

# **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**

Christian Everdell, 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:

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.

