Twitter Thread by Prince.&.The.Pervert.Podcast



Prince.&.The.Pervert.Podcast
@ohreallytruly

Documents dropped in US V #GhislaineMaxwell
45 pages plus exhibits which included redacted references, some of which we read out in today's podcast.

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA,

v.

GHISLAINE MAXWELL,

Defendant.

20 Cr. 330 (AJN)

MEMORANDUM OF GHISLAINE MAXWELL
IN SUPPORT OF HER RENEWED MOTION FOR BAIL

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Table of contents gives a quick over view of her arguments - devoted to splice!

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And those redacted references.
@lisapodcasts @pinkPeptobismol @bobby_capucci @tinkeringhalo10

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Why redact Scott Borgerson's name we all know.
He is prepared to forfeit all if she disappears!

[redacted] (*Id.* ¶¶ 10-11).

Ms. Maxwell's spouse fully supports her and is prepared to put up all of his and Ms. Maxwell's assets to ensure that Ms. Maxwell abides by the strict conditions proposed. He

has agreed to co-sign Ms. Maxwell's $22.5 million bond and to post all three properties he owns—all located in the United States and worth a total of approximately $8 million combined—as security for the bond. As the financial report discussed later in this submission makes clear, $22.5 million represents all of the current assets of Ms. Maxwell and her spouse. One of the properties is the family home where Ms. Maxwell, her spouse, [redacted] have lived together [redacted]. If Ms. Maxwell were to violate her bail conditions, which she has no intention of doing, she would be leaving her spouse [redacted] with virtually nothing. It is unfathomable that Ms. Maxwell would abandon her family, which she has fought so hard to protect, under these circumstances.

2. A Number of Ms. Maxwell's Family and Friends, and the Security Company Protecting Her, Are Prepared to Sign Significant Bonds

In addition to her spouse, a number of Ms. Maxwell's family members and friends, many of whom are U.S. citizens and residents, have volunteered to step forward as co-signers. These sureties, as well as the others who have written letters on Ms. Maxwell's behalf, know that Ms. Maxwell has never run from a difficult situation and will not do so now. To show the depth of their support and their confidence that Ms. Maxwell will abide by her bail conditions and remain in this country, the sureties have agreed to sign separate bonds for Ms. Maxwell in amounts that are significant and meaningful to them, and each would cause severe financial hardship if she were to violate her bail conditions.

For example, one surety, who is a U.S. citizen and resident, will post the only property she owns. This property is worth approximately $1.5 million and is her "only nest-

Two other US citizens have also offered $ - wonder if that was one of referees I spoke about in today's pod?

because Ghislaine violated the conditions of her release, I would be financially ruined. I make this pledge without reservation because I know that Ghislaine will remain in the United States to face the charges against her.

(Ex. F). Two other sureties, one of whom is a U.S. citizen and resident, will post cash bonds in the amount of $25,000, and another will post $2,000 in cash, which are significant pledges for these individuals.

In addition to these bonds, the security company that will provide security services to Ms. Maxwell upon her transfer into home confinement has agreed to post a $1 million bond in support of her bail application. In our collective experience as defense counsel, we are not aware of a previous example where a security company has posted a bond for a defendant. The head of the security company has confirmed that they have never done this for a defendant in the past but are willing to do so here because of his company's "long-standing relationship with Ms. Maxwell" and because he is "confident that she will not try to flee." (Ex. S).

In sum, these bonds reflect the depth of support that Ms. Maxwell has from her family and friends, who are risking their livelihoods, their safety, and their ability to live without constant media harassment to support her. (*See* Ex. B) ("Absolutely anyone who dares to put their head above the parapet so to speak, to … support Ghislaine personally, gets it shot off immediately amid a hail of social vilification and malignancy and reputational slaughtering."). Ms. Maxwell would never destroy those closest to her by fleeing, after they have risked so much to support her.

B. Ms. Maxwell Has Provided a Thorough Review of Her Finances for the Past Five Years

The government raised concerns at the initial bail hearing about the accuracy and completeness of the financial disclosures that Ms. Maxwell provided to Pretrial Services. (Dkt. 22 at 11-12; Tr. 28-29, 34-35). The Court stated that it did not have "a clear picture of

Have a listen while I speed read the document.
https://t.co/lX5kUDyFQO

I quote: “[S]he was finally able to locate a place where she could not be moving around constantly and collect herself to fight for her life and to clear her name.”)

Her lawyers referring to her purchasing and moving to New Hampshire.

