



**U.S. Department of Justice**

*United States Attorney  
Southern District of New York*

*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:

Today the Government is producing materials, including Jencks Act and *Giglio* material, regarding the witnesses who may be called to testify at trial in the above-referenced case. Enclosed please find an index detailing the materials included in today's production.

The Government notes that the records stamped 3522-004 reflect that [REDACTED] testified in the grand jury in connection with the investigation conducted by the Palm Beach State's Attorney's Office, but the clerk of court has confirmed to the Government that the audio files are unplayable and, therefore, there is no record of [REDACTED] grand jury testimony.

The Government is also producing today certain materials relating to individuals the Government does not currently intend to call as witnesses at trial in the above-referenced case. These materials do not contain a comprehensive set of Jencks Act and *Giglio* materials, as the Government does not expect to call these individuals to testify at trial. Instead, these materials contain, among other things, certain witness statements. Enclosed please find an index detailing these materials. This production should not be taken to indicate that the Government believes it

has any obligation to provide all of these materials; rather, we make this production as a courtesy. Moreover, although the Government presently does not intend to call the individuals listed in the enclosed index, we reserve the right to do so and will notify you should the Government determine that it intends to call any of these individuals at trial.

The Government wishes to highlight for you a particular portion of statements made by non-testifying witness [REDACTED] about Minor Victim-4. In particular [REDACTED] has previously stated to law enforcement, in sum and substance, that Minor Victim-4 introduced [REDACTED] to Jeffrey Epstein and instructed [REDACTED] to tell Epstein that [REDACTED] was 18 years old. These statements by [REDACTED] are contained in the Government's non-testifying witness productions, including in the first such production dated April 12, 2021 (see, e.g., 3501.149-023 at 1; 3501.149-026 at 9; and 3501.149-024 between approximately timestamp 04:20 and timestamp 07:30).

Please note that this letter, the enclosed indices, and the enclosed materials are governed by the July 31, 2020 Protective Order in this case. **In particular, the entire production is designated as "confidential" under the Protective Order. The index is itself designated as "confidential," because it includes information regarding records designated as "confidential" under the Protective Order.** 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.

Additionally, please note that many of the individuals referenced in this production are represented by counsel, as detailed in the enclosed indices. The Government reserves its right to amend and supplement these disclosures.

The Government also writes to notify you of the following matters regarding certain witnesses that the Government may call to testify at trial in the above-referenced case:

- [REDACTED]
  - The FBI provided transportation to and from the airport for trial preparation sessions. The FBI will similarly provide transportation for [REDACTED] when she travels to New York for trial testimony.
  - The U.S. Attorney's Office for the Southern District of New York (the "USAO SDNY") paid for travel to and from a trial preparation session, including hotel expenses. The USAO SDNY will similarly pay travel and hotel expenses when [REDACTED] travels to New York to testify at trial.
  - The USAO SDNY paid for [REDACTED] to accompany [REDACTED] for trial preparation sessions in New York. The USAO SDNY will similarly pay for [REDACTED] to accompany [REDACTED] to New York in connection with trial.

- The USAO SDNY paid for a car to take [REDACTED]  
[REDACTED]
- The FBI provided meals and snacks to [REDACTED] during trial preparation sessions.
- [REDACTED]
  - The USAO SDNY will pay travel and hotel expenses when [REDACTED] travels to New York to testify at trial.
- [REDACTED]
  - The USAO SDNY paid for [REDACTED] to travel to and from a witness interview with the Government in New York, including hotel expenses. The USAO SDNY will similarly pay travel and hotel expenses when [REDACTED] travels to New York to testify at trial.
- [REDACTED]
  - The USAO SDNY paid for travel to and from an August 2019 court hearing before Judge Berman, including hotel expenses.
  - The FBI paid for therapy sessions for [REDACTED]
  - The USAO SDNY will pay travel and hotel expenses when [REDACTED] travels to New York to testify at trial.
- [REDACTED]
  - The USAO SDNY paid for [REDACTED] to travel to and from a trial preparation session in New York.
  - The USAO SDNY will pay travel and hotel expenses when [REDACTED] travels to New York to testify at trial.
- [REDACTED]
  - The FBI provided transportation to and from the airport for trial preparation sessions. The FBI will similarly provide transportation for [REDACTED] for trial testimony.
  - The USAO SDNY paid for travel to and from a trial preparation session in New York, including hotel expenses. The USAO SDNY will similarly pay travel and hotel expenses when [REDACTED] travels to New York to testify at trial.
  - The USAO SDNY paid for lunch for [REDACTED] during trial preparation sessions that took place at mealtimes.
- [REDACTED]
  - The FBI has paid for transportation for [REDACTED] by car to and from trial preparation sessions.

- The USAO SDNY will pay travel and hotel expenses when [REDACTED] travels to New York to testify at trial.
- The USAO SDNY provided a letter to [REDACTED] employer confirming dates of trial preparation sessions and has agreed to similarly provide a letter to his employer regarding dates of future trial preparation sessions and trial testimony.
- [REDACTED]
  - The USAO SDNY paid for [REDACTED] to travel to and from a trial preparation session in New York, including hotel expenses. The USAO SDNY will similarly pay travel and hotel expenses when [REDACTED] travels to New York to testify at trial.
- [REDACTED]
  - The USAO SDNY paid for [REDACTED] to travel to and from two trial preparation sessions in New York, including hotel expenses. The USAO SDNY will similarly pay travel and hotel expenses when [REDACTED] travels to New York to testify at trial.
- [REDACTED]
  - The USAO SDNY paid for [REDACTED] to travel to and from a trial preparation session in New York, including hotel expenses. The USAO SDNY will similarly pay travel and hotel expenses when [REDACTED] travels to New York to testify at trial.
- The FBI offered the services of FBI victim specialists to all victims, including [REDACTED]. The victim services offered included counseling, assistance with finding appropriate therapy, and assistance with determining available public benefits and other resources available to crime victims.
- The USAO SDNY has offered—or will offer—to provide transportation to and/or from and hotel accommodations in New York City in connection with the trial testimony of the witnesses the Government anticipates testifying at the trial. Such arrangements have not yet been finalized. The USAO SDNY anticipates that it will pay travel and hotel expenses for trial testimony for at least the following individuals:  




Very truly yours,

DAMIAN WILLIAMS  
United States Attorney

by: s/ \_\_\_\_\_

 Assistant United States Attorneys

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