



**U.S. Department of Justice**

*United States Attorney  
Southern District of New York*

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October 19, 2020

**BY ELECTRONIC MAIL**

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**Re: *United States v. Ghislaine Maxwell, 20 Cr. 330 (AJN)***

Dear Counsel:

In recognition of the Government's ongoing discovery obligations, today we are producing copies of the materials listed in the below index, which materials are stamped with control numbers SDNY GM 00328070 through SDNY GM 00356148. The password for the drive is [REDACTED] The materials are available for pickup at the U.S. Attorney's Office in Manhattan.

Please note that both this letter and the enclosed materials are governed by the July 31, 2020 Protective Order in this case.<sup>1</sup> **This letter is itself designated as "confidential," because it includes information regarding records designated as "confidential" under the Protective Order.** An index of the materials contained in this production is below:

Bates Start	Bates End	Summary Description	Confidential Designation
SDNY GM 00328070	SDNY GM 00328072	2020.07.02, Aerial Video	
SDNY GM 00328073	SDNY GM 00328092	FBI Florida Documents	Confidential
SDNY GM 00328093	SDNY GM 00328289	FBI NY Documents	
SDNY GM 00328290	SDNY GM 00328461	Misc. Photos	Confidential

<sup>1</sup> Files in PDF format designated as "confidential" under the protective order have been stamped "confidential." However, certain files cannot be individually labeled as confidential on the documents themselves due to their file format. Such files include in their electronic names the word "Confidential."

SDNY_GM_00328462	SDNY_GM_00328667	PBPD Materials	
SDNY_GM_00328668	SDNY_GM_00329968	PBPD Materials	Confidential
SDNY_GM_00329969	SDNY_GM_00330052	PBPD Materials	Highly Confidential
SDNY_GM_00330053	SDNY_GM_00332355	PBSA Materials	Confidential
SDNY_GM_00332356	SDNY_GM_00332436	Scans of FBI Evidence	
SDNY_GM_00332437	SDNY_GM_00332863	Scans of FBI Evidence	Confidential
SDNY_GM_00332864	SDNY_GM_00332869	Scans of FBI Evidence	Highly Confidential
SDNY_GM_00332870	SDNY_GM_00332871	Video from Florida Investigation	Highly Confidential
SDNY_GM_00332872	SDNY_GM_00332887	Videos from Florida Investigation	Confidential
SDNY_GM_00332888	SDNY_GM_00332890	SDFL Materials	Confidential
SDNY_GM_00332891	SDNY_GM_00332891	SDFL Materials	Highly Confidential
SDNY_GM_00332892	SDNY_GM_00332894	FBI Florida Documents	
SDNY_GM_00332895	SDNY_GM_00332928	FBI FL Documents (included with 328073-328092)	Confidential
SDNY_GM_00332943	SDNY_GM_00332958	3-D Blueprints, in PBPD Materials (included with 328462-328667)	
SDNY_GM_00332949	SDNY_GM_00356148	FBI FL Documents from Discs	Confidential and Highly Confidential

The Government recognizes that its discovery obligations are ongoing and will promptly produce any additional discoverable material of which it becomes aware. Please do not hesitate to reach out if you have any difficulty accessing these materials or if you wish to arrange a time to review physical items in the FBI's custody.

Very truly yours,

AUDREY STRAUSS  
Acting United States Attorney

by: [REDACTED]

Assistant United States Attorneys  
[REDACTED]