

**JANE DOE ■. JEFFREY EPSTEIN**

**Case No.: 08-CIV-80893 – MARRA/JOHNSON**

**EXHIBIT “A”**

**CIVIL RICO CASE STATEMENT  
PURSUANT TO LOCAL RULE 12.1**

1. Plaintiff Jane Doe alleges a violation of Florida Statutes §§ 772.103(3) (participation in an enterprise through a criminal activity) and 772.103(4) (conspiracy to do so). The following information describes both the § 772.103(3) claim and the § 772.103(4) conspiracy claim, with the additional note that the conspiracy was between defendant Jeffrey Epstein, [REDACTED], [REDACTED] and numerous other persons whose identity is, at this time, unknown to Jane Doe. Epstein, [REDACTED], [REDACTED] and others all conspired together to violate the provisions of § 772.103(3), doing so willfully and with full knowledge of the criminal activities that were planned as part of the criminal enterprise. For convenience in this statement, Florida Statutes §§ 772.103(3) and (4) will be referred to as the "Florida Civil RICO provisions."

2. While others (including [REDACTED] and [REDACTED]) were involved in the plan, scheme, and enterprise, the sole defendant alleged in this complaint at this time is defendant Jeffrey Epstein. Epstein served as the leader and informal "C.E.O." of the criminal enterprise. He also criminally sexually abused and prostituted Jane Doe and other minor girls who were victims of the criminal enterprise. He also paid for [REDACTED] and [REDACTED] to be a part of the enterprise and conspired with them to commit criminal acts of sexual abuse and prostitution of minors. The basis for Epstein's liability is also described in Jane Doe's complaint.

3. The other wrongdoers included [REDACTED] [REDACTED] and [REDACTED] [REDACTED]. (Jane Doe is uncertain as to the precise spelling of their names and their full legal names.) They assisted defendant Jeffrey Epstein in recruiting and procuring minor girls to satisfy Epstein's criminal sexual purposes and for prostitution. For example, they

contacted the minor girls on the telephone to schedule times for each girl to "work" for Defendant Epstein at his house, and they helped to arrange for minor girls to travel to Epstein's West Palm Beach mansion to satisfy his sexual desires for minor girls. [REDACTED] and [REDACTED] also conspired with Epstein to commit acts of sexual abuse and prostitution with minor girls and aided and abetted Epstein in the abuse and prostitution. [REDACTED] and [REDACTED] had full knowledge of the crimes of the enterprise; they knew full well that the girls who were coming to Epstein's mansion were minors and that Epstein was sexually abusing and prostituting these minors, some of whom were 14 or younger. [REDACTED] and [REDACTED] willfully and knowingly participated in the activities of the enterprise and intended to make the criminal activities of the enterprise succeed. Among other things, [REDACTED] helped arrange for recruiters of the minor girls, and assisted Epstein in converting minor girls into prostitutes for Epstein's sexual gratification as well as encouraged and coerced these minor girls into recruiting additional minor girls for Epstein, and sometimes [REDACTED], to sexually batter and exploit, all in furtherance of the goal of the criminal enterprise. She also spoke personally to the recruiters as well as to the minor girls who were victims of Epstein sexual abuse. At Epstein's specific direction, [REDACTED] spoke to the recruiters about subjects such as finding more minor girls to satisfy Epstein's criminal sexual appetite. [REDACTED] also served as Epstein's scheduler, scheduling appointments for the minor girls to ostensibly do "work" when in fact (as she well knew) she was scheduling them to be sexually abused and prostituted by Epstein. [REDACTED] thus procured minor girls for prostitution and caused them to be prostituted. [REDACTED] also directly participated in the sexual abuse of the minor girls by participating in unlawful sexual activities and prostitution with the girls. Both [REDACTED] and

██████████ assisted Epstein in attempting to keep Epstein's criminal sexual abuse unknown to law enforcement and other authorities and in discouraging the minor girls from reporting the crimes to law enforcement and other authorities.

