



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

September 13, 2021

**BY ELECTRONIC MAIL**

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

Dear Counsel:

Today we are producing the materials listed in the below index. These discovery materials are stamped with control numbers SDNY\_GM\_02753699 through SDNY\_GM\_02762475.

Please note that both this letter and the enclosed materials are governed by the July 31, 2020 Protective Order in this case. **This letter 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.

An index of the materials contained in this production is below:

Bates Start	Bates End	Summary Description	Confidential Designation
SDNY GM 02753699	SDNY GM 02753699	Little St. John ImageLog	
SDNY GM 02753700	SDNY GM 02753700	New York ImageLog	
SDNY GM 02753701	SDNY GM 02760622	FAA Certified Records	Confidential
SDNY GM 02760623	SDNY GM 02760638	██████████ Photographs	Confidential
SDNY GM 02760639	SDNY GM 02760644	██████████ Photographs	Confidential
SDNY GM 02760645	SDNY GM 02760649	Photographs of Places	
SDNY GM 02760650	SDNY GM 02760656	T-Mobile Subpoena Returns	
SDNY GM 02760657	SDNY GM 02760678	Xavier College Preparatory Subpoena Returns	Confidential
SDNY GM 02760679	SDNY GM 02760680	██████████ Certified Birth Certificate	Confidential
SDNY GM 02760681	SDNY GM 02760681	██████████ Certified Birth Certificate	Confidential
SDNY GM 02760682	SDNY GM 02760682	FedEx Declaration	
SDNY GM 02760683	SDNY GM 02762472	FAA Records	Confidential
SDNY GM 02762473	SDNY GM 02762473	IDE Drives SystemInfo	
SDNY GM 02762474	SDNY GM 02762474	Windows Little St. John SystemInfo	
SDNY GM 02762475	SDNY GM 02762475	Windows NY SystemInfo	

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.

Very truly yours,

AUDREY STRAUSS  
United States Attorney

by: s/ \_\_\_\_\_

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Assistant United States Attorneys

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