



U.S. Department of Justice

*United States Attorney
Southern District of New York*

*The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007*

October 12, 2021

BY ELECTRONIC MAIL

Christian Everdell, Esq.

Mark Cohen, Esq.

Cohen & Gresser LLP

800 Third Avenue

New York, NY 10022

Laura Menninger, Esq.

Jeffrey Pagliuca, Esq.

Haddon, Morgan and Foreman, P.C.

150 East Tenth Avenue

Denver, CO 80203

Bobbi Sternheim, Esq.

Law Offices of Bobbi C. Sternheim

33 West 19th Street-4th Fl.

New York, NY 10007

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

Dear Counsel:

We write to notify you that the Government may seek to introduce certain evidence at trial. In particular, the Government may offer certain exhibits at trial that demonstrate that, in addition to the defendant's conduct with Jeffrey Epstein, the defendant took steps to provide other men with access to women. We are producing these proposed exhibits today, marked with the following exhibit numbers: [list].

In addition, please be advised that the Government may call [REDACTED] as a witness at trial. Today, we are producing Jencks Act materials relating to Ms. [REDACTED], who was employed by Jeffrey Epstein from approximately 2005-2006. The Government anticipates that Ms. [REDACTED] will testify about, among other things, certain documentary evidence relating to the charged crimes. The Government further anticipates that Ms. [REDACTED] will testify about her role in scheduling sexualized massages for Jeffrey Epstein with underage girls.

This evidence is admissible as direct evidence of the crimes charged and, in the alternative, pursuant to Rule 404(b) as proof of the defendant's intent, preparation, plan, knowledge, identity, and/or absence of mistake or accident with respect to the charges in the above-referenced case.

Please note that this letter and the information contained herein is governed by the July 31, 2020 Protective Order in this case. **This letter is itself designated as “confidential” under the Protective Order.**

Very truly yours,

AUDREY STRAUSS
United States Attorney

by: _____/s
[REDACTED]
[REDACTED]
[REDACTED]