



**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*

August 5, 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:

Today we are producing the materials listed in the below index. These discovery materials are stamped with control numbers SDNY\_GM\_02753644 through SDNY\_GM\_02753697.

Please note that both this letter and the enclosed materials are 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.** Recently, the Department of Justice directed this office to cease the dissemination of materials marked with the word “confidential” in order to avoid potential confusion with markings reserved for classified documents. Accordingly, in order to note the appropriate designation of this production under the operative Protective Order in this case, the materials being produced today are marked with the following label: “SUBJECT TO PROTECTIVE ORDER PARAGRAPHS 7, 8, 9, 10, 15, and 17.” This marking directly refers to the specific paragraphs of the Protective Order that govern today’s production.

An index of the materials contained in this production is below:

<b>Bates Start</b>	<b>Bates End</b>	<b>Summary Description</b>	<b>Confidential Designation</b>
SDNY GM 02753644	SDNY GM 02753684	Files Recovered from Discs Seized from Epstein NY Residence	Confidential
SDNY GM 02753685	SDNY GM 02753692	De-Designated Images from Epstein's Electronic Devices	Confidential
SDNY GM 02753693	SDNY GM 02753695	Missouri Records	Confidential
SDNY GM 02753696	SDNY GM 02753696	JPMorgan Chase Return	Confidential
SDNY GM 02753697	SDNY GM 02753697	Oxford Letter, 11-07-1995	Confidential

Please note that the files recovered from discs seized from Jeffrey Epstein's New York residence and the De-Designated Images from Epstein's Electronic Devices are being produced to you with html files that contain thumbnails of each image and any recovered metadata next to each thumbnail. In order to view the full size image from a particular row in the html file, click on the thumbnail, which will automatically open up the full size image from within the folder structure maintained in the folder entitled "Files." Use of these html files does not require Internet access, but does require that the file structure within the folder entitled "Files" remain unchanged.

Additionally, certain of the files that were recovered from the discs seized from Epstein's New York residence are not viewable on the FBI's system. In the interest of completeness, however, we are producing to you every file that was recovered from those discs, including those that are not openable or viewable.

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,

[REDACTED]  
 United States Attorney  
 [REDACTED]  
 by: [REDACTED]  
 [REDACTED]  
 [REDACTED]  
 [REDACTED]  
 Assistant United States Attorneys  
 [REDACTED]