

4. At all times material to this cause of action Defendant Jeffrey Epstein had multiple residences, including in New York, New York and the United States Virgin Islands. He is currently a citizen of the United States and a resident of New York and the U.S. Virgin Islands.

5. At all times material to this cause of action Defendant Jeffrey Epstein was an adult male born in 1953.

6. At all times material to this cause of action Defendant Ghislaine Maxwell was residing in in New York, New York and was a citizen of Great Britain and France.

7. At all times material to this cause of action [REDACTED] was residing in New York, New York, and, on information and belief, was a citizen of the United States.

8. At all times material to this cause of action [REDACTED] was residing in New York, New York and, on information and belief, was a citizen of the United States.

9. At all material times, [REDACTED] was residing in New York, New York and, on information and belief, was a citizen of the United States.

10. Including because a substantial part of the events and omissions giving rise to this cause of action occurred in the Southern District of New York, venue is proper in that District. 28 U.S.C. § 1391(b)(2)