



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*

March 29, 2021

BY ELECTRONIC MAIL



New York, NY 10022



Denver, CO 80203



New York, NY 10007

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

Dear Counsel:

In light of the return of superseding indictment S2 20 Cr. 330 (AJN) (the “S2 Indictment”), the Government writes to provide you with information regarding the individual identified as Minor Victim-4 in the S2 Indictment. Please note that both this letter is governed by the July 31, 2020 Protective Order in this case. **This letter is itself designated as “confidential,” because it includes information regarding records designated as “confidential” under the Protective Order.** Minor Victim-4 was born in [REDACTED].

To assist you in identifying portions of the discovery materials that are relevant to the new allegations contained in the S2 Indictment, below please find a list of certain Bates ranges that relate to Minor Victim-4, which were already produced to you. Please note that this list, which is being provided to you as a courtesy, is not exhaustive and does not include every portion of discovery that is relevant Minor Victim-4.

- [REDACTED]
- [REDACTED]
- [REDACTED]

Very truly yours,

AUDREY STRAUSS
United States Attorney

by:

Assistant United States Attorneys