

**From:** Sigrid McCawley <[REDACTED]>  
**To:** " [REDACTED]" <[REDACTED]>  
**Subject:** RE: Filing  
**Date:** Tue, 15 Dec 2020 14:59:37 +0000

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I should be able to get it to you today but just in case it is great to know I can get it to you by the morning.  
Thank you very much for all your hard work!

Sigrid  
**Sigrid McCawley**  
Partner

**BOIES SCHILLER FLEXNER LLP**

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[REDACTED]  
[REDACTED]  
[REDACTED]

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**From:** [REDACTED] [mailto:[REDACTED]]  
**Sent:** Tuesday, December 15, 2020 9:52 AM  
**To:** Sigrid McCawley <[REDACTED]>  
**Subject:** RE: Filing

The filing is due tomorrow, and we will likely aim to file it around 5pm ET, but we can file it later in the evening if needed.

Thanks,  
[REDACTED]

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

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**From:** Sigrid McCawley <[REDACTED]>  
**Sent:** Tuesday, December 15, 2020 9:49 AM  
**To:** [REDACTED] <[REDACTED]>  
**Subject:** RE: Filing

Thanks [REDACTED] – is your filing date today or tomorrow?

**Sigrid McCawley**  
Partner

**BOIES SCHILLER FLEXNER LLP**

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**From:** [REDACTED] | [mailto:\[REDACTED\]](#)

**Sent:** Tuesday, December 15, 2020 9:41 AM

**To:** Sigrid McCawley <[REDACTED]>

**Subject:** RE: Filing

Hi again,

My colleagues just pointed out that a letter addressed to Judge Nathan may be the most natural format for this pdf. But we of course defer to you and [REDACTED] regarding how she would like to format this statement.

Best,

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**From:** [REDACTED]

**Sent:** Tuesday, December 15, 2020 9:35 AM

**To:** Sigrid McCawley <[REDACTED]>

**Subject:** RE: Filing

Hi Sigrid,

Thank you very much for sending this along. We do not need this to be a signed declaration, but it would helpful if you could please provide [REDACTED] statement in a separate pdf with whatever attribution she is comfortable with. We will plan to publicly file that pdf as an exhibit to our memorandum of law in opposition to the bail motion.

Feel free to call my cell ([REDACTED]) if you'd like to discuss or have any questions.

Best,

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**From:** Sigrid McCawley <[REDACTED]>

**Sent:** Monday, December 14, 2020 8:39 PM

**To:** [REDACTED] <[REDACTED]>

**Cc:** Sigrid McCawley <[REDACTED]>

**Subject:** Filing

Hello Maureen,

I hope you are doing great. This is the statement that [REDACTED] would like to submit. What format would you like me to send it in? Should it be as a signed declaration? She is comfortable having it attributed to her name.

"I appreciate the opportunity to again be heard by the Court in this matter and once more request that Ghislaine Maxwell not be released prior to her trial. I write this not only on behalf of myself, but all of the other girls and young women who were victimized by Maxwell. Ghislaine Maxwell sexually abused me as a child and the government has the responsibility to make sure that she stands trial for her crimes. I do not believe that will happen or that any of her victims will see justice if she is released on bail. She has lived a life of privilege,

abusing her position of power to live beyond the rules. Fleeing the country in order to escape once more would fit with her long history of anti-social behavior.

Drawing on my personal experience with Maxwell and what I have learned of how she has lived since that time, I believe that she is a psychopath. Her abuse of me and many other children and young women is evidence of her disregard for and violation of the rights of others. She has demonstrated a complete failure to accept responsibility in any way for her actions and demonstrated a complete lack of remorse for her central role in procuring victims for Epstein. She was both charming and manipulative with me during the grooming process, consistent with what many of her victims have described. She has frequently lied to others, including repeatedly lying about me and my family. Maxwell has for decades lived a parasitic lifestyle relying on Epstein and others to fund her lavish existence.

Maxwell has repeatedly demonstrated that her primary concern is her own welfare, and that she is willing to harm others if it benefits her. She is quite capable of doing so once more. She will not hesitate to leave the country irrespective of whether others will be on the hook financially for her actions because she lacks empathy, and therefore simply does not care about hurting others. She would in fact be highly motivated to flee in order to reduce the possibility of continued imprisonment, the conditions of which she has continuously complained. Her actions over the last several years and choice to live in isolation for long periods suggest that being comfortable is more important to her than being connected. Even more concerning, is if she is let out she has the ability to once again abuse children and the painful consequences of that type of trauma can last a lifetime. I implore the Court to make sure that Ghislaine Maxwell does not escape justice by keeping her incarcerated until her trial.”

**Sigrid McCawley**  
Partner

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