

EXHIBIT D

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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VIRGINIA L. GIUFFRE,
Plaintiff,
v.
GHISLAINE MAXWELL,
Defendant.
-----X

15-cv-07433-RWS

Declaration of Ghislaine Maxwell

I, Ghislaine Maxwell, pursuant to 28 U.S.C. § 1746 declare as follows:

1. I am the defendant in the above captioned matter.
2. I respectfully submit this Declaration in response to allegations and statements made in Plaintiff's Response to the Motions in *limine* to exclude the "Victim Notification" Letter, References to Crime Victims Rights Act Litigation, Jeffrey Epstein Plea and Non-Prosecution Agreement and Sex Offender Registration, and the Jane Doe 102 Complaint.
3. It is my understanding that Plaintiff's Responses claim that I was aware or had knowledge of each of the documents or events at issue in the foregoing listed motions as of January 2015 when Ross Gow issued Mr. Barden's statement on my behalf ("the January 2015 Statement"). This is inaccurate.
4. As I stated in my deposition on April 22, 2016, I had no knowledge, prior to this lawsuit, of the Non-Prosecution Agreement between Jeffrey Epstein and the United States

government, other than reading in the press that Sarah Kellen was identified as an alleged co-conspirator. I had never, and still have not, seen the document or reviewed its contents.

5. I was aware that Mr. Epstein served jail time. I had and have no knowledge of the specifics as to how or why that occurred. As stated in my deposition, I knew that Mr. Epstein was alleged to have hired an underage prostitute, but I was unaware of the nature or basis for his conviction. I have been informed that there is a plea agreement between Mr. Epstein and a governmental entity. Prior to the January 2015 Statement, and to date, I have never seen that document or reviewed its contents.

6. Prior to the January 2015 statement, I had never seen any document, in any format, in which the Plaintiff in this case was listed or identified as a "victim" by any governmental agency or organization, including but not limited to, the U.S. Attorney's Office. This includes the document identified as the "Victim Notification" letter.

7. Prior to the January 2015 Statement, I was unaware that the federal government conducted any investigation of Mr. Epstein. I was never contacted in connection with any such alleged investigation. I have no knowledge if such an investigation ever occurred, what might have been investigated, or the conclusions of such investigation.

8. Prior to the January 2015 Statement, to the best of my recollection, I never reviewed a copy of the Complaint filed in the action captioned Jane Doe 102 v. Jeffrey Epstein.


9. At the time the Jane Doe 3 Joinder Motion was filed, I had never previously heard of the litigation in which that document was filed. I do not recall receiving or reviewing an actual copy of the Joinder Motion. Rather, I was informed that the press was asking about the

allegations contained in a court filing, and I had read in the press descriptions of the allegations. I, through my attorney, was reacting to the press descriptions of the allegations. Prior to the January 2015 Statement being issued, I did not read the complete Joinder Motion.

10. To this day, I am unaware of the reasoning or background of the "Crime Victim's Right Act" litigation. Prior to late December 2014, I did not know the case existed. After receiving press calls through my representatives, I was aware that there was a litigation. I was not aware of the nature of the litigation, the caption or title of the litigation, that it was referred to as the "Crime Victim's Rights Act" litigation, the legal basis for the claims, why plaintiff was filing a document in the litigation, or the overall purpose of the litigation.

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

Executed on March 24, 2017.

A handwritten signature in black ink, appearing to be "Ghislaine Maxwell", written over a horizontal line.

Ghislaine Maxwell