



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

February 26, 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\_02742751 through SDNY\_GM\_02742962.

Please note that both this letter and the enclosed materials are governed by the July 31, 2020 Protective Order in this case.<sup>1</sup> **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:

---

<sup>1</sup> 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.

Bates Start	Bates End	Summary Description	Confidential Designation
SDNY_GM_02742751	SDNY_GM_02742752	American Express records	
SDNY_GM_02742753	SDNY_GM_02742754	Amanda Kramer emails	Confidential
SDNY_GM_02742755	SDNY_GM_02742762	A. Kramer emails	
SDNY_GM_02742763	SDNY_GM_02742877	Emails between Serene Nakano and A. Marie Villafana	
SDNY_GM_02742878	SDNY_GM_02742886	A. Kramer February 2016 meeting notes	Confidential
SDNY_GM_02742887	SDNY_GM_02742892	Notes of February 11, 2021 Call with A. Kramer	
SDNY_GM_02742893	SDNY_GM_02742894	Notes from the U.S. Attorney's Office for the Southern District of Florida	
SDNY_GM_02742895	SDNY_GM_02742962	Flight log provided to A. Kramer at February 2016 meeting	Confidential

Among the materials contained in this production is an excerpt of a flight log that former Assistant United States Attorney [REDACTED] received during a February 29, 2016 meeting with attorneys representing [REDACTED] (the "February 2016 meeting"). At the February 2016 meeting, AUSA [REDACTED] received copies of Jeffrey Epstein's black book, excerpts of flight records, and certain Palm Beach Police Department reports. Epstein's black book and the Palm Beach Police Department reports were previously produced to you on August 21, 2020, and can be found at SDNY\_GM\_00174731-SDNY\_GM\_00174827 and SDNY\_GM\_00174880-SDNY\_GM\_00174966 respectively. Today we are producing to you the version of the flight records AUSA Kramer received at the February 2016 meeting, which includes a subset of logs previously produced to you on August 5, 2020 (*see* SDNY\_GM\_00005532-SDNY\_GM\_00005676) as well as two additional pages that were not previously produced to you in discovery, *see* SDNY\_GM\_02742935 and SDNY\_GM\_02742937.

Additionally, in recognition of the Government's obligations under *Brady v. Maryland*, 373 U.S. 83 (1963) and its progeny, we are disclosing the information below. This disclosure should not be taken to indicate that the Government believes the enclosed information constitutes *Brady* material. Rather, we make this disclosure in an abundance of caution. Specifically, the Government discloses the following:

- The witness identified as witness "M" in a 2007 *ex parte* declaration, which you attached as Exhibit B to the Defense Pretrial Motion Number 10 for Bill of Particulars and Pre-Trial Disclosures in this case, is [REDACTED]. On or about November 14, 2006, [REDACTED] was interviewed by the Federal Bureau of Investigation. The notes from that interview contain the following line on page 12: "rumor is that JE is gay," apparently referring to a rumor regarding Jeffrey Epstein's sexual orientation.

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,

AUDREY STRAUSS  
United States Attorney

by:

  
  