4. The names of all of the victims are unknown to the plaintiff at this time. However, they include Jane Doe herself as well as the victim in E.W. █. Jeffrey Epstein and L.M. █. Jeffrey Epstein. A list of more than 30 such minor female victims has previously been provided by the U.S. Attorney's Office for the Southern District of Florida to Epstein (but not to Jane Doe). The injuries to those victims resulted from criminal sexual activity and prostitution with Epstein and ██████████. The injuries they suffered are like those suffered by Jane Doe in this action, as described in paragraph 25 of her complaint. For example, Jane Doe and the other victims suffered grave emotional distress and financial injury from being forced to engage in unlawful sexual activities with him to which, as minors, they could not lawfully consent. They also suffered distress and financial injury from being prostituted by him.

5. The pattern of racketeering and/or criminal activity is also described in the complaint, which Jane Doe incorporates by reference into this statement here and at all other points in the statement. The criminal activity included Epstein using paid employees and underlings (including ██████████ and ██████████) to repeatedly find, procure, and bring to him minor girls in order for Epstein to solicit, induce, coerce, entice, compel or force these minor girls to engage in unlawful sexual activity and acts of prostitution.

The criminal activity and specific statutes violated that are relevant to the RICO count include, but are not necessarily limited to: Procuring for prostitution, or causing to

be prostituted, any person who is under the age of 18 years in violation of Florida Statutes Chapter 796.03; Acts of battery in violation of Florida Statutes Chapter 784; Forcing, compelling or coercing another to become a prostitute in violation of Florida Statutes Chapter 796.04; knowingly recruiting, enticing, harboring, transporting, providing or otherwise obtaining by any means a person, knowing that coercion would be used to cause that person to engage in prostitution in violation of Florida Statutes Chapter 796.045; tampering with a witness in violation of Florida Statutes Chapter 914.22; altering, destroying, removing, or concealing records or documents or other evidence with the purpose to impair its verity or availability in violation of Florida Statutes Chapter 918.13; maintaining a place for the purpose of lewdness or prostitution; offering or securing another for the purpose of prostitution or for some other lewd or indecent act; receiving persons into his Palm Beach mansion for the purpose of prostitution or lewdness; directing, taking or transporting or agreeing to direct take or transport persons to his Palm Beach mansion with knowledge or reasonable belief that the purpose of such directing, taking or transporting was prostitution or lewdness; all in violation of Florida Statutes Chapter 796.07. Numerous other crimes were committed by the criminal enterprise against the minor victims; however, those numerous other crimes are not crimes enumerated in the "criminal activity" section of the civil RICO section.

a. The dates of the events are not fully known to Jane Doe at this time. However, at a minimum, Epstein obtained minor girls (including Jane Doe) for sexual purposes of the period of approximately June 2002 through November 2005. Epstein could better determine than Jane Doe the precise dates of his abuse of her by reviewing

his schedule for this period of time and looking for notations of days on which she performed "work" for him. Epstein has pled guilty to two such criminal offenses against minor girls, although the total number of indictable or chargeable offenses would easily number more than 100. On each of these occasions, as described in the complaint, Epstein would have his underlings (including [REDACTED]) procure a minor girl to satisfy his sexual desires and then would satisfy his sexual desires through criminal sexual contact and conduct with the minor girls. Epstein would also watch [REDACTED] sexually abuse the minor girls to satisfy his sexual desires. Epstein had a particular interest in minor girls, including girls as young as 14 or younger. On occasion, he would turn away girls who were 18 or over because of perverse and unlawful sexual interest in young girls. Epstein recruited and paid the girls for the sexual activities. In doing so, he procured for prostitution, and caused to be prostituted, many young girls under the age of 18, in violation of (among other statutes) Florida Statute § 796.03. The pattern of criminal and unlawful sexual activity extended from at least June 2002 through November 2005. Epstein committed unlawful sexual abuse against Jane Doe at least 20 times between February 2003 to June 2005 while she was a minor. Other criminal activities involving tampering with and harassing witnesses occurred from June 2002 through early 2008 (and perhaps later).

