

From: "[REDACTED]" <[REDACTED]>
To: [REDACTED] <[REDACTED]>, [REDACTED] <[REDACTED]>
Cc: "[REDACTED]" <[REDACTED]>, "[REDACTED] (USANYS)" <[REDACTED]>
Subject: RE: FW: Ghislaine Maxwell 02879-509
Date: Wed, 30 Dec 2020 18:35:26 +0000

Yes, I'll call you in a minute.

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

From: [REDACTED] <[REDACTED]>
Sent: Wednesday, December 30, 2020 1:35 PM
To: [REDACTED] <[REDACTED]>; [REDACTED] <[REDACTED]>
Cc: [REDACTED] <[REDACTED]>; [REDACTED] (USANYS) <[REDACTED]>
Subject: Re: FW: Ghislaine Maxwell 02879-509

Available right now for a quick call?

>>> "[REDACTED]" <[REDACTED]> 12/30/2020 1:20 PM >>>
[REDACTED] and [REDACTED],

Additional email to discuss when you are available.

Thanks,
[REDACTED]

[REDACTED]
Assistant United States Attorney
Southern District of New York
1 St. Andrew's Plaza
New York, NY 10007

[REDACTED] <mailto:[REDACTED]>

From: BOBBI C STERNHEIM <bcsternheim@mac.com>
Sent: Wednesday, December 30, 2020 8:43 AM
To: [REDACTED] <[REDACTED]>
Cc: [REDACTED] <[REDACTED]>; [REDACTED] (USANYS) <[REDACTED]>;
Christian Everdell <[REDACTED]>; Mark S. Cohen <[REDACTED]>
Subject: Ghislaine Maxwell 02879-509

Good morning, [REDACTED]-

I am responding to select portions of yesterday's email:

Ms. Maxwell reports that she is searched, patted, and wanded multiple times per day
1- Isolation Cell to Day Room

EFTA00023113

2- Day Room to VTC Room -
3 - VTC Room to Day Room
4- Day Room to Isolation Cell
2 additional searches if she goes to and from recreation.

In addition, multiple times per day, she is required -to remove her shoes for inspection of her feet and shoes -to remove her mask for inspection of her mouth (now with a flashlight)
accompanied by inspection inside and behind her ears.

Her cell is searched multiple times per day:
In her presence- when she is taken out of her Isolation Cell in the morning Outside her presence-evidenced by items removed from her locker and papers left in disarray.
Also, her personal papers are searched in the Day Room.

At least 2 guards have eyes on her while she showers (her feet and head exposed) -“for her safety.”

Re: ambient temperature, which registered 68.6 on 12/21 (and decreases during the night)- Monday night (12/28) the ambient temperature was taken just inside the door frame of her Isolation Cell, not near the external non-insulated concrete wall on which condensation accumulates due to differentials between external and internal temperature.
Ms. Maxwell was given the third blanket in response to her being cold after condensation had accumulated.

Unlike other inmates - whose body temperatures elevate heat in common areas - Ms. Maxwell is an isolated inmate; no heat is generated from others to provide additional heat.

Given that she is surveilled 24 hours a day by handheld and stationary cameras, is escorted from locked area to locked area in the custody and control of 3 to 6 guards, and has no contact with any other inmates, it is unreasonable to compare her circumstances to any other inmate.

The searching is disproportionate to the amount of security and cameras focused directly on her and her circumstances as an isolated inmate under constant surveillance.

Thank you for your continued assistance.

Best wishes to you and your family for a happy and healthy new year.
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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