



U.S. Department of Justice

United States Attorney  
Southern District of New York

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August 5, 2020

**By Email & Hand**

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

Dear Counsel:

This letter provides discovery pursuant to Rule 16(a) of the Federal Rules of Criminal Procedure ("Fed. R. Crim. P."), and seeks reciprocal discovery.<sup>1</sup>

**Disclosure by the Government**

Based on your request for discovery in this case, enclosed please find copies of the materials listed in the attached index, which materials are stamped with control numbers SDNY\_GM\_00000001 through SDNY\_GM\_00012841. Please note that both this letter and the enclosed materials are governed by the July 31, 2020 Protective Order in this case.<sup>2</sup>

<sup>1</sup> In addition to information provided herein, please note that this Office periodically posts content on social media platforms including Twitter, Facebook and YouTube. Members of the public may post comments in response to the Office's postings. We do not control these user-generated comments, nor do we monitor or regularly review such comments. You may directly access these social media platforms in the event you believe someone may have posted information relevant to this case.

<sup>2</sup> Files in PDF format designated as "confidential" under the protective order have been stamped "confidential." However, certain files cannot be individually labeled as confidential on the documents themselves due to their file format. Such files include in their electronic names the word "Confidential," and, additionally, the bates numbers for confidential files that could not be individually labeled are included in the table below.

**This letter is itself designated as “confidential,” because it includes information regarding records designated as “confidential” under the Protective Order.**

The Government recognizes its obligations under *Brady v. Maryland*, 373 U.S. 83 (1963), and its progeny. The Government will provide material under *Giglio v. United States*, 405 U.S. 150, 154 (1972), and its progeny, in a timely manner prior to trial and consistent with the schedule set by the Court.

### **Disclosure by the Defendant**

In light of your request for discovery in this case, the Government hereby requests reciprocal discovery under Fed. R. Crim. P. 16(b). Specifically, we request that you allow inspection and copying of: (1) any books, or copies or portions thereof, which are in the defendant’s possession, custody or control, and which the defendant intends to introduce as evidence or otherwise rely on at trial; and (2) any results or reports of physical or mental examinations and of scientific tests or experiments made in connection with this case, or copies thereof, which are in the defendant’s possession or control, and which the defendant intends to introduce as evidence or otherwise rely on at trial or which were prepared by a witness whom the defendant intends to call at trial.

The Government also requests that the defendant disclose prior statements of witnesses he will call to testify. *See* Fed. R. Crim. P. 26.2; *United States v. Nobles*, 422 U.S. 225 (1975). We request that such material be provided on the same basis upon which we agree to supply the defendant with 3500 material relating to Government witnesses.

### **Sentence Reduction for Acceptance of Responsibility**

This Office will oppose the additional one-point reduction under the Sentencing Guidelines available for defendants who plead prior to the Government’s initiation of trial preparations pursuant to U.S.S.G. § 3E1.1(b), in the event your client has not entered a plea of guilty six weeks prior to trial, or prior to the provision of 3500 material, whichever is earlier. We will follow this policy whether or not suppression or other pretrial motions remain outstanding after this date and even if the trial date has not been announced by the Court six weeks in advance of the trial.

Finally, please be advised that pursuant to the policy of the Office concerning plea offers, no plea offer is effective unless and until made in writing and signed by authorized representatives of the Office. In particular, discussions regarding the pretrial disposition of a matter that are not reduced to writing and signed by authorized representatives of the Office cannot and do not constitute a “formal offer” or a “plea offer,” as those terms are used in *Lafler v. Cooper*, 132 S.Ct. 1376 (2012); *Missouri v. Frye*, 132 S.Ct. 1399 (2012).

Bates Start	Bates End	Confidential Non-PDF Files	Summary Description	Designation
SDNY_GM_00000001	SDNY_GM_00000002		Ghislaine Maxwell Joint Automated Booking System Summary	
SDNY_GM_00000003	SDNY_GM_00000044		Pen Register Orders and Applications	
SDNY_GM_00000045	SDNY_GM_00000717		Search Warrants and Applications	Confidential
SDNY_GM_00000718	SDNY_GM_00000833		Immigration and Travel Records for Jeffrey Epstein and Ghislaine Maxwell	
SDNY_GM_00000834	SDNY_GM_00000905		Unsealing materials pertaining to 15 Civ. 7433 (RWS), 19 Misc. 149 (CM)	
SDNY_GM_00000906	SDNY_GM_00000962		Unsealing materials pertaining to 17 Civ. 0616 (SN), 19 Misc. 179 (SN)	
SDNY_GM_00000963	SDNY_GM_00000964	<b>SDNY_GM_00000963</b>	Airline Reporting Corporation records	Confidential
SDNY_GM_00000965	SDNY_GM_00000965		Alaska Airlines records	Confidential
SDNY_GM_00000966	SDNY_GM_00000976	<b>SDNY_GM_00000967; SDNY_GM_00000969; SDNY_GM_00000971; SDNY_GM_00000973; SDNY_GM_00000974; SDNY_GM_00000976</b>	Amazon Records	Confidential
SDNY_GM_00000977	SDNY_GM_00001012		American Airlines records	Confidential
SDNY_GM_00001013	SDNY_GM_00001014	<b>SDNY_GM_00001014</b>	Apple Records for Jeffrey Epstein	Confidential
SDNY_GM_00001015	SDNY_GM_00003637		AT&T Records	Confidential
SDNY_GM_00003638	SDNY_GM_00003701		Bank of America Records	Confidential
SDNY_GM_00003702	SDNY_GM_00003702		Century Link Records for the number [REDACTED]	Confidential
SDNY_GM_00003703	SDNY_GM_00004639	<b>SDNY_GM_00004511</b>	Citibank Records	Confidential
SDNY_GM_00004640	SDNY_GM_00004649		Delaware Division of Corporations Records relating to LSJ LLC	
SDNY_GM_00004650	SDNY_GM_00004655		Delta Airlines Records	Confidential
SDNY_GM_00004656	SDNY_GM_00004656		[REDACTED]	Confidential
SDNY_GM_00004657	SDNY_GM_00004657		Expedia Records	
SDNY_GM_00004658	SDNY_GM_00004721		Experian Records	Confidential
SDNY_GM_00004722	SDNY_GM_00004762		Gold Coast Federal Credit Union records	Confidential
SDNY_GM_00004763	SDNY_GM_00004776		Google records regarding account information for Jeffrey Epstien and Ghislaine Maxwell	Confidential
SDNY_GM_00004776	SDNY_GM_00004781		Instagram records	

