

**From:** "██████████)" <██████████>  
**To:** █████ <████████>; █████ <████████>  
**Cc:** "████████ (USANYS)" <████████>; "████████)" <████████>

**Subject:** RE: Questions re Maxwell

**Date:** Mon, 23 Nov 2020 15:50:24 +0000

**Attachments:** 2020-11-23\_GM\_letter\_update\_re\_MDC\_conditions\_v2.docx

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Good morning,

Attached is the final version of the letter to Judge Nathan █████. This is the final version that we plan to file. Please let me know ASAP if anything in this letter is inaccurate.

Thanks very much,  
████████

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

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**From:** █████ (USANYS)  
**Sent:** Sunday, November 22, 2020 6:34 PM  
**To:** █████ <████████>  
**Cc:** █████ (USANYS) <████████>; █████ <████████>  
**Subject:** RE: Questions re Maxwell  
████████

Attached please find a draft update letter to Judge Nathan. Please let me know by the end of the day tomorrow (11/23) if anything in this letter is inaccurate. █████

Also, if you could please get me responses to the two questions in my below email tomorrow, I'd be very grateful.

Happy to have a call if that would be useful.

Thanks very much,  
████████

████████  
Assistant United States Attorney  
Southern District of New York  
1 St. Andrew's Plaza

EFTA00030487

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**From:** [REDACTED]  
**Sent:** Friday, November 20, 2020 2:34 PM  
**To:** Nicole McFarland <[REDACTED]>; Sophia Papapetru <[REDACTED]>  
**Cc:** [REDACTED] (USANYS) <[REDACTED]>; [REDACTED] <[REDACTED]>  
**Subject:** Questions re Maxwell

Hi [REDACTED],

I just got a call from [REDACTED] and we discussed a number of issues regarding Maxwell. The two issues I wanted to follow up with you about are below:

- Maxwell is reporting that a staff member named [REDACTED] or [REDACTED] was part of the group that included a COVID positive individual but [REDACTED] is still working at the MDC. Would you please check on that for me?
- Maxwell reported that a staff member entered her cell while she was inside it and took photographs of her cell today. Anything you can share with me about the purpose of that?

More generally, [REDACTED] indicated that she believes Maxwell's mental health is deteriorating significantly because of the constant surveillance she is experiencing. She reports being awoken in the night by a light shining into her eyes multiple times a night, being searched more frequently than other inmates, and having a camera constantly pointed at her in a way that other inmates do not experience. Our office of course defers to BOP on decisions regarding what is necessary for safety and security, but I wanted to pass along the concern.

Thanks,

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