



**U.S. Department of Justice**

*United States Attorney  
Southern District of New York*

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*The Silvio J. Mollo Building  
One Saint Andrew's Plaza  
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October 11, 2021

**BY ELECTRONIC MAIL**

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

Dear Counsel:

Pursuant to Judge Nathan's Order of September 3, 2021 (Dkt. No. 335), the Government writes to inform you that it may refer at trial to the following individuals as co-conspirators of the defendant, including for the purpose of Fed. R. Evid. 801(d)(2)(E):

- Jeffrey Epstein
- [REDACTED]
- [REDACTED], formerly known as [REDACTED]

The Government has produced all co-conspirator statements which it intends to offer at trial pursuant to Fed. R. Evid. 801(d)(2)(E) in the Government's production today or in its previous productions. To the extent the Government learns of additional co-conspirator statements as it continues to prepare for trial, it will produce those statements in connection with its ongoing obligation to produce Jencks Act material.

Please be advised that the above list is limited to the individuals the Government may refer to as co-conspirators at trial. While the Government makes no representations as to whether it views other individuals as potential or actual co-conspirators of the defendant, it does not intend to refer to any other individuals as co-conspirators at trial. The above list is also not intended to reflect a complete list of individuals who may be referenced at trial. That information is contained in the Government's Jencks Act production(s).

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,

DAMIAN WILLIAMS  
United States Attorney

By: s/ \_\_\_\_\_

[REDACTED]  
[REDACTED]  
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