

From: "[REDACTED]" >

To: [REDACTED] <[REDACTED]>

Cc: "[REDACTED]" >, "[REDACTED]" >

Subject: RE: SDNY PRESS GUIDANCE | U.S. v. GHISLAINE MAXWELL, FRIDAY, NOVEMBER 26, 2021

Date: Fri, 26 Nov 2021 21:09:57 +0000

Hey – just double checked with [REDACTED] on this and we agree it's really hard to predict. The parties were told to be there at 8:30 am. It's not crystal clear when the jurors will arrive, although there is already a qualified group so all they have to do is strikes, but there is a possibility of more questioning of certain jurors if either side has learned more about them since last week or they have learned more about the case. So....it's hard to know how long that will take. The press should get there early and just wait I think?

From: [REDACTED] >

Sent: Friday, November 26, 2021 3:50 PM

To: [REDACTED] >

Cc: [REDACTED] >; [REDACTED] >

Subject: Re: SDNY PRESS GUIDANCE | U.S. v. GHISLAINE MAXWELL, FRIDAY, NOVEMBER 26, 2021

Or course! Not at all for press, but for my planning — would it be safe to assume that openings would happen around 10:00 am?

Sent from my iPhone

On Nov 26, 2021, at 3:44 PM, [REDACTED] > wrote:

Perfect.

Sent from my iPhone

On Nov 26, 2021, at 3:39 PM, [REDACTED] > wrote:

To the extent it might be helpful to keep what press are in the room (or generally around) at bay, I have no problem doing that.

Sent from my iPhone

On Nov 26, 2021, at 3:32 PM, [REDACTED] > wrote:

Sure - if you think it's helpful to be there. There is a whole protocol around seats. I believe we have a government row and Damian and [REDACTED] are coming too.

Sent from my iPhone

On Nov 26, 2021, at 3:20 PM, [REDACTED] > wrote:

Understood, thanks. If you feel it would be helpful to have someone from the press office in the courtroom for openings, just let us know. I've mentioned it to [REDACTED], I believe he's reserved a seat.

From: [REDACTED] >
Sent: Friday, November 26, 2021 3:16 PM
To: [REDACTED] >
Cc: [REDACTED] >; [REDACTED]
[REDACTED] >
Subject: Re: SDNY PRESS GUIDANCE | U.S. v. GHISLAINE MAXWELL, FRIDAY, NOVEMBER 26, 2021

I don't think we know exactly. Parties will be there at 8:30 and apparently the jury too. But not sure when things will actually start.

Sent from my iPhone

On Nov 26, 2021, at 2:54 PM, [REDACTED] > wrote:

Just checking back on this. Thx!

From: [REDACTED]
Sent: Friday, November 26, 2021 10:34 AM
To: [REDACTED] >; [REDACTED]
[REDACTED] >
Cc: [REDACTED] >
Subject: RE: SDNY PRESS GUIDANCE | U.S. v. GHISLAINE MAXWELL, FRIDAY, NOVEMBER 26, 2021

Awesome, thanks. Are we able to provide a time if I also include the following?

9:30 a.m. – Jury charge followed by opening statements in U.S. v. [Ghislaine Maxwell](#) – the defendant is charged in connection to conspiring with Jeffrey Epstein to entice minors to travel to engage in criminal sexual activity – before Judge Alison Nathan (Courtroom 318, 40 Foley Square [overflow Courtrooms 110, 506, 905, and 906 of the Thurgood Marshall U.S. Courthouse]).

From: [REDACTED] >
Sent: Friday, November 26, 2021 10:26 AM
To: [REDACTED] >; [REDACTED]
[REDACTED] >
Cc: [REDACTED] >
Subject: RE: SDNY PRESS GUIDANCE | U.S. v. GHISLAINE MAXWELL, FRIDAY, NOVEMBER 26, 2021

I don't think so.

From: [REDACTED] >
Sent: Friday, November 26, 2021 10:25 AM
To: [REDACTED] >; [REDACTED]
[REDACTED] >
Cc: [REDACTED] >
Subject: SDNY PRESS GUIDANCE | U.S. v. GHISLAINE MAXWELL, FRIDAY, NOVEMBER 26, 2021
Importance: High

Before circulating this shortly, just wanted to check to see if any other orders or info worth including have happened between Wednesday and today? Thanks!

<image001.png>

PRESS GUIDANCE

Friday, November 26, 2021

***ADDITIONAL OFF-THE-RECORD GUIDANCE:** *Please note the Court has ruled that several of the government's witnesses, who are not alleged victims themselves, may testify under pseudonyms because the disclosure of their identities would ostensibly reveal the identities of the alleged victims. I believe most, if not all, news media outlets have a policy against identifying sex crime victims without their consent, and again urge you to abide by that policy with our witnesses and respect their privacy.*

If convicted, Ghislaine Maxwell faces the following statutory maximum penalties; however, her sentence would ultimately be at the sole discretion of the judge:

- **Count One: conspiracy to entice a minor to travel to engage in illegal sex acts, which carries a maximum sentence of five years in prison;**
- **Count Two: enticing a minor to travel to engage in illegal sex acts, which carries a maximum sentence of five years in prison;**
- **Count Three: conspiracy to transport a minor with the intent to engage in criminal sexual activity, which carries a maximum sentence of five years in prison;**
- **Count Four: transporting a minor with the intent to engage in criminal sexual activity, which carries a maximum sentence of 10 years in prison;**
- **Count Five: conspiracy to commit sex trafficking of minors, which carries a statutory maximum of 40 years in prison; and**
- **Count Six: sex trafficking of minors, which carries a statutory maximum of five years in prison.**

A trial logistics order from Judge Nathan is also attached.

<image001.png>

PRESS GUIDANCE

Tuesday, November 23, 2021

****OFF-THE-RECORD, AND FOR GUIDANCE ONLY: Several of the government's anticipated witnesses will be testifying in this trial using a pseudonym or first name. The Court granted a Government motion [attached] requesting that they be able to do so, because the victim witnesses are expected to describe alleged sensitive, explicit and personal events concerning illegal sexual abuse, sexual contact and other acts of which they have been victims. I believe most, if not all, news media outlets have a policy against identifying sex crime victims without their consent, and urge you to abide by that policy with our witnesses and respect their privacy.***

9:30 a.m. – Final pretrial conference U.S. v. [Ghislaine Maxwell](#) – the defendant is charged in connection to conspiring with Jeffrey Epstein to entice minors to travel to engage in criminal sexual activity – before Judge Alison Nathan (Courtroom 318, 40 Foley Square [overflow Courtrooms 110, 506, 905, and 906 of the Thurgood Marshall U.S. Courthouse]).

EXHIBITS: Government exhibits will be **provided exclusively through the SDNY file share**. If you are unable to access [this link to the file share](#) (USAFx), you must establish an account to access the files. To establish an account, request access by email to me or my colleague, [REDACTED], Cc'd here, prior to Monday, November 29, 2021.

Please also note that all case filings in U.S. v. Maxwell are available in the Court's electronic filing system; we encourage media representatives to establish a free [PACER](#) account, if they have not done so already. Credentialing and other matters relating to in-person attendance for the trial are handled by the SDNY District Executive's Office.

Periodic updates to follow.

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***** FOR PLANNING PURPOSES ONLY *****

DO NOT REPLY TO THIS MESSAGE. IF YOU HAVE QUESTIONS, PLEASE CALL THE PRESS OFFICE AT [REDACTED]