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**BY FIRST CLASS MAIL**

[REDACTED]  
Assistant Attorney General  
Criminal Division  
U.S. Department of Justice  
950 Pennsylvania Avenue, NW  
Washington, D.C. 20530-0001

**Re: *United States v. Ghislaine Maxwell*, S2 20 Cr. 330 (AJN)**

Dear Assistant Attorney General [REDACTED]:

We represent the defendant, Ghislaine Maxwell, in the above-referenced matter. This letter constitutes a request made pursuant to *United States ex. Rel. Touhy v. Regan*, 340 U.S. 462 (1951), for the testimony of (1) FBI Special Agent [REDACTED], (2) FBI Special Agent [REDACTED], (3) FBI Special Agent [REDACTED], and (4) Task Force Officer, Detective [REDACTED] at the trial in this case on November 29, 2019 at 9:00 A.M., before the Honorable Alison J. Nathan, United States District Judge.

In accordance with 28 C.F.R. § 16.23(c), we make the following statement setting forth a summary of the testimony we seek:

SA [REDACTED] and SA [REDACTED] were co-case agents in charge of an investigation into allegations of sexual abuse by Jeffrey Epstein conducted by the Palm Beach FBI and the U.S. Attorney's Office for the Southern District of Florida from approximately July 2006 to June 2008. We request testimony from SA [REDACTED] and SA [REDACTED] concerning the scope, timeline, and resolution of the investigation, as well as the various investigative steps taken by the agents, including but not limited to testimony about numerous witness interviews they conducted, physical evidence they reviewed, documents they obtained by subpoena, and their testimony before the grand jury.

SA [REDACTED] and TFO [REDACTED] are the co-case agents in charge of the current investigation being conducted by the New York FBI and the U.S. Attorney's Office for the Southern District of New York, which resulted in the indictment against Jeffrey Epstein returned on July 2, 2019 (19 Cr. 490 (RB)) and the above-captioned superseding indictment against Ms. Maxwell (S2 20 Cr. 330 (AJN)), the initial indictment against Ms. Maxwell having been returned on June 29, 2020 (20 Cr. 330

(AJN)). We request testimony from SA [REDACTED] and TFO [REDACTED] concerning the scope, timeline, and resolution of the investigation, as well as the various investigative steps taken by the agents, including but not limited to testimony about numerous witness interviews they conducted, physical evidence they reviewed, documents they obtained by subpoena, their testimony before the grand jury, and the indictments returned by the grand jury.

The testimony of these law enforcement officers is relevant and material to the issues in this case. Furthermore, it is Ms. Maxwell's position that the disclosure is appropriate under rules of procedure and that disclosure, to Ms. Maxwell's knowledge, would not violate any statute or regulations or reveal confidential sources, classified information, trade secrets, ongoing investigations, or investigatory techniques. (28 C.F.R. § 16.26(b)).

If you have any questions or would like to discuss further, please do not hesitate to contact me.

Sincerely,

/s/ Christian R. Everdell  
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[REDACTED]

cc: All counsel of record (by email)