

AFFIDAVIT

I, Christina J. Pryor, being duly sworn, do state and attest as follows:

1. I am a Special Agent with the Federal Bureau of Investigation (FBI) and have been so employed for three (3) months. I am currently assigned to the Safe Streets Task Force, Miami Field Division, FBI Squad PB-2. Prior to joining the Miami Field Division, I attended the FBI Academy in Quantico, Virginia, for five (5) months where I received training in federal criminal laws and investigation techniques, including the laws related to obstruction of justice.

2. This affidavit is based upon my own personal knowledge of the facts and circumstances surrounding the investigation, and information provided to me by other law enforcement officers. This affidavit does not purport to contain all the information known to me about this case but addresses only that information necessary to support a finding of probable cause for the issuance of a criminal complaint charging Alfredo Rodriguez with obstruction of official proceedings, in violation of Title 18, United States Code, Section 1512(c).

3. On October 27, 2009, agents of the FBI met with and interviewed a cooperating witness ("CW"). The CW reported that, while conducting discovery in a pending civil case before the United States District Court for the Southern District of Florida, he came into contact with Alfredo Rodriguez ("Rodriguez"), who was a subpoenaed witness in the civil case.

4. Rodriguez had been interviewed by FBI agents on January 18, 2007, in connection with a federal criminal investigation into the sexual exploitation of minors. Prior

to being interviewed by FBI, Rodriguez had also been contacted and interviewed by local police detectives, and had been asked to produce documents related to the criminal investigation. The civil litigation involving the CW related to civil damages claims made by victims of the criminal activity that formed the basis of the state and federal criminal investigations.

5. The CW explained to agents that Rodriguez had been deposed under oath on two occasions. The first deposition occurred on July 27, 2009, and the second deposition was conducted on August 9, 2009. In connection with those depositions, Rodriguez was served with a subpoena duces tecum that called for the production of several types of documentary evidence. The CW was present for both depositions and Rodriguez testified that he had no documents responsive to the subpoena duces tecum.

6. In August 2009, after the conclusion of the second deposition, the CW received a phone call from Rodriguez. Rodriguez informed the CW that he had additional information that he had not previously disclosed to any law enforcement agency or any of the civil attorneys. Rodriguez described the information as, the Holy Grail or Golden Nugget and explained that he had compiled lists of additional victims in the case and their contact information. Rodriguez explained that the information contained hundreds of additional victims and their phone numbers from diverse geographic locations, including New York, New Mexico, and Paris, France.

7. Rodriguez asked the CW to pay him \$50,000.00 and, in return, Rodriguez would turn over the documents relating to the victims. In his initial and subsequent

communications with Rodriguez, the CW explained to Rodriguez that he was under subpoena to turn over such information and that it would be illegal for Rodriguez to demand money for turning over the information. Rodriguez persisted that he would only turn over the information in his possession in exchange for \$50,000.00.

8. On October 28, 2009, in a consensually-monitored phone call, the CW telephoned Rodriguez. Rodriguez again indicated that he would not turn over the information relating to the additional victims without monetary compensation. Rodriguez was told that an associate of the CW would be in touch with him regarding the information and exchange. The associate that the CW referred to was, in fact, an undercover employee (UCE) of the FBI.

9. On October 29, 2009, the FBI UCE contacted Rodriguez via telephone. Rodriguez again explained that he would only turn over the information in exchange for monetary compensation. The UCE advised Rodriguez that it would take several days to acquire the funds and that once the funds were obtained, he/she would contact Rodriguez. During the conversation, Rodriguez admitted that he knew that the information was relevant to the FBI's criminal investigation and was called for by the investigation. Rodriguez explained that he had not turned over the information to the FBI because: (1) it was his "property" and he should be compensated for it; and (2) he was afraid that the target of the investigation would make him "disappear" or otherwise harm him, and the information was his "insurance policy."

10. On November 2, 2009, the UCE made contact with Rodriguez via telephone.

In that conversation, Rodriguez and the UCE continued the discussion regarding the purchase of the documents and scheduled a meeting for the following day.

11. On November 3, 2009, Rodriguez met with the UCE at a predetermined location. During the meeting, Rodriguez produced a small bound book and several sheets of legal pad paper containing hand written notes. Rodriguez explained that he had taken the bound book from his former employer's residence while employed there in 2004 to 2005 and that the book had been created by persons working for his former employer. Rodriguez discussed in detail the information contained within the book, and identified important information to the UCE. In addition, Rodriguez admitted he had previously lied to FBI. Rodriguez asked the UCE about the \$50,000.00, took possession of the money, and began counting it.

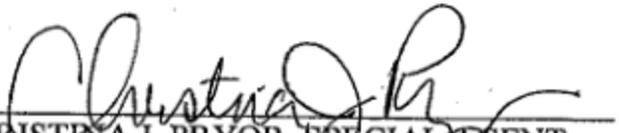
12. Rodriguez was then detained for Obstruction of Official Proceedings, Title 18, U.S. Code, Section 1512(c), and questioned. After *Miranda* warnings were administered by agents, Rodriguez waived his rights and signed a written waiver of those rights. Rodriguez admitted that he had the documents and book in his possession and had never turned them over to local law enforcement or the FBI. In addition, Rodriguez advised he had witnessed nude girls whom he believed were underage at the pool area of his former employer's home, knew that his former employer was engaging in sexual contact with underage girls, and had viewed pornographic images of underage girls on computers in his employer's home. Rodriguez was then released from custody for further investigation.

13. The items that Rodriguez had attempted to sell to the UC for \$50,000.00

were reviewed by an agent familiar with the underlying criminal investigation. As Rodriguez had described, the items contained information material to the underlying investigation that would have been extremely useful in investigating and prosecuting the case, including the names and contact information of material witnesses and additional victims. Had those items been produced in response to the inquiries of the state law enforcement officers or the FBI Special Agents, their contents would have been presented to the federal grand jury.

Based upon the foregoing, your affiant believes that probable cause exists to believe that, from at least as early as January 18, 2007 through on or about November 3, 2009, in Palm Beach County, in the Southern District of Florida, and elsewhere, Alfredo Rodriguez did corruptly conceal a record, document, or other object, with the intent to impair the object's availability for use in an official proceeding and otherwise corruptly obstructed or impeded an official proceeding, in violation of Title 18, United States Code, Section 1512(c).

FURTHER YOUR AFFIANT SAYETH NAUGHT.


CHRISTINA J. PRYOR, SPECIAL AGENT
FEDERAL BUREAU OF INVESTIGATION

Sworn to and subscribed before me
this 1 day of December, 2009.


LINNEA R. JOHNSON
UNITED STATES MAGISTRATE JUDGE

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

Case No. 09-8308-LRJ

UNITED STATES OF AMERICA

vs.

ALFREDO RODRIGUEZ,

Defendant.

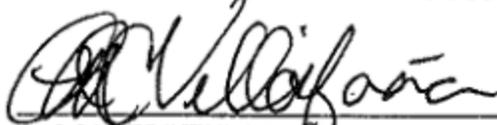
CRIMINAL COVER SHEET

1. Did this matter originate from a matter pending in the Northern Region of the United States Attorney's Office prior to October 14, 2003? Yes No
2. Did this matter originate from a matter pending in the Central Region of the United States Attorney's Office prior to September 1, 2007? Yes No

Respectfully submitted,

JEFFREY H. SLOMAN
ACTING UNITED STATES ATTORNEY

By:

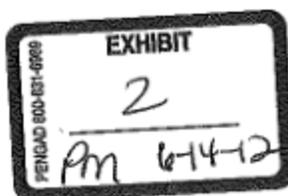


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EP-008

From: Cara L. Holmes
To: Bradley J. Edwards
Subject: Strategy
Date: Wednesday, July 29, 2009 1:13:13 PM

I think our best bet is to go after those close to Epstein.



08420

EP-001

EFTA01117114

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

CASE NO: 09-CV-81092-Cohn-Seltzer

█

Plaintiff

vs.

JEFFREY EPSTEIN,

Defendant

FILED by VT D.C.
ELECTRONIC

July 24, 2009

STEVEN M. LARIMORE
CLERK U.S. DIST. CT.
S.D. OF FLA. - MIAMI

COMPLAINT AND DEMAND FOR JURY TRIAL

Plaintiff, █, hereby sues the Defendant, Jeffrey Epstein, and states as follows:

1. At all times material to this cause of action, █, was a resident of Palm Beach County, Florida.

2. This Complaint is brought under a fictitious name to protect the identity of █, because this Complaint makes sensitive allegations of sexual assault and abuse of a then-minor.

3. At all times material to this cause of action, Defendant, Jeffrey Epstein, had a mansion located at 358 El Brillo Way, Palm Beach, Palm Beach County, Florida.

4. At all times materials to this cause of action, Defendant, Jeffrey Epstein, was an adult male born in 1953.

5. Defendant, Jeffrey Epstein, is currently a citizen of the State of Florida. This is substantiated by the residence that he maintains at 358 El Brillo Way, West Palm Beach, Florida where he spends the majority of his time, and intentions to remain at that address permanently are further evidenced by his statements to the Court during

EXHIBIT
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PM 6-14-12

his State Plea colloquy on June 30, 2008, case number 06CF009454AMB, taken before the Honorable Judge Dale Pucillo, wherein he indicated that after his release from the Palm Beach County Jail he intends to reside permanently at his home at 358 El Brillo Way, West Palm Beach, Florida, and he plans to work in West Palm Beach, Florida as well.

6. This Court has jurisdiction of this action and the claims set forth herein pursuant to 18 U.S.C. § 2255. [REDACTED] seeks damages in excess of 1 million dollars.

7. This Court has venue of this action pursuant to 28 U.S.C. § 1391(b), as a substantial part of the events giving rise to the claims occurred in this District.

STATEMENT OF FACTS

8. Upon information and belief, the Defendant, Jeffrey Epstein, has demonstrated a sexual preference and obsession for minor girls.

9. The Defendant, Jeffrey Epstein, developed a plan, scheme, and criminal enterprise that included an elaborate system wherein the then-minor [REDACTED] was brought to the Defendant, Jeffrey Epstein's residence by the Defendant's employees, recruiters, and assistants. When the assistants and employees left the then-minor [REDACTED] (and, on some occasions, other minor girls) alone in a room at the Defendant's mansion, the Defendant, Jeffrey Epstein, himself would appear, remove his clothing, and direct the then-minor [REDACTED] to remove her clothing. He would then perform one or more lewd, lascivious, and sexual acts, including, but not limited to, masturbation, touching of the then minor Plaintiff's sexual organs, coercing or forcing the then-minor [REDACTED] to perform oral sex on him, using vibrators or sexual toys on the then-minor [REDACTED], coercing the

then-minor [REDACTED] into sexual acts with himself or others, and digitally penetrating the then-minor [REDACTED]. He would then pay [REDACTED] for engaging in this sexual activity.

10. [REDACTED] was first brought to the Defendant, Jeffrey Epstein's mansion in 2002 when she was a fourteen-year old in middle school.

11. The then-minor [REDACTED] was a vulnerable child without adequate parental support at all times material to this Complaint. The Defendant, Jeffrey Epstein, a wealthy financier with a lavish home, significant wealth, and a network of assistants and employees, used his resources and his influence over a vulnerable minor child to engage in a systematic pattern of sexually exploitive behavior.

12. Beginning in approximately August 2002 and continuing until approximately the end of October 2005, the Defendant, Jeffrey Epstein, repeatedly coerced, induced and/or enticed the impressionable, vulnerable, and economically deprived then-minor [REDACTED] to commit various acts of sexual misconduct and sexually abused [REDACTED]. These acts included, but were not limited to, fondling and inappropriate and illegal sexual touching of the then-minor [REDACTED], forcing the then-minor [REDACTED] into oral sex, sexual misconduct and masturbation of the Defendant, Jeffrey Epstein, in the presence of the then-minor [REDACTED], handling and fondling of the then-minor [REDACTED]'s sexual organs for the purpose of masturbation, and encouraging the then-minor [REDACTED] to become involved in prostitution; Defendant, Jeffrey Epstein, committed, and conspired with others to commit, numerous criminal sexual offenses against the then minor Plaintiff including, but not limited to, sexual battery, solicitation of prostitution, coercing a minor into a life of prostitution, and lewd and lascivious assaults upon the person of the then-minor [REDACTED]. Defendant Jeffrey

Epstein knowingly transported [REDACTED] and other minors in interstate commerce with the intent that the [REDACTED] engage in prostitution and in other sexual activity for which he and others could be charged with criminal offenses. Defendant Jeffrey Epstein also knowingly used means of interstate commerce to knowingly persuade and induce minors, including [REDACTED], to engage in prostitution and other sexual activity for which he and others could be charged with criminal offenses.

13. In addition to the direct sexual abuse and molestation of the then-minor [REDACTED], Defendant, Jeffrey Epstein, instructed, coerced and otherwise induced the then-minor [REDACTED] to bring him numerous other minor girls (some as young as 12 years old) for the purposes of further satisfying his deviant sexual attraction to minors and for purposes of prostitution. On information and belief, Epstein sexually abused hundreds of minor girls through his recruiting system. Defendant, Jeffrey Epstein, used his money, wealth and power to unduly and improperly manipulate and influence the then-minor [REDACTED] to bring him these other minor girls for purposes of prostitution and in exchange for money. This influence led the then-minor [REDACTED] away from the life of a middle school aged child and into a delinquent lifestyle. This conduct also involved transporting [REDACTED] and other minors in interstate commerce and using means of interstate commerce, to persuade and induce [REDACTED] and others to engage in prostitution and in other sexual activity for which he and others could be charged with criminal offenses.

14. The Defendant, Jeffrey Epstein, at all times material to this Complaint, knew and should have known of [REDACTED]'s minority. The Defendant, Jeffrey Epstein, at all times

material to this Complaint, knew and should have know of the minority of the other girls he was sexually abusing

15. The acts referenced above in paragraphs 10 through 14, committed by Defendant, Jeffrey Epstein, against the then-minor Plaintiff [REDACTED] were committed in violation of numerous State criminal statutes condemning the sexual exploitation of minor children, prostitution and prostitution-related offenses, sexual performances by a child, lewd and lascivious assaults, sexual battery, contributing to the delinquency of a minor and other crimes, specifically including, but not limited to, those criminal offenses outlined in Chapters 794, 800, 827 and 847 of the Florida Statutes, as well as those designated in Florida Statutes §796.03, §796.07, §796.045, §796.04, §796.09, §39.01, and §827.04.

16. The acts reference above in paragraphs 10 through 15, committed by Defendant, Jeffrey Epstein, against the then-Minor Plaintiff [REDACTED] were committed in violation of numerous federal criminal statutes condemning the coercion and enticement of a minor to engage in prostitution or sexual activity, travel with intent to engage in illicit sexual conduct, sex trafficking of children, sexual exploitation of minor children, child exploitation enterprises, and other crimes, specifically including, but not limited to, those crimes designated in 18 U.S.C. § 2422(b), § 2423(b), and § 2423(e).

17. The crimes committed against [REDACTED] by Epstein were committed, on average, four times per month from the beginning of August 2002 through the end of October 2005, the exact dates being unknown to [REDACTED].

18. In June 2008, after investigations by the Palm Beach Police Department, the Palm Beach State Attorney's Office, the Federal Bureau of Investigation, and the United States Attorney's Office for the Southern District of Florida, Defendant, Jeffrey Epstein, entered pleas of "guilty" to various Florida state crimes involving the solicitation of minors for prostitution and the procurement of minors for the purposes of prostitution in the Fifteenth Judicial Circuit in the Palm Beach County, Florida. Defendant, Jeffrey Epstein, is in the same position as if he had been tried and convicted of the sexual offenses committed against Plaintiff and, as such, must admit liability unto Plaintiff, Jane Doe No. 101. In this action, Plaintiff hereby exclusively seeks civil remedies pursuant to 18 U.S.C. § 2255.

19. As a condition of his plea, and in exchange for the Federal Government not prosecuting the Defendant, Jeffrey Epstein, for numerous federal offenses, Defendant, Jeffrey Epstein, additionally entered into an agreement with the Federal Government to the following: "Any person, who while a minor, was a victim of an offense enumerated in Title 18, United States Code, Section 2255, will have the same rights to proceed under section 2255 as she would have had, if Mr. Epstein had been tried federally and convicted of an enumerated offense. For purposes of implementing this paragraph, the United States shall provide Mr. Epstein's attorneys with a list of individuals whom it was prepared to name in an indictment as victims of an enumerated offense by Mr. Epstein. Any judicial authority interpreting this provision, including any authority determining evidentiary burdens if any a Plaintiff must meet, shall consider that it is the intent of the parties to place these identified victims in the same position as they would have been

had Mr. Epstein been convicted at trial. No more; no less." Plaintiff [REDACTED] is covered by this paragraph and entitled to rights under this paragraph.

