

**From:** [REDACTED]  
**To:** [REDACTED]  
**Cc:** [REDACTED]  
[REDACTED]

**Subject:** Re: Ghislaine Maxwell 02879-509  
**Date:** Mon, 11 Jan 2021 14:49:14 +0000

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Your email will be forwarded to the appropriate parties.

Best,  
[REDACTED]

>>> [REDACTED] > 1/9/2021 4:09 PM >>>

Good afternoon-  
Thank you for the response.  
To avoid repeated, inappropriate touching of Ms. Maxwell's breasts during numerous daily pat-down searches, we are requesting the guards avoid touching and brushing over her breasts while she is wearing a thin tee shirt.  
We request that Ms. Maxwell be permitted to wear her khaki v-neck top during pat searches.  
The v points directly to the area where Ms. Maxwell should be searched and minimizes unnecessary exposure and feeling of vulnerability occurring several times per day.  
Enjoy the weekend.

[REDACTED]  
Law Offices of [REDACTED]  
[REDACTED] - 4th Floor  
New York, NY 10011

Main: [REDACTED]  
Cell: [REDACTED]  
Fax: [REDACTED]  
[REDACTED]

>  
> **\*\*Covid-19 Notice:** The [REDACTED] 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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> On Jan 8, 2021, at 1:15 PM, [REDACTED] wrote:

>  
> Good afternoon [REDACTED]:  
>  
> 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. 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..  
>  
>  
> [REDACTED]  
> Law Offices of [REDACTED]  
> [REDACTED] - 4th Floor  
> New York, NY 10011  
>  
> Main: [REDACTED]  
> Cell: [REDACTED]  
> Fax: [REDACTED]  
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Thank

> you.

>

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