

From: "[REDACTED]" >

To: "[REDACTED]" >

Cc: "[REDACTED]" >

Subject: Maxwell/MDC Complaints

Date: Fri, 30 Apr 2021 12:55:02 +0000

Attachments: 2021.04.29_AJN_Order_re_GM_Sleeping_Conditions.pdf; Letter_re-_Sleep_Deprivation-4-29-21.pdf

Hi [REDACTED],

A couple of things to put on your radar related to Maxwell's complaints about MDC:

- With respect to her complaints that MDC confiscated her legal documents in an attorney visit last weekend, MDC put in a fairly decent letter citing their regulations that permitted them to search legal documents for contraband and that prohibit passing documents to inmates. AJN then issued an order denying Maxwell's request for an order to show cause, but directing the MDC to affirm whether they copied Maxwell's legal documents and what they are doing to protect her A-C privilege. They submitted a response yesterday that confirmed they did not copy the documents and outlined their general policies for how attorney visits/calls/video conferences take place.
- With respect to her complaints about sleep, Maxwell filed the attached letter yesterday, including a photo of an alleged black eye that she doesn't know how she got, but it may be related to how she covers her eyes with a sock or cloth at night due to the flashlights. (??) AJN directed us to confer with MDC to answer specific questions (attached in the memo endorsement to her letter) and submit a response by May 5, which the team is working on.

Happy to discuss further if you have questions.

Thanks,

[REDACTED]

[REDACTED]

U.S. Attorney's Office

Southern District of New York

[REDACTED]

[REDACTED]