20. The defendant, Jeffrey Epstein, is thus estopped by his plea and agreement with the Federal Government from denying the acts alleged in this Complaint, and must effectively admit liability to the Plaintiff, [REDACTED], including admitting liability for all counts enumerated in this Complaint. Plaintiff [REDACTED] is entitled to damages, as further alleged below, including damages as provided in 18 U.S.C. § 2255, as amended by Pub. L. 109-248, Title VII, § 707(b) and (c), 120 Stat. 650.

COUNT 1

Cause of Action Pursuant to 18 U.S.C. § 2255

August 2002 – Incident 1

21. Plaintiff, [REDACTED] adopts and realleges paragraphs 1 through 20 above.

22. On or about August 2002, the exact date being unknown to [REDACTED], Defendant, Jeffrey Epstein, committed a federal sexual offense against her, including a violation of numerous federal criminal statutes condemning the coercion and enticement of a minor to engage in prostitution or sexual activity, travel with intent to engage in illicit sexual conduct, sex trafficking of children, sexual exploitation of minor children, transport of visual depictions of a minor engaging in sexually explicit conduct, child exploitation enterprises, and other crimes, specifically including, but not limited to, those crimes designated in 18 U.S.C. § 2422(b), § 2423(a), § 2423(b), and § 2423(e). [REDACTED] is therefore a victim of one or more offenses enumerated in 18 U.S.C. § 2255 and, as such, asserts a cause of action against the defendant, Jeffrey Epstein, pursuant to

this Section of the United States Code and the agreement between the Defendant, Jeffrey Epstein, and the United States Government.

23. As a direct and proximate result of the offenses enumerated in Title 18, United States Code, Section 2255, being committed against her, [REDACTED], has in the past suffered, and will in the future suffer, physical injury pain and suffering, emotional distress, psychological trauma, mental anguish, humiliation, embarrassment, loss of self-esteem, loss of dignity, invasion of her privacy and other damages associated with defendant, Jeffrey Epstein, controlling, manipulating and coercing her into a perverse and conventional way of life for a minor. The then-minor plaintiff [REDACTED], incurred medical and psychological expenses and the plaintiff, [REDACTED], will in the future suffer medical and psychological expenses. The plaintiff, [REDACTED], has suffered a loss of income, a loss of the capacity to earn income in the future, and a loss of the capacity to enjoy life. These injuries are permanent in nature and the plaintiff, [REDACTED], will continue to suffer these losses in the future.

24. Wherefore, the plaintiff, [REDACTED], demands judgments against the defendant, Jeffrey Epstein, for compensatory damages of at least the minimum amount provided by law, attorney's fees, costs, and such other and further relief as this Court deems just and proper, and hereby demands trial by jury on all issues triable as of right by a jury.

COUNT 2

Cause of Action Pursuant to 18 U.S.C. § 2255

August 2002 – Incident 2

25. Plaintiff, [REDACTED], adopts and realleges paragraphs 1 through 20 above.

26. On or about August 2002, the exact date being unknown to [REDACTED], Defendant, Jeffrey Epstein, committed a federal sexual offense against her, including a violation of numerous federal criminal statutes condemning the coercion and enticement of a minor to engage in prostitution or sexual activity, travel with intent to engage in illicit sexual conduct, sex trafficking of children, sexual exploitation of minor children, transport of visual depictions of a minor engaging in sexually explicit conduct, child exploitation enterprises, and other crimes, specifically including, but not limited to, those crimes designated in 18 U.S.C. § 2422(b), § 2423(a), § 2423(b), and § 2423(e). [REDACTED] is therefore a victim of one or more offenses enumerated in 18 U.S.C. § 2255 and, as such, asserts a cause of action against the defendant, Jeffrey Epstein, pursuant to this Section of the United States Code and the agreement between the Defendant, Jeffrey Epstein, and the United States Government.

27. As a direct and proximate result of the offenses enumerated in Title 18, United States Code, Section 2255, being committed against her, [REDACTED] has in the past suffered, and will in the future suffer, physical injury pain and suffering, emotional distress, psychological trauma, mental anguish, humiliation, embarrassment, loss of self-esteem, loss of dignity, invasion of her privacy and other damages associated with defendant, Jeffrey Epstein, controlling, manipulating and coercing her into a perverse and conventional way of life for a minor. The then-minor plaintiff [REDACTED] incurred medical and psychological expenses and the plaintiff, [REDACTED], will in the future suffer medical and psychological expenses. The plaintiff, [REDACTED], has suffered a loss of income, a loss of the capacity to earn income in the future, and a loss of the capacity to enjoy life. These

injuries are permanent in nature and the plaintiff, ■■■, will continue to suffer these losses in the future.

28. Wherefore, the plaintiff, ■■■, demands judgments against the defendant, Jeffrey Epstein, for compensatory damages of at least the minimum amount provided by law, attorney's fees, costs, and such other and further relief as this Court deems just and proper, and hereby demands trial by jury on all issues triable as of right by a jury.

COUNT 3

Cause of Action Pursuant to 18 U.S.C. § 2255

August 2002 – Incident 3

29. Plaintiff, ■■■, adopts and realleges paragraphs 1 through 20 above.

30. On or about August 2002, the exact date being unknown to ■■■, Defendant, Jeffrey Epstein, committed a federal sexual offense against her, including a violation of numerous federal criminal statutes condemning the coercion and enticement of a minor to engage in prostitution or sexual activity, travel with intent to engage in illicit sexual conduct, sex trafficking of children, sexual exploitation of minor children, transport of visual depictions of a minor engaging in sexually explicit conduct, child exploitation enterprises, and other crimes, specifically including, but not limited to, those crimes designated in 18 U.S.C. § 2422(b), § 2423(a), § 2423(b), and § 2423(e). ■■■ is therefore a victim of one or more offenses enumerated in 18 U.S.C. § 2255 and, as such, asserts a cause of action against the defendant, Jeffrey Epstein, pursuant to this Section of the United States Code and the agreement between the Defendant, Jeffrey Epstein, and the United States Government.

31. As a direct and proximate result of the offenses enumerated in Title 18, United States Code, Section 2255, being committed against her, [REDACTED], has in the past suffered, and will in the future suffer, physical injury pain and suffering, emotional distress, psychological trauma, mental anguish, humiliation, embarrassment, loss of self-esteem, loss of dignity, invasion of her privacy and other damages associated with defendant, Jeffrey Epstein, controlling, manipulating and coercing her into a perverse and conventional way of life for a minor. The then-minor plaintiff [REDACTED] incurred medical and psychological expenses and the plaintiff, [REDACTED], will in the future suffer medical and psychological expenses. The plaintiff, [REDACTED], has suffered a loss of income, a loss of the capacity to earn income in the future, and a loss of the capacity to enjoy life. These injuries are permanent in nature and the plaintiff, L.M., will continue to suffer these losses in the future.

32. Wherefore, the plaintiff, [REDACTED], demands judgments against the defendant, Jeffrey Epstein, for compensatory damages of at least the minimum amount provided by law, attorney's fees, costs, and such other and further relief as this Court deems just and proper, and hereby demands trial by jury on all issues triable as of right by a jury.

COUNT 4

Cause of Action Pursuant to 18 U.S.C. § 2255

August 2002 – Incident 4

33. Plaintiff, [REDACTED], adopts and realleges paragraphs 1 through 20 above.

34. On or about August 2002, the exact date being unknown to [REDACTED], Defendant, Jeffrey Epstein, committed a federal sexual offense against her, including a

violation of numerous federal criminal statutes condemning the coercion and enticement of a minor to engage in prostitution or sexual activity, travel with intent to engage in illicit sexual conduct, sex trafficking of children, sexual exploitation of minor children, transport of visual depictions of a minor engaging in sexually explicit conduct, child exploitation enterprises, and other crimes, specifically including, but not limited to, those crimes designated in 18 U.S.C. § 2422(b), § 2423(a), § 2423(b), and § 2423(e). ■ is therefore a victim of one or more offenses enumerated in 18 U.S.C. § 2255 and, as such, asserts a cause of action against the defendant, Jeffrey Epstein, pursuant to this Section of the United States Code and the agreement between the Defendant, Jeffrey Epstein, and the United States Government.

35. As a direct and proximate result of the offenses enumerated in Title 18, United States Code, Section 2255, being committed against her, ■ has in the past suffered, and will in the future suffer, physical injury pain and suffering, emotional distress, psychological trauma, mental anguish, humiliation, embarrassment, loss of self-esteem, loss of dignity, invasion of her privacy and other damages associated with defendant, Jeffrey Epstein, controlling, manipulating and coercing her into a perverse and conventional way of life for a minor. The then-minor plaintiff ■ incurred medical and psychological expenses and the plaintiff, ■, will in the future suffer medical and psychological expenses. The plaintiff, ■, has suffered a loss of income, a loss of the capacity to earn income in the future, and a loss of the capacity to enjoy life. These injuries are permanent in nature and the plaintiff, ■, will continue to suffer these losses in the future.

36. Wherefore, the plaintiff, ■■■, demands judgments against the defendant, Jeffrey Epstein, for compensatory damages of at least the minimum amount provided by law, attorney's fees, costs, and such other and further relief as this Court deems just and proper, and hereby demands trial by jury on all issues triable as of right by a jury.

COUNT 5

Cause of Action Pursuant to 18 U.S.C. § 2255

September 2002 – Incident 1

37. Plaintiff, ■■■, adopts and realleges paragraphs 1 through 20 above.

38. On or about September 2002, the exact date being unknown to ■■■, Defendant, Jeffrey Epstein, committed a federal sexual offense against her, including a violation of numerous federal criminal statutes condemning the coercion and enticement of a minor to engage in prostitution or sexual activity, travel with intent to engage in illicit sexual conduct, sex trafficking of children, sexual exploitation of minor children, transport of visual depictions of a minor engaging in sexually explicit conduct, child exploitation enterprises, and other crimes, specifically including, but not limited to, those crimes designated in 18 U.S.C. § 2422(b), § 2423(a), § 2423(b), and § 2423(e): L.M. is therefore a victim of one or more offenses enumerated in 18 U.S.C. § 2255 and, as such, asserts a cause of action against the defendant, Jeffrey Epstein, pursuant to this Section of the United States Code and the agreement between the Defendant, Jeffrey Epstein, and the United States Government.

39. As a direct and proximate result of the offenses enumerated in Title 18, United States Code, Section 2255, being committed against her, ■■■, has in the past

suffered, and will in the future suffer, physical injury pain and suffering, emotional distress, psychological trauma, mental anguish, humiliation, embarrassment, loss of self-esteem, loss of dignity, invasion of her privacy and other damages associated with defendant, Jeffrey Epstein, controlling, manipulating and coercing her into a perverse and conventional way of life for a minor. The then-minor plaintiff L.M. incurred medical and psychological expenses and the plaintiff, [REDACTED], will in the future suffer medical and psychological expenses. The plaintiff, [REDACTED], has suffered a loss of income, a loss of the capacity to earn income in the future, and a loss of the capacity to enjoy life. These injuries are permanent in nature and the plaintiff, [REDACTED], will continue to suffer these losses in the future.

40. Wherefore, the plaintiff, [REDACTED], demands judgments against the defendant, Jeffrey Epstein, for compensatory damages of at least the minimum amount provided by law, attorney's fees, costs, and such other and further relief as this Court deems just and proper, and hereby demands trial by jury on all issues triable as of right by a jury.

COUNT 6

Cause of Action Pursuant to 18 U.S.C. § 2255

September 2002 – Incident 2

41. Plaintiff, [REDACTED], adopts and realleges paragraphs 1 through 20 above.

42. On or about September 2002, the exact date being unknown to [REDACTED], Defendant, Jeffrey Epstein, committed a federal sexual offense against her, including a violation of numerous federal criminal statutes condemning the coercion and enticement of a minor to engage in prostitution or sexual activity, travel with intent to

engage in illicit sexual conduct, sex trafficking of children, sexual exploitation of minor children, transport of visual depictions of a minor engaging in sexually explicit conduct, child exploitation enterprises, and other crimes, specifically including, but not limited to, those crimes designated in 18 U.S.C. § 2422(b), § 2423(a), § 2423(b), and § 2423(e).

█ is therefore a victim of one or more offenses enumerated in 18 U.S.C. § 2255 and, as such, asserts a cause of action against the defendant, Jeffrey Epstein, pursuant to this Section of the United States Code and the agreement between the Defendant, Jeffrey Epstein, and the United States Government.

43. As a direct and proximate result of the offenses enumerated in Title 18, United States Code, Section 2255, being committed against her, █ has in the past suffered, and will in the future suffer, physical injury pain and suffering, emotional distress, psychological trauma, mental anguish, humiliation, embarrassment, loss of self-esteem, loss of dignity, invasion of her privacy and other damages associated with defendant, Jeffrey Epstein, controlling, manipulating and coercing her into a perverse and conventional way of life for a minor. The then-minor plaintiff █ incurred medical and psychological expenses and the plaintiff, █, will in the future suffer medical and psychological expenses. The plaintiff, █, has suffered a loss of income, a loss of the capacity to earn income in the future, and a loss of the capacity to enjoy life. These injuries are permanent in nature and the plaintiff, █, will continue to suffer these losses in the future.

44. Wherefore, the plaintiff, █, demands judgments against the defendant, Jeffrey Epstein, for compensatory damages of at least the minimum amount provided

by law, attorney's fees, costs, and such other and further relief as this Court deems just and proper, and hereby demands trial by jury on all issues triable as of right by a jury.

COUNT 7

Cause of Action Pursuant to 18 U.S.C. § 2255

September 2002 – Incident 3

45. Plaintiff, ■■■, adopts and realleges paragraphs 1 through 20 above.

46. On or about September 2002, the exact date being unknown to ■■■,

Defendant, Jeffrey Epstein, committed a federal sexual offense against her, including a violation of numerous federal criminal statutes condemning the coercion and enticement of a minor to engage in prostitution or sexual activity, travel with intent to engage in illicit sexual conduct, sex trafficking of children, sexual exploitation of minor children, transport of visual depictions of a minor engaging in sexually explicit conduct, child exploitation enterprises, and other crimes, specifically including, but not limited to, those crimes designated in 18 U.S.C. § 2422(b), § 2423(a), § 2423(b), and § 2423(e).

■■■ is therefore a victim of one or more offenses enumerated in 18 U.S.C. § 2255 and, as such, asserts a cause of action against the defendant, Jeffrey Epstein, pursuant to this Section of the United States Code and the agreement between the Defendant, Jeffrey Epstein, and the United States Government.

47. As a direct and proximate result of the offenses enumerated in Title 18, United States Code, Section 2255, being committed against her, ■■■ has in the past suffered, and will in the future suffer, physical injury pain and suffering, emotional distress, psychological trauma, mental anguish, humiliation, embarrassment, loss of

self-esteem, loss of dignity, invasion of her privacy and other damages associated with defendant, Jeffrey Epstein, controlling, manipulating and coercing her into a perverse and conventional way of life for a minor. The then-minor plaintiff [REDACTED] incurred medical and psychological expenses and the plaintiff, [REDACTED], will in the future suffer medical and psychological expenses. The plaintiff, [REDACTED], has suffered a loss of income, a loss of the capacity to earn income in the future, and a loss of the capacity to enjoy life. These injuries are permanent in nature and the plaintiff, [REDACTED], will continue to suffer these losses in the future.

48. Wherefore, the plaintiff, [REDACTED], demands judgments against the defendant, Jeffrey Epstein, for compensatory damages of at least the minimum amount provided by law, attorney's fees, costs, and such other and further relief as this Court deems just and proper, and hereby demands trial by jury on all issues triable as of right by a jury.

COUNT 8

Cause of Action Pursuant to 18 U.S.C. § 2255

September 2002 – Incident 4

49. Plaintiff, [REDACTED], adopts and realleges paragraphs 1 through 20 above.

50. On or about September 2002, the exact date being unknown to [REDACTED], Defendant, Jeffrey Epstein, committed a federal sexual offense against her, including a violation of numerous federal criminal statutes condemning the coercion and enticement of a minor to engage in prostitution or sexual activity, travel with intent to engage in illicit sexual conduct, sex trafficking of children, sexual exploitation of minor children, transport of visual depictions of a minor engaging in sexually explicit conduct,

child exploitation enterprises, and other crimes, specifically including, but not limited to, those crimes designated in 18 U.S.C. § 2422(b), § 2423(a), § 2423(b), and § 2423(e).

█ is therefore a victim of one or more offenses enumerated in 18 U.S.C. § 2255 and, as such, asserts a cause of action against the defendant, Jeffrey Epstein, pursuant to this Section of the United States Code and the agreement between the Defendant, Jeffrey Epstein, and the United States Government.

