



Christian R. Everdell
[REDACTED]

December 28, 2020

BY EMAIL

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United States Attorney's Office
Southern District of New York
1 St. Andrew's Plaza
New York, NY 10007

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

Dear Counsel:

On behalf of our client, Ghislaine Maxwell, we hereby request that the government file a Bill of Particulars pursuant to Rule 7(f) of the Federal Rules of Criminal Procedure. Please let us know by January 4, 2021 whether it will be necessary to raise any aspect of this request with the Court.

We request clarification of the allegations specified below in order to permit Ms. Maxwell to prepare her defense and avoid unfair surprise at trial. *See United States v. Bortnovsky*, 820 F.2d 572, 574 (2d Cir. 1987). The Superseding Indictment does not sufficiently inform Ms. Maxwell of the specific conduct of which she is accused. Accordingly, we request the following particulars regarding the indicated paragraphs of the Superseding Indictment:

1. Please provide the full names and full birthdays of the individuals identified in the Superseding Indictment as Minor Victims-1-3 (¶¶ 7, 11, 13, 17, 19).
2. Please identify the dates when, and locations where, Ms. Maxwell allegedly met and/or interacted with Minor Victim-1 (¶ 7a).
3. Please identify the dates when, and locations where, Ms. Maxwell allegedly "groomed" Minor Victim-1 "to engage in sexual acts with Epstein" (¶ 7a).
4. Please identify the dates when, and locations where, Jeffrey Epstein allegedly sexually abused Minor Victim-1 (¶ 7a).

5. Please identify the dates when, and locations where, Ms. Maxwell allegedly “was present for and involved in” Epstein’s sexual abuse of Minor Victim-1 (§ 7a).
6. Please identify the dates when, and locations where, Minor Victim-1 participated in “group sexualized massages” of Epstein (§ 7a).
7. Please describe with particularity the conduct that the government contends is a “group sexualized massage” and identify the criminal statute(s) the conduct allegedly violates and the other participants in those massages (§ 7a).
8. Please describe with particularity how Ms. Maxwell allegedly “involved” Minor Victim-1 in these massages and how Ms. Maxwell allegedly participated in these massages (§ 7a).
9. Please identify the dates when Minor Victim-1 allegedly traveled “across state lines for the purpose of sexual encounters with Epstein” (§ 7a).
10. Please identify the dates when Ms. Maxwell allegedly enticed Minor Victim-1 “to travel across state lines for the purpose of sexual encounters with Epstein” and describe with particularity the actions that Ms. Maxwell allegedly took to entice Minor Victim-1 to travel (§ 7a).
11. Please identify the dates when, and locations where, Ms. Maxwell allegedly met and/or interacted with Minor Victim-2 (§ 7b).
12. Please identify the dates when Minor Victim-2 allegedly traveled across state lines to and from New Mexico in 1996 (§ 7b).
13. Please identify the dates when Ms. Maxwell allegedly “groomed” Minor Victim-2 to engage in “acts of sexual abuse” with Epstein (§ 7b).
14. Please describe with particularity what Ms. Maxwell allegedly did as part of the “unsolicited massage” of Minor Victim-2 and identify the criminal statute(s) the conduct allegedly violates (§ 7b, 11c, 17c).
15. Please identify the dates when, and locations where, Ms. Maxwell allegedly met and/or interacted with Minor Victim-3 (§ 7c).
16. Please identify the dates when, and locations where, Ms. Maxwell allegedly introduced Minor Victim-3 to Epstein and the dates and locations of their subsequent “multiple interactions” (§ 7c).

17. Please identify the dates when, and locations where, Ms. Maxwell allegedly “groomed” Minor Victim-3 to engage in sex acts with Epstein (§ 7c).
18. Please identify the dates when, and locations where, Jeffrey Epstein allegedly sexually abused Minor Victim-3 (§ 7c).
19. Please describe with particularity the “sex acts” that Minor Victim-3 allegedly engaged in with Epstein during massages and identify the criminal statute(s) the conduct allegedly violates and the other participants in those massages (§ 7c).
20. Please identify the dates when Minor Victim-3 allegedly traveled in interstate or foreign commerce to engage in illegal sexual activity with Epstein (§ 7c).
21. Please specify when the conspiracies charged in Count One and Count Three began and ended. (§§ 9, 15).
22. Please identify the “others” who allegedly participated in the conspiracies charged in Count One and Count Three with Epstein and Ms. Maxwell. (§§ 9-10, 15-16).
23. Please identify any individuals who were enticed to travel, or were transported, in interstate or foreign commerce to engage in illegal sexual activity with Epstein during the time period of the charged conspiracies (1994-1997), apart from Minor Victims-1-3 (§ 10, 16).
24. Please identify the dates when, and the locations where, Ms. Maxwell participated in “group sexualized encounters” with Jeffrey Epstein and Minor Victim-1 (§§ 11a, 17a).
25. Please describe with particularity the conduct that the government believes constitutes a “group sexualized encounter” and identify the criminal statute(s) the conduct violates and the participants in those encounters (§§ 11a, 17a).
26. Please identify who allegedly enticed Minor Victim-1 to travel from Florida to New York in 1996 (§§ 11b, 17b).
27. Please identify from whom Ms. Maxwell was allegedly trying to “conceal her crimes” when she allegedly lied under oath in depositions in 2016 (§ 2).
28. Please identify “the specific events and acts of abuse” about which Ms. Maxwell allegedly “repeatedly provided false and perjurious statements” (§ 8).

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29. As to each statement alleged to be perjurious in Counts Five and Six of the Superseding Indictment please specify why the Government contends the statement was material (§§ 21, 23).

Thank you in advance for your prompt response to these requests.

Sincerely,

/s/ Christian Everdell
Christian R. Everdell
COHEN & GRESSER LLP

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cc: Mark S. Cohen, Esq.
Jeff Pagliuca, Esq.
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