

44. Defendant Maxwell frequently controlled the assignment, or “rotation,” of Plaintiff and the other young females concerning the time, place and manner of the sex acts they were told to provide to Defendant Epstein. Defendants Maxwell and Epstein also required Plaintiff to engage in sex acts with other females.

45. Defendants Epstein and Maxwell intimidated, threatened, humiliated and verbally abused Plaintiff in order to coerce her into sexual compliance. These Defendants threatened Plaintiff with serious harm, as well as serious psychological, financial, and reputational harm, with the purpose and effect of compelling Plaintiff to perform and continue performing the demanded commercial sexual activity.

46. On one occasion, after suffering verbal abuse and threats by Defendants Epstein, Maxwell, and [REDACTED] Plaintiff attempted to escape from Defendant Epstein’s private island. A search party led by Defendant Epstein located her and physically returned her to the main house on the island. Through these and other actions, the Defendants intended to cause, and did cause, Plaintiff to believe that failure to perform the actions they requested would result in physical restraint and potential harm to her person, as well as harm to her reputation, employability, and stable state of mind.