



U.S. Department of Justice

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October 20, 2020

BY ELECTRONIC MAIL

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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 00328070 through SDNY_GM_00356148. The password for the drive is [REDACTED] 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:

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."

Bates Start	Bates End	Summary Description	Confidential Designation
SDNY_GM_00328070	SDNY_GM_00328072	2020.07.02, Aerial Video	
SDNY_GM_00328073	SDNY_GM_00328092	FBI Florida Documents	Confidential
SDNY_GM_00328093	SDNY_GM_00328289	FBI NY Documents	
SDNY_GM_00328290	SDNY_GM_00328461	Misc. Photos	Confidential
SDNY_GM_00328462	SDNY_GM_00328667	PBPD Materials	
SDNY_GM_00328668	SDNY_GM_00329968	PBPD Materials	Confidential
SDNY_GM_00329969	SDNY_GM_00330052	PBPD Materials	Highly Confidential
SDNY_GM_00330053	SDNY_GM_00332355	PBSA Materials	Confidential
SDNY_GM_00332356	SDNY_GM_00332436	Scans of FBI Evidence	
SDNY_GM_00332437	SDNY_GM_00332863	Scans of FBI Evidence	Confidential
SDNY_GM_00332864	SDNY_GM_00332869	Scans of FBI Evidence	Highly Confidential
SDNY_GM_00332870	SDNY_GM_00332871	Video from Florida Investigation	Highly Confidential
SDNY_GM_00332872	SDNY_GM_00332887	Videos from Florida Investigation	Confidential
SDNY_GM_00332888	SDNY_GM_00332890	SDFL Materials	Confidential
SDNY_GM_00332891	SDNY_GM_00332891	SDFL Materials	Highly Confidential
SDNY_GM_00332892	SDNY_GM_00332894	FBI Florida Documents	
SDNY_GM_00332895	SDNY_GM_00332928	FBI FL Documents (included with 328073-328092)	Confidential
SDNY_GM_00332943	SDNY_GM_00332958	3-D Blueprints, in PBPD Materials (included with 328462-328667)	
SDNY_GM_00332949	SDNY_GM_00356148	FBI FL Documents from Discs	Confidential and Highly Confidential

Additionally, as you are aware, the Government has seized and extracted data from multiple electronic devices in connection with search warrants executed at Jeffrey Epstein's properties in New York and the Virgin Islands. The data from those devices has been subject to a privilege review, based on privileges asserted by Jeffrey Epstein's estate. Because the estate has not waived any of those privileges, the Prosecution Team in this case will not have access to any materials from those devices identified as privileged by the taint review team, and the Government will not produce any such privileged material to the defense in this case.

Further, it is the Government's current understanding that none of the seized devices belonged to the defendant, Ghislaine Maxwell, and as a result, it is the Government's understanding that the Prosecution Team is not legally permitted to provide you with the full set of non-privileged materials that were extracted from the devices. Instead, the Government anticipates producing only the materials designated responsive to the relevant warrants authorizing the search of these devices. Correspondingly, upon completion of the responsiveness review, the Prosecution Team will only have access to that same set of non-privileged materials deemed responsive to the relevant warrants. The Government expects to produce these responsive, non-privileged materials to you by the November 9, 2020 deadline for completion of discovery.

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
Acting United States Attorney

by: [REDACTED]

Assistant United States Attorneys
[REDACTED]