



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

November 18, 2020

BY ELECTRONIC MAIL

Christian Everdell, Esq.
Mark Cohen, Esq.
Cohen & Gresser LLP
800 Third Avenue
New York, NY 10022

Laura Menninger, Esq.
Jeffrey Pagliuca, Esq.
Haddon, Morgan and Foreman, P.C.
150 East Tenth Avenue
Denver, CO 80203

Bobbi Sternheim, Esq.
Law Offices of Bobbi C. Sternheim
33 West 19th Street-4th Fl.
New York, NY 10007

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

Dear Counsel:

In recognition of the Government's ongoing discovery obligations, today we are producing one hard drive and one CD, which contain copies of the materials listed in the below index. These discovery materials are stamped with control numbers SDNY_GM_00536837 through SDNY_GM_02742043. The password for the drive is "WO-6291_20201104" and the password for the CD is "USAOSdny1!". The drive and CD are both 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.

Bates Start	Bates End	Summary Description	Confidential Designation
SDNY_GM_00536837	SDNY_GM_00869725	SDNY_PROD015 - PART 01 (Search Warrant Returns)	Confidential
SDNY_GM_00869726	SDNY_GM_01216165	SDNY_PROD015 - PART 02 (Search Warrant Returns)	Confidential
SDNY_GM_01216166	SDNY_GM_01546512	SDNY_PROD015 - PART 03 (Search Warrant Returns)	Confidential
SDNY_GM_01546513	SDNY_GM_01964992	SDNY_PROD015 - PART 04 (Search Warrant Returns)	Confidential
SDNY_GM_01964993	SDNY_GM_02292245	SDNY_PROD015 - PART 05 (Search Warrant Returns)	Confidential
SDNY_GM_02292246	SDNY_GM_02678243	SDNY_PROD015 - PART 06 (Search Warrant Returns)	Confidential
SDNY_GM_02678244	SDNY_GM_02735320	SDNY_PROD015 - PART 07 (Search Warrant Returns)	Confidential
SDNY_GM_02735321	SDNY_GM_02742042	SDNY_PROD016 (Search Warrant Returns)	Confidential
SDNY_GM_02742043	SDNY_GM_02742043	NYC024318 1B71 (iPhone, images pt. 2)	Confidential

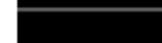
Please note that the item identified with bates number SDNY_GM_02742043 consists of the final portion of images identified responsive from Subject Device-2, which is an iPhone that law enforcement seized from Jeffrey Epstein at the time of his arrest in 2019. The remainder of the responsive materials from that same device were previously produced to you on November 9, 2020. Due to technical difficulties, we were unable to complete the responsiveness review of images from this device until November 17, 2020.

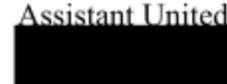
Additionally, as a courtesy, attached to this letter please find a chart of the Subject Devices searched pursuant to warrants in this case. The chart includes the FBI identifiers associated with each device and the date(s) on which the Government produced responsive material from each device to the defense. As noted in the chart, in some instances, the Government determined that there was no responsive material from certain devices and accordingly did not produce any data from those particular devices.

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 or if you wish to arrange a time to review physical items in the FBI's custody.

