



Christian R. Everdell  
+1 (212) 957-7600  
ceverdell@cohengresser.com

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**BY EMAIL**

[REDACTED]  
[REDACTED]  
[REDACTED]

United States Attorney's Office  
Southern District of New York  
1 St. Andrew's Plaza  
New York, NY 10007

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

Dear [REDACTED]:

We write to renew our request that you produce the FBI case file concerning the investigation of [REDACTED]. We had originally asked for the file in our discovery request letter dated October 13, 2020. You denied our request for the file on October 28, 2020, stating that the file has "no relation to your client and has no bearing on the charges in this case." *See* 10/28/2020 Letter at 7. Now that the S2 superseding indictment has broadened the allegations against Ms. Maxwell up to in or about 2004, Mr. [REDACTED] is very much relevant to the charges in this case and the file should be produced.

For example, in your letter to defense counsel dated March 29, 2021, you specifically identified several Bates numbers which you say relate to the new accuser referenced in the indictment as Minor Victim-4. Those Bates numbers include message pads containing numerous [REDACTED] that we believe were taken by, and signed by, [REDACTED] using the initials [REDACTED]. These message pad slips appear to be some of only a handful of documents upon which the government intends to rely to corroborate the testimony of Accuser-4.

Furthermore, Mr. [REDACTED] was discussed extensively at the February 29, 2016 meeting between AUSA [REDACTED] and attorneys Brad Edwards, Stan Pottinger and Peter Skinner, where the attorneys pitched the government to open an investigation into Epstein and Maxwell. *See* SDNY\_GM\_02742882. The notes appear to reflect an explanation of Mr. [REDACTED] conduct that formed the basis for his obstruction charge. *See id.* As you are aware, the discussions at the February 29, 2016 meeting are squarely at issue in Ms. Maxwell's motion to suppress. As such, the information contained in the FBI investigation file will be relevant at any hearing that takes place on Ms. Maxwell's motion and should therefore be produced.