2. Ms. Maxwell's Counsel Was in Regular Contact with the Government Prior to Her Arrest

At no time, however, did Ms. Maxwell intend to flee or hide from the government, as the government argued at the last bail hearing. In fact, her intent was exactly the opposite. As her spouse's letter makes clear, after spending a few months away [redacted], Ms. Maxwell moved [redacted] so that she could [redacted] be within driving distance of the prosecutors in New York in case they wished to speak to her. (Ex. A ¶ 12) ("[Ghislaine] was adamant to not only stay in the United States to fight the smears against her, but to be within driving distance of New York."). Contrary to the impression given by the government, Ms. Maxwell was not "changing locations on multiple occasions" as if she were a fugitive from justice. (Tr. 87). After Ms. Maxwell moved into the house in New Hampshire in December 2019, she remained there continuously for approximately seven months until her arrest. (*See* Ex. B) ("[S]he was finally able to locate a place where she could not be moving around constantly and collect herself to fight for her life and to clear her name.").

Ms. Maxwell, through her counsel, was also in regular contact with the government from the moment of Epstein's arrest up the time of her own arrest, as would be customary in such situations. Defense counsel corresponded by email, spoke on the phone, or had in-person meetings with government in July, August, September, and October 2019, and also in January and March 2020. The timeline attached to this submission illustrates the extent of these contacts. (Ex. R). Defense counsel also requested an opportunity to be heard in the event that the government was considering any charging decisions against Ms. Maxwell. We were never given that opportunity, which is uncharacteristic for the Southern District of New York, nor were we given any notice of her impending arrest.

Quote: She is being pursued relentlessly by the press, which would no doubt be camped out by her front door every day if she were granted bail.

So why leave safe, secure premises? What will her legal team say, considering her 'spouse' refused to acknowledge they were married

recap-39
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country. (Dkt. 18 at 12-14, Tr. 52-53). It is even more unfounded in light of the daily avalanche of media coverage of Ms. Maxwell. She is now one of the most recognizable and infamous people in the world. She is being pursued relentlessly by the press, which would no doubt be camped out by her front door every day if she were granted bail. The notion that Ms. Maxwell could somehow flee to a foreign country during a worldwide pandemic (presumably, by plane), while being supervised and monitored 24 hours a day and with the eyes of the global press corps on her every minute, without being caught, is absurd.

To the extent the Court is concerned that her calculus may have changed since her arrest because the threat of prosecution has now crystallized into concrete charges (Tr. 85-86), Ms. Maxwell has addressed that concern head-on—she will execute irrevocable waivers of her right to contest extradition in both the United Kingdom and France. (Ex. T). These waivers demonstrate Ms. Maxwell's firm commitment to remain in this country to face the charges against her. Moreover, as discussed more fully in the attached expert reports, because of these waivers and other factors, it is highly unlikely that Ms. Maxwell would be able to successfully resist an extradition request from the United States to either country, in the extremely unlikely event she were to violate her bail conditions. (Exs. U-V). Moreover, any extradition proceedings in either country would be resolved promptly. (*Id.*).

Courts have addressed concerns about a defendant's ties to a foreign state that enforces extradition waivers by requiring the defendant to execute such a waiver as a condition of release—including in cases where the defendants, unlike Ms. Maxwell, were not U.S. citizens. *See, e.g., United States v. Cirillo,* No. 99-1514, 1999 WL 1456536, at *2 (3d Cir. July 13, 1999) (vacating district court's detention order and reinstating magistrate's release order, which required foreign citizen and resident to sign an "irrevocable waiver of extradition" as a condition

Oh REALLY!

No meaningful documentary corroboration of the Government's Allegations against #GhislaineMaxwell

E. The Discovery Contains No Meaningful Documentary Corroboration of the Government's Allegations Against Ms. Maxwell

At the initial bail hearing, the government represented to the Court that "the evidence in this case is strong" and that the allegations of the alleged victims were "backed up [by] contemporaneous documents . . . [including] flight records, diary entries, business records, and other evidence." (Dkt. 4 at 5.) The Court credited those representations and accepted the government's proffer that the witness testimony would be "corroborated by *significant* contemporaneous documentary evidence." (Tr. 82) (emphasis added). The defense, of course, could not rebut the government's representations at the hearing because the government had not yet produced discovery.

Since then, the government has produced, and the defense has reviewed, hundreds of thousands of pages of discovery, including the entire initial tranche of discovery that the government represented was the core of its case against Ms. Maxwell.[9] The discovery contains no meaningful documentary corroboration of the allegations whatsoever, much less "significant" corroboration that the Court was led to believe existed. The vast majority of the discovery that the defense has reviewed relates to the time period in the 2000s and the 2010s, well after the conspiracy charged in the indictment (1994-1997). These documents include [redacted] In fact, only

Daily Mail, "French prosecutors probing Jeffrey Epstein over rape and abuse of children in Paris widen probe to include Ghislaine Maxwell to see if British socialite was involved in his offending," (Oct. 25, 2020), https://www.dailymail.co.uk/news/article-8878825/French-prosecutors-probing-Jeffrey-Epstein-widen-probe-include-Ghislaine-Maxwell html.

