



U.S. Department of Justice

United States Attorney  
Southern District of New York

The Silvio J. Mollo Building  
One Saint Andrew's Plaza  
New York, New York 10007

October 4, 2021

**BY ELECTRONIC MAIL**

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

Dear Counsel:

Today we are producing the materials listed in the below index. These discovery materials are stamped with control numbers SDNY\_GM\_02762476 through SDNY\_GM\_02762506.

Please note that both this letter and the enclosed materials are governed by the July 31, 2020 Protective Order in this case. **This letter is itself designated as “confidential,” because it includes information regarding records designated as “confidential” under the Protective Order.** Recently, the Department of Justice directed this office to cease the dissemination of materials marked with the word “confidential” in order to avoid potential confusion with markings reserved for classified documents. Accordingly, in order to note the appropriate designation of this production under the operative Protective Order in this case, the materials being produced today are marked with the following label: “SUBJECT TO PROTECTIVE ORDER PARAGRAPHS 7, 8, 9, 10, 15, and 17.” This marking directly refers to the specific paragraphs of the Protective Order that govern today’s production.

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

<b>Bates Start</b>	<b>Bates End</b>	<b>Summary Description</b>	<b>Confidential Designation</b>
SDNY GM 02762476	SDNY GM 02762476	Video	Confidential
SDNY GM 02762477	SDNY GM 02762477	Photo of 44 Kinnerton Street, London SW1 8ES, United Kingdom	
SDNY GM 02762478	SDNY GM 02762482	██████████ Deposition Documents <sup>1</sup>	Confidential
SDNY GM 02762483	SDNY GM 02762483	JPMorgan Chase records	Confidential
SDNY GM 02762484	SDNY GM 02762485	Maps of Palm Beach area	
SDNY GM 02762486	SDNY GM 02762487	Palm Beach School District records	Confidential
SDNY GM 02762488	SDNY GM 02762491	Jeffrey Epstein travel records	
SDNY GM 02762492	SDNY GM 02762500	Ghislaine Maxwell travel records	
SDNY GM 02762501	SDNY GM 02762501	██████████ travel records	Confidential
SDNY GM 02762502	SDNY GM 02762506	FBI NY documents	

The Government recognizes that its discovery obligations are ongoing and will promptly produce any additional discoverable material of which it becomes aware. Please do not hesitate to reach out if you have any difficulty accessing these materials.

Very truly yours,

AUDREY STRAUSS  
United States Attorney

by: \_\_\_\_\_ s/ \_\_\_\_\_

██████████  
██████████  
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Assistant United States Attorneys

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<sup>1</sup> The Government received some of the files in a format we are not able to open but we are producing the .ecl files to you in an abundance of caution.