



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

July 28, 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:

Today we are producing the materials listed in the below index. These discovery materials are stamped with control numbers SDNY_GM_02753552 through SDNY_GM_02753643.

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

Bates Start	Bates End	Summary Description	Confidential Designation
SDNY_GM_02753552	SDNY_GM_02753588	1B Chains of Custody Logs	
SDNY_GM_02753589	SDNY_GM_02753590	AT&T Certifications	
SDNY_GM_02753591	SDNY_GM_02753594	FBI Paperwork for Boot Collection, Transfer	
SDNY_GM_02753595	SDNY_GM_02753611	PBSD ██████████ Education Records	Confidential
SDNY_GM_02753612	SDNY_GM_02753612	1A Report for Case	

SDNY_GM_02753613	SDNY_GM_02753613	Ghislaine Maxwell 302 Notes; July 17, 2019	
SDNY_GM_02753614	SDNY_GM_02753615	Document from [REDACTED] File	
SDNY_GM_02753616	SDNY_GM_02753636	Epstein Photo Book; June 16, 2021	Confidential
SDNY_GM_02753637	SDNY_GM_02753637	FedEx Certification	
SDNY_GM_02753638	SDNY_GM_02753643	Property Receipts	

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:



[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

Assistant United States Attorneys

[REDACTED]