



U.S. Department of Justice

United States Attorney
Southern District of New York

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February 2, 2021

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 the materials listed in the below index. These discovery materials are stamped with control numbers SDNY_GM_02742303 through SDNY_GM_02742750. One of the items included in this production is the final report of the Office of Professional Responsibility ("OPR") regarding the resolution of the 2006-2008 criminal investigation of Jeffrey Epstein by the U.S. Attorney's Office for the Southern District of Florida (the "OPR Report"). Although the OPR Report is publicly available and accessible through multiple websites, the Government has elected to produce a copy to you as a courtesy.

In addition, due to an inadvertent error in Bates stamping in the prior production, which the Government just discovered, we are reproducing certain of the materials in the below index. These items were originally produced with incorrect Bates numbers that resulted in overlaps. These errors have now been corrected. These discovery materials are now stamped with the correct control numbers SDNY_GM_00328069.001 through SDNY_GM_00328069.794.

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_02742303	SDNY_GM_02742395	AT&T subpoena return, January 28, 2021	Confidential
SDNY_GM_002742396	SDNY_GM_002742398	FBI collected item log regarding highly confidential responsive materials	
SDNY_GM_002742399	SDNY_GM_002742400	FBI report regarding review of responsive digital evidence	
SDNY_GM_002742401	SDNY_GM_002742402	FBI collected item log regarding 10 yearbooks collected from West Palm Beach	
SDNY_GM_002742403	SDNY_GM_002742750	Office of Professional Responsibility report dated November 2020	
SDNY_GM_00328069.001	SDNY_GM_00328069.794	REPRODUCTION, JPMorgan Chase materials	Confidential

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:

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
Assistant United States Attorneys
[REDACTED]

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.