

From: [REDACTED] <[REDACTED]>

To: [REDACTED] >, [REDACTED]
>

Cc: [REDACTED] >

Subject: RE: Ghislaine Maxwell (USMS No. 02879-509)

Date: Mon, 13 Jul 2020 23:28:37 +0000

Good evening,

As discussed, I have run this up my chain, and BOP would prefer not to comment on Ms. Maxwell's housing conditions in public filings.

Thank you!

[REDACTED]

>>> "[REDACTED]" <[REDACTED]> 7/12/2020 4:17 PM >>>

Thanks, [REDACTED]. On a separate subject, is it correct that, for security reasons, the defendant is being housed in her own cell (without a cellmate), and that her exercise time is separate from other inmates? That is our current understanding, but we wanted to confirm, and also to make sure the BOP would not have an issue if we referenced this in public filings.

Thanks,

[REDACTED]

From: [REDACTED] <[REDACTED]>

Sent: Sunday, July 12, 2020 4:13 PM

To: [REDACTED] <[REDACTED]>

Cc: [REDACTED] <[REDACTED]>; [REDACTED] <[REDACTED]>; [REDACTED]
<[REDACTED]>

Subject: RE: Ghislaine Maxwell (USMS No. 02879-509)

[REDACTED]

Thanks for the update, and totally understand it's over a weekend, and we did not know that defense counsel had also been having additional afternoon calls, so that's helpful to know. Also helpful to know that you have not received other calls or emails from counsel. We'll let her counsel know that they will have calls tomorrow and Tuesday at 10:00 a.m., and thanks very much again for your help.

[REDACTED]

From: [REDACTED] <[REDACTED]>

Sent: Sunday, July 12, 2020 15:28

To: [REDACTED] <[REDACTED]>

Cc: [REDACTED] <[REDACTED]>; [REDACTED] <[REDACTED]>; [REDACTED]
<[REDACTED]>

Subject: Re: Ghislaine Maxwell (USMS No. 02879-509)

Apologies all, I just saw these emails. We are not providing weekend calls generally at this time, and counsel has been having 2 hour legal calls every afternoon in addition to the standing call set up in the morning. This is far more than almost every

other inmate receives prior to an arraignment. Most other arraignments have been set up with one or two days notice, with only one call to counsel and one call to pretrial services.

I have received no calls or emails from counsel, so I'm not sure where they have made these emergency requests.

They will have another call with her tomorrow, and I can let staff know they will request the call on Tuesday as well.

>>> "[REDACTED]" <[REDACTED]> 7/12/2020 12:42 PM >>>
[REDACTED]

Following up, we heard from defense counsel that they didn't receive a call this morning either and that they filed an emergency request but haven't heard back. Please let us know the status as soon as possible? They also wanted to confirm that they will have calls at 10:00 tomorrow and Tuesday. Again, we realize this is unusual but I'm not aware of any other defendants who are in this circumstance of having a bail hearing pending in just two days. Also copying [REDACTED] in case he's aware of someone else we should contact.

thank you,
[REDACTED]

On Jul 12, 2020, at 09:24, [REDACTED] <[REDACTED]> wrote:
[REDACTED]

Following up on this — we understand that as of Tuesday defense counsel will go through the normal process, but since the client's bail hearing is Tuesday they did anticipate being able to speak with her this weekend and tomorrow in advance. Thanks again and sorry for the bother.
[REDACTED]

On Jul 11, 2020, at 17:16, [REDACTED] <[REDACTED]> wrote:
[REDACTED]

We just were contacted by defense counsel, who said they didn't have a call with their client this morning – I think they expected that the morning calls up until her arraignment on Tuesday would include the weekend. Is it possible to reinstitute the call for tomorrow at 10:00, as well as on Monday? Thanks very much, and sorry for the late notice – we just heard from them a moment ago.

thanks,
[REDACTED]

From: [REDACTED]

Sent: Friday, July 10, 2020 10:34

To: [REDACTED] <[REDACTED]>

Cc: [REDACTED] <[REDACTED]>; [REDACTED] <[REDACTED]>

Subject: Re: Ghislaine Maxwell (USMS No. 02879-509)

Great — thank you again! (I told defense counsel that I would ask, but also just to give it a few minutes . . .)

Sent from my iPhone

On Jul 10, 2020, at 10:30, [REDACTED] <[REDACTED]> wrote:
[REDACTED]

I've been informed she is on the phone....

>>> "[REDACTED]" <[REDACTED]> 7/10/2020 10:26 AM >>>
[REDACTED]

Defense counsel for Maxwell communicated to us a few minutes ago that they haven't gotten a call yet this morning. Do you know if that has gone through in the past five or ten minutes? They are looking to speak with her before her interview with pretrial this afternoon.

I'm reachable at [REDACTED] if it's useful to chat in real time.

thanks,

[REDACTED]

On Jul 7, 2020, at 19:50, [REDACTED] <[REDACTED]> wrote:

[REDACTED],

You're welcome. We will do our best to provide a call at 10:00 AM every day this week to Mr. Everdell at the number he has previously provided. We will also provide a call on Monday 7/13/20.

