

From: [REDACTED]

To: [REDACTED]

Cc: [REDACTED]

Subject: RE: Ghislaine Maxwell (02879-509)

Date: Mon, 02 Nov 2020 16:21:39 +0000

Thanks [REDACTED] Not surprising but still frustrating that all this nothingness led to an urgent Sunday evening email.

From: [REDACTED]

Sent: Monday, November 2, 2020 11:07 AM

To: [REDACTED]

Cc: [REDACTED]

Subject: RE: Ghislaine Maxwell (02879-509)

Just got the following update from [REDACTED] (which I have conveyed to [REDACTED]):

- Within the last approximately 48 hours, MDC staff has conducted temperature checks in Ms. Maxwell's cell, all of which revealed that the temperature in Ms. Maxwell's cell was between 71 and 74 degrees. MDC legal counsel noted that the target temperature for the MDC during this season is 68 degrees. MDC staff also gave Ms. Maxwell an extra blanket, so she now has three blankets in her isolation cell.
- MDC staff physically entered Ms. Maxwell's cell and did not observe any smell or moisture. The unit team leader physically felt the papers in Ms. Maxwell's cell and observed that they felt normal and in no way damaged by moisture.
- MDC staff will ensure that Ms. Maxwell is able to bring a cup and a snack with her into her isolation cell.

From: [REDACTED]

Sent: Sunday, November 1, 2020 1:20 PM

To: [REDACTED]

Cc: [REDACTED]

Subject: Re: Ghislaine Maxwell (02879-509)

Okay, thanks for the heads up. Please let us know what you learn back from [REDACTED]

Sent from my iPhone

On Nov 1, 2020, at 1:06 PM, [REDACTED] > wrote:

Chiefs,

FYI, we just received the below from Maxwell's counsel. I've forwarded to [REDACTED] and asked her to call me ASAP to discuss. Wanted to let you know in case this turns into another letter to AJN.

Thanks,

From: [REDACTED]

Sent: Sunday, November 1, 2020 12:41 PM

To: [REDACTED]

Cc: [REDACTED]

Subject: Ghislaine Maxwell (02879-509)

Good afternoon-

I write to request immediate assistance for Ghislaine Maxwell.

There are many conditions and restrictions placed upon her at the MDC that are of great complaint, but of immediate concern are conditions within Ms. Maxwell's isolation cell.

The combination of cold, moisture, and sewage stench have made confinement in her cell unhealthy, unbearable, and utterly unreasonable.

Her request for an extra blanket has been denied.

Her request for use of her day mug for water has been denied.

(She's been told to cup her hands to drink water from the faucet.)

Her request to keep a snack in her cell has been denied.

The moisture accumulating in her cell risks her health and the security of her legal work.

You have known me and my reputation among your colleagues and the court.

Trust me when I say that in my 35 years of federal criminal practice, having represented individuals charged and convicted of terrorism and capital murder, housed in

MCC's 10South and FCI Florence-ADMAX (facilities I have visited), I have never witnessed such inappropriate and outlandish treatment of a non-violent pretrial detainee held on risk of flight.

The mistreatment of Ghislaine Maxwell reflects negatively on your Office, the Court, and the BOP. The Government as a whole can and needs to do better.

For today, we seek the bare minimum - a change of cell to a location that is safe from the cold, moisture, and stench, and an extra blanket to keep her warm.

The rest will be left for another day.

Please assist.

Thank you-

Bobbi

BOBBI C. STERNHEIM, ESQ.

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**Covid-19 Notice: The West 19th Street office is currently closed but we continue to work remotely.

Please use email or fax, instead of regular mail, for all correspondence during this time.

We continue to work regular business hours throughout this situation.

Thank you for your consideration. Our best wishes for your good health and well being.

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