



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

March 29, 2021

BY ELECTRONIC MAIL

Christian Everdell, Esq.
Mark Cohen, Esq.
Cohen & Gresser LLP
800 Third Avenue
New York, NY 10022

Laura Menninger, Esq.
Jeffrey Pagliuca, Esq.
Haddon, Morgan and Foreman, P.C.
150 East Tenth Avenue
Denver, CO 80203

Bobbi Sternheim, Esq.
Law Offices of Bobbi C. Sternheim
33 West 19th Street-4th Fl.
New York, NY 10007

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

Dear Counsel:

In light of the return of superseding indictment S2 20 Cr. 330 (AJN) (the "S2 Indictment"), the Government writes to provide you with information regarding the individual identified as Minor Victim-4 in the S2 Indictment. Please note that both this letter is 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.** Minor Victim-4 was born in [REDACTED].

To assist you in identifying portions of the discovery materials that are relevant to the new allegations contained in the S2 Indictment, below please find a list of certain Bates ranges that relate to Minor Victim-4, which were already produced to you. Please note that this list, which is being provided to you as a courtesy, is not exhaustive and does not include every portion of discovery that is relevant Minor Victim-4.

- SDNY_GM_00165560
- SDNY_GM_00165644
- SDNY_GM_00165654

- SDNY_GM_00165656 - SDNY_GM_00165659
- SDNY_GM_00165669 - SDNY_GM_00165670
- SDNY_GM_00165674
- SDNY_GM_00165691 - SDNY_GM_00165692
- SDNY_GM_00165701
- SDNY_GM_00165752
- SDNY_GM_00165776
- SDNY_GM_00365036 – SDNY_GM_00365049
- SDNY_GM_00381010 – SDNY_GM_00381013
- SDNY_GM_00381020 – SDNY_GM_00381023
- SDNY_GM_00394866
- SDNY_GM_00431558
- SDNY_GM_00449302
- SDNY_GM_00459391
- SDNY_GM_00459405
- SDNY_GM_00459416
- SDNY_GM_00459430
- SDNY_GM_00459444
- SDNY_GM_00459455
- SDNY_GM_00525482
- SDNY_GM_01987478
- SDNY_GM_02735989
- SDNY_GM_02742303 – SDNY_GM_2742395
- SDNY_GM_02743100

Very truly yours,

AUDREY STRAUSS
United States Attorney

by:



[Redacted]

Assistant United States Attorneys

[Redacted]