[9] The defense has not yet completed its review of the over 1.2 million documents produced on November 9, 2020 and November 18, 2020. This production includes documents and images seized from electronic devices found at Epstein's residences in searches of his residences in 2019. Our initial review, however, shows that the documents are from the 2000s and 2010s, well after the charged conspiracy.



Here come the redactions.... These about evidence proffered by the authorities.
As I can't see them, imagine #jizzstains voice yelling 'lies lies lies, Virginia lies' from her April 2016 deposition when faced with evidence and questions about #epstein #clinton and #princeandrew

a very small fraction of the discovery pertains in any way to the individuals we believe to be the three complainants named in the indictment, and none of it corroborates any allegations of "grooming" or sexual assault or a conspiracy with Epstein involving Ms. Maxwell.

For example, the government represented to the Court that it had "diary entries" that corroborated the witness testimony, suggesting that more than one of the complainants had kept contemporaneous diaries that implicated Ms. Maxwell. (Dkt. 4 at 5). The discovery produced thus far contains only [redacted].[10] [redacted]

In addition, the flight records that the government touted at the bail hearing, which include [redacted]

[10] [redacted]

[redacted]

That middle paragraph may come to bite her in the arse, as we say in Oz.

[redacted]

The discovery also does not contain any police reports in which the people we believe to be the complainants reported the alleged crimes to law enforcement. To the contrary, the only police reports provided are exculpatory. [redacted]

In sum, the discovery contains not a single contemporaneous email, text message, phone record, diary entry, police report, or recording that implicates Ms. Maxwell in the 1994-1997 conduct underlying the conspiracy charged in the indictment. The few documents in the discovery that pertain to the people we believe to be the three complainants referenced in the indictment do little, if anything, to support the government's case against Ms. Maxwell:

- [redacted]
- [redacted]

'strongly imply' that charges were only laid against #GhislaineMaxwell because the main target #epstein had died in their custody.
That GM was an 'afterthought'.
Wow ok.

- [redacted]

In addition, the discovery appears to show that, [redacted] the government did not issue subpoenas for documents related to Ms. Maxwell until *after* Epstein's death. Although the discovery does not include the grand jury subpoenas themselves, the subpoena returns appear to indicate that the government began issuing subpoenas for Ms. Maxwell's financial information on August 16, 2019, six days *after* Epstein's death, and issued additional subpoenas in the months that followed. The facts strongly imply that government only chose to pursue a case against Ms. Maxwell—who was not named in the Epstein indictment—because the main target, Jeffrey Epstein, had died in their custody. The lack of corroboration in the discovery confirms that the case against Ms. Maxwell was an afterthought and was reverse engineered based on allegations of 25-year-old conduct from a small number of alleged victims.

Thus, notwithstanding the statement in the government's bail submission, we have been provided with no meaningful documentary corroboration in this case. It appears that the evidence in this case boils down to witness testimony about events that allegedly took place over 25 years ago. Far from creating a flight risk, the lack of corroboration only reinforces Ms. Maxwell's conviction that she has been falsely accused and strengthens her long-standing desire to face the allegations against her and clear her name in court. This factor should weigh heavily in favor of granting Ms. Maxwell bail.

America is mean.

F. The Proposed Bail Package Is Expansive and Far Exceeds What Is Necessary to Reasonably Assure Ms. Maxwell's Presence in Court

In light of the additional information that Ms. Maxwell has provided in connection with this submission, which responds to each of the concerns raised by the government at the initial bail hearing, the government cannot meet its burden to establish that no set of bail conditions would reasonably assure Ms. Maxwell's appearance in court. The proposed bail package is exceptional in its scope, addresses all of the factors that the Court considered in evaluating risk of flight, and is more than sufficient to warrant her release from BOP custody and transfer to restricted home detention.

