

From: [REDACTED] <[REDACTED]>
To: [REDACTED] <[REDACTED]>, BOBBI C STERNHEIM <[REDACTED]>
Cc: Christian Everdell <[REDACTED]>, "Mark S. Cohen"
<[REDACTED]>, [REDACTED]
Subject: Re: Ghislaine Maxwell 02879-509
Date: Thu, 07 Jan 2021 17:05:33 +0000

Good afternoon Bobbi:

We have receive your concerns and will be looking in to these matters.
All concerns will be properly addressed as needed.

Best,

>>> BOBBI C STERNHEIM <[REDACTED]> 1/6/2021 2:38 AM >>>

Counsel for Ghislaine Maxwell learned that she has been issued a disciplinary charge. Please provide a copy of the Incident Report. Members of the same team who physically mistreated and threatened Ms. Maxwell on Sunday now claim that she is not tidy (See email below.) The basis of the charge is unclear - because Ms. Maxwell has not deviated from her routine of the past 7 months. But the fact that it comes after Ms. Maxwell and counsel made complaints about staff is concerning, disturbing, and questionable. The policy of rotating in staff from other institutions has contributed to lack of consistency and clarity in the management of Ms. Maxwell. One team tells her one thing which is then contradicted by another team. One team tells her she can't keep books in her locker; another team tells her to put books in her locker. One team tells her to keep a set of clothes in her isolation cell; another team faults her for doing so. Ms. Maxwell's request for guidance is met with a terse response: "Read the A&O handbook."

Ms. Maxwell cannot ask other inmates for help and is at the mercy of guards who appear to delight in their power over her. The present team was particularly harsh during a previous rotation and seem to have increased their contempt for Ms. Maxwell.

Ms. Maxwell- and counsel- are concerned for her safety while in the custody of the present team. In lieu of an opportunity for Ms. Maxwell to be moved to another unit, and the unlikelihood that she would be transferred to the MCC as a result of Epstein's death while BOP was "asleep" on the watch, we are requesting that the present team be removed from guarding Ms. Maxwell.

Issues still remain concerning Ms. Maxwell's meals. She still is not receiving items on the menu. Yesterday, she received the same meal for lunch and dinner. Tuesday morning she was given an inedible black and rotting banana. Over the weekend she was given bologna, despite being on a non-flesh diet. The guard informed her that the meat had not been refrigerated and recommended that she not eat it. The MDC's inability to provide proper nutrition is reoccurring and

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problematic.

The problems keep escalating, giving rise to the belief that Ms. Maxwell is being targeted and victimized. I urge you to address and correct these problems. The failure to do so will result in a request for court intervention.

BOBBI C. STERNHEIM, ESQ.
Law Offices of Bobbi C. Sternheim
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> On Jan 4, 2021, at 7:07 PM, BOBBI C STERNHEIM <[REDACTED]> wrote:

> Counsel for Ghislaine Maxwell (02879-509) write to report that she was physically mistreated and verbally threatened by MDC staff over the weekend.

> Officer [REDACTED] (sp) performed a body search of Ms. Maxwell inside her isolation cell with her back to the handheld camera.

> During the search, Officer [REDACTED] squeezed Ms. Maxwell's breast with vice-like pressure equivalent to a mammography.

> Ms. Maxwell physically recoiled in response to pain caused by Officer [REDACTED] Another guard, Officer [REDACTED] (sp)

> threatened to charge Ms. Maxwell with "assaulting an officer" should she move again during a search of her person.

> Ms. Maxwell reported the physical incident to a staff psychologist and to an associate warden and was examined by

> medical staff. In addition to written reports, the physical and verbal incidents should have been captured on the hand-held

> camera, used constantly to surveil Ms. Maxwell.

> This is not the first time Ms. Maxwell has been touched inappropriately by MDC staff, as MDC records should reflect.

>

> Counsel for Ms. Maxwell make this report to put the MDC on notice:

> Should Ms. Maxwell be further assaulted and threatened, we will file an official complaint with the Attorney General's Office and notify the Court. This will further blemish the BOP's reputation, already tarnished by negligence resulting in the death of Jeffrey Epstein. The restrictive conditions of Ms. Maxwell's detention in the MDC correlate directly to the Epstein debacle in the MCC, making unprovoked rough treatment of Ms. Maxwell baffling.

>

> Be further advised, should Ms. Maxwell face any retaliation as a result of this email, this too will be promptly reported.

>

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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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