

From: "██████████)" <██████████>
To: "██████████)" <██████████>, "██████████ (USANYS)"
<██████████>, "██████████)" <██████████>
Subject: FW: Ghislaine Maxwell 02879-509
Date: Thu, 17 Jun 2021 18:43:06 +0000

From: BOBBI C STERNHEIM <██████████>
Sent: Thursday, June 17, 2021 2:21 PM
To: █████ <██████████>
Cc: █████ <██████████>; █████ <██████████>; Christian Everdell
<██████████>
Subject: Ghislaine Maxwell 02879-509

Good afternoon-

Earlier this week, around 1:00 am

guards purposely awoke Ms. Maxwell because they observed her body shaking and were concerned that she was having a seizure.

They determined she was shivering from the extremely cold temperature in her cell.

At approximately 3:00 am the following day, the guards again disrupted Ms. Maxwell's sleep because her body was shaking. Again, they determined that she was shivering and gave her a blanket.

The guards have now removed two of her blankets, claiming the blankets are not authorized. Today, Ms. Maxwell awoke cold and headachy with a sore throat. When medical staff came by she was too exhausted to address her physical discomfort.

Please explain why guards purposely disrupt Ms. Maxwell's sleep, determine she is shivering, and then remove blankets- her only source of warmth. This makes no sense, is detrimental to her health, and is utterly insensitive.

In addition, VTC viewing is less blurry on counsel's end but the image repeatedly becomes broken and then completely blacks out.

This is disrupting attorney-client communication, the ability to prepare for trial, and is negatively impacting counsel's vision and concentration.

Please address and remedy this problems immediately.

BOBBI C. STERNHEIM, ESQ.
Law Offices of Bobbi C. Sternheim
██████████

New York, NY 10011

Main: █████

Cell: █████

Fax: █████

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On Jun 16, 2021, at 1:46 PM, BOBBI C STERNHEIM <[REDACTED]> wrote:

Good afternoon-

Despite being subjected to the most unique, restrictive, and invasive conditions of pretrial confinement, Ms. Maxwell has and continues to be a compliant detainee. She obeys all orders and commands - often muffled by masks, uttered behind prison doors, and/or combined with the din of background noise - as soon as they are audibly discernible.

Erratic enforcement of inconsistent rules and regulations imposed by revolving teams of guards who exert varying degrees of officiousness and contempt toward Ms. Maxwell is the fault of the MDC/BOP, not Ms. Maxwell.

Regards,

Bobbi

BOBBI C. STERNHEIM, ESQ.

Law Offices of Bobbi C. Sternheim

[REDACTED]
New York, NY 10011

Main: [REDACTED]

Cell: [REDACTED]

Fax: [REDACTED]

[REDACTED]

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On Jun 16, 2021, at 11:25 AM, [REDACTED] <[REDACTED]> wrote:

Hi Bobbi-

I apologize for the delay in response. I have been out of office sick.

We are looking into the concerns you have brought to our attention regarding the VTC units. All of the VTC units throughout the institution are now being stored in this manner as it is a protective barrier for the equipment. With that said, we will be doing test runs to investigate concerns you have mentioned.

Furthermore, Ms. Maxwell must oblige by the orders of the Officers. We offer Ms. Maxwell medical care on a daily basis, which she has declined.

Additionally, can you please provide me with a photo of the ear buds you are requesting to bring into the institution?

Best,

[REDACTED]

BOBBI C STERNHEIM <[REDACTED]> 6/16/2021 10:23 AM >>>

Good morning-

As reported yesterday, the modifications made in the VTC room are negatively impacting attorney-client communication.

The video is blurry; the audio includes distorting noises.

I am requesting that these problems be remedied immediately.

Also, I am bringing to your attention the inappropriate behavior of the

guards presently on Ms. Maxwell's detail: threatening discipline if Ms. Maxwell is "off camera" while leaning against a wall to soothe her aching

back; barking orders regarding the noise emanating from the washing machine

and the pace of her gait when walking; laughing amongst themselves as if any of this is funny.

The manner in which some of the guards responded to me on Sunday gives me reason to be concerned

about how they treat Ms. Maxwell when out of public view.

The courtesy of a response is requested.

Thank you-

Bobbi

BOBBI C. STERNHEIM, ESQ.
Law Offices of Bobbi C. Sternheim
[REDACTED]

New York, NY 10011

Main: [REDACTED]

EFTA00032746

Cell: [REDACTED]

Fax: [REDACTED]

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