



**U.S. Department of Justice**

*United States Attorney  
Southern District of New York*

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August 13, 2020

**BY ELECTRONIC MAIL**

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

Dear Counsel:

This letter provides additional discovery pursuant to Rule 16(a) of the Federal Rules of Criminal Procedure (“Fed. R. Crim. P.”). Based on your request for discovery in this case, today we are producing copies of the materials listed in the below index, which materials are stamped with control numbers SDNY\_GM\_00012842 through SDNY\_GM\_00165540. The materials are available for pickup at the U.S. Attorney’s Office in Manhattan. Additionally, to aid in the preparation of the defense, the Government hereby provides notice of the month and year in which the minor victims listed in the Indictment in the above-referenced case were born. Minor Victim-1 was born in August of 1980. Minor Victim-2 was born in July of 1979. Minor Victim-3 was born in March of 1977.

Please note that both this letter and 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 witness-identifying information and information regarding records designated as “confidential” under the Protective Order.**

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<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. Such files include in their electronic names the word “Confidential.”

An index of the materials contained in this production is below:

<b>Bates Start</b>	<b>Bates End</b>	<b>Summary Description</b>	<b>Confidential Designation</b>
SDNY_GM_00012842	SDNY_GM_00020407	First Bank of Puerto Rico Records	Confidential
SDNY_GM_00020408	SDNY_GM_00028286	UBS Financial Records	Confidential
SDNY_GM_00028287	SDNY_GM_00029786	Wells Fargo Records	Confidential
SDNY_GM_00029787	SDNY_GM_00037176	Fifth Third Bank records	Confidential
SDNY_GM_00037177	SDNY_GM_00065957	Deutsche Bank Records	Confidential
SDNY_GM_00065958	SDNY_GM_00078659	JPMorgan Chase Bank records	Confidential
SDNY_GM_00078660	SDNY_GM_00165521	Boies Schiller records	Confidential
SDNY_GM_00165522	SDNY_GM_00165540	Experian records	

Please do not hesitate to reach out if you have any difficulty accessing these materials.

Very truly yours,

AUDREY STRAUSS  
Acting United States Attorney

by:

Assistant United States Attorneys