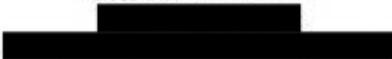


Exhibit I

Chloe Maxwell



1st December 2020

The Honorable Alison J. Nathan
United States District Court
Southern District of New York
United States Courthouse
40 Foley Square
New York, NY 10007

Your Honor:

This statement is provided in support of Ghislaine Maxwell's renewed application for bail and by way of character reference.

I am one of Ghislaine's seven nieces, the daughter of Pandora and Kevin Maxwell, Ghislaine's brother, and I am resident in Oxford in the UK. I am a single mother to my 2-year old son and I rent a small property from my mother whom I live next door to. I work as a Health and Wellbeing Coach, supporting women throughout their pregnancy and postpartum journeys.

I have clear memories of Ghislaine since I was 6 years old. I cared for her very much and she always showed me so much love, kindness and compassion. When I was 12 years old my parents were going through a difficult chapter of their marriage. I remember calling her and asking if I could live with her. Although that did not happen, she subsequently invited me to stay with her in New York.

Whenever I needed Ghislaine she was always there for me and I felt that she was supportive of my dreams and ambitions to be an independent and creative person. She was charismatic, charming, intelligent, generous and kind. I held her on a pedestal when I was growing up. I was always so inspired by how she went out on her own to America to start a new life and she did it with style and courage but also with determination and integrity. In 2009 she again invited me to stay with her as an Intern. I wanted to quit university in UK and she wanted to show me how important it was to become an expert in something. She introduced me to her set in New York and I realised if I wanted to fulfil my potential, I had to specialise in an area to become truly expert. She was then devoting herself to her Oceans charity with her then partner and I recall spending much time with them both and also with his children as well.

In 2013 at my Grandmother's Memorial Service in Oxford I met her then boyfriend and now husband. Ghislaine has always visited Europe sporadically but America has been her home since I can remember. With everything that has happened with Jeffrey in the press and Ghislaine being dragged into the coverage every time, she simply sought a quiet life with her husband and his young children in the States. And I recall spending a wonderful Christmas with them in 2018 when they had invited all Ghislaine's siblings and their children, together with her husband's family to spend quality family time together.

Ghislaine was one of the original 'it' girls in London back in the day. Perhaps because of that 'tag' the media followed her activities for many years and on the back of the Epstein connection have now written defamatory and appalling statements about her quality of character. What the Press has written about her with no personal knowledge of her could not be further from the truth. Throughout my life she has shown nothing but integrity. She loves her family and is a committed and loyal person with morals that are unwavering. My parents entrusted Ghislaine with me when I was aged 12, 15 and 19, all key points during my adolescence. Because of her I have known more of the world, have had my imagination ignited and expanded in ways I could not have imagined and that has had a profound and positive

Chloe Maxwell

impact on me. She did not have to show me the kindness and dedication that she has showed me throughout my life, but she did. When my parents could not provide me with the emotional support I needed at various times, she was always there for me.

I know for sure that what Ghislaine would most like is to have the time and the opportunity to prepare her defence properly against the serious charges she is facing. My mother – who is a real judge of character – is I know willing to put up her home as a pledge to the certainty of Ghislaine not being a flight risk.

I do not have any assets of my own to put forward but I do know that Ghislaine is an honest, committed, loyal and compassionate person who needs her family's support as much as we have needed hers in the past, so it is an honour as much as a personal obligation for me to be able to provide this letter of support for her in her hour of need.

Respectfully yours.



Chloe Maxwell