SDNY_GM_00004782	SDNY_GM_00005414			Confidential
SDNY_GM_00005415	SDNY_GM_00005416		MCC Request for Emails	
SDNY_GM_00005417	SDNY_GM_00005417		Microsoft Records regarding account information for Jeffrey Epstein	
SDNY_GM_0005418	SDNY_GM_00005444	<b>SDNY_GM_00005431; SDNY_GM_00005432; SDNY_GM_00005433; SDNY_GM_00005435</b>	MoneyGram Records relating to [REDACTED] Ghislaine Maxwell, and [REDACTED]	Confidential
SDNY_GM_00005445	SDNY_GM_00005484		New York State Department of State records	
SDNY_GM_00005485	SDNY_GM_00005491	<b>SDNY_GM_00005487; SDNY_GM_00005488; SDNY_GM_00005490; SDNY_GM_00005491</b>	Oath Holdings records for Jeffrey Epstein email accounts	Confidential
SDNY_GM_00005492	SDNY_GM_00005531		[REDACTED]	Confidential
SDNY_GM_00005532	SDNY_GM_00005676		Flight manifests and records from [REDACTED] 1991 - 2013	Confidential
SDNY_GM_00005677	SDNY_GM_00006060	<b>SDNY_GM_00006007; SDNY_GM_00006008; SDNY_GM_00006009 ; SDNY_GM_00006010</b>	Charles Schwab Records	Confidential
SDNY_GM_00006061	SDNY_GM_00006079		Shoppers Travel Records	Confidential
SDNY_GM_00006080	SDNY_GM_00006096		Southwest Records	Confidential
SDNY_GM_00006097	SDNY_GM_00006129		Capital One Records	Confidential
SDNY_GM_00006130	SDNY_GM_00007425		TD Bank Records	Confidential
SDNY_GM_00007426	SDNY_GM_00007641	<b>SDNY_GM_00007521 -- SDNY_GM_00007580; SDNY_GM_00007620 -- SDNY_GM_00007641</b>	PayPal Records	Confidential
SDNY_GM_00007642	SDNY_GM_00007677	<b>SDNY_GM_00007642 -- SDNY_GM_00007654 -- SDNY_GM_00007658; SDNY_GM_00007666; SDNY_GM_00007676; SDNY_GM_00007677</b>	T-Mobile records	Confidential
SDNY_GM_00007678	SDNY_GM_00008136		Materials from Darren Indyke and Richard Kahn (Epstein Estate Executors)	Confidential
SDNY_GM_00008137	SDNY_GM_00008137		UMB Bank no records notification	Confidential
SDNY_GM_00008138	SDNY_GM_00008146		United Airlines records	Confidential
SDNY_GM_00008147	SDNY_GM_00010164	<b>SDNY_GM_00009087; SDNY_GM_00009088</b>	UBS Bank records	Confidential
SDNY_GM_00010165	SDNY_GM_00010355		USAA records	

SDNY_GM_00010356	SDNY_GM_00010456		U.S. Virgin Islands Division of Corporations records for Laurel Inc, Maple Inc, and Nautilus, Inc	Confidential
SDNY_GM_00010457	SDNY_GM_00010459		Venmo records	Confidential
SDNY_GM_00010460	SDNY_GM_00010461		Verizon records	Confidential
SDNY_GM_00010462	SDNY_GM_00011483		Flight manifest records from [REDACTED]	Confidential
SDNY_GM_00011484	SDNY_GM_00011488		Western Union record of no accounts found	Confidential
SDNY_GM_00011489	SDNY_GM_00012474	<b>SDNY_GM_00011489; SDNY_GM_00011490; SDNY_GM_00012217; SDNY_GM_00012220; SDNY_GM_00012305; SDNY_GM_00012359; SDNY_GM_00012382; SDNY_GM_00012396 SDNY_GM_00012405 SDNY_GM_00012435</b>	TD Ameritrade Materials	Confidential
SDNY_GM_00012475	SDNY_GM_00012841		Materials from [REDACTED] [REDACTED]	Confidential

Very truly yours,

AUDREY STRAUSS  
Acting United States Attorney

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

[REDACTED]

Assistant United States Attorneys

[REDACTED]

*Enclosure*