b. On many of the occasions, the exact dates of which are not as yet determined by the Jane Doe, Epstein would represent that he was interested in a "massage" or legitimate "work" when in fact he was interested in unlawful sexual activity with the minor girls, including fondling the girls, masturbating in their presence, and vaginally penetrating them or causing them to be penetrated. Epstein and others acting

under his direction falsely represented to the minor girls that he was interested in a "massage" or "work" when in fact he was interested in procuring the girls for unlawful sexual activity and acts of prostitution. Epstein and others acting under his direction used means of interstate communications to make these false representations, including cellular telephones.

c. Epstein has pled guilty to two Florida criminal offenses against minor girls.

d. The relationship of the criminal activity to the enterprise is also described in the complaint. The Florida offenses to which Epstein pled guilty are but a few of the many instances of his plan succeeding. The acts are all related to each other, are arranged, and are part of a common plan for these reasons: they have the same intent (to gratify Epstein's unlawful sexual interest in minor girls); the same results (the unlawful sexual abuse and prostitution of minor girls); the same accomplices (including ██████ and frequently ██████); the same victims (Jane Doe was herself victimized more than 20 times, and many other girls were also victimized repeatedly); the same means (there was a standard payment of several hundred dollars for going to the mansion, and standard escalation feature depending on the nature of the sexual acts that Epstein performed); and the same methods of commission (Epstein obtained young, skinny, and attractive girls to satisfy his sexual desires while they were economically disadvantaged and lacked a stable family life and therefore, he perceived, would be interested in obtaining money and unlikely to report his crimes to law enforcement). The acts were also interrelated by common characteristics, namely the identity of the perpetrator (Epstein and often ██████) and the common results of his crimes (sexual abuse and acts of prostitution with minor girls). The acts also constituted

a clear pattern of criminal activity.

6. The criminal acts of Epstein occurred repeatedly over a substantial period of time and were not isolated events. In particular, Epstein committed repeated (more than 20) criminal acts of sexual abuse against Jane Doe from approximately February 2003 to June 2005. He committed similar criminal acts of unlawful sexual activity and prostitution against other minor girls for a period of time exceeding more than three years, from approximately June 2002 through November 2005. The acts occurred frequently during this time, easily exceeding more than 100 instances of criminal sexual abuse. (Jane Doe does not know the exact number of acts, but intends to determine this during the discovery process. It is possible that the total number of acts could be several hundred or thousand.) The acts were part of Epstein's regular way of doing business (e.g., obtaining sexual gratification) during this period of time. Epstein and others acting at his direction (including [REDACTED]) made hundreds of telephone calls in furtherance of these illegal activities. It is common belief that the sexual acts against minors temporarily ceased in approximately November 2005 when Epstein learned that law enforcement authorities were investigating his crimes. If, however, Epstein, through his criminal enterprise, is given the opportunity to commit similar acts in the future upon his release from jail, the enterprise will likely continue this illegal activity. In addition, Epstein committed criminal acts of tampering with witnesses in violation of Florida Statutes § 914.22. For example, Epstein paid the minor girls money not only with the intent to prostitute them but also with the specific intent of causing the minor girls not to communicate to law enforcement officers information about the sexual abuse committed against them. Epstein made bigger payments to the minor girls depending on the

