 15th Judicial Circuit, Palm Beach County Case No. 2002-IN-024424-AXXX-MB – **Possession of tobacco by a minor**
12. *State v. Jane Doe*, 15th Judicial Circuit Court, Palm Beach County Case No. 50-2005-IN-005174-AXXXX-MB – **Possession of tobacco by a minor**
13. Palm Beach County Sheriff's Office Offense Report Case No. 02-094884 - **Runaway**
14. Palm Beach County Sheriff's Office Offense Report Case No. 02-108484 – **Runaway**

15. Palm Beach County Sheriff's Office Offense Report Case No. 02-113653 – **Runaway; uncontrollable**
16. Palm Beach County Sheriff's Office Offense Report Case No. 02-116357 – **Runaway**
17. Palm Beach County Sheriff's Office Offense Report Case No. 02-116631 – **Runaway**
18. Palm Beach County Sheriff's Office Offense Report Case No. 02-122524 – **Runaway**
19. Palm Beach County Sheriff's Office Offense Report Case No. 03-116298 – **Runaway; officer found Jane Doe in a vehicle occupied by two known heroin addicts**
20. Palm Beach County Sheriff's Office Offense Report Case No. 03-118053 – **Runaway**
21. West Palm Beach Police Report Case No. 03-29553 – **Runaway**
22. West Palm Beach Police Report Case No. 04-000491 – **Runaway**
23. Palm Beach County Sheriff's Office Offense Report Case No. 03-114489 – **Jane Doe reported child abuse claim against mother; during interview, Jane Doe (age 15) disrespectful and admitted to smoking to one pack of cigarettes every 2-3 days and had been smoking for 3-4 years**
24. Palm Beach County Sheriff's Office Offense Report Case No. 04-120214 – **Child neglect; Jane Doe left home alone while grandmother was on vacation; neighbor complained of suspected drug activities**
25. *State v. Jane Doe*, 15th Judicial Circuit Court, Palm Beach County Case No. 50-2005-CT-006666-AXXX-MB – **Careless driving, driving without a license, leaving the scene of an accident**
26. *State of Florida v. Jane Doe*, 15th Judicial Circuit Court, Palm Beach County Case No. 50-2009-CT-025833-AXXX-MB – **Driving with no license; driving in wrong direction**
27. *State of Florida v. Jane Doe*, 15th Judicial Circuit Court, Palm Beach County Case No. 50-2010-CT-009222-AXXX-MB – **Driving without a license; failure to appear arrests**
28. *State of Florida v. Jane Doe*, 15th Judicial Circuit Court, Palm Beach County Case No. 2010-CT-027408-AXXX-SB – **Driving without a license; careless driving**

29. *State of Florida v. Jane Doe*, 15th Judicial Circuit Court, Palm Beach County Case No. 50-2010-CT-028350 – **Driving with knowledge without license; speeding failure to display registration; failure to appear arrests**
30. *State of Florida v. Jane Doe*, 17th Judicial Circuit Court, Broward County Case No. 11020221CF10A – **Driving while licensed revoked; failure to obey traffic sign**
31. *State of Florida v. Jane Doe*, 15th Judicial Circuit Court, Palm Beach County Case No. 50-2010-CT-035811-AXXX-MB – **Driving with no license; speeding**
32. *State of Florida v. Jane Doe*, 15th Judicial Circuit Court, Palm Beach County Case No. 50-2010-CT-037864-AXXX-MB – **Driving with no license**
33. *State of Florida v. Jane Doe*, 15th Judicial Circuit Court, Palm Beach County Case No. 50-2010-CT-037753-AXXX-MB – **Driving with no license; no seat belt**
34. *State of Florida v. Jane Doe*, 15th Judicial Circuit Court, Palm Beach County Case No. 50-2010-CT-037705-AXXX-MB – **Driving with no license; arrests for failure to appear**
35. *State of Florida v. Jane Doe*, 15th Judicial Circuit Court, Palm Beach County Case No. 50-2010-CT-039080-AXXX-MB – **Driving with no license; speeding; arrests for failure to appear**
36. *State of Florida v. Jane Doe*, 15th Judicial Circuit Court, Palm Beach County Case No. 50-2010-TR-312095-AXXX-NB – **Seat belt violation**
37. *State of Florida v. Jane Doe*, 15th Judicial Circuit Court, Palm Beach County Case No. 50-2011-TR-001899-AXXX-MB – **No proof of insurance**
38. *State of Florida v. Jane Doe*, 15th Judicial Circuit Court, Palm Beach County Case No. 50-2011-CT-003703-AXXX-MB – **Driving with no license; arrests for failure to appear**
39. *Jane Doe v. Jamie N. Capalbo*, 15th Judicial Circuit Court, Palm Beach County Case No. 50-2011-DR-002053-XXXX-MB - **Domestic**
40. *Batu Ibrahim Tonaroglu v. Jane Doe*, 15th Judicial Circuit Court, Palm Beach County Case No. 50-2014-AS-700326-XXXX-MB – **Domestic**
41. Multiple records concerning Jane Doe's parents' criminal and drug background