

From: [REDACTED]
[REDACTED]
[REDACTED]

Subject: FW: Ghislaine Maxwell 02879-509

Date: Fri, 08 Jan 2021 18:21:05 +0000

FYI

-----Original Message-----

From: [REDACTED]

Sent: Friday, January 8, 2021 1:15 PM

To: BOBBI C STERNHEIM <bcsternheim@mac.com>

Cc: [REDACTED]; Christian Everdell <CEverdell@cohengresser.com>; Mark S. Cohen <mcohen@cohengresser.com>; [REDACTED]

Subject: Re: Ghislaine Maxwell 02879-509

Good afternoon Bobbi:

As you noted Ms. Maxwell has continuously been produced in advance of 12:30 PM. In addition, I would like to note that while Ms. Maxwell was produced after the scheduled time (twice), the additional time was provided to compensate for the delay. Please understand that while we are working to ensure all inmates are produced for their court and legal calls, there are institutional emergencies that require additional assistance, causing staff to slightly deviate from time frames.

Should you request a copy of the incident report, Ms. Maxwell may provide you with it, however I cannot. I can further assure you that the daily searches are consistent with BOP Program Statement § 552.06, Searches of Housing Units, Inmates, and Inmate Work Areas. It is my understanding that gloves and masks were recently brought to the unit.

Any further concerns you have indicated will be reviewed and addressed accordingly if need be.

Thank you for your time and patience in this matter, [REDACTED]

>>> [REDACTED] 1/7/2021 9:50 PM >>>

For the past two days, Ms. Maxwell has not been on time for the daily 12:30 VTCs. Yesterday, she arrived at 12:59; today she arrived at 12:47. Until yesterday, Ms. Maxwell appeared in advance of 12:30. We appreciate [REDACTED]'s assistance in facilitating Ms. Maxwell's appearance, but no explanation has been provided for these delays..

Each delay limits the time Ms. Maxwell can confer with counsel. We hope this will not be repeated and is not retribution for complaints made by counsel.

We learned today that the complaint report issued to Ms. Maxwell earlier this week has now been revised. I renew my request for the original report and request a copy of the updated report.

This morning at 6:40 am, the team leader ordered Ms. Maxwell to clean a toilet, providing a few paper towels, but no gloves, sending a clear message that Ms. Maxwell should clean the toilet bare handed, despite having cleaned the toilet the night before. Gloves were provided only upon request by Ms. Maxwell. Per the A&O Handbook, sanitation duties commence at 7:30 am for pretrial inmates (See A&O, p.4). We request that Ms.

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Maxwell be permitted to perform sanitation duties in the evening when returned to her isolation cell.

Further, the team leader ordered Ms. Maxwell to clean crumbs from her bed. Lest she face another charge of being untidy, Ms. Maxwell attempted to comply but there were no crumbs - just stains on the blanket issued to her. This is another example of the petty officiousness displayed by the present team.

The ear searches continue. Routinely, in connection with open mouth searches, guards run fingers through Ms. Maxwell's hair and behind her ears, at times before she gets a chance to put on her face mask. These searches - conducted within 6 inches of Ms. Maxwell's face - continue to increase her risk of exposure to COVID. The number of daily searches of Ms. Maxwell, an isolated inmate under constant surveillance by multiple guards, seems excessive and unnecessarily violative..

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