



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

October 2, 2020

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

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

Dear Counsel:

In recognition of the Government's ongoing discovery obligations, today we are producing copies of the materials listed in the below index, which materials are stamped with control numbers SDNY_GM_000174967 through SDNY_GM_00328863. The password for the drive is "USAOsdny1!". The materials are available for pickup at the U.S. Attorney's Office in Manhattan.

Please note that both this letter and the enclosed materials are governed by the July 31, 2020 Protective Order in this case.¹ **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_00174967	SDNY_GM_00270985	Deutsche Bank records	Confidential
SDNY_GM_00270986; SDNY_GM_00328070	SDNY_GM_00323934; SDNY_GM_00328863	JPMorgan Chase records	Confidential
SDNY_GM_00323935	SDNY_GM_00324015	GM Documents	

¹ 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."

SDNY GM 00324016	SDNY GM 00324036	Citibank records for Ghislaine Maxwell	
SDNY GM 00324037	SDNY GM 00325754	UBS records for Angara Trust, Montepelier Trust, Terramar Project, Inc., Max Foundation, Ghislaine Maxwell, Ghislaine Maxwell IRA, & Ellmax, LLC	
SDNY GM 00325755	SDNY GM 00325761	LSJ Scene2Go	
SDNY GM 00325762	SDNY GM 00328069	American Express records for Jeffrey Epstein and Ghislaine Maxwell	Confidential

The Government is also reproducing to the defendant the files specified in Defense's September 21, 2020 letter. In order to avoid further difficulties with respect to viewing the files, the Government offers the following instructions:

1. Any .dat, .dvt, and .vol files can be opened and viewed by right-clicking on the file and selecting "Edit with Notepad" or a similar text-viewing program.
2. Any video file can be opened with VLC, which has been included.
3. Accessory files (i.e. .dii, .ami, .cms, etc.) are to be ignored, as they serve no functional purpose besides assisting in the operation of other (i.e. video) files.
4. Any previously flagged files that are not noted here have been converted to PDFs and/or had their file paths shortened to enable viewing.

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 or if you wish to arrange a time to review physical items in the FBI's custody.

Very truly yours,

by:

[REDACTED]

[REDACTED]

[REDACTED]

Assistant United States Attorneys

[REDACTED]