



U.S. Department of Justice

United States Attorney  
Southern District of New York

The Silvio J. Mollo Building  
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New York, New York 10007

July 23, 2021

**BY ELECTRONIC MAIL**

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

Dear Counsel:

Today we are producing certain materials relating to individuals the Government does not currently intend to call as witnesses at trial in the above-referenced case. Attached please find an index detailing the materials included in today's production.

Please note that both the index and the enclosed materials are governed by the July 31, 2020 Protective Order in this case. **In particular, the entire production is 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.** 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.

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

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. Consistent with that representation, the Government hereby provides notice that it now intends to call [REDACTED] as a witness at trial. Accordingly, the Government will not produce any additional materials regarding Ms. [REDACTED] until the disclosure of testifying witness materials, consistent with the schedule set by the Court.

Very truly yours,

[REDACTED]  
United States Attorney

by: s/ \_\_\_\_\_  
[REDACTED]  
[REDACTED]  
[REDACTED]  
Assistant United States Attorneys  
[REDACTED]

*Enclosure*