51. As a direct and proximate result of the offenses enumerated in Title 18, United States Code, Section 2255, being committed against her, █, has in the past suffered, and will in the future suffer, physical injury pain and suffering, emotional distress, psychological trauma, mental anguish, humiliation, embarrassment, loss of self-esteem, loss of dignity, invasion of her privacy and other damages associated with defendant, Jeffrey Epstein, controlling, manipulating and coercing her into a perverse and conventional way of life for a minor. The then-minor plaintiff █, incurred medical and psychological expenses and the plaintiff, █, will in the future suffer medical and psychological expenses. The plaintiff, █, has suffered a loss of income, a loss of the capacity to earn income in the future, and a loss of the capacity to enjoy life. These injuries are permanent in nature and the plaintiff, █, will continue to suffer these losses in the future.

52. Wherefore, the plaintiff, █, demands judgments against the defendant, Jeffrey Epstein, for compensatory damages of at least the minimum amount provided by law, attorney's fees, costs, and such other and further relief as this Court deems just and proper, and hereby demands trial by jury on all issues triable as of right by a jury.

COUNT 9

Cause of Action Pursuant to 18 U.S.C. § 2255

October 2002 – Incident 1

53. Plaintiff, ■■■, adopts and realleges paragraphs 1 through 20 above.

54. On or about October 2002, the exact date being unknown to ■■■,

Defendant, Jeffrey Epstein, committed a federal sexual offense against her, including a violation of numerous federal criminal statutes condemning the coercion and enticement of a minor to engage in prostitution or sexual activity, travel with intent to engage in illicit sexual conduct, sex trafficking of children, sexual exploitation of minor children, transport of visual depictions of a minor engaging in sexually explicit conduct, child exploitation enterprises, and other crimes, specifically including, but not limited to, those crimes designated in 18 U.S.C. § 2422(b), § 2423(a), § 2423(b), and § 2423(e).

■■■ is therefore a victim of one or more offenses enumerated in 18 U.S.C. § 2255 and, as such, asserts a cause of action against the defendant, Jeffrey Epstein, pursuant to this Section of the United States Code and the agreement between the Defendant, Jeffrey Epstein, and the United States Government.

55. As a direct and proximate result of the offenses enumerated in Title 18, United States Code, Section 2255, being committed against her, ■■■ has in the past suffered, and will in the future suffer, physical injury pain and suffering, emotional distress, psychological trauma, mental anguish, humiliation, embarrassment, loss of self-esteem, loss of dignity, invasion of her privacy and other damages associated with defendant, Jeffrey Epstein, controlling, manipulating and coercing her into a perverse

and conventional way of life for a minor. The then-minor plaintiff [REDACTED], incurred medical and psychological expenses and the plaintiff, [REDACTED], will in the future suffer medical and psychological expenses. The plaintiff, [REDACTED], has suffered a loss of income, a loss of the capacity to earn income in the future, and a loss of the capacity to enjoy life. These injuries are permanent in nature and the plaintiff, [REDACTED], will continue to suffer these losses in the future.

56. Wherefore, the plaintiff, [REDACTED], demands judgments against the defendant, Jeffrey Epstein, for compensatory damages of at least the minimum amount provided by law, attorney's fees, costs, and such other and further relief as this Court deems just and proper, and hereby demands trial by jury on all issues triable as of right by a jury.

COUNT 10

Cause of Action Pursuant to 18 U.S.C. § 2255

October 2002 – Incident 2

57. Plaintiff, [REDACTED], adopts and realleges paragraphs 1 through 20 above.

58. On or about October 2002, the exact date being unknown to L.M., Defendant, Jeffrey Epstein, committed a federal sexual offense against her, including a violation of numerous federal criminal statutes condemning the coercion and enticement of a minor to engage in prostitution or sexual activity, travel with intent to engage in illicit sexual conduct, sex trafficking of children, sexual exploitation of minor children, transport of visual depictions of a minor engaging in sexually explicit conduct, child exploitation enterprises, and other crimes, specifically including, but not limited to, those crimes designated in 18 U.S.C. § 2422(b), § 2423(a), § 2423(b), and § 2423(e).

█. is therefore a victim of one or more offenses enumerated in 18 U.S.C. § 2255 and, as such, asserts a cause of action against the defendant, Jeffrey Epstein, pursuant to this Section of the United States Code and the agreement between the Defendant, Jeffrey Epstein, and the United States Government.

59. As a direct and proximate result of the offenses enumerated in Title 18, United States Code, Section 2255, being committed against her, █. has in the past suffered, and will in the future suffer, physical injury pain and suffering, emotional distress, psychological trauma, mental anguish, humiliation, embarrassment, loss of self-esteem, loss of dignity, invasion of her privacy and other damages associated with defendant, Jeffrey Epstein, controlling, manipulating and coercing her into a perverse and conventional way of life for a minor. The then-minor plaintiff █. incurred medical and psychological expenses and the plaintiff, █., will in the future suffer medical and psychological expenses. The plaintiff, █., has suffered a loss of income, a loss of the capacity to earn income in the future, and a loss of the capacity to enjoy life. These injuries are permanent in nature and the plaintiff, █., will continue to suffer these losses in the future.

60. Wherefore, the plaintiff, █., demands judgments against the defendant, Jeffrey Epstein, for compensatory damages of at least the minimum amount provided by law, attorney's fees, costs, and such other and further relief as this Court deems just and proper, and hereby demands trial by jury on all issues triable as of right by a jury.

COUNT 11

Cause of Action Pursuant to 18 U.S.C. § 2255

October 2002 – Incident 3

61. Plaintiff, ■■■, adopts and realleges paragraphs 1 through 20 above.

62. On or about October 2002, the exact date being unknown to ■■■, Defendant, Jeffrey Epstein, committed a federal sexual offense against her, including a violation of numerous federal criminal statutes condemning the coercion and enticement of a minor to engage in prostitution or sexual activity, travel with intent to engage in illicit sexual conduct, sex trafficking of children, sexual exploitation of minor children, transport of visual depictions of a minor engaging in sexually explicit conduct, child exploitation enterprises, and other crimes, specifically including, but not limited to, those crimes designated in 18 U.S.C. § 2422(b), § 2423(a), § 2423(b), and § 2423(e). ■■■ is therefore a victim of one or more offenses enumerated in 18 U.S.C. § 2255 and, as such, asserts a cause of action against the defendant, Jeffrey Epstein, pursuant to this Section of the United States Code and the agreement between the Defendant, Jeffrey Epstein, and the United States Government.

63. As a direct and proximate result of the offenses enumerated in Title 18, United States Code, Section 2255, being committed against her, ■■■ has in the past suffered, and will in the future suffer, physical injury pain and suffering, emotional distress, psychological trauma, mental anguish, humiliation, embarrassment, loss of self-esteem, loss of dignity, invasion of her privacy and other damages associated with defendant, Jeffrey Epstein, controlling, manipulating and coercing her into a perverse and conventional way of life for a minor. The then-minor plaintiff ■■■ incurred medical and psychological expenses and the plaintiff, ■■■, will in the future suffer medical and

psychological expenses. The plaintiff, ■■■, has suffered a loss of income, a loss of the capacity to earn income in the future, and a loss of the capacity to enjoy life. These injuries are permanent in nature and the plaintiff, ■■■, will continue to suffer these losses in the future.

64. Wherefore, the plaintiff, ■■■, demands judgments against the defendant, Jeffrey Epstein, for compensatory damages of at least the minimum amount provided by law, attorney's fees, costs, and such other and further relief as this Court deems just and proper, and hereby demands trial by jury on all issues triable as of right by a jury.

COUNT 12

Cause of Action Pursuant to 18 U.S.C. § 2255

October 2002 – Incident 4

65. Plaintiff, ■■■, adopts and realleges paragraphs 1 through 20 above.

66. On or about October 2002, the exact date being unknown to ■■■, Defendant, Jeffrey Epstein, committed a federal sexual offense against her, including a violation of numerous federal criminal statutes condemning the coercion and enticement of a minor to engage in prostitution or sexual activity, travel with intent to engage in illicit sexual conduct, sex trafficking of children, sexual exploitation of minor children, transport of visual depictions of a minor engaging in sexually explicit conduct, child exploitation enterprises, and other crimes, specifically including, but not limited to, those crimes designated in 18 U.S.C. § 2422(b), § 2423(a), § 2423(b), and § 2423(e). ■■■ is therefore a victim of one or more offenses enumerated in 18 U.S.C. § 2255 and, as such, asserts a cause of action against the defendant, Jeffrey Epstein, pursuant to

this Section of the United States Code and the agreement between the Defendant, Jeffrey Epstein, and the United States Government.

67. As a direct and proximate result of the offenses enumerated in Title 18, United States Code, Section 2255, being committed against her, [REDACTED], has in the past suffered, and will in the future suffer, physical injury pain and suffering, emotional distress, psychological trauma, mental anguish, humiliation, embarrassment, loss of self-esteem, loss of dignity, invasion of her privacy and other damages associated with defendant, Jeffrey Epstein, controlling, manipulating and coercing her into a perverse and conventional way of life for a minor. The then-minor plaintiff [REDACTED], incurred medical and psychological expenses and the plaintiff, [REDACTED], will in the future suffer medical and psychological expenses. The plaintiff, [REDACTED], has suffered a loss of income, a loss of the capacity to earn income in the future, and a loss of the capacity to enjoy life. These injuries are permanent in nature and the plaintiff, [REDACTED], will continue to suffer these losses in the future.

68. Wherefore, the plaintiff, [REDACTED], demands judgments against the defendant, Jeffrey Epstein, for compensatory damages of at least the minimum amount provided by law, attorney's fees, costs, and such other and further relief as this Court deems just and proper, and hereby demands trial by jury on all issues triable as of right by a jury.

COUNT 13

Cause of Action Pursuant to 18 U.S.C. § 2255

November 2002 – Incident 1

69. Plaintiff, [REDACTED], adopts and realleges paragraphs 1 through 20 above.

70. On or about November 2002, the exact date being unknown to [REDACTED], Defendant, Jeffrey Epstein, committed a federal sexual offense against her, including a violation of numerous federal criminal statutes condemning the coercion and enticement of a minor to engage in prostitution or sexual activity, travel with intent to engage in illicit sexual conduct, sex trafficking of children, sexual exploitation of minor children, transport of visual depictions of a minor engaging in sexually explicit conduct, child exploitation enterprises, and other crimes, specifically including, but not limited to, those crimes designated in 18 U.S.C. § 2422(b), § 2423(a), § 2423(b), and § 2423(e). [REDACTED] is therefore a victim of one or more offenses enumerated in 18 U.S.C. § 2255 and, as such, asserts a cause of action against the defendant, Jeffrey Epstein, pursuant to this Section of the United States Code and the agreement between the Defendant, Jeffrey Epstein, and the United States Government.

71. As a direct and proximate result of the offenses enumerated in Title 18, United States Code, Section 2255, being committed against her, [REDACTED] has in the past suffered, and will in the future suffer, physical injury pain and suffering, emotional distress, psychological trauma, mental anguish, humiliation, embarrassment, loss of self-esteem, loss of dignity, invasion of her privacy and other damages associated with defendant, Jeffrey Epstein, controlling, manipulating and coercing her into a perverse and conventional way of life for a minor. The then-minor plaintiff [REDACTED] incurred medical and psychological expenses and the plaintiff, [REDACTED], will in the future suffer medical and psychological expenses. The plaintiff, [REDACTED], has suffered a loss of income, a loss of the capacity to earn income in the future, and a loss of the capacity to enjoy life. These

injuries are permanent in nature and the plaintiff, ■■■, will continue to suffer these losses in the future.

72. Wherefore, the plaintiff, ■■■, demands judgments against the defendant, Jeffrey Epstein, for compensatory damages of at least the minimum amount provided by law, attorney's fees, costs, and such other and further relief as this Court deems just and proper, and hereby demands trial by jury on all issues triable as of right by a jury.

COUNT 14

Cause of Action Pursuant to 18 U.S.C. § 2255

November 2002 – Incident 2

73. Plaintiff, ■■■, adopts and realleges paragraphs 1 through 20 above.

74. On or about November 2002, the exact date being unknown to ■■■, Defendant, Jeffrey Epstein, committed a federal sexual offense against her, including a violation of numerous federal criminal statutes condemning the coercion and enticement of a minor to engage in prostitution or sexual activity, travel with intent to engage in illicit sexual conduct, sex trafficking of children, sexual exploitation of minor children, transport of visual depictions of a minor engaging in sexually explicit conduct, child exploitation enterprises, and other crimes, specifically including, but not limited to, those crimes designated in 18 U.S.C. § 2422(b), § 2423(a), § 2423(b), and § 2423(e). ■■■ is therefore a victim of one or more offenses enumerated in 18 U.S.C. § 2255 and, as such, asserts a cause of action against the defendant, Jeffrey Epstein, pursuant to this Section of the United States Code and the agreement between the Defendant, Jeffrey Epstein, and the United States Government.

75. As a direct and proximate result of the offenses enumerated in Title 18, United States Code, Section 2255, being committed against her, [REDACTED] has in the past suffered, and will in the future suffer, physical injury pain and suffering, emotional distress, psychological trauma, mental anguish, humiliation, embarrassment, loss of self-esteem, loss of dignity, invasion of her privacy and other damages associated with defendant, Jeffrey Epstein, controlling, manipulating and coercing her into a perverse and conventional way of life for a minor. The then-minor plaintiff [REDACTED] incurred medical and psychological expenses and the plaintiff, [REDACTED], will in the future suffer medical and psychological expenses. The plaintiff, [REDACTED], has suffered a loss of income, a loss of the capacity to earn income in the future, and a loss of the capacity to enjoy life. These injuries are permanent in nature and the plaintiff, [REDACTED], will continue to suffer these losses in the future.

76. Wherefore, the plaintiff, [REDACTED], demands judgments against the defendant, Jeffrey Epstein, for compensatory damages of at least the minimum amount provided by law, attorney's fees, costs, and such other and further relief as this Court deems just and proper, and hereby demands trial by jury on all issues triable as of right by a jury.

COUNT 15

Cause of Action Pursuant to 18 U.S.C. § 2255

November 2002 – Incident 3

77. Plaintiff, [REDACTED], adopts and realleges paragraphs 1 through 20 above.

78. On or about November 2002, the exact date being unknown to [REDACTED], Defendant, Jeffrey Epstein, committed a federal sexual offense against her, including a

violation of numerous federal criminal statutes condemning the coercion and enticement of a minor to engage in prostitution or sexual activity, travel with intent to engage in illicit sexual conduct, sex trafficking of children, sexual exploitation of minor children, transport of visual depictions of a minor engaging in sexually explicit conduct, child exploitation enterprises, and other crimes, specifically including, but not limited to, those crimes designated in 18 U.S.C. § 2422(b), § 2423(a), § 2423(b), and § 2423(e).

█. is therefore a victim of one or more offenses enumerated in 18 U.S.C. § 2255 and, as such, asserts a cause of action against the defendant, Jeffrey Epstein, pursuant to this Section of the United States Code and the agreement between the Defendant, Jeffrey Epstein, and the United States Government.

79. As a direct and proximate result of the offenses enumerated in Title 18, United States Code, Section 2255, being committed against her, █. has in the past suffered, and will in the future suffer, physical injury pain and suffering, emotional distress, psychological trauma, mental anguish, humiliation, embarrassment, loss of self-esteem, loss of dignity, invasion of her privacy and other damages associated with defendant, Jeffrey Epstein, controlling, manipulating and coercing her into a perverse and conventional way of life for a minor. The then-minor plaintiff █. incurred medical and psychological expenses and the plaintiff, █., will in the future suffer medical and psychological expenses. The plaintiff, █., has suffered a loss of income, a loss of the capacity to earn income in the future, and a loss of the capacity to enjoy life. These injuries are permanent in nature and the plaintiff, █., will continue to suffer these losses in the future.

80. Wherefore, the plaintiff, ■■■, demands judgments against the defendant, Jeffrey Epstein, for compensatory damages of at least the minimum amount provided by law, attorney's fees, costs, and such other and further relief as this Court deems just and proper, and hereby demands trial by jury on all issues triable as of right by a jury.

COUNT 16

Cause of Action Pursuant to 18 U.S.C. § 2255

November 2002 – Incident 4

81. Plaintiff, ■■■, adopts and realleges paragraphs 1 through 20 above.

82. On or about November 2002, the exact date being unknown to ■■■, Defendant, Jeffrey Epstein, committed a federal sexual offense against her, including a violation of numerous federal criminal statutes condemning the coercion and enticement of a minor to engage in prostitution or sexual activity, travel with intent to engage in illicit sexual conduct, sex trafficking of children, sexual exploitation of minor children, transport of visual depictions of a minor engaging in sexually explicit conduct, child exploitation enterprises, and other crimes, specifically including, but not limited to, those crimes designated in 18 U.S.C. § 2422(b), § 2423(a), § 2423(b), and § 2423(e). ■■■ is therefore a victim of one or more offenses enumerated in 18 U.S.C. § 2255 and, as such, asserts a cause of action against the defendant, Jeffrey Epstein, pursuant to this Section of the United States Code and the agreement between the Defendant, Jeffrey Epstein, and the United States Government.