degree of force he used towards them, making larger payments when he was more concerned about the fact they might report the crimes committed against them. These payments pose a continuing threat of misconduct, as they may interfere with the ability of law enforcement to discover and prosecute all of Epstein's crimes. Epstein or other members of his enterprise, paid for attorney's to represent several of his minor victims while he and his employees or assistants were being criminally investigated in an effort to influence the testimony of persons that had information otherwise valuable to law enforcement. Epstein and his enterprise may likewise interfere with the ability of Jane Doe to discover all of the information supporting her claim. Epstein also selected impoverished girls for his crimes, believing that the payments would be more effective in obtaining their silence and that their economic circumstances might make them less likely to report to law enforcement. If all else failed, after having unlawful sex with the minor girls, Epstein would tell them not to tell anyone about their unlawful encounter or "bad things" would happen. In addition, since November 2005 and through the early part of 2008 (and perhaps later), Epstein and others acting at his direction have attempted to discourage the victims of his crimes from reporting his crimes and cooperating with law enforcement. For example, persons acting at the direction of Epstein have aggressively attempted to "interview" the victims or to "tail" the victims in their cars. They also harassed a victim shortly before she was to testify at a grand jury investigating Epstein. These efforts have been made not for legitimate investigative reasons but rather for the purpose of discouraging the victims from cooperating with law enforcement (and, in at least one case, the investigating grand jury) and from filing civil lawsuits to vindicate their rights.

7. The enterprise included, at a minimum, a group of individuals associated in fact to assist Epstein in recruiting and procuring minor girls and obtaining criminal gratification of his illegal sexual interest in minor girls.

a. The persons constituting the enterprise included a group of individuals associated in fact. These individuals include Epstein, [REDACTED], [REDACTED] and [REDACTED], as well as other persons whose names Jane Doe intends to identify during the discovery phase of this case.

b. The criminal enterprise had a definite structure similar to a mafia-type family, although all the details of that structure are not currently known to Jane Doe. Through discovery, Jane Doe intends to ascertain the precise structure of the enterprise that enabled Epstein to commit sexual crimes against her. While Jane Doe does not currently know all of the details of the structure, she does know that the enterprise operated together on a continuing basis, with largely the same personnel for a common purpose. The shared purpose of the enterprise was to satisfy Epstein's illegal interest in having sexual activities with minor girls. The enterprise was not a mere informal conspiracy, but had a definite hierarchical structure. Epstein served informally but effectively as the leader, C.E.O. or "boss" of this organization, directing his underlings how to recruit and procure young girls for his sexual activities and when to bring the girls to his mansion. Epstein's key "lieutenant" in the organization was [REDACTED], who served as both his scheduler and a recruiter/procurer of the girls. This was an important function, as the recruiting was necessary to satisfy Epstein's desire to abuse a large number of different minor girls with different (albeit similar) physical attributes and the scheduling was necessary to insure that the minor girls would be brought to Epstein's

mansion to be sexually abused and prostituted at a time when Epstein was there (but not at the same time, when they might learn of other girls' identities and possibly become emboldened to report his activities to law enforcement.) Scheduling was also necessary to ensure secrecy, so that as few persons as possible were aware that minor girls were coming at unusual hours to Epstein's mansion. [REDACTED] also needed (directly or indirectly) to make transportation arrangements for many of the girls, as they were often too young to drive themselves to and from the mansion. [REDACTED] also served as a recruiter and helped Epstein satisfy his criminal sexual desires by, on occasion, directly participating in sexual abuse and prostitution of the minor girls. Epstein, [REDACTED], and [REDACTED] all took steps to conceal the existence of the enterprise and to discourage the girls from reporting the sexual abuse and prostitution to law enforcement or other authority figures. Epstein also used otherwise-legitimate business activities to help further the purpose of the criminal enterprise. These apparently legitimate activities provided "cover" for Epstein and his associates to commit the crimes. Epstein also maintained the appearance of an upstanding and prominent banker and investor to discourage the minor girls from reporting the abuse to law enforcement. By projecting an image of financial power (and strong political connections to prominent politicians and current and former government officials and personal connections to prominent scientists), Epstein hoped to discourage the minor girls from reporting what he was doing to them by making it appear that they would not be believed. These business activities helped Epstein secure the financial resources to commit the crimes against the minor girls and to pay for prostituting them. For example, the activities paid for maintaining the mansion where the girls were abused and paid for the cellular

