



Haddon, Morgan and Foreman, P.C.  
Laura A. Menninger

150 East 10th Avenue  
Denver, Colorado 80203



April 6, 2016

Via Email



Re: Giuffre v. Maxwell, 15-cv-07433-RWS

I appreciate your taking the time to talk to me yesterday. As you know, I represent Ghislaine Maxwell in the United States District Court for the Southern District of New York in a defamation action brought by Plaintiff [REDACTED] (aka Jane Doe #3).

During the course of discovery disputes Ms. Sigrid McCawley, counsel for [REDACTED] represented to the Hon. Robert W. Sweet that my client is “under investigation” by an unidentified law enforcement agency. She argues, therefore, that she can withhold documents based initially on a supposed “investigative privilege” and then later on a “public interest privilege.” I am unaware as to how either of these supposed “privileges” would apply to Ms. Giuffre. Regardless, because you are the only person employed by the government who I am aware has knowledge of some of the issues with respect to these individuals, I called you to inquire if you are aware of any investigation by law enforcement.

In response to my questions I understood you to say:

- Ms. Ghislaine Maxwell is not the subject of a current criminal investigation by your office.
- You are unaware of any law enforcement agency currently conducting a criminal investigation of Ms. Maxwell.
- Ms. Maxwell was not named in any non-prosecution agreement with or concerning Jeffrey Epstein.



Page 2

If I have misunderstood any of those statements, please let me know. Thank you for your assistance.

Best regards,

HADDON, MORGAN AND FOREMAN, P.C.

A handwritten signature in blue ink, appearing to read 'L.A.M.', written over a horizontal line. The signature is stylized and extends to the right of the line.

Laura A. Menninger