83. As a direct and proximate result of the offenses enumerated in Title 18, United States Code, Section 2255, being committed against her, ■■■ has in the past

suffered, and will in the future suffer, physical injury pain and suffering, emotional distress, psychological trauma, mental anguish, humiliation, embarrassment, loss of self-esteem, loss of dignity, invasion of her privacy and other damages associated with defendant, Jeffrey Epstein, controlling, manipulating and coercing her into a perverse and conventional way of life for a minor. The then-minor plaintiff [REDACTED] incurred medical and psychological expenses and the plaintiff, L.M., will in the future suffer medical and psychological expenses. The plaintiff, [REDACTED], has suffered a loss of income, a loss of the capacity to earn income in the future, and a loss of the capacity to enjoy life. These injuries are permanent in nature and the plaintiff, [REDACTED], will continue to suffer these losses in the future.

84. Wherefore, the plaintiff, [REDACTED], demands judgments against the defendant, Jeffrey Epstein, for compensatory damages of at least the minimum amount provided by law, attorney's fees, costs, and such other and further relief as this Court deems just and proper, and hereby demands trial by jury on all issues triable as of right by a jury.

COUNT 17

Cause of Action Pursuant to 18 U.S.C. § 2255

December 2002 – Incident 1

85. Plaintiff, [REDACTED], adopts and realleges paragraphs 1 through 20 above.

86. On or about December 2002, the exact date being unknown to [REDACTED], Defendant, Jeffrey Epstein, committed a federal sexual offense against her, including a violation of numerous federal criminal statutes condemning the coercion and enticement of a minor to engage in prostitution or sexual activity, travel with intent to

engage in illicit sexual conduct, sex trafficking of children, sexual exploitation of minor children, transport of visual depictions of a minor engaging in sexually explicit conduct, child exploitation enterprises, and other crimes, specifically including, but not limited to, those crimes designated in 18 U.S.C. § 2422(b), § 2423(a), § 2423(b), and § 2423(e).

■■■■ is therefore a victim of one or more offenses enumerated in 18 U.S.C. § 2255 and, as such, asserts a cause of action against the defendant, Jeffrey Epstein, pursuant to this Section of the United States Code and the agreement between the Defendant, Jeffrey Epstein, and the United States Government.

87. As a direct and proximate result of the offenses enumerated in Title 18, United States Code, Section 2255, being committed against her, ■■■■ has in the past suffered, and will in the future suffer, physical injury pain and suffering, emotional distress, psychological trauma, mental anguish, humiliation, embarrassment, loss of self-esteem, loss of dignity, invasion of her privacy and other damages associated with defendant, Jeffrey Epstein, controlling, manipulating and coercing her into a perverse and conventional way of life for a minor. The then-minor plaintiff ■■■■ incurred medical and psychological expenses and the plaintiff, L.M., will in the future suffer medical and psychological expenses. The plaintiff, ■■■■, has suffered a loss of income, a loss of the capacity to earn income in the future, and a loss of the capacity to enjoy life. These injuries are permanent in nature and the plaintiff, ■■■■, will continue to suffer these losses in the future.

88. Wherefore, the plaintiff, ■■■■, demands judgments against the defendant, Jeffrey Epstein, for compensatory damages of at least the minimum amount provided

by law, attorney's fees, costs, and such other and further relief as this Court deems just and proper, and hereby demands trial by jury on all issues triable as of right by a jury.

COUNT 18

Cause of Action Pursuant to 18 U.S.C. § 2255

December 2002 – Incident 2

89. Plaintiff, ■■■, adopts and realleges paragraphs 1 through 20 above.

90. On or about December 2002, the exact date being unknown to ■■■, Defendant, Jeffrey Epstein, committed a federal sexual offense against her, including a violation of numerous federal criminal statutes condemning the coercion and enticement of a minor to engage in prostitution or sexual activity, travel with intent to engage in illicit sexual conduct, sex trafficking of children, sexual exploitation of minor children, transport of visual depictions of a minor engaging in sexually explicit conduct, child exploitation enterprises, and other crimes, specifically including, but not limited to, those crimes designated in 18 U.S.C. § 2422(b), § 2423(a), § 2423(b), and § 2423(e). ■■■ is therefore a victim of one or more offenses enumerated in 18 U.S.C. § 2255 and, as such, asserts a cause of action against the defendant, Jeffrey Epstein, pursuant to this Section of the United States Code and the agreement between the Defendant, Jeffrey Epstein, and the United States Government.

91. As a direct and proximate result of the offenses enumerated in Title 18, United States Code, Section 2255, being committed against her, ■■■ has in the past suffered, and will in the future suffer, physical injury pain and suffering, emotional distress, psychological trauma, mental anguish, humiliation, embarrassment, loss of

self-esteem, loss of dignity, invasion of her privacy and other damages associated with defendant, Jeffrey Epstein, controlling, manipulating and coercing her into a perverse and conventional way of life for a minor. The then-minor plaintiff [REDACTED] incurred medical and psychological expenses and the plaintiff, [REDACTED], will in the future suffer medical and psychological expenses. The plaintiff, L.M., has suffered a loss of income, a loss of the capacity to earn income in the future, and a loss of the capacity to enjoy life. These injuries are permanent in nature and the plaintiff, [REDACTED], will continue to suffer these losses in the future.

92. Wherefore, the plaintiff, [REDACTED], demands judgments against the defendant, Jeffrey Epstein, for compensatory damages of at least the minimum amount provided by law, attorney's fees, costs, and such other and further relief as this Court deems just and proper, and hereby demands trial by jury on all issues triable as of right by a jury.

COUNT 19

Cause of Action Pursuant to 18 U.S.C. § 2255

December 2002 – Incident 3

93. Plaintiff, L.M. adopts and realleges paragraphs 1 through 20 above.

94. On or about December 2002, the exact date being unknown to [REDACTED], Defendant, Jeffrey Epstein, committed a federal sexual offense against her, including a violation of numerous federal criminal statutes condemning the coercion and enticement of a minor to engage in prostitution or sexual activity, travel with intent to engage in illicit sexual conduct, sex trafficking of children, sexual exploitation of minor children, transport of visual depictions of a minor engaging in sexually explicit conduct,

child exploitation enterprises, and other crimes, specifically including, but not limited to, those crimes designated in 18 U.S.C. § 2422(b), § 2423(a), § 2423(b), and § 2423(e). L.M. is therefore a victim of one or more offenses enumerated in 18 U.S.C. § 2255 and, as such, asserts a cause of action against the defendant, Jeffrey Epstein, pursuant to this Section of the United States Code and the agreement between the Defendant, Jeffrey Epstein, and the United States Government.

95. As a direct and proximate result of the offenses enumerated in Title 18, United States Code, Section 2255, being committed against her, [REDACTED], has in the past suffered, and will in the future suffer, physical injury pain and suffering, emotional distress, psychological trauma, mental anguish, humiliation, embarrassment, loss of self-esteem, loss of dignity, invasion of her privacy and other damages associated with defendant, Jeffrey Epstein, controlling, manipulating and coercing her into a perverse and conventional way of life for a minor. The then-minor plaintiff [REDACTED], incurred medical and psychological expenses and the plaintiff, [REDACTED], will in the future suffer medical and psychological expenses. The plaintiff, [REDACTED], has suffered a loss of income, a loss of the capacity to earn income in the future, and a loss of the capacity to enjoy life. These injuries are permanent in nature and the plaintiff, [REDACTED], will continue to suffer these losses in the future.

96. Wherefore, the plaintiff, [REDACTED], demands judgments against the defendant, Jeffrey Epstein, for compensatory damages of at least the minimum amount provided by law, attorney's fees, costs, and such other and further relief as this Court deems just and proper, and hereby demands trial by jury on all issues triable as of right by a jury.

COUNT 20

Cause of Action Pursuant to 18 U.S.C. § 2255

December 2002 – Incident 4

97. Plaintiff, [REDACTED] adopts and realleges paragraphs 1 through 20 above.

98. On or about December 2002, the exact date being unknown to [REDACTED], Defendant, Jeffrey Epstein, committed a federal sexual offense against her, including a violation of numerous federal criminal statutes condemning the coercion and enticement of a minor to engage in prostitution or sexual activity, travel with intent to engage in illicit sexual conduct, sex trafficking of children, sexual exploitation of minor children, transport of visual depictions of a minor engaging in sexually explicit conduct, child exploitation enterprises, and other crimes, specifically including, but not limited to, those crimes designated in 18 U.S.C. § 2422(b), § 2423(a), § 2423(b), and § 2423(e). [REDACTED] is therefore a victim of one or more offenses enumerated in 18 U.S.C. § 2255 and, as such, asserts a cause of action against the defendant, Jeffrey Epstein, pursuant to this Section of the United States Code and the agreement between the Defendant, Jeffrey Epstein, and the United States Government.

99. As a direct and proximate result of the offenses enumerated in Title 18, United States Code, Section 2255, being committed against her, [REDACTED] has in the past suffered, and will in the future suffer, physical injury pain and suffering, emotional distress, psychological trauma, mental anguish, humiliation, embarrassment, loss of self-esteem, loss of dignity, invasion of her privacy and other damages associated with defendant, Jeffrey Epstein, controlling, manipulating and coercing her into a perverse

and conventional way of life for a minor. The then-minor plaintiff [REDACTED] incurred medical and psychological expenses and the plaintiff, [REDACTED], will in the future suffer medical and psychological expenses. The plaintiff, [REDACTED], has suffered a loss of income, a loss of the capacity to earn income in the future, and a loss of the capacity to enjoy life. These injuries are permanent in nature and the plaintiff, [REDACTED], will continue to suffer these losses in the future.

100. Wherefore, the plaintiff, [REDACTED], demands judgments against the defendant, Jeffrey Epstein, for compensatory damages of at least the minimum amount provided by law, attorney's fees, costs, and such other and further relief as this Court deems just and proper, and hereby demands trial by jury on all issues triable as of right by a jury.

COUNT 21

Cause of Action Pursuant to 18 U.S.C. § 2255

January 2003 – Incident 1

101. Plaintiff, [REDACTED], adopts and realleges paragraphs 1 through 20 above.

102. On or about January 2003, the exact date being unknown to [REDACTED], Defendant, Jeffrey Epstein, committed a federal sexual offense against her, including a violation of numerous federal criminal statutes condemning the coercion and enticement of a minor to engage in prostitution or sexual activity, travel with intent to engage in illicit sexual conduct, sex trafficking of children, sexual exploitation of minor children, transport of visual depictions of a minor engaging in sexually explicit conduct, child exploitation enterprises, and other crimes, specifically including, but not limited to, those crimes designated in 18 U.S.C. § 2422(b), § 2423(a), § 2423(b), and § 2423(e).

█ is therefore a victim of one or more offenses enumerated in 18 U.S.C. § 2255 and, as such, asserts a cause of action against the defendant, Jeffrey Epstein, pursuant to this Section of the United States Code and the agreement between the Defendant, Jeffrey Epstein, and the United States Government.

103. As a direct and proximate result of the offenses enumerated in Title 18, United States Code, Section 2255, being committed against her, █ has in the past suffered, and will in the future suffer, physical injury pain and suffering, emotional distress, psychological trauma, mental anguish, humiliation, embarrassment, loss of self-esteem, loss of dignity, invasion of her privacy and other damages associated with defendant, Jeffrey Epstein, controlling, manipulating and coercing her into a perverse and conventional way of life for a minor. The then-minor plaintiff █ incurred medical and psychological expenses and the plaintiff, █, will in the future suffer medical and psychological expenses. The plaintiff, █, has suffered a loss of income, a loss of the capacity to earn income in the future, and a loss of the capacity to enjoy life. These injuries are permanent in nature and the plaintiff, █, will continue to suffer these losses in the future.

104. Wherefore, the plaintiff, █, demands judgments against the defendant, Jeffrey Epstein, for compensatory damages of at least the minimum amount provided by law, attorney's fees, costs, and such other and further relief as this Court deems just and proper, and hereby demands trial by jury on all issues triable as of right by a jury.

COUNT 22

Cause of Action Pursuant to 18 U.S.C. § 2255

January 2003 – Incident 2

105. Plaintiff, [REDACTED], adopts and realleges paragraphs 1 through 20 above.

106. On or about January 2003, the exact date being unknown to [REDACTED], Defendant, Jeffrey Epstein, committed a federal sexual offense against her, including a violation of numerous federal criminal statutes condemning the coercion and enticement of a minor to engage in prostitution or sexual activity, travel with intent to engage in illicit sexual conduct, sex trafficking of children, sexual exploitation of minor children, transport of visual depictions of a minor engaging in sexually explicit conduct, child exploitation enterprises, and other crimes, specifically including, but not limited to, those crimes designated in 18 U.S.C. § 2422(b), § 2423(a), § 2423(b), and § 2423(e). [REDACTED] is therefore a victim of one or more offenses enumerated in 18 U.S.C. § 2255 and, as such, asserts a cause of action against the defendant, Jeffrey Epstein, pursuant to this Section of the United States Code and the agreement between the Defendant, Jeffrey Epstein, and the United States Government.

107. As a direct and proximate result of the offenses enumerated in Title 18, United States Code, Section 2255, being committed against her, [REDACTED] has in the past suffered, and will in the future suffer, physical injury pain and suffering, emotional distress, psychological trauma, mental anguish, humiliation, embarrassment, loss of self-esteem, loss of dignity, invasion of her privacy and other damages associated with defendant, Jeffrey Epstein, controlling, manipulating and coercing her into a perverse and conventional way of life for a minor. The then-minor plaintiff [REDACTED] incurred medical and psychological expenses and the plaintiff, [REDACTED], will in the future suffer medical and

psychological expenses. The plaintiff, L.M., has suffered a loss of income, a loss of the capacity to earn income in the future, and a loss of the capacity to enjoy life. These damages are permanent in nature and the plaintiff, ■■■, will continue to suffer these losses in the future.

108. Wherefore, the plaintiff, ■■■, demands judgments against the defendant, Jeffrey Epstein, for compensatory damages of at least the minimum amount provided by law, attorney's fees, costs, and such other and further relief as this Court deems just and proper, and hereby demands trial by jury on all issues triable as of right by a jury.

COUNT 23

Cause of Action Pursuant to 18 U.S.C. § 2255

January 2003 – Incident 3

109. Plaintiff, ■■■, adopts and realleges paragraphs 1 through 20 above.

110. On or about January 2003, the exact date being unknown to ■■■, Defendant, Jeffrey Epstein, committed a federal sexual offense against her, including a violation of numerous federal criminal statutes condemning the coercion and enticement of a minor to engage in prostitution or sexual activity, travel with intent to engage in illicit sexual conduct, sex trafficking of children, sexual exploitation of minor children, transport of visual depictions of a minor engaging in sexually explicit conduct, child exploitation enterprises, and other crimes, specifically including, but not limited to, those crimes designated in 18 U.S.C. § 2422(b), § 2423(a), § 2423(b), and § 2423(e). ■■■ is therefore a victim of one or more offenses enumerated in 18 U.S.C. § 2255 and, as such, asserts a cause of action against the defendant, Jeffrey Epstein, pursuant to

this Section of the United States Code and the agreement between the Defendant, Jeffrey Epstein, and the United States Government.

111. As a direct and proximate result of the offenses enumerated in Title 18, United States Code, Section 2255, being committed against her, [REDACTED], has in the past suffered, and will in the future suffer, physical injury pain and suffering, emotional distress, psychological trauma, mental anguish, humiliation, embarrassment, loss of self-esteem, loss of dignity, invasion of her privacy and other damages associated with defendant, Jeffrey Epstein, controlling, manipulating and coercing her into a perverse and conventional way of life for a minor. The then-minor plaintiff [REDACTED] incurred medical and psychological expenses and the plaintiff, [REDACTED], will in the future suffer medical and psychological expenses. The plaintiff, [REDACTED], has suffered a loss of income, a loss of the capacity to earn income in the future, and a loss of the capacity to enjoy life. These injuries are permanent in nature and the plaintiff, [REDACTED], will continue to suffer these losses in the future.

112. Wherefore, the plaintiff, [REDACTED], demands judgments against the defendant, Jeffrey Epstein, for compensatory damages of at least the minimum amount provided by law, attorney's fees, costs, and such other and further relief as this Court deems just and proper, and hereby demands trial by jury on all issues triable as of right by a jury.