telephones and other means of communications that were used to recruit and procure the girls. The business activities also helped to provide the funds to pay [REDACTED] and [REDACTED] large sums of money to participate in the illegal enterprise and make payments to the girls for performing sexual acts. In sum, Epstein and the persons under his direction associated in fact and functioned as a continuing unit. This enterprise produced a course of conduct that lead to a pattern of criminal activity involving hundreds of instances of sexual abuse and prostitution of minor girls. This enterprise was the vehicle for Epstein to commit his crimes against Jane Doe and other minor girls and operated on a continuing basis from June 2002 to November 2005 (and, in regard to witness tampering and harassment, through at least early 2008). The enterprise enabled Epstein to sexually abuse and prostitute Jane Doe in particular on more than 20 occasions from February 2003 through June 2005.

c. Epstein served as the informal but effective leader or "C.E.O." of the enterprise.

d. Epstein was associated with the enterprise as its informal but effective leader or "C.E.O."

e. Epstein directed the affairs of the enterprise and the others in the enterprise responded to his commands.

f. Based on the facts that she currently possesses, Jane Doe specifically alleges and intends to prove both that (i) Epstein was an individual separate from the enterprise and (ii) the defendant was a member of the enterprise, namely that he served as the effective leader of the enterprise. With regard to point (i), the illegal enterprise had a definite structure and operational function apart from Epstein. The structure is

described in greater detail in this statement in answer 5.b above. With regard to point (ii), the defendant was a member of the enterprise and served to execute many of the decisions and activities of the enterprise and to command the execution of others. Epstein personally engaged in sexual abuse of minor girls, including Jane Doe. Epstein also directed others to engage in sexual abuse of minor girls, including [REDACTED]. Epstein also procured girls for prostitution and caused these girls to be prostituted. Epstein also served as the leader of the enterprise.

g. Epstein was a direct perpetrator of the racketeering activity. In particular, Epstein engaged in criminal acts of sexual abuse and prostitution with minor girls, as well as procuring girls for prostitution. He also directed others (i.e., [REDACTED]) to engage in such criminal acts and served as the leader of the criminal enterprise.

8. The relationship between the pattern of criminal activity and the enterprise is not completely known to Jane Doe at this time. There was a criminal entity separate and apart from the pattern of activity in which it engaged. The pattern of criminal activity was the series of crimes committed by Epstein and others, and includes the specific crimes identified in part 5.a. above. These offenses were closely related and formed a clear pattern, as described in part 5.b above. These acts included acts of sexual abuse and procuring the prostitution of minors by Epstein personally and by [REDACTED] acting at Epstein's direction. In contrast, the enterprise was the group of persons who associated together for the common purpose of engaging in the criminal course of conduct described at greater length elsewhere in this statement, including part 5.e above. The group of persons included Epstein, [REDACTED], and [REDACTED] and numerous others whose identity is, at this time, unknown to Jane Doe.

9. In this part of the statement, Jane Doe will provide a description of the relationship between the otherwise-lawful activities of the enterprise and the criminal activities of the enterprise. The lawful and unlawful activities of the enterprise have been described in addition in the complaint and previous answers found in parts 5, 6 and 7 above (which Jane Doe expressly incorporates into her answer here). The usual and daily activities of the criminal enterprise included scheduling meetings, activities, and other events for Epstein – including scheduling “private time” in his mansion for Epstein to commit sexual crimes against minor girls. [REDACTED] served as Epstein’s scheduler, scheduling both otherwise-lawful activities to provide “cover” for Epstein as well as the illegal sexual activities. The exact frequency with which the sexual crimes took place varied and is not known, at this time, to Jane Doe. However, when Epstein was in West Palm Beach, it often occurred on a weekly or daily basis (and, in some instances, took place on several times during a single day). The scheduling was designed to secure a private place in Epstein’s mansion when few other persons would be present at the mansion, so as to reduce the chance of detection of Epstein’s sexual abuse and prostitution as well as to make it more difficult for the minor girls to report his actions to law enforcement or other authorities. The usual activities of the enterprise also included maintaining the mansion and securing means of communication (i.e., cellular telephones) to recruit minor girls and procure them for prostitution. The activities further included arranging transportation for the girls to and from the mansion if it was necessary. The enterprise also attempted to make Epstein appear to be an upstanding and law-abiding member of community and a successful businessperson, for reasons described in paragraph 6.b above. The enterprise served as the usual way

in which Epstein would obtain sexual gratification.

