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UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

<p>██████████</p> <p style="text-align: center;">Plaintiff.</p> <p>v.</p> <p>GHISLAINE MAXWELL</p> <p style="text-align: center;">Defendant.</p>	<p style="text-align: center;">15-cv-07433-RWS</p>
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Declaration of ██████████

I, ██████████, declare as follows:

1. I am currently 42 years old. I was employed by Ghislaine Maxwell as her PA ("personal assistant") for several years until September of 2001. I worked hard in this role and I had a totally professional relationship with Ms Maxwell.
2. During the time that I worked for Ms. Maxwell I met ██████████, now ██████████. I was never involved in any sexual contact with Ms. ██████████, Ms. Maxwell and Jeffrey Epstein as Ms. ██████████ has alleged. I am sickened by some of her statements, the contents of which are completely false and make me feel violated.
3. Ms. ██████████ has interwoven mundane, every day, events which may or may not have happened, such as shopping trips, with the most grotesque lies which make me sick to my stomach.
4. To be absolutely clear, I never saw ██████████ ██████████ engaged in any sexual contact with anyone, including Jeffrey Epstein, Ghislaine Maxwell, myself or anyone else. Ms. ██████████ never told me that she engaged in any sexual contact with Jeffrey Epstein, Ghislaine Maxwell or anyone else. Her statements about me in her book manuscript and to the press to the contrary are shocking, untrue and have caused me to feel violated and sick.
5. There is at ET1 a document which I understand contains excerpts from Ms. ██████████ ██████████ which relate to me. By reference to this document I comment as follows, page references are to the said manuscript:
  - 4.1 Page 28: This is untrue. I do not have "shocking blue eyes". I do not recall Ms ██████████ ever introducing herself as ██████████. I do not recall when I first met Ms

██████ but I certainly did not have a coy smile on my face nor did I imply that I knew what she 'was on trial for.'

- 4.2 Page 29: This is totally untrue and statements like this shocked me to the core in disbelief and disgust.
- 4.3 Page 31: This is a paragraph of half-truths. It is untrue that I stayed in the "yellow guest room". If I did stay at the house I stayed in the blue guest room. The blue guest room did have a balcony which was shared with the yellow guest room where I would sometimes sit and have a cigarette. I have no recollection of Ms ██████ being given a cigarette, her coughing and me and Ghislaine laughing.
- 4.4 Page 32: This is absolute and utter complete rubbish. It is pure fiction. It never happened and I deeply resent the allegation as I would never behave in this way.
- 4.5 Page 48: This is totally untrue and a complete fabrication. It never happened.
- 4.6 Page 67: I have never been yacht hopping in the South of France. I have never been to the South of France with Jeffrey Epstein, Ghislaine Maxwell and Ms ██████. In the manuscript Ms ██████ alleges I went with her to St Tropez. This is untrue. I have never been to St Tropez with Ms ██████.
- 4.7 Page 70: I have never been scuba diving or swimming with sharks of any type. This is a complete fabrication.
- 4.8 Page 71: I have never shared a hotel room with Ms ██████. It is quite possible that I was with Ms ██████ in Paris and we may have gone shopping but it is more than 15 years ago and I do not believe anyone can recall this with any degree of accuracy. I certainly never smoked drugs on a rooftop with Ms. ██████ or anyone else. I do not smoke drugs.
- 4.9 Page 72: I faintly recall a similar monkey story but I believe this happened to Ms. Maxwell and not to Ms. ██████.
- 4.10 Page 110: I do not recall Bill Clinton visiting the island. I did not have dinner with Bill Clinton on the island. I have seen this allegation published on a number of occasions and each time the seating order of the guests changes. It is untrue. The only time I have met Bill Clinton was not on the island and Ms. ██████ was not present.

6. There is at ET2 actual extracts from the manuscript which I understand are the paragraphs containing my name. Most of the detail within this section is covered above but for completeness sake I would add the following:
- 5.1 Page 6: I have never lived in the rural countryside. This is another fabrication.
- 5.2 Page 6: *The longest break from work I ever had was when I had to care for a parent who had had a major operation. Suggesting I took six weeks off work for a holiday is untrue.*
- 5.3 Page 6: I was not at Ms [REDACTED] 18<sup>th</sup> birthday and the story around that birthday involving me is untrue.
- 5.4 Page 7: I do not recall someone called "Brunei" or the events described in this paragraph. The allegation regarding "eight beauties" is untrue. I would remember something like this and it just didn't happen.
7. There is at ET3 extracts from two press articles which are examples of the untrue allegations that Ms [REDACTED] has made to the press concerning me.
- 6.1 As stated above I never met Bill Clinton on the island and never had dinner with him on the island. I only had dinner with him once, it was not on any island and Ms [REDACTED] was not present.
- 6.2 I did not just "run errands" for Ms Maxwell. I was employed as a PA. I supported Ms. Maxwell in the extensive work she undertook. The role involved long hours and *hard work and my engagement was totally professional.*
- 6.3 I did not go to the US hoping to become a model or actress nor did I meet Ms Maxwell in New York. In fact, I met Ms Maxwell in London where she interviewed me to be her personal assistant. I went to America in that role. Ms [REDACTED] probably recalls that I studied drama and sees that I had been an actress for a short while and so she embellishes the story by suggesting I had gone to America to be an actress or a model. This is as I have said untrue.
- 6.4 I was not lured to Florida with promises of a great lifestyle. In fact I was told that the work would be hard but exciting and it was. I moved to New York not Florida as stated.

- 6.5 I was not given an apartment. I stayed in a corporate apartment and I received a lower salary as a result. My occupation of the apartment was taken into account in my compensation.
- 6.6 When I was door stepped by the press I refused to speak to them at all. It is not correct to say that I refused to comment on my relationship with Epstein and Ms Maxwell as if that was the extent of my objection. I objected to members of the tabloid press arriving unannounced at my house, with some saying the most appalling things in front of my elderly and unwell parents and I wanted to have nothing to do with the tabloid press. Not all, but some of their behaviour was intimidating and aggressive and I would not engage with them.
8. I do not know why Ms [REDACTED] has chosen to make up stories about me. I think she has done it to try and give credibility to her allegations and for monetary gain. I can assure the Court that the allegations she has made are untrue, as set out above.
9. I have been deeply hurt by these allegations which I regard as being gross, untrue and have made me sick to my stomach. Her choice to do this has greatly impacted my life.
10. Permitting Ms. [REDACTED] to repeat these lies concerning me on a witness stand in a public courtroom would amount to perjury, would be a severe invasion of my privacy and I would consider them a defamation of my character.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on February 23<sup>rd</sup> 2017

..... [REDACTED]

[REDACTED]