COUNT 24

Cause of Action Pursuant to 18 U.S.C. § 2255

January 2003 – Incident 4

113. Plaintiff, [REDACTED], adopts and realleges paragraphs 1 through 20 above.

114. On or about January 2003, the exact date being unknown to [REDACTED], Defendant, Jeffrey Epstein, committed a federal sexual offense against her, including a violation of numerous federal criminal statutes condemning the coercion and enticement of a minor to engage in prostitution or sexual activity, travel with intent to engage in illicit sexual conduct, sex trafficking of children, sexual exploitation of minor children, transport of visual depictions of a minor engaging in sexually explicit conduct, child exploitation enterprises, and other crimes, specifically including, but not limited to, those crimes designated in 18 U.S.C. § 2422(b), § 2423(a), § 2423(b), and § 2423(e). [REDACTED] is therefore a victim of one or more offenses enumerated in 18 U.S.C. § 2255 and, as such, asserts a cause of action against the defendant, Jeffrey Epstein, pursuant to this Section of the United States Code and the agreement between the Defendant, Jeffrey Epstein, and the United States Government.

115. As a direct and proximate result of the offenses enumerated in Title 18, United States Code, Section 2255, being committed against her, [REDACTED] has in the past suffered, and will in the future suffer, physical injury pain and suffering, emotional distress, psychological trauma, mental anguish, humiliation, embarrassment, loss of self-esteem, loss of dignity, invasion of her privacy and other damages associated with defendant, Jeffrey Epstein, controlling, manipulating and coercing her into a perverse and conventional way of life for a minor. The then-minor plaintiff [REDACTED] incurred medical and psychological expenses and the plaintiff, [REDACTED], will in the future suffer medical and psychological expenses. The plaintiff, [REDACTED], has suffered a loss of income, a loss of the capacity to earn income in the future, and a loss of the capacity to enjoy life. These

injuries are permanent in nature and the plaintiff, ■■■, will continue to suffer these losses in the future.

116. Wherefore, the plaintiff, ■■■, demands judgments against the defendant, Jeffrey Epstein, for compensatory damages of at least the minimum amount provided by law, attorney's fees, costs, and such other and further relief as this Court deems just and proper, and hereby demands trial by jury on all issues triable as of right by a jury.

COUNT 25

Cause of Action Pursuant to 18 U.S.C. § 2255

February 2003 – Incident 1

117. Plaintiff, ■■■, adopts and realleges paragraphs 1 through 20 above.

118. On or about February 2003, the exact date being unknown to ■■■, Defendant, Jeffrey Epstein, committed a federal sexual offense against her, including a violation of numerous federal criminal statutes condemning the coercion and enticement of a minor to engage in prostitution or sexual activity, travel with intent to engage in illicit sexual conduct, sex trafficking of children, sexual exploitation of minor children, transport of visual depictions of a minor engaging in sexually explicit conduct, child exploitation enterprises, and other crimes, specifically including, but not limited to, those crimes designated in 18 U.S.C. § 2422(b), § 2423(a), § 2423(b), and § 2423(e). ■■■ is therefore a victim of one or more offenses enumerated in 18 U.S.C. § 2255 and, as such, asserts a cause of action against the defendant, Jeffrey Epstein, pursuant to this Section of the United States Code and the agreement between the Defendant, Jeffrey Epstein, and the United States Government.

119. As a direct and proximate result of the offenses enumerated in Title 18, United States Code, Section 2255, being committed against her, [REDACTED], has in the past suffered, and will in the future suffer, physical injury pain and suffering, emotional distress, psychological trauma, mental anguish, humiliation, embarrassment, loss of self-esteem, loss of dignity, invasion of her privacy and other damages associated with defendant, Jeffrey Epstein, controlling, manipulating and coercing her into a perverse and conventional way of life for a minor. The then-minor plaintiff [REDACTED], incurred medical and psychological expenses and the plaintiff, [REDACTED], will in the future suffer medical and psychological expenses. The plaintiff, [REDACTED], has suffered a loss of income, a loss of the capacity to earn income in the future, and a loss of the capacity to enjoy life. These injuries are permanent in nature and the plaintiff, [REDACTED], will continue to suffer these losses in the future.

120. Wherefore, the plaintiff, [REDACTED], demands judgments against the defendant, Jeffrey Epstein, for compensatory damages of at least the minimum amount provided by law, attorney's fees, costs, and such other and further relief as this Court deems just and proper, and hereby demands trial by jury on all issues triable as of right by a jury.

COUNT 26

Cause of Action Pursuant to 18 U.S.C. § 2255

February 2003 – Incident 2

121. Plaintiff, [REDACTED], adopts and realleges paragraphs 1 through 20 above.

122. On or about February 2003, the exact date being unknown to [REDACTED], Defendant, Jeffrey Epstein, committed a federal sexual offense against her, including a

violation of numerous federal criminal statutes condemning the coercion and enticement of a minor to engage in prostitution or sexual activity, travel with intent to engage in illicit sexual conduct, sex trafficking of children, sexual exploitation of minor children, transport of visual depictions of a minor engaging in sexually explicit conduct, child exploitation enterprises, and other crimes, specifically including, but not limited to, those crimes designated in 18 U.S.C. § 2422(b), § 2423(a), § 2423(b), and § 2423(e). ■■■ is therefore a victim of one or more offenses enumerated in 18 U.S.C. § 2255 and, as such, asserts a cause of action against the defendant, Jeffrey Epstein, pursuant to this Section of the United States Code and the agreement between the Defendant, Jeffrey Epstein, and the United States Government.

123. As a direct and proximate result of the offenses enumerated in Title 18, United States Code, Section 2255, being committed against her, ■■■ has in the past suffered, and will in the future suffer, physical injury pain and suffering, emotional distress, psychological trauma, mental anguish, humiliation, embarrassment, loss of self-esteem, loss of dignity, invasion of her privacy and other damages associated with defendant, Jeffrey Epstein, controlling, manipulating and coercing her into a perverse and conventional way of life for a minor. The then-minor plaintiff ■■■ incurred medical and psychological expenses and the plaintiff, ■■■, will in the future suffer medical and psychological expenses. The plaintiff, ■■■, has suffered a loss of income, a loss of the capacity to earn income in the future, and a loss of the capacity to enjoy life. These injuries are permanent in nature and the plaintiff, ■■■, will continue to suffer these losses in the future.

124. Wherefore, the plaintiff, [REDACTED], demands judgments against the defendant, Jeffrey Epstein, for compensatory damages of at least the minimum amount provided by law, attorney's fees, costs, and such other and further relief as this Court deems just and proper, and hereby demands trial by jury on all issues triable as of right by a jury.

COUNT 27

Cause of Action Pursuant to 18 U.S.C. § 2255

February 2003 – Incident 3

125. Plaintiff, [REDACTED] adopts and realleges paragraphs 1 through 20 above.

126. On or about February 2003, the exact date being unknown to [REDACTED], Defendant, Jeffrey Epstein, committed a federal sexual offense against her, including a violation of numerous federal criminal statutes condemning the coercion and enticement of a minor to engage in prostitution or sexual activity, travel with intent to engage in illicit sexual conduct, sex trafficking of children, sexual exploitation of minor children, transport of visual depictions of a minor engaging in sexually explicit conduct, child exploitation enterprises, and other crimes, specifically including, but not limited to, those crimes designated in 18 U.S.C. § 2422(b), § 2423(a), § 2423(b), and § 2423(e). [REDACTED] is therefore a victim of one or more offenses enumerated in 18 U.S.C. § 2255 and, as such, asserts a cause of action against the defendant, Jeffrey Epstein, pursuant to this Section of the United States Code and the agreement between the Defendant, Jeffrey Epstein, and the United States Government.

127. As a direct and proximate result of the offenses enumerated in Title 18, United States Code, Section 2255, being committed against her, [REDACTED], has in the past

suffered, and will in the future suffer, physical injury pain and suffering, emotional distress, psychological trauma, mental anguish, humiliation, embarrassment, loss of self-esteem, loss of dignity, invasion of her privacy and other damages associated with defendant, Jeffrey Epstein, controlling, manipulating and coercing her into a perverse and conventional way of life for a minor. The then-minor plaintiff [REDACTED] incurred medical and psychological expenses and the plaintiff, [REDACTED], will in the future suffer medical and psychological expenses. The plaintiff, [REDACTED], has suffered a loss of income, a loss of the capacity to earn income in the future, and a loss of the capacity to enjoy life. These injuries are permanent in nature and the plaintiff, [REDACTED], will continue to suffer these losses in the future.

128. Wherefore, the plaintiff, [REDACTED], demands judgments against the defendant, Jeffrey Epstein, for compensatory damages of at least the minimum amount provided by law, attorney's fees, costs, and such other and further relief as this Court deems just and proper, and hereby demands trial by jury on all issues triable as of right by a jury.

COUNT 28

Cause of Action Pursuant to 18 U.S.C. § 2255

February 2003 – Incident 4

129. Plaintiff, [REDACTED], adopts and realleges paragraphs 1 through 20 above.

130. On or about February 2003, the exact date being unknown to [REDACTED], Defendant, Jeffrey Epstein, committed a federal sexual offense against her, including a violation of numerous federal criminal statutes condemning the coercion and enticement of a minor to engage in prostitution or sexual activity, travel with intent to

engage in illicit sexual conduct, sex trafficking of children, sexual exploitation of minor children, transport of visual depictions of a minor engaging in sexually explicit conduct, child exploitation enterprises, and other crimes, specifically including, but not limited to, those crimes designated in 18 U.S.C. § 2422(b), § 2423(a), § 2423(b), and § 2423(e).

1. is therefore a victim of one or more offenses enumerated in 18 U.S.C. § 2255 and, as such, asserts a cause of action against the defendant, Jeffrey Epstein, pursuant to this Section of the United States Code and the agreement between the Defendant, Jeffrey Epstein, and the United States Government.

131. As a direct and proximate result of the offenses enumerated in Title 18, United States Code, Section 2255, being committed against her, 1. has in the past suffered, and will in the future suffer, physical injury pain and suffering, emotional distress, psychological trauma, mental anguish, humiliation, embarrassment, loss of self-esteem, loss of dignity, invasion of her privacy and other damages associated with defendant, Jeffrey Epstein, controlling, manipulating and coercing her into a perverse and conventional way of life for a minor. The then-minor plaintiff 1. incurred medical and psychological expenses and the plaintiff, L.M., will in the future suffer medical and psychological expenses. The plaintiff, 1., has suffered a loss of income, a loss of the capacity to earn income in the future, and a loss of the capacity to enjoy life. These injuries are permanent in nature and the plaintiff, 1., will continue to suffer these losses in the future.

132. Wherefore, the plaintiff, 1., demands judgments against the defendant, Jeffrey Epstein, for compensatory damages of at least the minimum amount provided

by law, attorney's fees, costs, and such other and further relief as this Court deems just and proper, and hereby demands trial by jury on all issues triable as of right by a jury.

COUNT 29

Cause of Action Pursuant to 18 U.S.C. § 2255

March 2003 – Incident 1

133. Plaintiff, ■■■, adopts and realleges paragraphs 1 through 20 above.

134. On or about March 2003, the exact date being unknown to ■■■, Defendant, Jeffrey Epstein, committed a federal sexual offense against her, including a violation of numerous federal criminal statutes condemning the coercion and enticement of a minor to engage in prostitution or sexual activity, travel with intent to engage in illicit sexual conduct, sex trafficking of children, sexual exploitation of minor children, transport of visual depictions of a minor engaging in sexually explicit conduct, child exploitation enterprises, and other crimes, specifically including, but not limited to, those crimes designated in 18 U.S.C. § 2422(b), § 2423(a), § 2423(b), and § 2423(e). ■■■ is therefore a victim of one or more offenses enumerated in 18 U.S.C. § 2255 and, as such, asserts a cause of action against the defendant, Jeffrey Epstein, pursuant to this Section of the United States Code and the agreement between the Defendant, Jeffrey Epstein, and the United States Government.

135. As a direct and proximate result of the offenses enumerated in Title 18, United States Code, Section 2255, being committed against her, ■■■ has in the past suffered, and will in the future suffer, physical injury pain and suffering, emotional distress, psychological trauma, mental anguish, humiliation, embarrassment, loss of

self-esteem, loss of dignity, invasion of her privacy and other damages associated with defendant, Jeffrey Epstein, controlling, manipulating and coercing her into a perverse and conventional way of life for a minor. The then-minor plaintiff [REDACTED] incurred medical and psychological expenses and the plaintiff, [REDACTED], will in the future suffer medical and psychological expenses. The plaintiff, [REDACTED], has suffered a loss of income, a loss of the capacity to earn income in the future, and a loss of the capacity to enjoy life. These injuries are permanent in nature and the plaintiff, [REDACTED], will continue to suffer these losses in the future.

136. Wherefore, the plaintiff, [REDACTED], demands judgments against the defendant, Jeffrey Epstein, for compensatory damages of at least the minimum amount provided by law, attorney's fees, costs, and such other and further relief as this Court deems just and proper, and hereby demands trial by jury on all issues triable as of right by a jury.

COUNT 30

Cause of Action Pursuant to 18 U.S.C. § 2255

March 2003 – Incident 2

137. Plaintiff, [REDACTED], adopts and realleges paragraphs 1 through 20 above.

138. On or about March 2003, the exact date being unknown to [REDACTED], Defendant, Jeffrey Epstein, committed a federal sexual offense against her, including a violation of numerous federal criminal statutes condemning the coercion and enticement of a minor to engage in prostitution or sexual activity, travel with intent to engage in illicit sexual conduct, sex trafficking of children, sexual exploitation of minor children, transport of visual depictions of a minor engaging in sexually explicit conduct,

child exploitation enterprises, and other crimes, specifically including, but not limited to, those crimes designated in 18 U.S.C. § 2422(b), § 2423(a), § 2423(b), and § 2423(e).

1. is therefore a victim of one or more offenses enumerated in 18 U.S.C. § 2255 and, as such, asserts a cause of action against the defendant, Jeffrey Epstein, pursuant to this Section of the United States Code and the agreement between the Defendant, Jeffrey Epstein, and the United States Government.

139. As a direct and proximate result of the offenses enumerated in Title 18, United States Code, Section 2255, being committed against her, 1. has in the past suffered, and will in the future suffer, physical injury pain and suffering, emotional distress, psychological trauma, mental anguish, humiliation, embarrassment, loss of self-esteem, loss of dignity, invasion of her privacy and other damages associated with defendant, Jeffrey Epstein, controlling, manipulating and coercing her into a perverse and conventional way of life for a minor. The then-minor plaintiff 1. incurred medical and psychological expenses and the plaintiff, 1., will in the future suffer medical and psychological expenses. The plaintiff, 1., has suffered a loss of income, a loss of the capacity to earn income in the future, and a loss of the capacity to enjoy life. These injuries are permanent in nature and the plaintiff, 1., will continue to suffer these losses in the future.

140. Wherefore, the plaintiff, 1., demands judgments against the defendant, Jeffrey Epstein, for compensatory damages of at least the minimum amount provided by law, attorney's fees, costs, and such other and further relief as this Court deems just and proper, and hereby demands trial by jury on all issues triable as of right by a jury.

█ is therefore a victim of one or more offenses enumerated in 18 U.S.C. § 2255 and, as such, asserts a cause of action against the defendant, Jeffrey Epstein, pursuant to this Section of the United States Code and the agreement between the Defendant, Jeffrey Epstein, and the United States Government.

279. As a direct and proximate result of the offenses enumerated in Title 18, United States Code, Section 2255, being committed against her, █ has in the past suffered, and will in the future suffer, physical injury pain and suffering, emotional distress, psychological trauma, mental anguish, humiliation, embarrassment, loss of self-esteem, loss of dignity, invasion of her privacy and other damages associated with defendant, Jeffrey Epstein, controlling, manipulating and coercing her into a perverse and conventional way of life for a minor. The then-minor plaintiff █ incurred medical and psychological expenses and the plaintiff, █, will in the future suffer medical and psychological expenses. The plaintiff, █, has suffered a loss of income, a loss of the capacity to earn income in the future, and a loss of the capacity to enjoy life. These injuries are permanent in nature and the plaintiff, █, will continue to suffer these losses in the future.

280. Wherefore, the plaintiff, █, demands judgments against the defendant, Jeffrey Epstein, for compensatory damages of at least the minimum amount provided by law, attorney's fees, costs, and such other and further relief as this Court deems just and proper, and hereby demands trial by jury on all issues triable as of right by a jury.

COUNT 66

Cause of Action Pursuant to 18 U.S.C. § 2255

December 2003 – Incident 2

281. Plaintiff, [REDACTED], adopts and realleges paragraphs 1 through 20 above.

282. On or about December 2003, the exact date being unknown to [REDACTED], Defendant, Jeffrey Epstein, committed a federal sexual offense against her, including a violation of numerous federal criminal statutes condemning the coercion and enticement of a minor to engage in prostitution or sexual activity, travel with intent to engage in illicit sexual conduct, sex trafficking of children, sexual exploitation of minor children, transport of visual depictions of a minor engaging in sexually explicit conduct, child exploitation enterprises, and other crimes, specifically including, but not limited to, those crimes designated in 18 U.S.C. § 2422(b), § 2423(a), § 2423(b), and § 2423(e). [REDACTED] is therefore a victim of one or more offenses enumerated in 18 U.S.C. § 2255 and, as such, asserts a cause of action against the defendant, Jeffrey Epstein, pursuant to this Section of the United States Code and the agreement between the Defendant, Jeffrey Epstein, and the United States Government.

