



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 25, 2021

BY ELECTRONIC MAIL

Christian Everdell, 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:

Today the Government is producing additional materials, including Jencks Act and *Giglio* material, regarding witnesses who may be called to testify at trial in the above-referenced case. Enclosed please find an index detailing the materials included in today's production.

The Government is also producing today certain materials relating to individuals the Government does not currently intend to call as witnesses at trial in the above-referenced case. These materials do not contain a comprehensive set of Jencks Act and *Giglio* materials, as the Government does not expect to call these individuals to testify at trial. Instead, these materials contain, among other things, certain witness statements. Enclosed please find an index detailing these materials. Please note that the records stamped 3501.507 through 3501.516 were previously produced to you on October 11, 2021 with a different stamp (3501.450 through 3501.459), which was inadvertently used for two sets of witnesses. The Government is reproducing the materials to avoid any confusion. This production should not be taken to indicate that the Government believes it has any obligation to provide all of these materials; rather, we make this production as a courtesy. Moreover, although the Government presently does not intend to call the individuals listed in the

enclosed index, we reserve the right to do so and will notify you should the Government determine that it intends to call any of these individuals at trial.

Please note that this letter, the enclosed indices, and the enclosed materials are governed by the July 31, 2020 Protective Order in this case. **In particular, certain materials are designated as “confidential” under the Protective Order. The index is itself designated as “confidential,” because it includes information regarding records designated as “confidential” under the Protective Order.** 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.

Additionally, please note that many of the individuals referenced in this production are represented by counsel, as detailed in the enclosed indices. The Government reserves its right to amend and supplement these disclosures.

Very truly yours,

DAMIAN WILLIAMS
United States Attorney

by: s/ _____

A black rectangular redaction box covering the signature of the Assistant United States Attorneys.

Assistant United States Attorneys