10. Through his criminal enterprise, Epstein received perverse and unlawful sexual gratification from sexually abusing minor girls and engaging in acts of prostitution with them. He also received perverse sexual gratification from directing others (e.g., ██████████) to sexually abuse and prostitute minor girls. He could not have gained access to the great number of minor girls without a structured and organized enterprise promoting the same agenda and plan.

11. While Jane Doe's civil action alleges violations of the Florida Civil RICO statute rather than violations of the federal civil RICO statute, it should be noted that means of interstate communications were used to perpetrate the crimes against minor girls (including Jane Doe), including cellular and other telephones that Epstein used, or caused to be used, to arrange his illegal sexual activities and to recruit additional minor girls to participate in these activities. Through his recruitment and procuring of young girls, Epstein's activities directly affected interstate commerce.

12. Based on the information currently known to her, Jane Doe does not allege that Epstein, who is a billionaire banker, used the enterprise to personally make a financial profit or to obtain the collection of an unlawful debt. That being said, Plaintiff Jane Doe does not concede that the enterprise did not turn a profit. Discovery will reveal this information regarding profits appreciated by the criminal enterprise through various criminal activities of the enterprise. Epstein did, however, make payments to and prostitute the minor girls for the sexual gratification that he obtained from them and to discourage them from reporting his crimes to law enforcement and other authorities.

13. Based on the information currently known to her, Jane Doe does not

allege that Epstein, who is a billionaire banker, used the enterprise to obtain or maintain control of a business enterprise or real property. Epstein did, however, use his West Palm Beach mansion to perpetrate the crimes against the then-minor girls. He also used his financial success to provide "cover" for his crimes, as described in part 6.b above.

14. The criminal enterprise is described in the complaint and part 6 of this statement above, which description Jane Doe incorporates here.

a. The enterprise included persons unknown to Jane Doe, but at least included Epstein and his paid assistants [REDACTED] [REDACTED] and [REDACTED] [REDACTED].

b. Under the direction of Epstein, [REDACTED], [REDACTED] and others whose names are unknown to Jane Doe arranged for minor girls to come to Epstein's mansion where he could sexual abuse them and prostitute them to satisfy his perverse sexual desires. [REDACTED] and [REDACTED] were responsible for recruiting the girls and procuring them for prostitution. [REDACTED] was also responsible for scheduling a time when both Epstein and the minor girl could meet together at Epstein's mansion for the sexual abuse and for making travel arrangements (if necessary) for the girls. [REDACTED] was also responsible for ensuring the privacy of the room in Epstein's mansion where Epstein would sexually abuse the girls. [REDACTED] would participate in abusing and prostituting the girls for Epstein's sexual gratification. [REDACTED] and [REDACTED] received payments and other forms of compensation from Epstein for performing these illegal activities and for participating in the enterprise. Epstein, [REDACTED], and [REDACTED] also all took steps to discourage the girls from reporting these crimes to law enforcement, including making cash payments to the girls.

