

**From:** "[REDACTED]" <[REDACTED]>  
**To:** "[REDACTED] (USANYS)" <[REDACTED]>  
**Cc:** "[REDACTED]" <[REDACTED]>, "[REDACTED] (USANYS)" <[REDACTED]>  
**Subject:** RE: laptop for MDC  
**Date:** Thu, 29 Oct 2020 14:23:05 +0000

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Hi [REDACTED],

Thanks for your help with this. We spoke with [REDACTED] at BOP legal this morning, and she highlighted three specific requirements for the laptop:

- It must be disabled for all communications, including wifi/bluetooth
- All games and entertainment programs must be disabled/uninstalled
- All audio and video recording capabilities must be disabled

[REDACTED] is conferring with the Warden in the next few days to determine whether our laptop request will be approved. If the request is approved, we are aiming to deliver the laptop to MDC on November 16<sup>th</sup>, if at all possible. We would need time to load the laptop with files before it goes to MDC.

Thanks so much,

[REDACTED]

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**From:** [REDACTED] (USANYS) <[REDACTED]>  
**Sent:** Wednesday, October 28, 2020 2:44 PM  
**To:** [REDACTED] <[REDACTED]>  
**Subject:** Re: laptop for MDC

It sure we will research one tonight and place the order tomorrow. It depends on availability and delivery. Do we have a copy of the data that goes with the drive?  
Also with the ever changing policies in BOP, can you confirm that they will allow her to have a laptop. Not sure the rules at MDC.

Sent from my iPhone

On Oct 28, 2020, at 2:22 PM, [REDACTED] <[REDACTED]> wrote:

Perfect, thanks so much. How long would you estimate that will take?

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**From:** [REDACTED] (USANYS) <[REDACTED]>  
**Sent:** Wednesday, October 28, 2020 2:20 PM  
**To:** [REDACTED] <[REDACTED]>  
**Cc:** [REDACTED] <[REDACTED]>; [REDACTED] (USANYS) <[REDACTED]>  
**Subject:** RE: laptop for MDC

We will spec out a laptop to purchase for this case.

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**From:** [REDACTED] <[REDACTED]>  
**Sent:** Wednesday, October 28, 2020 2:09 PM  
**To:** [REDACTED] (USANYS) <[REDACTED]>  
**Cc:** [REDACTED] <[REDACTED]>; [REDACTED] (USANYS) <[REDACTED]>  
**Subject:** RE: laptop for MDC

Thanks so much.

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**From:** [REDACTED] (USANYS) <[REDACTED]>  
**Sent:** Wednesday, October 28, 2020 2:06 PM  
**To:** [REDACTED] <[REDACTED]>  
**Cc:** [REDACTED] <[REDACTED]>; [REDACTED] (USANYS) <[REDACTED]>  
**Subject:** RE: laptop for MDC

Let me discuss with [REDACTED] the best options. get back to you shortly.

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**From:** [REDACTED] <[REDACTED]>  
**Sent:** Wednesday, October 28, 2020 1:58 PM  
**To:** [REDACTED] (USANYS) <[REDACTED]>  
**Cc:** [REDACTED] <[REDACTED]>; [REDACTED] (USANYS) <[REDACTED]>  
**Subject:** laptop for MDC

Hi [REDACTED],

I hope you're doing well. Because of some discovery accessibility issues we're having in the Ghislaine Maxwell case, we would like to provide a clean laptop to Maxwell in MDC for discovery review purposes. The laptop need only permit review of standard files – word, pdf, .tif, .xls, etc. All other capabilities and programs can be disabled. I understand we did something similar in the Avenatti case, and we'd like to do the same here. Would that be possible? It would be a huge help to us if you could possibly prep and provide us with a laptop for this purpose.

Thanks so much—

[REDACTED]