

personal, psychological, financial, and related vulnerabilities. The Defendants' tactics included promising the victims money, shelter, transportation, employment, admission into educational institutions, educational tuition, and other things of value in exchange for sex.

20. Defendants' sex trafficking venture and enterprise operated in a hierarchal structure with Defendants Jeffrey Epstein and Ghislaine Maxwell at the top and underlings below. Underlings included the other named Defendants as well as unnamed co-conspirators such as various housekeepers and butlers; an airplane pilot; and various employees, assistants and associates. Wittingly and unwittingly, such underlings performed their respective roles with the purpose and effect of insuring that the enterprise supplied young females to Defendant Epstein and others for sexual purposes. At all times material to this complaint, the venture and enterprise was a group of two or more individuals associated in fact and deed.

21. Defendants Epstein and Maxwell, with help from assistants, associates and underlings, recruited and procured hundreds of girls over the decades of the operation of their scheme. Such recruitment and procurement included fraud, coercion, the threat of coercion, and a combination of these and similar tactics. Following the Defendants' recruitment and procurement of the females to join Epstein in New York and the U.S. Virgin Islands, the Defendants used fraudulent