

To Whom It May Concern:

This request is for records relating to two cases in the United States District Court, Southern District Of New York:

- 1) [REDACTED] v. Ghislaine Maxwell 15-cv-7433 (LAP) and
- 2) United States v. Ghislaine Maxwell, 20 Cr. 330 (AJN).

The records pertain to Ghislaine Noelle Marion Maxwell (hereafter "GM"), born 25 December 1961 in Maisons-Laffitte, France, and currently held at the federal Metropolitan Detention Center in Brooklyn, New York. It is also for records pertaining to Jeffrey Edward Epstein (hereafter "JE"), born January 20, 1953 in Brooklyn, New York, and deceased August 10, 2019 in the federal Metropolitan Correctional Center New York.

Please forward this request, or relevant parts of this request to the appropriate components of the Department of Justice. I am also submitting directly to the Civil and Criminal components.

Please tell me in advance what the reasonable costs or cost estimate for research, reproduction, and delivery will be. If the requested records cannot be sent digitally due to the volume of records identified in response to my request, please advise me of the actual cost of copying all records onto a hard drive, CD, DVD, or other delivery method.

If my request is too broad or does not reasonably describe the records, please contact me via email so that I may clarify my request, and when appropriate, inform me of the manner in which records are filed, retrieved or generated.

If it is necessary to modify my request, an email response with an explanation and description of modifications is preferred.

If for any reason any portion of my request is denied, please inform me of the reasons for the denial in writing via email and provide the name, address and email address of the person or body to whom an appeal should be directed.

For the below events, I am requesting audio, video, photographic, and/or other still image records including but not limited to diagrams and drawings, as well as all transcripts and other metadata, physical or digital, associated with these audio-visual records.

- A. Any other 911 calls regarding JE or GM.
- B. All phone calls, interviews, or other recorded conversations with victims and possible victims of JE and/or GM.
- C. All phone calls, interviews, or other recorded conversations with the parents and other relatives of victims and possible victims of JE and/or GM.
- D. All phone calls, interviews, or other recorded conversations with witnesses and possible witnesses of JE and/or GM.
- E. Surveillance photographs, audio, and video of JE, GM, their properties, or their associates.
- F. All phone calls, interviews, or other recorded conversations with JE or GM, or representatives of JE or GM.
- A. All audio, video, photographs, or drawings of JE and GM, including depositions, subpoenas, or other interviews gathered during investigation or prosecution efforts.

News Media Requesters Classification and Expedition Request:

I request that I be properly classified as a news media requester and that this request be expedited as I am a full-time member of a media team primarily engaged in disseminating information. I am an Archival Producer for Blue Ant Media, and I am requesting this information in that editorial capacity.

Blue Ant Media is widely recognized for its documentaries, regularly producing broadcasts of public interest and importance, such as the Netflix series Bobby Kennedy for President and The Disappearance of Madeleine McCann and many other titles for major broadcasters and streamers.

<https://www.netflix.com/title/80174282>

<https://www.netflix.com/title/80194956>

Our request should be expedited for the following reasons:

1. The case we are requesting records from is one of importance to the American public.

<https://www.vox.com/2020/7/2/21311343/ghislaine-maxwell-arrest-jeffrey-epstein>

2. This is a breaking news story:

<https://news.sky.com/story/ghislaine-maxwell-loses-fight-to-prevent-evidence-about-her-personal-life-being-used-in-epstein-trial-12108844>

3. This relates to a federal investigation and court case.

If you have any questions about my media status, please contact me.

I am not asking for a fee waiver.

Thank you for reviewing this request. I look forward to hearing back from you about the status and am available via email at any time to discuss any issues or questions.

Sincerely,

Kevina Tidwell

Archival Producer, Blue Ant Media

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