

Exhibit K

[REDACTED]

October 28, 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 in support of Guislaine Maxwell's request for bail and her character.

My name is [REDACTED]

[REDACTED] I have maintained a fairly close relationship with the entire family for most of my life. I not only got to know the senior Maxwells but also got to know very well their children including Ghislaine, since my age of 15.

Though I was spending more of my time with the older siblings [REDACTED] I also chose deliberately to spend time with Ian, Kevin and Ghislaine, who were soon going to prep school together during term-time. You need to know that their father was narcissistic, highly controlling and demanding as a father, and let them know early that he was going to leave his large fortune to charity. So all the kids knew they had to "make it on their own" despite the wealth and privilege in which they were growing up.

As I got to know each of these kids, including Ghislaine, I noticed that early on, every single one worked very hard at their jobs, as neither parent, Bob nor Betty would easily bear any idleness, and each strove for their father's and mother's respect through that their intelligence and that hard work. So it didn't surprise me that in her prep school classes, as well as her bachelor's and master's work at Oxford, where she'd followed her elder siblings, Ghislaine produced exemplary grades and a reputation as a serious student. I also noticed that personally, Ghislaine was quick-witted, full of initiative and good humor, sincerely caring towards everyone she knew.

I've maintained a fairly close relationship with the entire Maxwell clan for most of my life. I didn't continue to visit them regularly in England, but I stayed in touch by phone, especially with Philip, Isabel, Betty and Christine from 1962 through the present. I spent time with Betty, Mrs Maxwell, as she needed support, having suddenly been left after the death of Robert Maxwell. Later on, I wrote a book explaining my gratitude to Betty for all she'd taught me about goodness and maturity. When she was finally on her deathbed with Parkinson's in 2013, I was glad Isabel, who was caring for her, read her my book.

So I am in a position to speak to Guislaine's character. I had gotten to know her vital personality quite well when she was young. And even though I wasn't in direct touch with her later on, all these Maxwell children are quite "tight" - they've always stayed closely in touch with each other. Thus whenever I'd speak to any of her elders - Philip, Anne, Isabel and Christine, I'd also hear reports not just about their own lives and activities, but also Kevin's and Ian's, as well about Ghislaine's life. Her siblings consistently reported for about a decade that she was enjoying life while starting her own charity.

So what kind of a character is Ghislaine? I can testify without the least doubt that she is mature, sensitive, thoughtful, honest and, like all her siblings, strong-willed, determined and quite obviously grounded in good human values. She does not lie. She is no "chicken" - it would be totally unlike her to run away from the charges leveled against her by the Government. In fact, the idea of not "facing the music" is totally against the values of every single Maxwell, because both their parents always emphasized personal responsibility - specifically to face Bob's temper. These people consider running away their greatest shame. Furthermore, in facing their father's criticisms, they were trained, over and over, to defend themselves with real courage. So I have no doubt that not only did Ghislaine - despite the blaring headlines in the press and the governments' own opposition to bail alleging incorrectly that she is a "flight risk" - made absolutely no attempt to leave the US at any time in 2019, but has stayed to fight the civil accusations against her starting earlier. Nor do I have any doubt whatsoever that she fully intends to defend herself to the limit of her energy based upon her actual innocence and that above all she wants to go to trial and she is categorically not a flight risk.

Yours sincerely,

