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October 14, 2021

BY CERTIFIED MAIL AND EMAIL

Mr. Scott Falk
Office of Chief Counsel
U.S. Customs and Border Protection
1300 Pennsylvania Avenue, Suite 4.4-B
Washington, D.C. 20229
CBP-Service-Intake@cbp.dhs.gov

Re: *United States v. Ghislaine Maxwell*, S2 20 Cr. 330 (AJN)

Dear Mr. Falk:

We represent the defendant, Ghislaine Maxwell, in the above-referenced matter. This letter constitutes a request made pursuant to *United States ex. rel. Touhy v. Regan*, 340 U.S. 462 (1951) and 6 C.F.R. § 5.43(a)(1) for the production of documents in the possession of the U.S. Customs and Border Protection at the trial in this case on November 29, 2019 at 9:00 A.M., before the Honorable Alison J. Nathan, United States District Judge. The requested documents are set forth in the attached subpoena.

In accordance with 6 C.F.R. § 5.45(a), we make the following statement setting forth “the nature and relevance” of the information we seek:

On March 29, 2021, Ghislaine Maxwell was charged in a superseding indictment with the following offenses: (1) Count One: conspiracy to entice minors to travel to engage in illegal sex acts, (2) Count Two: enticement of a minor to travel to engage in illegal sex acts, (3) Count Three: conspiracy to transport minors with intent to engage in criminal sexual activity, (4) Count Four: transportation of a minor with intent to engage in criminal sexual activity, (5) Count Five: sex trafficking conspiracy, and (6) Count Six: sex trafficking of a minor. The charges relate to an alleged scheme between Ms. Maxwell and Jeffrey Epstein to sexually abuse underaged girls from in or about 1994 to in or about 2004.

The three individuals listed in the attached subpoena are identified in the superseding indictment as “Minor Victim 1,” “Minor Victim 2,” and “Minor Victim 3.” All three individuals are expected to testify for the government at trial.

All three of the witnesses traveled internationally during the time period covered by the attached subpoena, and some have alleged that they traveled at the request

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of, or with the assistance of, Jeffrey Epstein. Because the crimes alleged require interstate or foreign travel, the border crossing records for these individuals will be directly relevant at trial.

If you have any questions or would like to discuss further, please do not hesitate to contact me.

Sincerely,

/s/ Christian R. Everdell
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