



U.S. Department of Justice

United States Attorney
Southern District of New York

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BY ELECTRONIC MAIL

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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_02762507 through SDNY_GM_02763017.

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.** 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:

Bates Start	Bates End	Summary Description	Confidential Designation
SDNY GM 02762507	SDNY GM 02762567	SDFL files ¹	
SDNY GM 02762568	SDNY GM 02762569	JPMC documents ²	
SDNY GM 02762570	SDNY GM 02762637	Database files (Ghislaine Maxwell)	
SDNY GM 02762638	SDNY GM 02762663	Database files (Jeffrey Epstein)	
SDNY GM 02762664	SDNY GM 02762775	FAA records	Confidential
SDNY GM 02762776	SDNY GM 02762776	FedEx records	Confidential
SDNY GM 02762777	SDNY GM 02762831	Miscellaneous	
SDNY GM 02762832	SDNY GM 02763004	Miscellaneous	Confidential
SDNY GM 02763005	SDNY GM 02763007	Photographs	
SDNY GM 02763008	SDNY GM 02763016	Photographs	Confidential
SDNY GM 02763017	SDNY GM 02763017	Photos of Palm Beach House	

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,

AUDREY STRAUSS
United States Attorney

by: s/ _____

Assistant United States Attorneys

¹ We are unable to view these files, as they are either corrupt or we do not have the requisite software to view them, but we are producing these files to you in an abundance of caution.

² We are unable to view the JPMC files, which we understand to be from FBI in Florida. The two files are password protected, but we are producing these files to you in an abundance of caution.