283. As a direct and proximate result of the offenses enumerated in Title 18, United States Code, Section 2255, being committed against her, L.M. has in the past suffered, and will in the future suffer, physical injury pain and suffering, emotional distress, psychological trauma, mental anguish, humiliation, embarrassment, loss of self-esteem, loss of dignity, invasion of her privacy and other damages associated with defendant, Jeffrey Epstein, controlling, manipulating and coercing her into a perverse and conventional way of life for a minor. The then-minor plaintiff [REDACTED] incurred medical and psychological expenses and the plaintiff, [REDACTED], will in the future suffer medical and

psychological expenses. The plaintiff, ■■■, has suffered a loss of income, a loss of the capacity to earn income in the future, and a loss of the capacity to enjoy life. These injuries are permanent in nature and the plaintiff, ■■■, will continue to suffer these losses in the future.

284. Wherefore, the plaintiff, ■■■, demands judgments against the defendant, Jeffrey Epstein, for compensatory damages of at least the minimum amount provided by law, attorney's fees, costs, and such other and further relief as this Court deems just and proper, and hereby demands trial by jury on all issues triable as of right by a jury.

COUNT 67

Cause of Action Pursuant to 18 U.S.C. § 2255

December 2003 – Incident 3

285. Plaintiff, ■■■, adopts and realleges paragraphs 1 through 20 above.

286. On or about December 2003, the exact date being unknown to ■■■, Defendant, Jeffrey Epstein, committed a federal sexual offense against her, including a violation of numerous federal criminal statutes condemning the coercion and enticement of a minor to engage in prostitution or sexual activity, travel with intent to engage in illicit sexual conduct, sex trafficking of children, sexual exploitation of minor children, transport of visual depictions of a minor engaging in sexually explicit conduct, child exploitation enterprises, and other crimes, specifically including, but not limited to, those crimes designated in 18 U.S.C. § 2422(b), § 2423(a), § 2423(b), and § 2423(e). ■■■ is therefore a victim of one or more offenses enumerated in 18 U.S.C. § 2255 and, as such, asserts a cause of action against the defendant, Jeffrey Epstein, pursuant to

this Section of the United States Code and the agreement between the Defendant, Jeffrey Epstein, and the United States Government.

287. As a direct and proximate result of the offenses enumerated in Title 18, United States Code, Section 2255, being committed against her, ■■■ has in the past suffered, and will in the future suffer, physical injury pain and suffering, emotional distress, psychological trauma, mental anguish, humiliation, embarrassment, loss of self-esteem, loss of dignity, invasion of her privacy and other damages associated with defendant, Jeffrey Epstein, controlling, manipulating and coercing her into a perverse and conventional way of life for a minor. The then-minor plaintiff ■■■ incurred medical and psychological expenses and the plaintiff, ■■■, will in the future suffer medical and psychological expenses. The plaintiff, ■■■, has suffered a loss of income, a loss of the capacity to earn income in the future, and a loss of the capacity to enjoy life. These injuries are permanent in nature and the plaintiff, ■■■, will continue to suffer these losses in the future.

288. Wherefore, the plaintiff, ■■■, demands judgments against the defendant, Jeffrey Epstein, for compensatory damages of at least the minimum amount provided by law, attorney's fees, costs, and such other and further relief as this Court deems just and proper, and hereby demands trial by jury on all issues triable as of right by a jury.

COUNT 68

Cause of Action Pursuant to 18 U.S.C. § 2255

December 2003 – Incident 4

289. Plaintiff, ■■■, adopts and realleges paragraphs 1 through 20 above.

290. On or about December 2003, the exact date being unknown to ■■■, Defendant, Jeffrey Epstein, committed a federal sexual offense against her, including a violation of numerous federal criminal statutes condemning the coercion and enticement of a minor to engage in prostitution or sexual activity, travel with intent to engage in illicit sexual conduct, sex trafficking of children, sexual exploitation of minor children, transport of visual depictions of a minor engaging in sexually explicit conduct, child exploitation enterprises, and other crimes, specifically including, but not limited to, those crimes designated in 18 U.S.C. § 2422(b), § 2423(a), § 2423(b), and § 2423(e). ■■■ is therefore a victim of one or more offenses enumerated in 18 U.S.C. § 2255 and, as such, asserts a cause of action against the defendant, Jeffrey Epstein, pursuant to this Section of the United States Code and the agreement between the Defendant, Jeffrey Epstein, and the United States Government.

291. As a direct and proximate result of the offenses enumerated in Title 18, United States Code, Section 2255, being committed against her, ■■■ has in the past suffered, and will in the future suffer, physical injury pain and suffering, emotional distress, psychological trauma, mental anguish, humiliation, embarrassment, loss of self-esteem, loss of dignity, invasion of her privacy and other damages associated with defendant, Jeffrey Epstein, controlling, manipulating and coercing her into a perverse and conventional way of life for a minor. The then-minor plaintiff ■■■ incurred medical and psychological expenses and the plaintiff, ■■■, will in the future suffer medical and psychological expenses. The plaintiff, ■■■, has suffered a loss of income, a loss of the capacity to earn income in the future, and a loss of the capacity to enjoy life. These

injuries are permanent in nature and the plaintiff, ■■■, will continue to suffer these losses in the future.

292. Wherefore, the plaintiff, ■■■, demands judgments against the defendant, Jeffrey Epstein, for compensatory damages of at least the minimum amount provided by law, attorney's fees, costs, and such other and further relief as this Court deems just and proper, and hereby demands trial by jury on all issues triable as of right by a jury.

COUNT 69

Cause of Action Pursuant to 18 U.S.C. § 2255

January 2004 – Incident 1

293. Plaintiff, ■■■, adopts and realleges paragraphs 1 through 20 above.

294. On or about January 2004, the exact date being unknown to ■■■, Defendant, Jeffrey Epstein, committed a federal sexual offense against her, including a violation of numerous federal criminal statutes condemning the coercion and enticement of a minor to engage in prostitution or sexual activity, travel with intent to engage in illicit sexual conduct, sex trafficking of children, sexual exploitation of minor children, transport of visual depictions of a minor engaging in sexually explicit conduct, child exploitation enterprises, and other crimes, specifically including, but not limited to, those crimes designated in 18 U.S.C. § 2422(b), § 2423(a), § 2423(b), and § 2423(e). ■■■ is therefore a victim of one or more offenses enumerated in 18 U.S.C. § 2255 and, as such, asserts a cause of action against the defendant, Jeffrey Epstein, pursuant to this Section of the United States Code and the agreement between the Defendant, Jeffrey Epstein, and the United States Government.

295. As a direct and proximate result of the offenses enumerated in Title 18, United States Code, Section 2255, being committed against her, [REDACTED] has in the past suffered, and will in the future suffer, physical injury pain and suffering, emotional distress, psychological trauma, mental anguish, humiliation, embarrassment, loss of self-esteem, loss of dignity, invasion of her privacy and other damages associated with defendant, Jeffrey Epstein, controlling, manipulating and coercing her into a perverse and conventional way of life for a minor. The then-minor plaintiff [REDACTED] incurred medical and psychological expenses and the plaintiff, [REDACTED], will in the future suffer medical and psychological expenses. The plaintiff, [REDACTED], has suffered a loss of income, a loss of the capacity to earn income in the future, and a loss of the capacity to enjoy life. These injuries are permanent in nature and the plaintiff, [REDACTED], will continue to suffer these losses in the future.

296. Wherefore, the plaintiff, [REDACTED], demands judgments against the defendant, Jeffrey Epstein, for compensatory damages of at least the minimum amount provided by law, attorney's fees, costs, and such other and further relief as this Court deems just and proper, and hereby demands trial by jury on all issues triable as of right by a jury.

COUNT 70

Cause of Action Pursuant to 18 U.S.C. § 2255

January 2004 – Incident 2

297. Plaintiff, [REDACTED], adopts and realleges paragraphs 1 through 20 above.

298. On or about January 2004, the exact date being unknown to [REDACTED], Defendant, Jeffrey Epstein, committed a federal sexual offense against her, including a

violation of numerous federal criminal statutes condemning the coercion and enticement of a minor to engage in prostitution or sexual activity, travel with intent to engage in illicit sexual conduct, sex trafficking of children, sexual exploitation of minor children, transport of visual depictions of a minor engaging in sexually explicit conduct, child exploitation enterprises, and other crimes, specifically including, but not limited to, those crimes designated in 18 U.S.C. § 2422(b), § 2423(a), § 2423(b), and § 2423(e).

█ is therefore a victim of one or more offenses enumerated in 18 U.S.C. § 2255 and, as such, asserts a cause of action against the defendant, Jeffrey Epstein, pursuant to this Section of the United States Code and the agreement between the Defendant, Jeffrey Epstein, and the United States Government.

299. As a direct and proximate result of the offenses enumerated in Title 18, United States Code, Section 2255, being committed against her, █ has in the past suffered, and will in the future suffer, physical injury pain and suffering, emotional distress, psychological trauma, mental anguish, humiliation, embarrassment, loss of self-esteem, loss of dignity, invasion of her privacy and other damages associated with defendant, Jeffrey Epstein, controlling, manipulating and coercing her into a perverse and conventional way of life for a minor. The then-minor plaintiff █ incurred medical and psychological expenses and the plaintiff, █, will in the future suffer medical and psychological expenses. The plaintiff, █, has suffered a loss of income, a loss of the capacity to earn income in the future, and a loss of the capacity to enjoy life. These injuries are permanent in nature and the plaintiff, █, will continue to suffer these losses in the future.

300. Wherefore, the plaintiff, ■■■, demands judgments against the defendant, Jeffrey Epstein, for compensatory damages of at least the minimum amount provided by law, attorney's fees, costs, and such other and further relief as this Court deems just and proper, and hereby demands trial by jury on all issues triable as of right by a jury.

COUNT 71

Cause of Action Pursuant to 18 U.S.C. § 2255

January 2004 – Incident 3

301. Plaintiff, ■■■, adopts and realleges paragraphs 1 through 20 above.

302. On or about January 2004, the exact date being unknown to ■■■, Defendant, Jeffrey Epstein, committed a federal sexual offense against her, including a violation of numerous federal criminal statutes condemning the coercion and enticement of a minor to engage in prostitution or sexual activity, travel with intent to engage in illicit sexual conduct, sex trafficking of children, sexual exploitation of minor children, transport of visual depictions of a minor engaging in sexually explicit conduct, child exploitation enterprises, and other crimes, specifically including, but not limited to, those crimes designated in 18 U.S.C. § 2422(b), § 2423(a), § 2423(b), and § 2423(e). ■■■ is therefore a victim of one or more offenses enumerated in 18 U.S.C. § 2255 and, as such, asserts a cause of action against the defendant, Jeffrey Epstein, pursuant to this Section of the United States Code and the agreement between the Defendant, Jeffrey Epstein, and the United States Government.

303. As a direct and proximate result of the offenses enumerated in Title 18, United States Code, Section 2255, being committed against her, ■■■ has in the past

suffered, and will in the future suffer, physical injury pain and suffering, emotional distress, psychological trauma, mental anguish, humiliation, embarrassment, loss of self-esteem, loss of dignity, invasion of her privacy and other damages associated with defendant, Jeffrey Epstein, controlling, manipulating and coercing her into a perverse and conventional way of life for a minor. The then-minor plaintiff [REDACTED] incurred medical and psychological expenses and the plaintiff, [REDACTED], will in the future suffer medical and psychological expenses. The plaintiff, [REDACTED], has suffered a loss of income, a loss of the capacity to earn income in the future, and a loss of the capacity to enjoy life. These injuries are permanent in nature and the plaintiff, [REDACTED], will continue to suffer these losses in the future.

304. Wherefore, the plaintiff, [REDACTED], demands judgments against the defendant, Jeffrey Epstein, for compensatory damages of at least the minimum amount provided by law, attorney's fees, costs, and such other and further relief as this Court deems just and proper, and hereby demands trial by jury on all issues triable as of right by a jury.

COUNT 72

Cause of Action Pursuant to 18 U.S.C. § 2255

January 2004 – Incident 4

305. Plaintiff, [REDACTED], adopts and realleges paragraphs 1 through 20 above.

306. On or about January 2004, the exact date being unknown to [REDACTED], Defendant, Jeffrey Epstein, committed a federal sexual offense against her, including a violation of numerous federal criminal statutes condemning the coercion and enticement of a minor to engage in prostitution or sexual activity, travel with intent to

engage in illicit sexual conduct, sex trafficking of children, sexual exploitation of minor children, transport of visual depictions of a minor engaging in sexually explicit conduct, child exploitation enterprises, and other crimes, specifically including, but not limited to, those crimes designated in 18 U.S.C. § 2422(b), § 2423(a), § 2423(b), and § 2423(e).

█ is therefore a victim of one or more offenses enumerated in 18 U.S.C. § 2255 and, as such, asserts a cause of action against the defendant, Jeffrey Epstein, pursuant to this Section of the United States Code and the agreement between the Defendant, Jeffrey Epstein, and the United States Government.

307. As a direct and proximate result of the offenses enumerated in Title 18, United States Code, Section 2255, being committed against her, █ has in the past suffered, and will in the future suffer, physical injury pain and suffering, emotional distress, psychological trauma, mental anguish, humiliation, embarrassment, loss of self-esteem, loss of dignity, invasion of her privacy and other damages associated with defendant, Jeffrey Epstein, controlling, manipulating and coercing her into a perverse and conventional way of life for a minor. The then-minor plaintiff █ incurred medical and psychological expenses and the plaintiff, █, will in the future suffer medical and psychological expenses. The plaintiff, █, has suffered a loss of income, a loss of the capacity to earn income in the future, and a loss of the capacity to enjoy life. These injuries are permanent in nature and the plaintiff, █, will continue to suffer these losses in the future.

308. Wherefore, the plaintiff, █, demands judgments against the defendant, Jeffrey Epstein, for compensatory damages of at least the minimum amount provided

by law, attorney's fees, costs, and such other and further relief as this Court deems just and proper, and hereby demands trial by jury on all issues triable as of right by a jury.

COUNT 73

Cause of Action Pursuant to 18 U.S.C. § 2255

February 2004 – Incident 1

309. Plaintiff, ■■■, adopts and realleges paragraphs 1 through 20 above.

310. On or about February 2004, the exact date being unknown to ■■■, Defendant, Jeffrey Epstein, committed a federal sexual offense against her, including a violation of numerous federal criminal statutes condemning the coercion and enticement of a minor to engage in prostitution or sexual activity, travel with intent to engage in illicit sexual conduct, sex trafficking of children, sexual exploitation of minor children, transport of visual depictions of a minor engaging in sexually explicit conduct, child exploitation enterprises, and other crimes, specifically including, but not limited to, those crimes designated in 18 U.S.C. § 2422(b), § 2423(a), § 2423(b), and § 2423(e). ■■■ is therefore a victim of one or more offenses enumerated in 18 U.S.C. § 2255 and, as such, asserts a cause of action against the defendant, Jeffrey Epstein, pursuant to this Section of the United States Code and the agreement between the Defendant, Jeffrey Epstein, and the United States Government.

311. As a direct and proximate result of the offenses enumerated in Title 18, United States Code, Section 2255, being committed against her, ■■■ has in the past suffered, and will in the future suffer, physical injury pain and suffering, emotional distress, psychological trauma, mental anguish, humiliation, embarrassment, loss of

self-esteem, loss of dignity, invasion of her privacy and other damages associated with defendant, Jeffrey Epstein, controlling, manipulating and coercing her into a perverse and conventional way of life for a minor. The then-minor plaintiff [REDACTED] incurred medical and psychological expenses and the plaintiff, [REDACTED], will in the future suffer medical and psychological expenses. The plaintiff, [REDACTED], has suffered a loss of income, a loss of the capacity to earn income in the future, and a loss of the capacity to enjoy life. These injuries are permanent in nature and the plaintiff, [REDACTED], will continue to suffer these losses in the future.

312. Wherefore, the plaintiff, [REDACTED], demands judgments against the defendant, Jeffrey Epstein, for compensatory damages of at least the minimum amount provided by law, attorney's fees, costs, and such other and further relief as this Court deems just and proper, and hereby demands trial by jury on all issues triable as of right by a jury.

