



U.S. Department of Justice

United States Attorney
Southern District of New York

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November 9, 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 materials are stamped with control numbers SDNY_GM_02767074 through SDNY_GM_02771980.

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.** 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 02767074	SDNY GM 02771980	Business Records from SDFL Files ¹	Confidential

Although the Government believes that all of these materials are also located in the Florida FBI file and were previously produced to you from that file in the fall of 2020, out of an abundance of caution, the Government is producing these records to you in the form in which they were stored in the files maintained by the U.S. Attorney's Office for the Southern District of Florida. 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,

DAMIAN WILLIAMS
United States Attorney

by: s/ _____



Assistant United States Attorneys

¹ These materials appear to be largely duplicative of materials previously produced to you in discovery.