

15546 Meadowgate Road, Encino, CA 91436

December 6, 2021

Merrick B Garland
Attorney General
US Department of Justice
950 Pennsylvania Avenue, NW
Washington DC 20530-0001

Dear Attorney General Garland,

Appeal for immediate improvements in daily in-trial conditions for Ghislaine Maxwell, detained in the Metropolitan Detention Center (MDC), currently standing trial in the Southern District of New York Federal court

In light of inadequate, timely access to Counsel during her trial to date, the lack of adequate sustenance or hygiene provision during 12-hour court days and obliging her to wear four-point shackles prior to being seated in court every day which is hobbling her we, Ghislaine Maxwell's brothers and sisters, address this personal appeal to you today.

We do so in your capacity as Attorney General, with direct responsibility for the Bureau of Prisons, the US Marshals Service and the Federal Courts in the Southern District of NY supervising the trial of our sister and urgently request you to order immediate changes in her in-trial regime in the interests of justice and common humanity.

Background

Ghislaine Maxwell's trial is currently taking place in the Thurgood Marshall United States Courthouse in Manhattan, presided over by the Hon. Alison J Nathan. The trial is in its sixth day today and is anticipated to last a further five weeks.

In the five days of the trial that have taken place to date, the US Marshals Service, ensuring the transport of our sister to and from court and her security during trial, has:

- not permitted her regular access to counsel either before the hearing commences or after the Jury has risen for more than typically 15 minutes in total each day thus depriving our sister of regular access to her counsel during the trial day other than when the court is actually sitting when both she and they must concentrate on proceedings;
- transported her, from MDC to the courthouse in a four-point restraint before 07h00 each morning. The restraint is only removed in the pending cell at the courthouse; she is returned to the MDC again in this same restraint after the court rises each day, only reaching her cell by 19h30, having been required to sit outside the MDC facility in the four-point restraint for more than 90 minutes typically before readmission to the facility. Our sister has been obliged on several occasions to walk up and down stairs in the courthouse whilst wearing this restraint which is injurious to her, causing broken skin, bleeding, bone contusions, painful chaffing, not to mention unnecessary trauma and additional risk of infection in an unclean environment at the MDC with the prevalence of rodent faeces and urine;
- declined to provide her with any but the most basic of sustenance during the court day and on the first day of the trial with no food at all. The diet is limited to boiled eggs, a piece of bread without condiments and one fruit and on the first three days of trial no utensils were

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provided to her. This is wholly inadequate considering the rigors of her ongoing detention now exceeding 500 days, the length of the court day and her need to concentrate fully during proceedings; and finally,

- not permitted her to wash her hands with soap after transportation nor after visiting the rest room. The lack of soap and ability to wash is both against the spirit of Covid measures to protect the safety of detainees and those around them, as well as being unsanitary.

By way of explanation, the US Marshals Service claims that the provision of food, etc, to defendants in court is not their responsibility.

The Bureau of Prisons and the MDC facility have failed to provide our sister with adequate food, or utensils, or a paper towel or napkin, determining that provision of food outside of the facility is the responsibility of the US Marshals Service.

Judge Nathan has declined to intervene in any way.

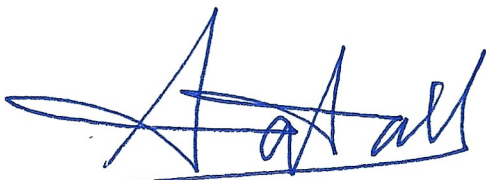
Appeal for immediate remediation and action

Given the abrogation of responsibility for Ghislaine's in-trial access to Counsel and for her physical welfare, we, her family, make this direct appeal to you to order with immediate effect changes to the in-trial conditions of our sister's detention including specific instructions to:

- the US Marshals Service
 - not to use four-point restraints which shackle Ghislaine's hands, waist and feet during transportation to and from the pending cell at the Court
 - to permit her to meet with counsel for at least 30 minutes prior to each day's court hearing and for at least 30 minutes after court has risen each day before her return to MDC
- the Bureau of Prisons to provide Ghislaine with:
 - a food pack for each day of trial that the US Marshals Service shall deliver to her daily at the courthouse upon her arrival; and
 - soap bar with which to wash her hands post transportation to the Court House and any restroom breaks which soap the US Marshals Service shall permit her to use

We urge you to attend to the above requests immediately and without delay.

Respectfully submitted,



Ian Maxwell

By: s/ _____

Anne Holve

Dr. Philip Maxwell

Dr. Christine Maxwell

Isabel Maxwell

Kevin Maxwell