

**From:** "[REDACTED]" <[REDACTED]>  
**To:** "[REDACTED]" <[REDACTED]>  
**Cc:** "[REDACTED]" <[REDACTED]>, "[REDACTED]" <[REDACTED]>, "[REDACTED]" <[REDACTED]>, "[REDACTED]" <[REDACTED]>

**Subject:** RE: SDNY PRESS GUIDANCE | U.S. v. GHISLAINE MAXWELL, TUESDAY, NOVEMBER 23, 2021

**Date:** Wed, 24 Nov 2021 20:47:26 +0000

**Inline-Images:** image001.png

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[+ [REDACTED], who has graciously offered to stay on an extra week or two to help me with this trial.]

You're very welcome, as always. I plan on following up this Friday, with an email to list the charges and max she faces, I can add that further guidance as to the non-victim witnesses as well.

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**From:** [REDACTED] <[REDACTED]>  
**Sent:** Wednesday, November 24, 2021 3:34 PM  
**To:** [REDACTED]  
**Cc:** [REDACTED]; [REDACTED] <[REDACTED]>; [REDACTED]; [REDACTED]  
**Subject:** RE: SDNY PRESS GUIDANCE | U.S. v. GHISLAINE MAXWELL, TUESDAY, NOVEMBER 23, 2021

Hey [REDACTED],

Thanks for sending this, we really appreciate the efforts about victim anonymity. I wanted to flag for your awareness: there will also be witnesses who are not victims, but who are testifying under pseudonyms because identifying them would identify victims. I would think the media policies about that would be the same, but I wanted to let you know in case you get press inquiries about those witnesses.

Thanks!

[REDACTED]  
Assistant United States Attorney  
Southern District of New York  
One Saint Andrew's Plaza  
New York, NY 10007  
[REDACTED]

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**From:** [REDACTED] <[REDACTED]>  
**Sent:** Wednesday, November 24, 2021 3:21 PM  
**To:** [REDACTED] <[REDACTED]>; [REDACTED] <[REDACTED]>; [REDACTED] <[REDACTED]>; [REDACTED] <[REDACTED]>  
**Subject:** FW: SDNY PRESS GUIDANCE | U.S. v. GHISLAINE MAXWELL, TUESDAY, NOVEMBER 23, 2021  
**Importance:** High

Also wanted to be sure you saw this guidance note, which I thought was helpful. I asked [REDACTED] to copy you guys but can't see if he did.

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**From:** [REDACTED] >  
**Sent:** Tuesday, November 23, 2021 8:24 AM  
**Cc:** [REDACTED] >  
**Subject:** SDNY PRESS GUIDANCE | U.S. v. GHISLAINE MAXWELL, TUESDAY, NOVEMBER 23, 2021  
**Importance:** High

In order meet the demand for the high volume of media requests we are already receiving, the following guidance is being provided in advance of the trial to ensure efficient communications. Please take careful note.



## UNITED STATES ATTORNEY'S OFFICE *Southern District of New York*

### PRESS GUIDANCE

Tuesday, November 23, 2021

***\*OFF-THE-RECORD, AND FOR GUIDANCE ONLY:*** *Several of the government's anticipated witnesses will be testifying in this trial using a pseudonym or first name. The Court granted a Government motion [attached] requesting that they be able to do so, because the victim witnesses are expected to describe alleged sensitive, explicit and personal events concerning illegal sexual abuse, sexual contact and other acts of which they have been victims. I believe most, if not all, news media outlets have a policy against identifying sex crime victims without their consent, and urge you to abide by that policy with our witnesses and respect their privacy.*

9:30 a.m. – Final pretrial conference U.S. v. [Ghislaine Maxwell](#) – the defendant is charged in connection to conspiring with Jeffrey Epstein to entice minors to travel to engage in criminal sexual activity – before Judge Alison Nathan (Courtroom 318, 40 Foley Square [overflow Courtrooms 110, 506, 905, and 906 of the Thurgood Marshall U.S. Courthouse]).

**EXHIBITS:** Government exhibits will be **provided exclusively through the [SDNY file share](#)**. If you are unable to access [this link to the file share](#) (USAFx), you must establish an account to access the files. To establish an account, request access by email to me or my colleague, Jim Margolin, Cc'd here, prior to Wednesday, November 29, 2021.

Please also note that all case filings in U.S. v. Maxwell are available in the Court's electronic filing system; we encourage media representatives to establish a free [PACER](#) account, if they have not done so already. Credentialing and other matters relating to in-person attendance for the trial are handled by the SDNY District Executive's Office.

Periodic updates to follow.

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**\*\*\* FOR PLANNING PURPOSES ONLY \*\*\***

**DO NOT REPLY TO THIS MESSAGE. IF YOU HAVE QUESTIONS, PLEASE CALL THE PRESS OFFICE AT [\(212\) 637-2600](#).**