

# **EXHIBIT 1**



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

April 23, 2021

**BY ELECTRONIC MAIL**

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

Dear Counsel:

Pursuant to Rule 16(a)(1)(G) of the Federal Rules of Criminal Procedure, the Government hereby provides notice that it may call as an expert witness at trial [REDACTED], a clinical [REDACTED].

The Government reserves the right to call additional expert witnesses and will promptly provide notice if the Government elects to do so.

**I. Disclosure by the Government**

[REDACTED]

█. █ expected testimony relies on her education and training on psychological trauma, traumatic stress, interpersonal violence, and sexual abuse. It also relies on █. █ extensive clinical experience treating individuals who suffered sexual abuse and trauma in childhood and adolescence, as well as █. █ experience conducting forensic psychological evaluations of people who have experienced sexual abuse and trauma. The Government is producing notes from the Government's interviews with █. █ today as well.

In light of your request for the foregoing notice, the Government hereby requests reciprocal notice under Rule 16(b)(1)(C) of the Federal Rules of Criminal Procedure regarding any expert witness that the defendant intends to rely upon, including a written summary of any testimony that the defendant intends to use under Rules 702, 703, or 705 of the Federal Rules of Evidence, as well as the witness's qualifications.

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Additionally, the Government reiterates its August 5, 2020 request for reciprocal discovery under Fed. R. Crim. P. 16(b). Specifically, we request that you allow inspection and copying of: (1) any books, papers, documents, data, photographs, tangible objects, buildings or places, or copies or portions thereof, which are in the defendant's possession, custody or control, and which the defendant intends to introduce as evidence or otherwise rely on at trial; and (2) any results or reports of physical or mental examinations and of scientific tests or experiments made in connection with this case, or copies thereof, which are in the defendant's possession or control, and which the defendant intends to introduce as evidence or otherwise rely on at trial or which were prepared by a witness whom the defendant intends to call at trial.

The Government also reiterates its August 5, 2020 request that the defendant disclose prior statements of witnesses she will call to testify, including expert witnesses. *See* Fed. R. Crim. P. 26.2; *United States v. Nobles*, 422 U.S. 225 (1975). The Government requests that such material be provided on the same basis upon which the Government agrees to supply the defendant with 3500 material relating to Government witnesses.

Very truly yours,

AUDREY STRAUSS  
United States Attorney

by: /s/

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[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
Assistant United States Attorneys  
[REDACTED]