COUNT 74

Cause of Action Pursuant to 18 U.S.C. § 2255

February 2004 – Incident 2

313. Plaintiff, [REDACTED], adopts and realleges paragraphs 1 through 20 above.

314. On or about February 2004, the exact date being unknown to [REDACTED], Defendant, Jeffrey Epstein, committed a federal sexual offense against her, including a violation of numerous federal criminal statutes condemning the coercion and enticement of a minor to engage in prostitution or sexual activity, travel with intent to engage in illicit sexual conduct, sex trafficking of children, sexual exploitation of minor children, transport of visual depictions of a minor engaging in sexually explicit conduct,

child exploitation enterprises, and other crimes, specifically including, but not limited to, those crimes designated in 18 U.S.C. § 2422(b), § 2423(a), § 2423(b), and § 2423(e). L.M. is therefore a victim of one or more offenses enumerated in 18 U.S.C. § 2255 and, as such, asserts a cause of action against the defendant, Jeffrey Epstein, pursuant to this Section of the United States Code and the agreement between the Defendant, Jeffrey Epstein, and the United States Government.

315. As a direct and proximate result of the offenses enumerated in Title 18, United States Code, Section 2255, being committed against her, [REDACTED] has in the past suffered, and will in the future suffer, physical injury pain and suffering, emotional distress, psychological trauma, mental anguish, humiliation, embarrassment, loss of self-esteem, loss of dignity, invasion of her privacy and other damages associated with defendant, Jeffrey Epstein, controlling, manipulating and coercing her into a perverse and conventional way of life for a minor. The then-minor plaintiff [REDACTED] incurred medical and psychological expenses and the plaintiff, [REDACTED], will in the future suffer medical and psychological expenses. The plaintiff, [REDACTED], has suffered a loss of income, a loss of the capacity to earn income in the future, and a loss of the capacity to enjoy life. These injuries are permanent in nature and the plaintiff, [REDACTED], will continue to suffer these losses in the future.

316. Wherefore, the plaintiff, [REDACTED], demands judgments against the defendant, Jeffrey Epstein, for compensatory damages of at least the minimum amount provided by law, attorney's fees, costs, and such other and further relief as this Court deems just and proper, and hereby demands trial by jury on all issues triable as of right by a jury.

COUNT 75

Cause of Action Pursuant to 18 U.S.C. § 2255

February 2004 – Incident 3

317. Plaintiff, ■■■, adopts and realleges paragraphs 1 through 20 above.

318. On or about February 2004, the exact date being unknown to ■■■, Defendant, Jeffrey Epstein, committed a federal sexual offense against her, including a violation of numerous federal criminal statutes condemning the coercion and enticement of a minor to engage in prostitution or sexual activity, travel with intent to engage in illicit sexual conduct, sex trafficking of children, sexual exploitation of minor children, transport of visual depictions of a minor engaging in sexually explicit conduct, child exploitation enterprises, and other crimes, specifically including, but not limited to, those crimes designated in 18 U.S.C. § 2422(b), § 2423(a), § 2423(b), and § 2423(e). ■■■ is therefore a victim of one or more offenses enumerated in 18 U.S.C. § 2255 and, as such, asserts a cause of action against the defendant, Jeffrey Epstein, pursuant to this Section of the United States Code and the agreement between the Defendant, Jeffrey Epstein, and the United States Government.

319. As a direct and proximate result of the offenses enumerated in Title 18, United States Code, Section 2255, being committed against her, ■■■ has in the past suffered, and will in the future suffer, physical injury pain and suffering, emotional distress, psychological trauma, mental anguish, humiliation, embarrassment, loss of self-esteem, loss of dignity, invasion of her privacy and other damages associated with defendant, Jeffrey Epstein, controlling, manipulating and coercing her into a perverse

and conventional way of life for a minor. The then-minor plaintiff [REDACTED] incurred medical and psychological expenses and the plaintiff, [REDACTED], will in the future suffer medical and psychological expenses. The plaintiff, [REDACTED], has suffered a loss of income, a loss of the capacity to earn income in the future, and a loss of the capacity to enjoy life. These injuries are permanent in nature and the plaintiff, [REDACTED], will continue to suffer these losses in the future.

320. Wherefore, the plaintiff, [REDACTED], demands judgments against the defendant, Jeffrey Epstein, for compensatory damages of at least the minimum amount provided by law, attorney's fees, costs, and such other and further relief as this Court deems just and proper, and hereby demands trial by jury on all issues triable as of right by a jury.

COUNT 76

Cause of Action Pursuant to 18 U.S.C. § 2255

February 2004 – Incident 4

321. Plaintiff, [REDACTED], adopts and realleges paragraphs 1 through 20 above.

322. On or about February 2004, the exact date being unknown to [REDACTED], Defendant, Jeffrey Epstein, committed a federal sexual offense against her, including a violation of numerous federal criminal statutes condemning the coercion and enticement of a minor to engage in prostitution or sexual activity, travel with intent to engage in illicit sexual conduct, sex trafficking of children, sexual exploitation of minor children, transport of visual depictions of a minor engaging in sexually explicit conduct, child exploitation enterprises, and other crimes, specifically including, but not limited to, those crimes designated in 18 U.S.C. § 2422(b), § 2423(a), § 2423(b), and § 2423(e).

█. is therefore a victim of one or more offenses enumerated in 18 U.S.C. § 2255 and, as such, asserts a cause of action against the defendant, Jeffrey Epstein, pursuant to this Section of the United States Code and the agreement between the Defendant, Jeffrey Epstein, and the United States Government.

323. As a direct and proximate result of the offenses enumerated in Title 18, United States Code, Section 2255, being committed against her, █. has in the past suffered, and will in the future suffer, physical injury pain and suffering, emotional distress, psychological trauma, mental anguish, humiliation, embarrassment, loss of self-esteem, loss of dignity, invasion of her privacy and other damages associated with defendant, Jeffrey Epstein, controlling, manipulating and coercing her into a perverse and conventional way of life for a minor. The then-minor plaintiff █. incurred medical and psychological expenses and the plaintiff, █., will in the future suffer medical and psychological expenses. The plaintiff, █., has suffered a loss of income, a loss of the capacity to earn income in the future, and a loss of the capacity to enjoy life. These injuries are permanent in nature and the plaintiff, █., will continue to suffer these losses in the future.

324. Wherefore, the plaintiff, █., demands judgments against the defendant, Jeffrey Epstein, for compensatory damages of at least the minimum amount provided by law, attorney's fees, costs, and such other and further relief as this Court deems just and proper, and hereby demands trial by jury on all issues triable as of right by a jury.

COUNT 77

Cause of Action Pursuant to 18 U.S.C. § 2255

March 2004 – Incident 1

325. Plaintiff, [REDACTED] adopts and realleges paragraphs 1 through 20 above.

326. On or about March 2004, the exact date being unknown to [REDACTED],

Defendant, Jeffrey Epstein, committed a federal sexual offense against her, including a violation of numerous federal criminal statutes condemning the coercion and enticement of a minor to engage in prostitution or sexual activity, travel with intent to engage in illicit sexual conduct, sex trafficking of children, sexual exploitation of minor children, transport of visual depictions of a minor engaging in sexually explicit conduct, child exploitation enterprises, and other crimes, specifically including, but not limited to, those crimes designated in 18 U.S.C. § 2422(b), § 2423(a), § 2423(b), and § 2423(e).

[REDACTED] is therefore a victim of one or more offenses enumerated in 18 U.S.C. § 2255 and, as such, asserts a cause of action against the defendant, Jeffrey Epstein, pursuant to this Section of the United States Code and the agreement between the Defendant, Jeffrey Epstein, and the United States Government.

327. As a direct and proximate result of the offenses enumerated in Title 18, United States Code, Section 2255, being committed against her, [REDACTED] has in the past suffered, and will in the future suffer, physical injury pain and suffering, emotional distress, psychological trauma, mental anguish, humiliation, embarrassment, loss of self-esteem, loss of dignity, invasion of her privacy and other damages associated with defendant, Jeffrey Epstein, controlling, manipulating and coercing her into a perverse and conventional way of life for a minor. The then-minor plaintiff [REDACTED] incurred medical and psychological expenses and the plaintiff, [REDACTED], will in the future suffer medical and

psychological expenses. The plaintiff, ■■■, has suffered a loss of income, a loss of the capacity to earn income in the future, and a loss of the capacity to enjoy life. These injuries are permanent in nature and the plaintiff, ■■■, will continue to suffer these losses in the future.

328. Wherefore, the plaintiff, ■■■, demands judgments against the defendant, Jeffrey Epstein, for compensatory damages of at least the minimum amount provided by law, attorney's fees, costs, and such other and further relief as this Court deems just and proper, and hereby demands trial by jury on all issues triable as of right by a jury.

COUNT 78

Cause of Action Pursuant to 18 U.S.C. § 2255

March 2004 – Incident 2

329. Plaintiff, ■■■, adopts and realleges paragraphs 1 through 20 above.

330. On or about March 2004, the exact date being unknown to ■■■, Defendant, Jeffrey Epstein, committed a federal sexual offense against her, including a violation of numerous federal criminal statutes condemning the coercion and enticement of a minor to engage in prostitution or sexual activity, travel with intent to engage in illicit sexual conduct, sex trafficking of children, sexual exploitation of minor children, transport of visual depictions of a minor engaging in sexually explicit conduct, child exploitation enterprises, and other crimes, specifically including, but not limited to, those crimes designated in 18 U.S.C. § 2422(b), § 2423(a), § 2423(b), and § 2423(e). ■■■ is therefore a victim of one or more offenses enumerated in 18 U.S.C. § 2255 and, as such, asserts a cause of action against the defendant, Jeffrey Epstein, pursuant to

this Section of the United States Code and the agreement between the Defendant, Jeffrey Epstein, and the United States Government.

331. As a direct and proximate result of the offenses enumerated in Title 18, United States Code, Section 2255, being committed against her, [REDACTED], has in the past suffered, and will in the future suffer, physical injury pain and suffering, emotional distress, psychological trauma, mental anguish, humiliation, embarrassment, loss of self-esteem, loss of dignity, invasion of her privacy and other damages associated with defendant, Jeffrey Epstein, controlling, manipulating and coercing her into a perverse and conventional way of life for a minor. The then-minor plaintiff [REDACTED], incurred medical and psychological expenses and the plaintiff, [REDACTED], will in the future suffer medical and psychological expenses. The plaintiff, [REDACTED], has suffered a loss of income, a loss of the capacity to earn income in the future, and a loss of the capacity to enjoy life. These injuries are permanent in nature and the plaintiff, [REDACTED], will continue to suffer these losses in the future.

332. Wherefore, the plaintiff, [REDACTED], demands judgments against the defendant, Jeffrey Epstein, for compensatory damages of at least the minimum amount provided by law, attorney's fees, costs, and such other and further relief as this Court deems just and proper, and hereby demands trial by jury on all issues triable as of right by a jury.

COUNT 79

Cause of Action Pursuant to 18 U.S.C. § 2255

March 2004 – Incident 3

333. Plaintiff, [REDACTED], adopts and realleges paragraphs 1 through 20 above.

334. On or about March 2004, the exact date being unknown to [REDACTED], Defendant, Jeffrey Epstein, committed a federal sexual offense against her, including a violation of numerous federal criminal statutes condemning the coercion and enticement of a minor to engage in prostitution or sexual activity, travel with intent to engage in illicit sexual conduct, sex trafficking of children, sexual exploitation of minor children, transport of visual depictions of a minor engaging in sexually explicit conduct, child exploitation enterprises, and other crimes, specifically including, but not limited to, those crimes designated in 18 U.S.C. § 2422(b), § 2423(a), § 2423(b), and § 2423(e). [REDACTED] is therefore a victim of one or more offenses enumerated in 18 U.S.C. § 2255 and, as such, asserts a cause of action against the defendant, Jeffrey Epstein, pursuant to this Section of the United States Code and the agreement between the Defendant, Jeffrey Epstein, and the United States Government.

335. As a direct and proximate result of the offenses enumerated in Title 18, United States Code, Section 2255, being committed against her, [REDACTED] has in the past suffered, and will in the future suffer, physical injury pain and suffering, emotional distress, psychological trauma, mental anguish, humiliation, embarrassment, loss of self-esteem, loss of dignity, invasion of her privacy and other damages associated with defendant, Jeffrey Epstein, controlling, manipulating and coercing her into a perverse and conventional way of life for a minor. The then-minor plaintiff [REDACTED] incurred medical and psychological expenses and the plaintiff, [REDACTED], will in the future suffer medical and psychological expenses. The plaintiff, [REDACTED], has suffered a loss of income, a loss of the capacity to earn income in the future, and a loss of the capacity to enjoy life. These

injuries are permanent in nature and the plaintiff, [REDACTED], will continue to suffer these losses in the future.

336. Wherefore, the plaintiff, [REDACTED], demands judgments against the defendant, Jeffrey Epstein, for compensatory damages of at least the minimum amount provided by law, attorney's fees, costs, and such other and further relief as this Court deems just and proper, and hereby demands trial by jury on all issues triable as of right by a jury.

COUNT 80

Cause of Action Pursuant to 18 U.S.C. § 2255

March 2004 – Incident 4

337. Plaintiff, [REDACTED], adopts and realleges paragraphs 1 through 20 above.

338. On or about March 2004, the exact date being unknown to [REDACTED], Defendant, Jeffrey Epstein, committed a federal sexual offense against her, including a violation of numerous federal criminal statutes condemning the coercion and enticement of a minor to engage in prostitution or sexual activity, travel with intent to engage in illicit sexual conduct, sex trafficking of children, sexual exploitation of minor children, transport of visual depictions of a minor engaging in sexually explicit conduct, child exploitation enterprises, and other crimes, specifically including, but not limited to, those crimes designated in 18 U.S.C. § 2422(b), § 2423(a), § 2423(b), and § 2423(e). [REDACTED] is therefore a victim of one or more offenses enumerated in 18 U.S.C. § 2255 and, as such, asserts a cause of action against the defendant, Jeffrey Epstein, pursuant to this Section of the United States Code and the agreement between the Defendant, Jeffrey Epstein, and the United States Government.

339. As a direct and proximate result of the offenses enumerated in Title 18, United States Code, Section 2255, being committed against her, [REDACTED], has in the past suffered, and will in the future suffer, physical injury pain and suffering, emotional distress, psychological trauma, mental anguish, humiliation, embarrassment, loss of self-esteem, loss of dignity, invasion of her privacy and other damages associated with defendant, Jeffrey Epstein, controlling, manipulating and coercing her into a perverse and conventional way of life for a minor. The then-minor plaintiff [REDACTED] incurred medical and psychological expenses and the plaintiff, [REDACTED], will in the future suffer medical and psychological expenses. The plaintiff, [REDACTED], has suffered a loss of income, a loss of the capacity to earn income in the future, and a loss of the capacity to enjoy life. These injuries are permanent in nature and the plaintiff, [REDACTED], will continue to suffer these losses in the future.

340. Wherefore, the plaintiff, [REDACTED], demands judgments against the defendant, Jeffrey Epstein, for compensatory damages of at least the minimum amount provided by law, attorney's fees, costs, and such other and further relief as this Court deems just and proper, and hereby demands trial by jury on all issues triable as of right by a jury.

COUNT 81

Cause of Action Pursuant to 18 U.S.C. § 2255

April 2004 – Incident 1

341. Plaintiff, [REDACTED], adopts and realleges paragraphs 1 through 20 above.

342. On or about April 2004, the exact date being unknown to [REDACTED], Defendant, Jeffrey Epstein, committed a federal sexual offense against her, including a violation of

numerous federal criminal statutes condemning the coercion and enticement of a minor to engage in prostitution or sexual activity, travel with intent to engage in illicit sexual conduct, sex trafficking of children, sexual exploitation of minor children, transport of visual depictions of a minor engaging in sexually explicit conduct, child exploitation enterprises, and other crimes, specifically including, but not limited to, those crimes designated in 18 U.S.C. § 2422(b), § 2423(a), § 2423(b), and § 2423(e). ■■■ is therefore a victim of one or more offenses enumerated in 18 U.S.C. § 2255 and, as such, asserts a cause of action against the defendant, Jeffrey Epstein, pursuant to this Section of the United States Code and the agreement between the Defendant, Jeffrey Epstein, and the United States Government.

343. As a direct and proximate result of the offenses enumerated in Title 18, United States Code, Section 2255, being committed against her, ■■■, has in the past suffered, and will in the future suffer, physical injury pain and suffering, emotional distress, psychological trauma, mental anguish, humiliation, embarrassment, loss of self-esteem, loss of dignity, invasion of her privacy and other damages associated with defendant, Jeffrey Epstein, controlling, manipulating and coercing her into a perverse and conventional way of life for a minor. The then-minor plaintiff ■■■ incurred medical and psychological expenses and the plaintiff, ■■■, will in the future suffer medical and psychological expenses. The plaintiff, ■■■, has suffered a loss of income, a loss of the capacity to earn income in the future, and a loss of the capacity to enjoy life. These injuries are permanent in nature and the plaintiff, ■■■, will continue to suffer these losses in the future.

