

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X  
UNITED STATES OF AMERICA

-against-

S2 20 Cr. 330 (AJN)

GHISLAINE MAXWELL,

DECLARATION

Defendant.

-----X

[REDACTED] pursuant to 28 U.S.C. § 1746, hereby declares under penalty of perjury:

1. I am [REDACTED] years of age having been born in [REDACTED]
2. I worked in corporate finance and stock broking for most of my working life.
3. My securities firm operated from the United States, United Kingdom and was a global securities business.
4. I lived in London, Palm Beach and the South of France in the 1990s.
5. I was based out of Palm Beach between 1992 and 1996 and returned to London that year.
6. I have known [REDACTED] from the mid-1990s until the present day. She attended the same school as my son in France.
7. I remember her from the 1990s as very pretty and very sociable.
8. I have met her in London many times.
9. I did not have a sexual relationship with [REDACTED]
10. [REDACTED] dated and slept with many of my friends, including business partners.
11. [REDACTED] went out with my business partner [REDACTED] on and off for some years.



12. After [REDACTED] was engaged to the owner of Riccardo's restaurant and I saw her boasting the ring.
13. She often bragged about sleeping with Bill Wyman of the Rolling Stones and many other celebrities. She dined out on her posing suggestively for known photographers in society publications. .
14. I do remember her as a coke head, as someone who was always disappearing to the loo to snort a line of coke.
15. [REDACTED] frequently would invent stories about her life, her past, her present, her family, that she was related to royalty.
16. I last met [REDACTED] on a plane in 2019/2020. She was on a leg to Los Angeles. She was in a window seat and I was walking down the aisle when she waved and called to me. She approached me and we chatted for several minutes.
17. I do not know in what context the subject of Jeffrey Epstein came up but it was clearly in an unguarded moment. She volunteered with a meaningful laugh 'it fell right into my lap.'
18. After that chance meeting [REDACTED] started calling me from time to time from Los Angeles. I was slightly bewildered why she would want to speak to me.
19. During these conversations, she reverted to the upcoming trial of Ghislaine Maxwell. She mentioned that she was getting big money from the Epstein estate.
20. She told me that the case against Ghislaine Maxwell was getting stronger because the women in the case against her were strengthening their stories.
21. [REDACTED] left me with the clear impression that her story was less of an opportunity to advantage herself with media attention but much more importantly it was the one chance she had to excuse herself from her past indiscretions. She had become the victim for everyone to see. I believe that in the context of her past life that I had witnessed personally her story about her 'abuse' was exaggerated even fabricated with an insistence that she now had a steady partner.
22. I could detect a need to get her story straight in the context of other complainants and put the blame for any indiscretions directly onto Ghislaine Maxwell. In this she said the media was helping her. That was the last conversation we had and whatever reason she had for calling me at all had passed.
23. There was no other way I would have her LA phone number unless she gave it to me. I did not ask for it. She put it into my phone herself.



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

Executed on December 6, 2021.