c. As a result of the criminal enterprise, Jane Doe (then a minor) suffered criminal sexual abuse at the hands of Epstein. As alleged in greater detail in the complaint, this abuse primarily lead to actual damages, namely loss of personal property, for which she is statutorily entitled to no less than \$200. The property lost in the form of lost income, loss of ability to earn income, and monies expended by her for medical and psychological treatment. Stated simply, she lost money (property) as a result of this sexual abuse she suffered at the hands of Epstein's criminal enterprise. The abuse also lead to significant past and future physical injury, pain and suffering, emotional distress, psychological trauma, mental anguish, humiliation, embarrassment, loss of self-esteem, loss of dignity, invasion of privacy, and other damages, including consequential damages from Epstein controlling, manipulating and coercing her into a perverse and unconventional way of life for a minor. In addition, the time involved in the abuse created lost opportunities to pursue other activities (including economic activities) and lead to past and future financial and proprietary losses to Jane Doe, as well as the need for psychiatric services. Jane Doe has also suffered a loss of income, a loss of capacity to earn income in the future, and a loss of the capacity to enjoy life. It has also lead to the need to file this civil suit, with consequent attorney's fees. All of these damages were caused by, and proximately caused by, the criminal enterprise and its criminal acts. All of these injuries were inflicted directly on Jane Doe and occurred by reason of the criminal acts of the enterprise, including the acts of sexual abuse by Epstein.

d. The defendant "person" in the Florida Civil RICO action is, at this time, only defendant Epstein. Defendant Epstein is associated with a criminal

enterprise that conducted and participated, both directly and indirectly, in a pattern of criminal activity in violation of both Florida and federal criminal law. The exact relationship between Epstein and the criminal enterprise is described in greater detail in parts 5 and 6 above.

15. The criminal conspiracy involving the enterprise is described above. Jane Doe expressly incorporates that information into her statement here. The conspiracy was formed of Epstein, [REDACTED], [REDACTED], and others, who agreed to arrange for illegal sexual gratification by Epstein through the sexual abuse and prostitution of minor girls both by Epstein personally and by others (i.e., [REDACTED]) while he watched. The object and substance of the conspiracy was to obtain minor girls for Epstein so that he could satisfy his perverse sexual interest in minor girls, to recruit minor girls to be abused and prostituted for his gratification, to keep the existence of the sexual abuse from being learned by law enforcement and other authorities, and to discourage the victims from reporting the abuse to authorities. The conspiracy started no later than approximately June 2002 in West Palm Beach, Florida, and other locations. The sexual abuse of the minor girls appears to have, at least temporarily, ceased in approximately 2005. The conspiracy extended beyond November 2005 to early 2008 (and perhaps later) in its efforts to keep the criminal conspiracy unknown, as described in part 5.f above. The conspiracy committed numerous overt acts. For example, [REDACTED] and [REDACTED] arranged for minor girls to be brought to Epstein's West Palm Beach mansion so that he could sexually abuse the girls and obtain sexual gratification. Epstein sexually abused minor girls at his mansion and made payments to them and otherwise prostituted them there.

16. Jane Doe suffered actual damages, including financial and proprietary injuries, as described in part 13.C above.

17. The enterprise injured Jane Doe and the other minor girls by enabling Epstein to sexually abuse and prostitute the girls.

18. Defendant Epstein is liable for all the damages for his criminal activity and the activity of his criminal enterprise. (If additional defendants are added to the complaint, these other defendants may also be jointly and severable liable for the damages.) The damages for which Epstein is liable include compensatory damages (including damages for emotional distress as well as damages for financial and proprietary losses), attorney's fees, and such further relief as the Court deems just and proper. The amount of these damages is in excess of \$50,000,000. These damages recoverable under the Civil RICO count are trebled by operation of Florida Statutes 772.104. Jane Doe is aware of the provision in Florida Statutes 772.104(3) ("In no event shall punitive damages be awarded under this section"), but is nonetheless entitled to punitive damages by virtue of her complaint. She is seeking punitive damages for Epstein's outrageous and egregious conduct and crimes under other provisions of law in this lawsuit.

19. All of the above answers must be read in light of the complaint that has been filed in this case. Jane Doe expressly incorporates by reference her complaint as part of the answer to each of the above questions. Whenever the word "include" or its variations appears in this statement, the information that follows is not intended to be an exclusive listing.