Courts in this Circuit have ordered release of high-profile defendants with financial means and foreign citizenship on bonds in lower amounts with less or no security with similar or less restrictive conditions:

DEFENDANT	BOND	SECURED	HOME DETENTION	ELECTRONIC MONITORING	PRIVATE SECURITY	U.S. CITIZEN	FOREIGN CITIZENSHIP
SADR	$32.6M aggregate	✓	Nightly Curfew	✓	NO	NO	Iran | St Kitts-Nevis
DREIER	$10M	NO	✓	✓	✓	✓	NO
MADOFF	$10M	✓	✓	✓	NO	✓	NO
KHASHOGGI Extradited from Switzerland	$10M	✓	✓	✓	NO	✓	Saudi Arabia
ESPOSITO	$9.8M	✓	✓	✓	Video Only	✓	NO
SABHNANI Wife	$2.5M	✓	✓	✓	NO	✓	Indonesia
SABHNANI Husband	$2M	✓	✓	✓	NO	✓	India
BODMER Arrested -South Korea	$2M	✓	✓	✓	NO	NO	Switzerland
KARNI No U.S. Ties	$7.5M	✓	✓	✓	NO	NO	Israel | South Africa
HANSON	NOT REPORTED	✓	✓	✓	NO	✓	China
HANSEN Travel to Denmark Permitted	$500K	NO	NO	NO	NO	NO	Denmark
MAXWELL	$28.5M aggregate	✓	✓	✓	✓	✓	UK | France

The Court should also not give any weight to the government's speculative assertions that others might provide money and other support to Ms. Maxwell if she were to flee. (Dkt. 22 at

Relying on 'heresay' from wardens and interim wardens 'have never seen anything like her current regime'.

Cut the heresay

11-12). Ms. Maxwell is not obligated to rebut every theoretical possibility that the government might raise that may contribute to a potential flight risk in order to be granted bail. That is not the standard. *Cf. United States v. Orta*, 760 F.2d 887, 888 n.4, 892-93 (8th Cir. 1985) ("The legal standard required by the [Bail Reform] Act is one of reasonable assurances, not absolute guarantees."). Ms. Maxwell has no intention of fleeing. If she did, then under the proposed bail conditions she would lose everything and destroy the family she has been fighting so hard to protect since Epstein's arrest. Ms. Maxwell will not do that, and should be granted bail.

G. The Alternative to Bail Is Confinement Under Oppressive Conditions that Impact Ms. Maxwell's Health and Ability to Prepare Her Defense

Granting bail to Ms. Maxwell is all the more appropriate and necessary because the past few months have shown that Ms. Maxwell cannot adequately participate in her defense and prepare for trial from the inside the MDC. The alternative to release is her continued confinement under extraordinarily onerous conditions that are not only unjust and punitive, but also meaningfully impair Ms. Maxwell's ability to review the voluminous discovery produced by the government and to communicate effectively with counsel to prepare her defense.

Ms. Maxwell has spent the entirety of her detention—now over five months—in d*e facto* solitary confinement, under conditions that rival those used at USP Florence ADMAX to supervise the most dangerous inmates in the federal system and are tantamount to imprisonment as a defendant convicted of capital murder and incarcerated on death row. In fact, multiple wardens and interim wardens have remarked that in their collective years of experience they have never seen anything like her current regime. The restrictive regulations to which Ms. Maxwell is subjected are not reasonably related to a legitimate goal to ensure the security of Ms. Maxwell or the MDC. Instead, it seems clear that the overly restrictive conditions are an

Oh so #GhislaineMaxwell's treatment is because they are punishing her for the 'BOP's own negligence with respect to #Epstein'.
Her team have complained and complained but GM still can't sit with the popular kids in the mess hall.

exaggerated response to Epstein's death, effectively punishing Ms. Maxwell for the BOP's own negligence with respect to Epstein.[11]

Counsel has attempted to address the restrictions in numerous letters, emails and calls to the MDC warden, the MDC legal department, and the prosecutors, but to no avail. Rather than repeating these points here at length, we refer the Court to our letter to the MDC warden, dated October 29, 2020, which details the most serious and extraordinarily restrictive conditions of confinement.[12] These include:

- *De Facto* Solitary Confinement
- Excessive Surveillance
- Excessive Scanning and Strip Searching
- Deprivation of Food
- Deprivation of Sleep
- Deprivation of Communication with Family and Friends
- Compromised Communication with Legal Counsel

The conditions of Ms. Maxwell's detention are utterly inappropriate, and totally disproportionate for a non-violent pretrial detainee with no prior criminal history facing non-violent charges a quarter-century old. Moreover, they adversely impact her ability to prepare her defense and compromise her physical health and psychological wellbeing.

In addition to these intolerable conditions, Ms. Maxwell has had to contend with numerous unacceptable delays and technical problems with the discovery that the government has produced to her thus far. We have raised these issues with the prosecutors on numerous occasions. As we advised the Court in our letter of October 23, 2020, defense counsel first

[11] These conditions are especially inappropriate because Ms. Maxwell has been an exemplary inmate and has not received any disciplinary infractions since her arrest. In fact, she has been made a suicide watch inmate, which is the highest and most trusted responsibility that an inmate can have. It is the height of irony that Ms. Maxwell is being constantly surveilled as if she were a suicide risk when she, herself, is trusted enough (if she were ever released from isolation) to monitor inmates who are truly at risk of suicide.

