



U.S. Department of Justice

United States Attorney
Southern District of New York

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April 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 discovery materials are stamped with control numbers SDNY_GM_02743293 through SDNY_GM_02753397.

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_02743293	SDNY_GM_02753127	Records from American Express	
SDNY_GM_02753128	SDNY_GM_02753138	Records from T-Mobile	
SDNY_GM_02753139	SDNY_GM_02753143	Customs and Border Patrol Records	Confidential

SDNY_GM_02753144	SDNY_GM_02753291	Materials from FBI Florida relating to Alfredo Rodriguez investigation ¹	
SDNY_GM_02753292	SDNY_GM_02753317	FBI Florida document	Confidential
SDNY_GM_02753318	SDNY_GM_02753395	Palm Beach Police Department records	Confidential
SDNY_GM_02753396	SDNY_GM_02753397	Palm Beach Police Department video surveillance footage	

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]

¹ We are in receipt of your April 7, 2021 Letter, in which you request disclosure of “the FBI case file concerning the investigation of Alfredo Rodriguez.” The materials within this Bates range constitute the files that the Government referenced in its October 7, 2020 letter to the Court regarding the investigation that led to the prosecution in *United States v. Alfredo Rodriguez*, 10 Cr. 80015 (KAM). This production should not be taken to indicate that the Government believes it has any obligation, under Rule 16 or otherwise, to produce these materials; rather, we make this production as a courtesy.