

**EXHIBIT D – ALLEGATIONS AS TO C. BRONFMAN**

<b>10 Plaintiffs Make No Factual Allegations At All or Make Only Boilerplate Allegations Related to NXIVM Enrollment and Do Not Mention C. Bronfman</b>	<b>35 Plaintiffs Make Only Boilerplate Allegations Related to NXIVM Enrollment + Unspecified Uncompensated Labor and Do Not Mention C. Bronfman</b>	<b>13 Plaintiffs Make Some Kind of Individualized Allegation(s) but Do Not Mention C. Bronfman</b>	<b>18 Plaintiffs Mention C. Bronfman in Some Way</b>
Jane Doe 35	Jane Doe 24	Nicole	Daniela
Jane Doe 42	Jane Doe 25	I. Oxenberg	Camila
Jane Doe 45	T. Chapman	A. Ames	Adrian
Jane Doe 54	Jane Doe 29	Amanda	S. Edmondson
Jane Doe 57	Jane Doe 30	Jane Doe 6	J.J. Salazar
Jane Doe 62	Jane Doe 31	Jane Doe 7	Souki
John Doe 10	Jane Doe 32	Jane Doe 8	Audrey
John Doe 12	Jane Doe 34	Jane Doe 9	A. Stiles
John Doe 20	Jane Doe 36	Jane Doe 10	B. Piesse
Jane Doe 59	Jane Doe 37	Jane Doe 11	M. Vicente
	Jane Doe 38	Jane Doe 15	T. Natalie
	Jane Doe 39	Jane Doe 53	Jane Doe 17
	Jane Doe 40	John Doe 3	Jane Doe 19
	A. McLean		Jane Doe 20
	Jane Doe 43		Jane Doe 21
	Jane Doe 44		Jane Doe 22
	Jane Doe 47		Jane Doe 28
	Jane Doe 48		Jane Doe 50
	Jane Doe 52		
	Jane Doe 56		
	Kayla		
	Jane Doe 60		
	Jane Doe 63		
	John Doe 4		

<b>10 Plaintiffs Make No Factual Allegations At All or Make Only Boilerplate Allegations Related to NXIVM Enrollment and Do Not Mention C. Bronfman</b>	<b>35 Plaintiffs Make Only Boilerplate Allegations Related to NXIVM Enrollment + Unspecified Uncompensated Labor and Do Not Mention C. Bronfman</b>	<b>13 Plaintiffs Make Some Kind of Individualized Allegation(s) but Do Not Mention C. Bronfman</b>	<b>18 Plaintiffs Mention C. Bronfman in Some Way</b>
	John Doe 5		
	John Doe 6		
	John Doe 7		
	John Doe 9		
	John Doe 11		
	John Doe 13		
	John Doe 14		
	John Doe 15		
	John Doe 19		
	John Doe 21		
	John Doe 22		