[12] The Warden never responded to the letter. In our response to the government's 90-day status report concerning MDC conditions, counsel requested that the Warden provide a first-hand report to the Court and counsel. Following Court directive for a report from the MDC, MDC Legal submitted a letter that recited BOP policy but failed to address a number of concerns.

In comes COVID. FFS does she realise the hardship so many individuals, families have had to endure due to COVID. Loss of loved ones, extreme side effects, loss of jobs, lining up for hours for food parcels?
Going to work and being constantly exposed so they can keep kids fed!

alerted the government on August 27, 2020 that there were significant portions of the first three discovery productions that Ms. Maxwell could not read. (Dkt. 66). Despite numerous attempts to fix these problems over the succeeding weeks, including producing a replacement hard drive containing these productions, the problems were not resolved and the replacement hard drive was broken. In addition, the fourth and fifth productions, which were produced after the defense alerted the government to these problems, contained some of the same technical problems and included a significant number of unreadable documents. Most recently, the hard drives for the sixth and seventh productions have stopped functioning properly. As a result, Ms. Maxwell has not had access to a complete set of readable discovery for *over four* months.[13] Ms. Maxwell cannot defend herself if she cannot review the discovery.

Most recently, Ms. Maxwell has had to endure the added burdens of quarantine. On November 18, 2020, Ms. Maxwell was given a COVID test and placed in 14-day quarantine due to contact with a staffer who tested positive. The revolving team of guards assigned to Ms. Maxwell, some coming from other BOP institutions confronting their own COVID outbreaks, heightens her exposure to the virus. As reported by the associate warden to the Criminal Justice Advisory Board on December 2, MDC does not mandate testing among its staff. A temperature check and response to a few questions does little to detect an asymptomic carrier. The constant strip searching, touch wanding, and in-mouth checking of Ms. Maxwell heightens her risk for exposure to COVID-19.

[13] On November 18, 2020, the government, at our request, provided a laptop computer to Ms. Maxwell in the MDC, which it believed would remedy the issues with unreadable documents, and has agreed to provide a new hard drive containing all of the discovery. It is too early to tell whether the new laptop and hard drive will solve all of the technical problems. We note, however, that now that Ms. Maxwell has been released from quarantine, she only has access to the laptop from 8am-5pm, five days a week, which will effectively limit her review time to that time slot because of compatibility issues between the recently produced hard drives and the prison computer.

Everyone deserves to have a fair trial with decent legal representation but does she realise that people in the US are having to push back life saving treatments due to COVID - chemo for starters.

Ms. Maxwell's quarantine period also resulted in cancellation of weekly in-person legal visits. This is likely to continue in light of the spike in COVID infection within and outside the MDC. Within a two-day period from December 1 to December 3, 55 inmates tested positive, compared with 25 from March to December 1. As of the date of this filing, the BOP reports 80 MDC inmates and staff with COVID.[14] If legal visits are suspended, it will further limit our ability to review the voluminous discovery (well in excess of one million documents) with Ms. Maxwell and will further compromise her ability to prepare her defense. Moreover, as this Court observed in *United States v. Stephens*, if an outbreak occurs "substantial medical and security challenges would almost certainly arise." *Stephens*, 447 F. Supp. 3d at 65. We urge the Court to weigh the threat of COVID as a factor favoring release in this case, as it did in *Stephens*.

CONCLUSION

Ghislaine Maxwell is committed to defending herself and wants nothing more than to remain in this country, with her family and friends by her side, so that she can fight the allegations against her and clear her name. She is determined to ensure that her sureties and her family do not suffer because of any breach of the terms of her bond. We have presented a substantial bail package that satisfies the concerns of the Court and the government, which contains more than ample security and safeguards to reasonably assure that Ms. Maxwell remains in New York and appears in court. The Court has the obligation to ensure that a defendant's constitutional right to prepare a defense is safeguarded. The correct—and only legitimate—decision is to grant Ms. Maxwell bail on the proposed strict conditions.

[14] *See* https://www.bop.gov/coronavirus/.

Fighting the urge
Fighting
Fighting
Losing
BITE ME!

weigh the threat of COVID as a factor favoring release in this case, as it did in *Stephens*.

CONCLUSION

Ghislaine Maxwell is committed to defending herself and wants nothing more than to remain in this country, with her family and friends by her side, so that she can fight the allegations against her and clear her name. She is determined to ensure that her sureties and her family do not suffer because of any breach of the terms of her bond. We have presented a substantial bail package that satisfies the concerns of the Court and the government, which contains more than ample security and safeguards to reasonably assure that Ms. Maxwell remains in New York and appears in court. The Court has the obligation to ensure that a defendant's constitutional right to prepare a defense is safeguarded. The correct—and only legitimate—decision is to grant Ms. Maxwell bail on the proposed strict conditions.

