UNITED STATES DISTRICT COURT for the Southern District of New York

Virginia L Giuffre Plaintiff

Civil Action No. 15-cv-07433-RWS

v.

Ghislaine Maxwell Defendant

AFFIDAVIT OF CESAR AUGUSTO SEPULVEDA

Cesar Augusto Sepulveda being duly sworn, Deposes and says as follows:-

- That Deponent is not a party to this action, is over 18 years of age and is a Corporate Investigator/ Process Server employed with Process Servers Limited, at 12 Angel Gate, 326 City Road, London EC1V 2PT, England and is a person authorised to effect service of Judicial Process according to the laws of England & Wales.
- 2. That on Wednesday the 13th day of July 2016 at 3.00pm and before 4.30pm, Deponent served the Subpoena to Testify at a Deposition in a Civil Action, dated the 6th day of July 2016 and returnable on the 20th day of July 2016 at 2.00pm, at the offices of Boies, Schiller & Flexner, LLP, Solicitors, at 25 Old Broad Street, London EC2N 1HQ, England, together with the Proof of Service, the Federal Rule, Schedule A Definitions, list of documents to be produced pursuant to the Subpoena, the Summary of the document to be served, Certificate and the Request for Service Abroad, by sending the same in duplicate to the said Witness, Ross Gow, to both the business address of the Witness in Central London, England and to the residential address in Battersea. London, England, namely to Acuity Reputation, 23 Berkeley Square, London W1J 6HE, England and to Flat 26, Albert Mansions, Albert Bridge Road, Battersea, London SW11 4QB, England.
- 3. That Deponent placed the proceedings in duplicate in sealed envelopes addressed to the Witness, Ross Gow, at each address and each envelope also enclosed a small envelope with £30.00 cash conduct money and each envelope was sent via the Royal Mail Post Office, 160-161 Upper Street, Islington, London N1 1US, England, by Special Delivery Tracked and Signed For, which is the UK equivalent of Registered Delivery and service was effected by post and by sending to each address, as it was not possible to meet personally with Ross Gow, despite physical attendances being made to both addresses.
- 4. That Deponent was instructed to effect personal service of the proceedings upon Ross Gow and Deponent urgently attended at 23 Berkeley Square,

London W1J 6HE, England and on the afternoon of Friday the 8th day of July 2016, Deponent established that the address is a multi-occupied commercial building, which is operated by London Executive Offices (LEO). London Executive Offices (LEO) provide business services, virtual offices and accommodation addresses and the female receptionist who was interviewed advised that Acuity Reputation use their services and do collect their mail from the address and that they book their meeting rooms when one is needed. The receptionist would not, or could not provide an alternative address for Ross Gow and enquiries established that the contact telephone number for Acuity Reputation is shown as + 44 (0) 7778 755251, with an email address of ross@acuityreputation.com. Deponent learned that Ross Gow is the founder and Managing Partner of Acuity Reputation and further open source information established some additional information and Deponent then caused further searches to be conducted at Companies House, Cardiff and an alternative possible address was located for Ross Neil Sutherland Gow, as 45 Copley Park, London SW16 3DB, England. The search also revealed that Ross Neil Sutherland Gow is a Director with Acuity Reputation Limited, company registration number 070010265 and Deponent then made a visit to the alternative address.

- 5. That on the early evening of Friday the 8th day of July 2016 at 7,00pm, by attending at 45 Copley Park, Deponent then established that the Witness, Ross Gow and his family used to reside at 45 Copley Park, but had moved out three years earlier and the neighbour interviewed at 47 Copley Park could not say where the family had moved to and further enquiries were conducted which revealed that Ross Gow is on the Advisory Board of the Moscow International Finance Committee and is an Honorary Member of the European Executive Council and that he is also a Freeman of the City of London, a Fellow of the Royal Society of Arts. The Deponent caused further database searches to be conducted and whilst the database searches of the 45 Copley Park address did not reveal a new address, the search did reveal a previous address for Ross Gow as 135 Cavendish Road, London SW12 0BN, England and that Ross Gow and his wife were registered at the previous address from 1996 through to 1999 and as open source information revealed that the family may have moved to the Battersea area of South London, where Directory Enquiries has the name R Gow listed with an Ex-Directory telephone number, further enquiries were conducted. It was also learned that the family maintain a holiday home in the South of France, at Saint-Julien-en-Born and tracing enquiries revealed a possible address for the Witness as Flat 26, Albert Mansions, Albert Bridge Road, Battersea, London SW11 4QB, England, where Directory Enquiries does have the surname Gow listed with the Ex-Directory telephone number. A date of birth was also obtained for Ross Gow as the 26th day of October 1962.
- 6. That Deponent then attended on occasions to this residential property and despite attending there on Monday the 11th day of July 2016, at 4.30pm and again on Tuesday the 12th day of July 2016, at 8.30am, no reply could be obtained from the property and no useful information could be learned as to the whereabouts of the Witness and therefore, Deponent served the proceedings by postal service as instructed.

- 7. That Deponent can confirm that the fees to date are £1,263.00 excluding VAT, together with Disbursements of £60.00 and any additional charges for the courier of the Affidavit to the US Lawyers, which will be arranged in due course.
- 8. That copies of the sets of proceedings so served as aforesaid are exhibited hereto and marked "A"_

SWORN AT

IN

THIS A DAY OF

BEFORE ME

North Highline

A SOLICITOR

UNITED STATES DISTRICT COURT for the Southern District of New York

Virginia L Giuffre Plaintiff Civil Action No. 15-ev-07433-RWS

v.

Ghislaine Maxwell

Defendant

This is the exhibit marked "A" referred to in the Affidavit of Cesar Augusto Sepulveda sworn before me this day of

A Solicitor 13 to 15 to 160