

# Exhibit D



1<sup>st</sup> 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

PRIVATE AND CONFIDENTIAL

Your Honor

**Re: *United States v. Ghislaine Maxwell*, 20 Cr. 330 (AJN)**

I am sending this letter of support knowing it is to be presented to the Court in connection with Ghislaine Maxwell's renewed bail application. The content of this letter is true and within my knowledge.

I first met Ghislaine Maxwell in 1988 when she employed me to work for her at Maxwell's Corporate Gifts in London. I left in 1989, but we remained in touch and became close friends and have been in regular contact ever since. I stayed with her in her apartment in New York for some weeks immediately after her father's death in 1991 and have visited with her on numerous occasions and see her whenever she travels to the UK. She has also stayed with me and my family at our home in Wiltshire.

I have always found Ghislaine to be open, honest and trustworthy in all her dealings and therefore had no hesitation when she asked me to be a Director of The TerraMar Charity in the UK and allowed my UK home address to be used as the Charity's registered address. Ghislaine is transparent in everything she does including in her financial dealings that I personally witnessed as a Trustee of TerraMar which, following unwarranted press speculation last year, was investigated by the Charity Commission. No wrongdoing was found whatsoever but the Charity was subsequently dissolved as the connection with Ghislaine allied to relentless media pressure made it an untenable enterprise.

Ghislaine knows my family well, I had no hesitation in allowing my daughter (when she was 16 and again at 18) to stay with her in the US and UK, when we both visited. All three of my children (boy twins aged 27 and a girl, 21) have known her all their lives, love and adore her and she has always been a great support to them.

Speaking for myself and my family I can confirm that we stand absolutely behind her in her fight to clear her name. I have never known Ghislaine to be involved in anything unlawful and she has always been a loyal, genuine and generous friend. Nor have I ever witnessed any inappropriate behaviour on her part.

In 2017 I lived with Ghislaine and her family for a few weeks, helping move them into their house. Her Spouse, Stepchildren and Mother-in-Law subsequently came to stay with my family in the UK in August 2018. When my husband, I and our daughter were all staying with them in August 2017, her Spouse's ex-wife came and had dinner at the house with us. It was a wonderful example of divorced parents making sure that the children's welfare is put before everything else. Ghislaine is a fun, considerate and loving Stepmother, making sure that the children feel safe and secure. It is very obvious that they love her deeply. They are an incredibly strong and close family unit.

Ghislaine has lived in the United States since the beginning of the 1990s and has had to deal with fluctuating amounts of press interest in her life. This was notwithstanding her huge and understandable mistrust of the media which started with the fall-out from the sudden death of her Father and has continued to this day. Despite the tremendous ramping of press interest in her following the death of Jeffrey Epstein in August 2019 Ghislaine remained living in the States. This was primarily so that she could be with her family but also to ensure she was available to deal with any civil or even criminal allegations arising from her past connection to Epstein should these arise. When the press intrusion became too intense, she removed herself from the family home to protect her Spouse and his children. Any reports to the effect Ghislaine took that decision to evade law enforcement are as far from the truth as they are offensive.

My husband and I experienced first-hand what it felt like to be on the receiving end of such relentless press intrusion in our own lives in the UK. We had to leave our home for a week because the press presence was so aggressive and so constant: we had phone calls, emails, letters, visits – and everyone in our village was spoken to. Even my parents and children were harassed. I look after the running of Ghislaine's house in London and today still there are journalists knocking on the door and filming the house. Ghislaine was terrified of being found by the press, or by deranged individuals and conspiracy theorists who threatened to harm her. A UK newspaper (The Sun) put up a bounty for information leading to her discovery. She had to isolate herself to protect her family and friends as much as herself. I spent a couple of days and nights with her in October 2019 – we went for a walk and I directly experienced for myself the pressure and fear she was living under. Any car or person that went by the house, or any unusual sounds she heard when we were in the house, she thought the press or bounty hunters might have found her. She was genuinely terrified for her safety and this ended up making me feel terrified too.

Ghislaine has always met problems head on and has never been afraid of the truth. I have personally witnessed this at many points in her life when she has had to pick herself up and rise to the challenge in front of her. Ghislaine has been a constant and very important part of my life for 32 years and I have no doubt – particularly if she is permitted properly to prepare her defence in a non-custodial environment conducive to that end (the primary rationale for her renewed bail application) - that she will attend her trial to fight these heinous charges and to clear her name.

Respectfully



Katie Vaughan-Edwards