

# **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

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

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.