[14] *See* https://www.bop.gov/coronavirus/.

For the foregoing reasons, Ms. Maxwell respectfully requests that the Court order her release on bail pursuant to the conditions she has proposed.

Dated: December 4, 2020

Respectfully submitted,

/s/ Mark S. Cohen

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Exhibit A - is this #ScottBorgerson but does say they were one of the initial co-signers of her first bail applications.

Note the last bit - prayers for the #Epstein victims.
You say victims I say survivors.

Despite our best efforts, there have still been life altering consequences as a result of the media's harassment.

There are other examples of painful and real loss like this due to the media's aggressive treatment of those who simply know Ghislaine; the entire experience has been most regrettable.

My support for her bail application

12. I believe that Ghislaine had nothing to do with Epstein's crimes. She has pleaded not guilty and denied the criminal allegations against her, and I fully believe that it is her intent and desire to remain in the U.S. to face the ensuing process and to clear her name.

Over the past few years she has had dozens of alternative places she could have gone, but she did not want to be perceived as running or as having done something wrong. She was adamant to not only stay in the United States to fight the smears against her, but to be within driving distance of New York. She was not hiding from the SDNY, but she left Her arrest came as a shock.

13. I did not initially come forward as a co-signer of her first bail application for the reasons stated above, trying to protect from ferocious media aggression.

13. I believe wholeheartedly in Ghislaine's commitment to stand trial and not to seek to leave the jurisdiction should her bail application be successful.

I pray for Ghislaine's safety. I am praying for justice. And I pray for her constitutionally afforded due process.

With humility and deep compassion, I am also praying for Epstein's victims.

Exhibit B. Has seen her grow up? And has offered to stay with her 24/7 in a house they have already located if given bail! This person offering up $1.5m.

[redacted] has only and always maintained her absolute innocence of these accusations, and how she has felt 100% frustrated that she cannot come out and fight against each and all allegations in the civil suits that have come against her. I know deeply and expect that she will welcome a fair legal process to clear her name.

Further she has been at ALL times inside the United States, contrary to the many wild and unsubstantiated rumors in the media. She has never left the country wants only to fight the case and remain in the country to do that. The United States has been her home since 1991 – and she has *always* returned here. I have witnessed her great humility, I have witnessed her personal warmth and bravery, and her humanity and great resilience in the face of the tidal waves of negative adverse publicity in the social media and by the Press, all over the world.

I attest that Ghislaine was only laying low for her own protection against vigilantes and the 'mob' who have been baying for her blood to this day. She has never hid from the authorities and is frustrated that she never had the opportunity to talk to them personally to counteract all the lies pouring out in the media.

In regard to bail, I know in every fiber of my being that [redacted] will NOT skip bail and am co-signing [redacted] a bond in the value of $1,500,000 which is secured by [redacted]. I myself [redacted] do not own any property or I would have put it up without hesitation.

There is another critical reason I know she will not skip bail if released on remand – This is because I am willing, [redacted] to stay with Ghislaine 24 x 7 if she is released into my personal custody – in a residence in New York that we have located - for as long as necessary. I am prepared to stay with her 24/7 indefinitely and [redacted] I have complete confidence that [redacted] will utterly not seek to flee her bail and I completely assure the court that if she is released into my custody that she will remain with me 24x7x365 and will not leave the premises unless required to do so by the court and in direct coordination with them.

Yours respectfully,

[redacted]

Exhibit C. Another person putting up $1.5m of their retirement savings.
Oh and look she worked so hard at Terramar - pretty sure @Agenthades1 will have the figures about how much went in and what came of it. A few speeches and trips to the Arctic Circle Assembly.

[redacted] Throughout her school life Ghislaine always had friends and seemed to be genuinely grounded in her love of life and learning. We were all quite proud when she graduated from Oxford with her Bachelor's degree. She, [redacted] learned early on the value of hard work [redacted] Around 1990, Ghislaine came to live in New York to continue Maxwell Corporate Gifts, a successful company she had founded in the UK which was subsequently absorbed [redacted]

[redacted] in 1991, Ghislaine had to rely on her personal compass, inner resilience and sheer determination to build a fresh life for herself. Her prior 'big picture' experience, top-level entertaining skills and talent for organizing, coupled with her multi-cultural and multi-lingual sophistication, opened doors into New York society. Although it is true that for many years Ghislaine was frequently involved in high society and attended fashionable social gatherings; what irks me greatly is the press's one dimensional 'socialite' focus on Ghislaine, that completely denies and refuses to acknowledge the very serious, highly intellectual and passionate caring sides of Ghislaine. For example, since 2003, Ghislaine devoted all her energy, her own financial resources and intellectual skills to helping save the Oceans, through her establishment of the not-for-profit company, *The Terramar Project.* Ghislaine's deep knowledge and appreciation of the significant role the oceans play in our world's fragile ecosystem enabled her to work with key partners to influence the United Nations in 2014 in enunciating its Sustainable Development Goal 15 "To conserve and sustainably use the oceans, seas and marine resources for sustainable development." Indeed, it seemed so clear to me that this mission encompassed her life's passion and offered a way for her proactively to give something back of real value to society.

