



**U.S. Department of Justice**

*United States Attorney  
Southern District of New York*

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[REDACTED]

March 12, 2021

**BY ELECTRONIC MAIL**

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

Dear Counsel:

Today we are producing the materials listed in the below index. These discovery materials are stamped with control numbers SDNY\_GM\_02742963 through SDNY\_GM\_02743100. Please note that these are the materials that the Court directed the Government to disclose by today's date in an Order dated November 18, 2020 (Dkt. No. 73).

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:

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<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.

| Bates Start      | Bates End        | Summary Description  | Confidential Designation |
|------------------|------------------|--|--------------------------|
| SDNY_GM_02742963 | SDNY_GM_02743100 | Photographs and documents received from victims not referenced in Indictment No. S1 20 Cr. 330 | 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.

Very truly yours,

AUDREY STRAUSS  
United States Attorney

by:

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