



U.S. Department of Justice

United States Attorney
Southern District of New York

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BY ELECTRONIC MAIL

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

Dear Counsel:

We write to notify you that the Government may seek to introduce certain evidence at trial. In particular, the Government may offer certain exhibits at trial that demonstrate that, in addition to the defendant's conduct with Jeffrey Epstein, the defendant took steps to please other influential men by providing them with access to women she selected for them. For example, in one email, the defendant made arrangements for the Duke of York to be introduced to "pretty" girls for, as the defendant called it, "2 legged sight seeing." In another email, the defendant told Doug Band that she was arranging a dinner for him and a [REDACTED] and a [REDACTED]. We are producing these proposed exhibits today, marked with the following exhibit numbers: GX 401 through 404, GX 409 through 410, and GX 413.

In addition, please be advised that the Government may call [REDACTED] as a witness at trial. Today, we are producing Jencks Act materials relating to Ms. [REDACTED] who was employed by Jeffrey Epstein from approximately 2005-2006. The Government anticipates that Ms. [REDACTED] will testify about, among other things, certain documentary evidence relating to the charged crimes. The Government further anticipates that Ms. [REDACTED] will testify [REDACTED]

This evidence is admissible as direct evidence of the crimes charged and, in the alternative, pursuant to Rule 404(b) as proof of the defendant's intent, preparation, plan, knowledge, identity, and/or absence of mistake of accident with respect to the charges in the above-referenced case. Because this evidence is admissible as direct evidence, the Government is not planning to affirmatively move *in limine* to seek its admission.

Please note that this letter and the information contained herein is governed by the July 31, 2020 Protective Order in this case. **This letter is itself designated as "confidential" under the Protective Order.**

Very truly yours,

DAMIAN WILLIAMS
United States Attorney

by: _____ /s
[REDACTED]
[REDACTED]
[REDACTED]
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[REDACTED]