Ghislaine showed a huge amount of courage and forbearance in the face of great adversity [redacted] and in the years that followed. I have seen this strength more than ever during the times [redacted]
Despite the tremendous daily pressures she has been under, notably from the world's media, universally hostile to her, she has shown simultaneously a deal of humility and fortitude. She has the profoundly deep conviction (through every fibre of her being) of her innocence in the face of all the unsupported accusations and criminal charges latterly filed against her.

To the best of my knowledge and belief, [redacted] Ghislaine has never been brought in for questioning, arrested, or charged with any criminal offense by law enforcement until now. Notwithstanding the seriousness of the offenses with which she has been charged, as a US Citizen, she has the constitutional right to the presumption of innocence and a fair trial. For the purpose of increasing their profits by boosting TV ratings and / or newspaper readership, the world's media has aired or printed the most heinous accusations against her, in some cases for years now, that have never been cross-examined in a criminal court in front of an

Exhibit D. Interesting read. Quick glance is a couple and UK based.

The talk of being hounded by press isn't clear if they were hounded due to #GhislaineMaxwell or a separate event.

Details GM's fear, Gee any thought to the survivors that hid, moved, gave up careers?

In 2017 I lived with Ghislaine and her family for a few weeks, helping move them into their house. Her Spouse. [redacted] 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 [redacted] 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. [redacted] 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 [redacted] 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

[redacted]

Exhibit E. Wow $3.5million. stays with her in European and the UK plus visits to the US.
Says #ghislainemaxwell gave a widow a house. Well hell she has a few.

Southern District of New York
United States Courthouse
40 Foley Square
New York, NY 10007

November 23rd 2020

Your Honor

This statement is in support of Ghislaine Maxwell's request for bail and her character.

My name is [redacted]

I write this letter in support of [redacted] Ghislaine Maxwell. [redacted]

We remain close and have been in communication by phone and videolink most weeks up until her arrest on July 2nd 2020; I have historically regularly visited her in the United States at least a couple of times a year and she has always caught up with me when she has visited the UK or Europe. I have historically and continue to act as one her closest confidants and advisors, [redacted]

Ghislaine has always faced up to every challenge she has met in her life whether it involved [redacted] or decisions involving either her business interests or philanthropic interests. I consider her to be absolutely straight, clear and honest in all her dealings with third parties - this attitude applies to her filing her tax returns as it does to every other aspect of her life: organised, clear and straight.

Until these charges, [redacted] has never been involved in any allegation of breaking the law in any jurisdiction.

Speaking for myself, [redacted] I can confirm that I stand absolutely behind her in her fight to clear her name. [redacted] she has been a constant visitor to my family homes, has had my children to stay with her in her homes [redacted] and I would not hesitate to leave any of my kids or grandkids in her care. I have never witnessed, nor heard from my children or grandchildren any reports of any inappropriate behaviour [redacted].

Ghislaine has stayed at all times in the jurisdiction of the Unites States since the new charges against the late Jeffrey Epstein and has from the outset confirmed to me personally on

numerous occasions that she wanted to be available to deal with any civil or criminal allegations, to confront these and to deal with them in situ. She provided evidence under oath in deposition in civil litigation rather than stay silent which is a good illustration of her candour.

From my own experience, I can confirm that Ghislaine is kind, thoughtful and generous whether it is helping friends who have fallen on difficult times such as a friend who was recently widowed and to whom Ghislaine provided her own home in London immediately; or inviting my children and their friends when on their gap year to stay with her and to sort out transport, housing and friends to support them on their travels; or whether devoting considerable resources and time to her philanthropic activity primarily in oceans conservation.

I have offered to co-sign a bond in the amount of US$3,500,000 where the amount of the bond would be secured by properties owned by [redacted] as this represents the entirety of realisable family wealth; I do this in support of [redacted] judgement in relation to Ghislaine's integrity and commitment to attend court and to underline that the family would be left without resources in the event that the bond was called.

Exhibit F this is the letter I read in today's pop. Know her since 1979.
Offering up 3.5million.

Your Honor:

This statement is in support of Ghislaine Maxwell's request for bail and her character.

