



**U.S. Department of Justice**

*United States Attorney  
Southern District of New York*

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*The Jacob K. Javits Federal Building  
26 Federal Plaza, 37th Floor  
New York, New York 10278*

January 31, 2026

**BY ECF**

Honorable Richard M. Berman  
United States District Judge  
Southern District of New York  
500 Pearl Street  
New York, New York 10007

Honorable Paul A. Engelmayer  
United States District Court  
Southern District of New York  
40 Foley Square  
New York, NY 10007

**Re: *United States v. Jeffrey Epstein,*  
19 Cr. 490 (RMB)**

***United States v. Ghislaine Maxwell,*  
20 Cr. 330 (PAE)**

Dear Judges Berman and Engelmayer:

The Government respectfully submits this letter in response to Your Honors' December 10, 2025, Order in *United States v. Epstein*, 19 Cr. 490 (RMB), Dkt. 92, as well as the December 9, 2025 Order in *United States v. Maxwell*, 20 Cr. 330 (PAE), Dkt. 820. The Government submits this letter jointly as it believes that the issues raised are overlapping between the two cases.

In our letter of yesterday, we alerted the Court that the Department would, with specifically identified exceptions, produce identified documents, files, records, videos and images held by the Department related to the investigations of Jeffrey Epstein and Ghislane Maxwell as required by Epstein Files Transparency Act, Pub. L. 119-38, 139 Stat. 656 (Nov. 19, 2025) (the "Act"). As indicated, and throughout the course of yesterday, the Department uploaded more than 3 million pages to the public website. We write below with a set of relevant updates and remain available to answer any questions from the Court.

Hons. Richard M. Berman and Paul A. Engelmayer, U.S.D.J.

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*Protection of Victim Identifying Information.* The Government's letter yesterday discussed, among other issues, the Department's substantial efforts to protect victim privacy, including the steps the Department was prepared to take in the event of the inadvertent publication of victim names or the publication of information that could be used to identify victims. Given, among other things, the manual review and redaction process required to comply with the Act, the Department has been alerted by several victims and victim counsel to instances where additional redactions are needed to protect victim privacy. Additionally, yesterday, counsel for certain victims contacted the Department to provide additional identifiers not previously provided to the Department for redaction. Requests for additional, or corrected, redactions are submitted to an email account (EFTA@usdoj.gov) that is continuously monitored by a team of dedicated Department personnel that are working to redact and replace the documents. Over the course of yesterday and today, the Department has also been working to enhance its processes for reviewing and responding to these requests, including adding additional personnel to the response team. Attorneys at the SDNY have additionally been conferring with victim counsel since prior to the document release, providing updates as tranches of documents were uploaded to the public website, and have offered to provide assistance to counsel in this process. The volume of documents responsive to the Act and the nature of the materials present challenges to quickly redacting documents once they have been flagged, but the Department remains committed to meeting its obligations under the Act while also diligently protecting victim privacy, and is working to further expedite its processes today for receiving and responding to victim outreach concerning documents.

*Document Uploads.* Throughout all of yesterday, and including as final quality control processes and file checks were completed, the Department uploaded a series of tranches of documents to the public website. Additionally, yesterday afternoon, the Honorable Analisa Torres issued an Order authorizing the Department to publicly disclose transcripts and exhibits from grand jury proceedings in *United States v. Noel et al.*, 19 Cr. 830 (AT), Dkt. 73. The Department will promptly release appropriately redacted versions of such materials. As noted in the Department's EFTA Production Letter to Congress yesterday, it has also made an application to release certain materials sealed in a civil proceeding, and awaits further guidance from the Court in that matter.

The Government will continue to keep the Court apprised of relevant developments and remains available, as always, to answer any questions the Court may have.

Respectfully yours,

/s/ Jay Clayton

JAY CLAYTON

United States Attorney

Southern District of New York