

**From:** [REDACTED]  
**To:** [REDACTED]  
**Cc:** [REDACTED]

**Subject:** Re: Sixth Production  
**Date:** Mon, 09 Nov 2020 22:37:58 +0000

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Thanks! Please add the following language:

The Government recognizes its obligations under *Brady v. Maryland*, 373 U.S. 83 (1963), and its progeny. Pursuant to those obligations, we are disclosing the information below. This disclosure should not be taken to indicate that the Government believes the enclosed information constitutes *Brady* material. Rather, we make this disclosure in an abundance of caution. Specifically, the Government discloses the following:

- During the Palm Beach Department’s investigation of Jeffrey Epstein in 2005, a witness (“Witness-1”) disclosed to detectives that Epstein had paid Witness-1 to bring girls for sexualized massages, and that Epstein told her: “the younger the better.” Witness-1 described bringing multiple girls who were under the age of eighteen to Epstein’s residence in Florida. Witness-1 remarked of Epstein: “He likes the girls that are between the ages of 18 and 20.” Witness-1 is represented by Rita Glavin, Esq.

Sent from my iPhone

On Nov 9, 2020, at 5:27 PM, [REDACTED] wrote:

Hi all,

[REDACTED] if you have not yet added that paragraph, I wanted to send the cover letter with the updated indexes so you could review and work off of this version. I noted whether the device contained images or videos or both, and I added Maxwell’s entire index to the end of the cover letter. I’m more than happy to change anything as needed!

Thanks,  
[REDACTED]

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**From:** [REDACTED]  
**Sent:** Monday, November 9, 2020 5:14 PM  
**To:** [REDACTED]  
**Cc:** [REDACTED]

**Subject:** RE: Sixth Production  
Good catch, thanks, [REDACTED] Would you please add in that paragraph (I’m not sure where to find it)? Letter is saved here:  
[REDACTED]

**From:** [REDACTED]  
**Sent:** Monday, November 9, 2020 4:46 PM  
**To:** [REDACTED]  
**Cc:** [REDACTED]

<[REDACTED]>  
**Subject:** Re: Sixth Production

Thanks! I think there was just the [REDACTED] disclosure— if that paragraph hasn't already gone in a recent discovery letter, it should go in this one.

Sent from my iPhone

On Nov 9, 2020, at 4:36 PM, [REDACTED] wrote:

Thanks so much, [REDACTED]. Attached is a revised draft of the letter. As we discussed, please double-check the index for which devices had just images, and correct those rows accordingly. You can go ahead and load all the iPhone materials onto the drive.

[REDACTED] any edits before this letter goes out? I don't think there was anything else substantive we needed to add, but let me know if I'm forgetting something.

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**From:** [REDACTED]

**Sent:** Monday, November 9, 2020 2:07 PM

[REDACTED]

**Subject:** Sixth Production

Hi all!

Great news – after I've reviewed, the drive going to defense today has all the required items for production! I believe we will be uploading NYC024318 1B71 (iPhone) to this drive (and I've noted the tentative bates number for that on the index, attached here and updated on the shared, and in the cover letter, attached) – but other than that, we are all set. I've attached a (very basic) cover letter for defense, for your review and relevant additions. Since we are reproducing so much to MDC, I also created a unique index for the MDC drive on the shared index. I can attach that chart to defense's cover letter when it goes out, if that would be helpful, or I can just keep the MDC index section for our internal organization.

[REDACTED] is still working on copying the MDC drive. Hopefully we'll have an update soon. I'm happy to make any changes within the cover letter and/or index as necessary. Thank you all!

[REDACTED]  
Paralegal Specialist  
U.S. Attorney's Office | SDNY  
1 St. Andrew's Plaza  
New York, NY 10007

[REDACTED]

<2020.11.09 Maxwell Discovery Letter.docx>

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