My name is [redacted] I am resident in [redacted] I have known Ghislaine since 1979 when she was 18 years old, living at her family home in Oxford. At that time, when we first met, my first impression was the same as it remains now, that she is extraordinarily vivacious, friendly and intelligent. She has her father's charisma and has a genuine warmth. She was then diligently working for her final years of school exams to achieve her place at Oxford University, which she succeeded in.

Throughout the last couple of years, she has been in touch as she was based in [redacted] joined a large family event hosted by Ghislaine and her husband in which she was very hospitable and obviously very much at home and in love. We all met her new family, and extended family, [redacted]. Prior to this, at various points in the lives of my children, as they have expressed a desire to see New York, Ghislaine has welcomed them, hosted them, and entertained them with friends and their children. At no time did I have any hesitation about them making those trips. The older children would have been in their early teens at that time.

I recall when we all descended on her home in Manhattan in 2011. She was extremely busy with her philanthropic work that was very important to her regarding the Oceans and marine conservation, and her work took her to presentations at the UN and TED talks, I believe.

It has been clear for many years that Ghislaine regards the US as her home, retaining her London house as a place to stay on return visits to see family and visit her mother (who [redacted]

died in 2013). In recent years she has not been in the UK at all, I believe, for any length of time. She is a person who my children always regarded as sparkling and engaging, and dedicated to her oceans conservation work and other business projects.

I would describe her as a woman of principle; very disciplined with an extraordinary work ethic, instilled by both her parents. She is the youngest of seven surviving siblings, all of whom are close and all of whom have the same work ethic and integrity.

I have at no point given any credence to the ridiculous and defamatory statements in the press about her being in hiding from law enforcement; this has never been the case. She would just like an opportunity to prepare her defence in an appropriate manner.

I am totally confident that Ghislaine will appear in court as required, and I am prepared to sign a bond in the amount of $3.5 million in support of her bail application. This amount represents the value of effectively all of my assets, including my home [redacted] If I lost these assets because Ghislaine violated the conditions of her release, I would be financially ruined. I make this pledge without reservation because I know that Ghislaine will remain in the United States to face the charges against her, which she vehemently denies.

Yours sincerely

[redacted]

Exhibit G SURROGATE MOTHER!

Ghislaine and I have always remained in close touch. During the last 30 years or so this has been primarily by phone and email as Ghislaine has lived for the greater part of that time in the US whilst I live in London. On my last two trips to the US in February 2013 and in December 2018 I stayed with her for about a week on both occasions and she always made a point of seeing me whenever she came through London. [redacted] in areas where we would both consider I have some knowledge I would certainly think of myself as a trusted advisor of hers.

[redacted] Ghislaine eventually excelled academically and ended up graduating with honours from Oxford University and has gone on to achieve many and varied professional goals. Determination is a notable characteristic of hers, as is her naturalness and honesty – which I have never doubted - whether in her dealings with me personally or to my knowledge with [redacted] and friends, or in her business interests or charitable activities. Until the laying of these charges against her, I am not aware there have ever been any allegations of criminal conduct against Ghislaine whether in the US or in any other country for that matter.

Ghislaine has always been an exemplary [redacted] surrogate mother and friend. My son travelled with me on both my trips to the US mentioned above when he was aged [redacted] staying with Ghislaine at her then homes in New York and [redacted] Together with me, my son [redacted] stands four-square behind her as she seeks to defend and clear her name. She has spent many hours with my son and he and I have never witnessed any inappropriate behaviour on her part. I

[redacted]

have personally seen [redacted] in many settings over the years, sometimes with young children [redacted] and Ghislaine has always behaved totally appropriately. In my eyes she is a totally trustworthy individual and I would have no hesitation at any time leaving children or young adults in her care.

Regarding the extremely serious charges she is now facing, Ghislaine has repeatedly denied any knowledge of, or involvement in, any such improper and criminal conduct. Based on my knowing her very well [redacted] and the nature of her character I believe in her innocence and I have no doubt that she will deal with all the allegations head on and will attend trial for the opportunity it provides her finally to put her side of the story without it being intermediated by an overwhelmingly hostile media.

[redacted] I have no doubt [redacted] will not shirk the responsibility she has to attend her trial in this matter and will fight the case through to the finish to clear her name. [redacted] Knowing her as I do, for Ghislaine too there is simply no other option [redacted]

Respectfully,

Trying to download more exhibits but it seems the site needs coffee.
Nothing is loading!

Remember Ghislaine is behind bars but so are the survivors until justice is served.

The doc site is crashing and timing out so as it’s 10.45pm here in Oz I’m off to bed.

If you can access the docs please share what you find! Many people rely on twitter for their access.