The EDNY and SDNY created a joint protocol whereby counsel may request legal calls to be placed in the afternoon at the MDC. Requests should be sent to [REDACTED].

Truly urgent requests can be sent to me, but unless there is a last minute, imminent court deadline, counsel really should send the requests to the federal defenders, as outlined in the protocol. We want to ensure inmates get equitable access. If they anticipate needing several calls in a week, they should make requests in advance and note whether and when calls would be preferred. Generally, calls are for 30 minutes in duration. If a longer call is desired, that should be explained as well.

If you need anything else, please let me know.

Thank you,

[REDACTED]

>>> "[REDACTED]" <[REDACTED]> 7/7/2020 5:00 PM >>>

Thank you so much, [REDACTED]

A 10am standing legal call every day before the arraignment on Tuesday 7/14 would be perfect if that's something you would be able to accommodate. Defense counsel will be available at that time, and they are very grateful for the time.

We have also conveyed to defense counsel that they will need to follow the same protocols as other inmates' counsel following the arraignment. Thank you for letting us know about the lack of requests from defense counsel thus far. There appears to be some confusion on their end about how to submit requests to schedule legal calls. Would you be able to please share with us the procedure that they should follow, so that we can make sure they understand what steps to take going forward?

Thank you again for all of your help—we really appreciate it.

Best,

[REDACTED]

From: [REDACTED] <[REDACTED]>

Sent: Tuesday, July 7, 2020 4:23 PM

To: [REDACTED] <[REDACTED]>

Cc: [REDACTED] <[REDACTED]>; [REDACTED]

<[REDACTED]>

Subject: RE: Ghislaine Maxwell (USMS No. 02879-509)

You're welcome.

Would 10 am work as a standing legal call through the end of this week (and Monday, if you think that's a good idea), in advance of the arraignment on Tuesday? However, after this, defense counsel should be required to follow the same protocols as all other inmates' counsel with respect to requesting legal calls.

I also just want to make clear that defense counsel sent no requests yesterday that I am aware of, and we were able to facilitate a call yesterday evening following a request from your office, and today, I received one request, about mid-day, that we were again able to accommodate. So, I do not think it is fair at all to categorize this as defense counsel having difficulty scheduling legal calls.

Thank you,

[REDACTED]

>>> "[REDACTED]" <[REDACTED]> 7/7/2020 2:37 PM >>>

Thanks, [REDACTED]. This is about the legal call today. In addition, because defense counsel has having difficulty scheduling legal calls, it would be helpful if MDC could schedule standing calls for the rest of this week to address this issue. Thanks very much.

From: [REDACTED] <[REDACTED]>

Sent: Tuesday, July 7, 2020 2:36 PM

To: [REDACTED] <[REDACTED]>

Cc: [REDACTED] <[REDACTED]>; [REDACTED] <[REDACTED]>

Subject: Re: Ghislaine Maxwell (USMS No. 02879-509)

Hi [REDACTED],

I just saw this now. Is this about the legal call issue or something separate? If it's about the legal call, I am working on it.

Thanks,

[REDACTED]

>>> "[REDACTED]" <[REDACTED]> 7/7/2020 1:27 PM >>>

Hi [REDACTED],

Thanks for your help with this. Are you available now for a call? We are having a time sensitive issue with this.

Thanks,

[REDACTED]

Sent from my iPhone

On Jul 6, 2020, at 7:59 PM, [REDACTED] <[REDACTED]> wrote:

Hi [REDACTED],

For future reference, there is a protocol in place for defense counsel to request legal calls. If counsel is unaware of it, I can provide the details.

However, I understand that she just came into custody today and there is a more urgent deadline. If you can please provide the name and phone number of counsel, I will do my best.

Thanks,

[REDACTED]

Sent from my Verizon, Samsung Galaxy smartphone

----- Original message -----

From: "[REDACTED]" <[REDACTED]>

Date: 7/6/20 7:48 PM (GMT-05:00)

To: [REDACTED] <[REDACTED]>

Cc: [REDACTED] <[REDACTED]>, [REDACTED] <[REDACTED]>

Subject: Ghislaine Maxwell (USMS No. 02879-509)

>>> "[REDACTED]" 07/06/2020 19:48 >>>

Hi [REDACTED],

Hope you're doing well. This evening, Judge Nathan directed the parties in the US v. Ghislaine Maxwell case to file a letter by 9pm today. Defense counsel need to speak with Ms. Maxwell this evening about the letter, but they have not been able to reach her. Would it be possible to allow Ms. Maxwell to make a legal call to her lawyers this evening, please?

Thank you very much for your help.

[REDACTED]

[REDACTED]

Assistant United States Attorney

Southern District of New York

1 St. Andrew's Plaza

New York, NY 10007

[REDACTED]

[REDACTED]