Very truly yours,

AUDREY STRAUSS
Acting United States Attorney

by 


Assistant United States Attorneys


Enclosure

Device Number	1B Number	FBI Barcode	CART Evidence Number(s)	Responsive Material Produced
Subject Device-01	1B72	E6516107	NYC024319	Produced 11/09/2020
Subject Device-02	1B71	E6516106	NYC024318	Produced 11/09/2020, 11/18/2020
Subject Device-03	1B73	E6516108	NYC024354	Produced 11/09/2020, 11/18/2020
Subject Device-03	1B74	E6516109	NYC024355	Produced 11/09/2020, 11/18/2020
Subject Device-04	1B70	E6515034	NYC024332	Produced 11/09/2020, 11/18/2020
Subject Device-05	1B69	E6515033	NYC024359	Produced 11/09/2020
Subject Device-06	1B68	E6515032	NYC024358	Produced 11/09/2020
Subject Device-07	1B67	E6515031	NYC024357	Produced 11/09/2020
Subject Device-08	1B62	E6515026	NYC024335, NYC024336, NYC024337	Produced 11/09/2020, 11/18/2020
Subject Device-09	1B61	E6515025	NYC024320, NYC024321	Produced 11/09/2020, 11/18/2020
Subject Device-10	1B60	E6515024	NYC024342	None
Subject Device-11	1B59	E6515023	NYC024333, NYC024334	Produced 11/18/2020
Subject Device-12	1B58	E6515022	NYC024351	Produced 11/09/2020
Subject Device-13	1B57	E6515021	NYC024328, NYC024329	Produced 11/09/2020, 11/18/2020
Subject Device-14	1B56	E6515020	NYC024338	None
Subject Device-15	1B55	E6515019	N/A (FBI unable to access)	None
Subject Device-16	1B54	E6515018	NYC024353	Produced 11/09/2020, 11/18/2020
Subject Device-17	1B53	E6515017	NYC024329	Produced 11/09/2020, 11/18/2020
Subject Device-18	1B52	E6515016	NYC024340	Produced 11/09/2020
Subject Device-19	1B51	E6515015	NYC024345	None
Subject Device-20	1B50	E6515014	NYC024346	None
Subject Device-21	1B49	E6515013	NYC024347	None
Subject Device-22	1B48	E6515012	NYC024344	None
Subject Device-23	1B47	E6515011	NYC024343	Produced 11/09/2020, 11/18/2020
Subject Device-24	1B46	E6515010	NYC024341	Produced 11/09/2020, 11/18/2020
Subject Device-25	1B44	E6515008	NYC024339	None
Subject Device-26	1B43	E6515007	NYC024323, NYC024324	Produced 11/09/2020, 11/18/2020
Subject Device-27	1B42	E6515006	NYC024330, NYC024331	None
Subject Device-28	1B41	E6515005	NYC024325, NYC024326, NYC027913	Produced 11/09/2020, 11/18/2020
Subject Device-29	1B40	E6515004	NYC027913	Produced 11/18/2020
Subject Device-30	1B39	E6515003	NYC027911	None
Subject Device-31	1B38	E6515002	NYC027912	None

Corrected Subject Device-32	1B30	E6433822	NYC024348	Produced 11/09/2020, 11/18/2020
Corrected Subject Device-33	1B32	E6433824	NYC024350	Produced 11/09/2020, 11/18/2020
Corrected Subject Device-34	1B29	E6433821	NYC024349	Produced 11/09/2020, 11/18/2020
Subject Device-35	1B28	E6433828	NYC024327	Produced 11/09/2020, 11/18/2020
Subject Device-36	1B80	E6516259	NYC024362	Produced 11/09/2020, 11/18/2020
Subject Device-37	1B81	E6516260	NYC024363	Produced 11/09/2020, 11/18/2020
Subject Device-38	1B82	E6516261	NYC024364	Produced 11/09/2020, 11/18/2020
Subject Device-39	1B83	E6516262	NYC027905	Produced 11/09/2020
Subject Device-40	1B84	E6516263	NYC027904	Produced 11/09/2020
Subject Device-41	1B85	E6516264	NYC024365	Produced 11/09/2020, 11/18/2020
Subject Device-42	1B87	E6516266	NYC024366	Produced 11/09/2020, 11/18/2020
Subject Device-43	1B96	E6516275	NYC024367, NYC027908	Produced 11/18/2020
Subject Device-44	1B97	E6516276	NYC024368	Produced 11/09/2020, 11/18/2020
Subject Device-45	1B98	E6516277	NYC024369	Produced 11/09/2020, 11/18/2020
Subject Device-46	1B102	E6516281	NYC024371	Produced 11/09/2020, 11/18/2020
Subject Device-47	1B106	E6516285	NYC027909, NYC027910	Produced 11/09/2020, 11/18/2020
Subject Device-48	1B107	E6516286	NYC024372	Produced 11/09/2020, 11/18/2020
Subject Device-49	1B111	E6516290	NYC0247903	None
Subject Device-50	1B112	E6516291	NYC024373	None
Subject Device-51	1B115	E6516294	NYC024376, NYC024377, NYC024378, NYC024379, NYC024380	None
Subject Device-52	1B116	E6516306	NYC024381	None
Subject Device-53	1B117	E6516296	NYC024395	None
Subject Device-54	1B118	E6516297	NYC024383	Produced 11/09/2020, 11/18/2020
Subject Device-55	1B119	E6516298	NYC024385, NYC024386	Produced 11/09/2020, 11/18/2020
Subject Device-56	1B120	E6516299	NYC024387, NYC024388	Produced 11/09/2020, 11/18/2020
Subject Device-57	1B121	E6516300	NYC024384	Produced 11/09/2020, 11/18/2020
Subject Device-58	1B122	E6516301	NYC024389, NYC024390	Produced 11/09/2020, 11/18/2020
Subject Device-59	1B123	E6516302	NYC024391, NYC024392	Produced 11/09/2020, 11/18/2020
Subject Device-60	1B124	E6516303	NYC024393, NYC024394	Produced 11/18/2020
Subject Device-61	1B109	E6516288	NYC027906	None
Subject Device-62	1B99	E6516278	NYC024370	Produced 11/09/2020