



U.S. Department of Justice

United States Attorney
Southern District of New York

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September 29, 2020

BY ELECTRONIC MAIL

Christian Everdell, Esq.
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Laura Menninger, Esq.
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Haddon, Morgan and Foreman, P.C.

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

Dear Counsel:

This letter provides additional discovery pursuant to Rule 16(a) of the Federal Rules of Criminal Procedure ("Fed. R. Crim. P."). Based on your request for discovery in this case, today we are producing copies of the materials listed in the below index, which materials are stamped with control numbers SDNY_GM_000174967 through SDNY_GM_00328069. The materials are available for pickup at the U.S. Attorney's Office in Manhattan.

Please note that both this letter and the enclosed materials are governed by the July 31, 2020 Protective Order in this case.¹ **This letter is itself designated as "confidential," because it includes information regarding records designated as "confidential" under the Protective Order.**

An index of the materials contained in this production is below:

¹ Files in PDF format designated as "confidential" under the protective order have been stamped "confidential." However, certain files cannot be individually labeled as confidential on the documents themselves due to their file format. Such files include in their electronic names the word "Confidential."

Bates Start	Bates End	Summary Description	Confidential Designation
SDNY GM 00174967	SDNY GM 00270985	Deutsche Bank records	Confidential
SDNY GM 00270986	SDNY GM 00323934	JPMorgan Chase records	Confidential
SDNY GM 00323935	SDNY GM 00324015	GM Documents	
SDNY GM 00324016	SDNY GM 00324036	Citibank records for Ghislaine Maxwell	
SDNY GM 00324037	SDNY GM 00325754	UBS records for Angara Trust, Montepelier Trust, Terramar Project, Inc., Max Foundation, Ghislaine Maxwell, Ghislaine Maxwell IRA, & Ellmax, LLC	
SDNY GM 00325755	SDNY GM 00325761	LSJ Scene2Go	
SDNY GM 00325762	SDNY GM 00328069	American Express records for Jeffrey Epstein and Ghislaine Maxwell	Confidential

Please do not hesitate to reach out if you have any difficulty accessing these materials or if you wish to arrange a time to review physical items in the FBI's custody.

Very truly yours,

[REDACTED]

Acting United States Attorney

by:

[REDACTED]

Assistant United States Attorneys

[REDACTED]