



U.S. Department of Justice

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BY ELECTRONIC MAIL

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

Dear Counsel:

This letter provides additional discovery pursuant to Rule 16(a) of the Federal Rules of Criminal Procedure ("Fed. R. Crim. P."). Based on your request for discovery in this case, today we are producing copies of the materials listed in the below index, which materials are stamped with control numbers SDNY_GM_000165541 through SDNY_GM_00174966. A reproduction of materials previously produced by the Government on August 12, 2020, which are stamped with control numbers SDNY_GM_00086557 through SDNY_GM_00096055 and SDNY_GM_00164920 through SDNY_GM_00165517 is also included. The materials are available for pickup at the U.S. Attorney's Office in Manhattan.

Materials stamped with control numbers SDNY_GM_00166247 through SDNY_GM_00166273, SDNY_GM_00167093 through SDNY_GM_00167097, SDNY_GM_00167911 through SDNY_GM_00167913, SDNY_GM_00174366 through SDNY_GM_00174369, and SDNY_GM_00174431 through SDNY_GM_00174458 have been designated as "highly confidential" because they contain nude, partially nude, or otherwise sexualized images of individuals. Consistent with the Protective Order in this case, the Government is only producing these "highly confidential" materials to defense counsel and is not producing these materials directly to the defendant.

Please note that both this letter and the enclosed materials are governed by the July 31, 2020 Protective Order in this case.¹ **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_00086557; SDNY_GM_00164920	SDNY_GM_00096055; SDNY_GM_00165517	Reproduction of Boies Schiller materials	Confidential
SDNY_GM_00165541	SDNY_GM_00165557	Emails	Confidential
SDNY_GM_00165558	SDNY_GM_00165924	Message pad scans	Confidential
SDNY_GM_00165925	SDNY_GM_00165981	NYPD computer checks	Confidential
SDNY_GM_00165982	SDNY_GM_00166006	Photos of Journal entries and people	Confidential
SDNY_GM_00166007	SDNY_GM_00166043	Search warrant scans	Confidential
SDNY_GM_00166044	SDNY_GM_00166190	Sentinel search warrant and arrest reports	Confidential
SDNY_GM_00166191	SDNY_GM_00169759	Search warrant photos	Confidential
SDNY_GM_00169760	SDNY_GM_00171456	Ghislaine Maxwell phone data	
SDNY_GM_00171457	SDNY_GM_00172215	Database searches	Confidential
SDNY_GM_00172216	SDNY_GM_00172217	Recordings from Jeffrey Epstein deposition; February 17, 2010	
SDNY_GM_00172218	SDNY_GM_00173008	FBI Florida Physical Evidence	Confidential
SDNY_GM_00173009	SDNY_GM_00173019	Ghislaine Maxwell New Hampshire Residence	
SDNY_GM_00173020	SDNY_GM_00173128	████████ Records	Confidential
SDNY_GM_00173129	SDNY_GM_00173156	Jeffrey Epstein arrest materials and statement	Confidential
SDNY_GM_00173157	SDNY_GM_00173876	Jeffrey Epstein properties	
SDNY_GM_00173877	SDNY_GM_00173944	Jeffrey Epstein travel and SORNA records	Confidential
SDNY_GM_00173945	SDNY_GM_00174213	████████ records	Confidential
SDNY_GM_00174214	SDNY_GM_00174966	Palm Beach Police Department and Florida Materials	Confidential

This production includes certain materials from the files of the Florida office of the Federal Bureau of Investigation (“FBI”). The Government notes that the remainder of the Florida FBI

¹ 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.”

files are loaded onto an electronic review platform and will be processed and produced on a rolling basis as part of electronic discovery.

Additionally, the Government notes that the physical items referenced in the productions to date can be made available for you to review at the FBI New York office, upon request. Those physical items include numerous hard copies of photographs and discs containing photographs, which were seized during searches of Jeffrey Epstein's residences. As a courtesy, the FBI is in the process of scanning those hard copy photographs and copying the photographs contained on the discs. Once that process is complete, the Government intends to produce electronic copies of any such photographs that do not contain highly confidential images. Any photographs among those physical items identified as highly confidential will be made available for review at the FBI New York office.

Finally, the Government wishes to inform you, as a courtesy, that it is in possession of a copy of the FBI's case file regarding the investigation of a former employee of Jeffrey Epstein's named [REDACTED] for obstruction of justice (the "[REDACTED] File"). The [REDACTED] File is maintained under a different FBI case number from the investigation that led to the charges against your client. The [REDACTED] File has no relation to your client and no bearing on the charges in this case. Accordingly, the Government does not intend to produce the [REDACTED] File because it is not discoverable in this case.

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]