344. Wherefore, the plaintiff, ■■■, demands judgments against the defendant, Jeffrey Epstein, for compensatory damages of at least the minimum amount provided by law, attorney's fees, costs, and such other and further relief as this Court deems just and proper, and hereby demands trial by jury on all issues triable as of right by a jury.

COUNT 82

Cause of Action Pursuant to 18 U.S.C. § 2255

April 2004 – Incident 2

345. Plaintiff, ■■■, adopts and realleges paragraphs 1 through 20 above.

346. On or about April 2004, the exact date being unknown to ■■■, Defendant, Jeffrey Epstein, committed a federal sexual offense against her, including a violation of numerous federal criminal statutes condemning the coercion and enticement of a minor to engage in prostitution or sexual activity, travel with intent to engage in illicit sexual conduct, sex trafficking of children, sexual exploitation of minor children, transport of visual depictions of a minor engaging in sexually explicit conduct, child exploitation enterprises, and other crimes, specifically including, but not limited to, those crimes designated in 18 U.S.C. § 2422(b), § 2423(a), § 2423(b), and § 2423(e). ■■■ is therefore a victim of one or more offenses enumerated in 18 U.S.C. § 2255 and, as such, asserts a cause of action against the defendant, Jeffrey Epstein, pursuant to this Section of the United States Code and the agreement between the Defendant, Jeffrey Epstein, and the United States Government.

347. As a direct and proximate result of the offenses enumerated in Title 18, United States Code, Section 2255, being committed against her, ■■■ has in the past

suffered, and will in the future suffer, physical injury pain and suffering, emotional distress, psychological trauma, mental anguish, humiliation, embarrassment, loss of self-esteem, loss of dignity, invasion of her privacy and other damages associated with defendant, Jeffrey Epstein, controlling, manipulating and coercing her into a perverse and conventional way of life for a minor. The then-minor plaintiff [REDACTED], incurred medical and psychological expenses and the plaintiff, [REDACTED], will in the future suffer medical and psychological expenses. The plaintiff, [REDACTED], has suffered a loss of income, a loss of the capacity to earn income in the future, and a loss of the capacity to enjoy life. These injuries are permanent in nature and the plaintiff, [REDACTED], will continue to suffer these losses in the future.

348. Wherefore, the plaintiff, [REDACTED], demands judgments against the defendant, Jeffrey Epstein, for compensatory damages of at least the minimum amount provided by law, attorney's fees, costs, and such other and further relief as this Court deems just and proper, and hereby demands trial by jury on all issues triable as of right by a jury.

COUNT 83

Cause of Action Pursuant to 18 U.S.C. § 2255

April 2004 – Incident 3

349. Plaintiff, [REDACTED], adopts and realleges paragraphs 1 through 20 above.

350. On or about April 2004, the exact date being unknown to [REDACTED], Defendant, Jeffrey Epstein, committed a federal sexual offense against her, including a violation of numerous federal criminal statutes condemning the coercion and enticement of a minor to engage in prostitution or sexual activity, travel with intent to engage in illicit sexual

conduct, sex trafficking of children, sexual exploitation of minor children, transport of visual depictions of a minor engaging in sexually explicit conduct, child exploitation enterprises, and other crimes, specifically including, but not limited to, those crimes designated in 18 U.S.C. § 2422(b), § 2423(a), § 2423(b), and § 2423(e). ■■■ is therefore a victim of one or more offenses enumerated in 18 U.S.C. § 2255 and, as such, asserts a cause of action against the defendant, Jeffrey Epstein, pursuant to this Section of the United States Code and the agreement between the Defendant, Jeffrey Epstein, and the United States Government.

351. As a direct and proximate result of the offenses enumerated in Title 18, United States Code, Section 2255, being committed against her, ■■■. has in the past suffered, and will in the future suffer, physical injury pain and suffering, emotional distress, psychological trauma, mental anguish, humiliation, embarrassment, loss of self-esteem, loss of dignity, invasion of her privacy and other damages associated with defendant, Jeffrey Epstein, controlling, manipulating and coercing her into a perverse and conventional way of life for a minor. The then-minor plaintiff ■■■. incurred medical and psychological expenses and the plaintiff, L.M., will in the future suffer medical and psychological expenses. The plaintiff, ■■■., has suffered a loss of income, a loss of the capacity to earn income in the future, and a loss of the capacity to enjoy life. These injuries are permanent in nature and the plaintiff, ■■■., will continue to suffer these losses in the future.

352. Wherefore, the plaintiff, ■■■., demands judgments against the defendant, Jeffrey Epstein, for compensatory damages of at least the minimum amount provided

by law, attorney's fees, costs, and such other and further relief as this Court deems just and proper, and hereby demands trial by jury on all issues triable as of right by a jury.

COUNT 84

Cause of Action Pursuant to 18 U.S.C. § 2255

April 2004 – Incident 4

353. Plaintiff, [REDACTED], adopts and realleges paragraphs 1 through 20 above.

354. On or about April 2004, the exact date being unknown to [REDACTED], Defendant, Jeffrey Epstein, committed a federal sexual offense against her, including a violation of numerous federal criminal statutes condemning the coercion and enticement of a minor to engage in prostitution or sexual activity, travel with intent to engage in illicit sexual conduct, sex trafficking of children, sexual exploitation of minor children, transport of visual depictions of a minor engaging in sexually explicit conduct, child exploitation enterprises, and other crimes, specifically including, but not limited to, those crimes designated in 18 U.S.C. § 2422(b), § 2423(a), § 2423(b), and § 2423(e). [REDACTED] is therefore a victim of one or more offenses enumerated in 18 U.S.C. § 2255 and, as such, asserts a cause of action against the defendant, Jeffrey Epstein, pursuant to this Section of the United States Code and the agreement between the Defendant, Jeffrey Epstein, and the United States Government.

355. As a direct and proximate result of the offenses enumerated in Title 18, United States Code, Section 2255, being committed against her, L.M. has in the past suffered, and will in the future suffer, physical injury pain and suffering, emotional distress, psychological trauma, mental anguish, humiliation, embarrassment, loss of

self-esteem, loss of dignity, invasion of her privacy and other damages associated with defendant, Jeffrey Epstein, controlling, manipulating and coercing her into a perverse and conventional way of life for a minor. The then-minor plaintiff [REDACTED] incurred medical and psychological expenses and the plaintiff, [REDACTED], will in the future suffer medical and psychological expenses. The plaintiff, [REDACTED], has suffered a loss of income, a loss of the capacity to earn income in the future, and a loss of the capacity to enjoy life. These injuries are permanent in nature and the plaintiff, [REDACTED], will continue to suffer these losses in the future.

356. Wherefore, the plaintiff, [REDACTED], demands judgments against the defendant, Jeffrey Epstein, for compensatory damages of at least the minimum amount provided by law, attorney's fees, costs, and such other and further relief as this Court deems just and proper, and hereby demands trial by jury on all issues triable as of right by a jury.

COUNT 85

Cause of Action Pursuant to 18 U.S.C. § 2255

May 2004 – Incident 1

357. Plaintiff, [REDACTED], adopts and realleges paragraphs 1 through 20 above.

358. On or about May 2004, the exact date being unknown to [REDACTED], Defendant, Jeffrey Epstein, committed a federal sexual offense against her, including a violation of numerous federal criminal statutes condemning the coercion and enticement of a minor to engage in prostitution or sexual activity, travel with intent to engage in illicit sexual conduct, sex trafficking of children, sexual exploitation of minor children, transport of visual depictions of a minor engaging in sexually explicit conduct, child exploitation

enterprises, and other crimes, specifically including, but not limited to, those crimes designated in 18 U.S.C. § 2422(b), § 2423(a), § 2423(b), and § 2423(e). ■■■ is therefore a victim of one or more offenses enumerated in 18 U.S.C. § 2255 and, as such, asserts a cause of action against the defendant, Jeffrey Epstein, pursuant to this Section of the United States Code and the agreement between the Defendant, Jeffrey Epstein, and the United States Government.

359. As a direct and proximate result of the offenses enumerated in Title 18, United States Code, Section 2255, being committed against her, ■■■. has in the past suffered, and will in the future suffer, physical injury pain and suffering, emotional distress, psychological trauma, mental anguish, humiliation, embarrassment, loss of self-esteem, loss of dignity, invasion of her privacy and other damages associated with defendant, Jeffrey Epstein, controlling, manipulating and coercing her into a perverse and conventional way of life for a minor. The then-minor plaintiff ■■■. incurred medical and psychological expenses and the plaintiff, ■■■., will in the future suffer medical and psychological expenses. The plaintiff, ■■■., has suffered a loss of income, a loss of the capacity to earn income in the future, and a loss of the capacity to enjoy life. These injuries are permanent in nature and the plaintiff, ■■■., will continue to suffer these losses in the future.

360. Wherefore, the plaintiff, ■■■., demands judgments against the defendant, Jeffrey Epstein, for compensatory damages of at least the minimum amount provided by law, attorney's fees, costs, and such other and further relief as this Court deems just and proper, and hereby demands trial by jury on all issues triable as of right by a jury.

COUNT 86

Cause of Action Pursuant to 18 U.S.C. § 2255

May 2004 – Incident 2

361. Plaintiff, [REDACTED], adopts and realleges paragraphs 1 through 20 above.

362. On or about May 2004, the exact date being unknown to [REDACTED], Defendant, Jeffrey Epstein, committed a federal sexual offense against her, including a violation of numerous federal criminal statutes condemning the coercion and enticement of a minor to engage in prostitution or sexual activity, travel with intent to engage in illicit sexual conduct, sex trafficking of children, sexual exploitation of minor children, transport of visual depictions of a minor engaging in sexually explicit conduct, child exploitation enterprises, and other crimes, specifically including, but not limited to, those crimes designated in 18 U.S.C. § 2422(b), § 2423(a), § 2423(b), and § 2423(e). [REDACTED] is therefore a victim of one or more offenses enumerated in 18 U.S.C. § 2255 and, as such, asserts a cause of action against the defendant, Jeffrey Epstein, pursuant to this Section of the United States Code and the agreement between the Defendant, Jeffrey Epstein, and the United States Government.

363. As a direct and proximate result of the offenses enumerated in Title 18, United States Code, Section 2255, being committed against her, [REDACTED] has in the past suffered, and will in the future suffer, physical injury pain and suffering, emotional distress, psychological trauma, mental anguish, humiliation, embarrassment, loss of self-esteem, loss of dignity, invasion of her privacy and other damages associated with defendant, Jeffrey Epstein, controlling, manipulating and coercing her into a perverse

and conventional way of life for a minor. The then-minor plaintiff [REDACTED] incurred medical and psychological expenses and the plaintiff, [REDACTED], will in the future suffer medical and psychological expenses. The plaintiff, [REDACTED], has suffered a loss of income, a loss of the capacity to earn income in the future, and a loss of the capacity to enjoy life. These injuries are permanent in nature and the plaintiff, [REDACTED], will continue to suffer these losses in the future.

364. Wherefore, the plaintiff, [REDACTED], demands judgments against the defendant, Jeffrey Epstein, for compensatory damages of at least the minimum amount provided by law, attorney's fees, costs, and such other and further relief as this Court deems just and proper, and hereby demands trial by jury on all issues triable as of right by a jury.

COUNT 87

Cause of Action Pursuant to 18 U.S.C. § 2255

May 2004 – Incident 3

365. Plaintiff, [REDACTED], adopts and realleges paragraphs 1 through 20 above.

366. On or about May 2004, the exact date being unknown to [REDACTED], Defendant, Jeffrey Epstein, committed a federal sexual offense against her, including a violation of numerous federal criminal statutes condemning the coercion and enticement of a minor to engage in prostitution or sexual activity, travel with intent to engage in illicit sexual conduct, sex trafficking of children, sexual exploitation of minor children, transport of visual depictions of a minor engaging in sexually explicit conduct, child exploitation enterprises, and other crimes, specifically including, but not limited to, those crimes designated in 18 U.S.C. § 2422(b), § 2423(a), § 2423(b), and § 2423(e). [REDACTED] is

therefore a victim of one or more offenses enumerated in 18 U.S.C. § 2255 and, as such, asserts a cause of action against the defendant, Jeffrey Epstein, pursuant to this Section of the United States Code and the agreement between the Defendant, Jeffrey Epstein, and the United States Government.

367. As a direct and proximate result of the offenses enumerated in Title 18, United States Code, Section 2255, being committed against her, [REDACTED], has in the past suffered, and will in the future suffer, physical injury pain and suffering, emotional distress, psychological trauma, mental anguish, humiliation, embarrassment, loss of self-esteem, loss of dignity, invasion of her privacy and other damages associated with defendant, Jeffrey Epstein, controlling, manipulating and coercing her into a perverse and conventional way of life for a minor. The then-minor plaintiff [REDACTED] incurred medical and psychological expenses and the plaintiff, [REDACTED], will in the future suffer medical and psychological expenses. The plaintiff, [REDACTED], has suffered a loss of income, a loss of the capacity to earn income in the future, and a loss of the capacity to enjoy life. These injuries are permanent in nature and the plaintiff, [REDACTED], will continue to suffer these losses in the future.

368. Wherefore, the plaintiff, [REDACTED], demands judgments against the defendant, Jeffrey Epstein, for compensatory damages of at least the minimum amount provided by law, attorney's fees, costs, and such other and further relief as this Court deems just and proper, and hereby demands trial by jury on all issues triable as of right by a jury.

COUNT 88

Cause of Action Pursuant to 18 U.S.C. § 2255

May 2004 – Incident 4

369. Plaintiff, ■■■, adopts and realleges paragraphs 1 through 20 above.

370. On or about May 2004, the exact date being unknown to ■■■, Defendant, Jeffrey Epstein, committed a federal sexual offense against her, including a violation of numerous federal criminal statutes condemning the coercion and enticement of a minor to engage in prostitution or sexual activity, travel with intent to engage in illicit sexual conduct, sex trafficking of children, sexual exploitation of minor children, transport of visual depictions of a minor engaging in sexually explicit conduct, child exploitation enterprises, and other crimes, specifically including, but not limited to, those crimes designated in 18 U.S.C. § 2422(b), § 2423(a), § 2423(b), and § 2423(e). ■■■ is therefore a victim of one or more offenses enumerated in 18 U.S.C. § 2255 and, as such, asserts a cause of action against the defendant, Jeffrey Epstein, pursuant to this Section of the United States Code and the agreement between the Defendant, Jeffrey Epstein, and the United States Government.

371. As a direct and proximate result of the offenses enumerated in Title 18, United States Code, Section 2255, being committed against her, L.M. has in the past suffered, and will in the future suffer, physical injury pain and suffering, emotional distress, psychological trauma, mental anguish, humiliation, embarrassment, loss of self-esteem, loss of dignity, invasion of her privacy and other damages associated with defendant, Jeffrey Epstein, controlling, manipulating and coercing her into a perverse and conventional way of life for a minor. The then-minor plaintiff ■■■ incurred medical and psychological expenses and the plaintiff, ■■■, will in the future suffer medical and

psychological expenses. The plaintiff, ■■■, has suffered a loss of income, a loss of the capacity to earn income in the future, and a loss of the capacity to enjoy life. These injuries are permanent in nature and the plaintiff, ■■■, will continue to suffer these losses in the future.

372. Wherefore, the plaintiff, ■■■, demands judgments against the defendant, Jeffrey Epstein, for compensatory damages of at least the minimum amount provided by law, attorney's fees, costs, and such other and further relief as this Court deems just and proper, and hereby demands trial by jury on all issues triable as of right by a jury.

COUNT 89

Cause of Action Pursuant to 18 U.S.C. § 2255

June 2004 – Incident 1

373. Plaintiff, ■■■, adopts and realleges paragraphs 1 through 20 above.

374. On or about June 2004, the exact date being unknown to ■■■, Defendant, Jeffrey Epstein, committed a federal sexual offense against her, including a violation of numerous federal criminal statutes condemning the coercion and enticement of a minor to engage in prostitution or sexual activity, travel with intent to engage in illicit sexual conduct, sex trafficking of children, sexual exploitation of minor children, transport of visual depictions of a minor engaging in sexually explicit conduct, child exploitation enterprises, and other crimes, specifically including, but not limited to, those crimes designated in 18 U.S.C. § 2422(b), § 2423(a), § 2423(b), and § 2423(e). ■■■ is therefore a victim of one or more offenses enumerated in 18 U.S.C. § 2255 and, as such, asserts a cause of action against the defendant, Jeffrey Epstein, pursuant to

this Section of the United States Code and the agreement between the Defendant, Jeffrey Epstein, and the United States Government.

375. As a direct and proximate result of the offenses enumerated in Title 18, United States Code, Section 2255, being committed against her, [REDACTED], has in the past suffered, and will in the future suffer, physical injury pain and suffering, emotional distress, psychological trauma, mental anguish, humiliation, embarrassment, loss of self-esteem, loss of dignity, invasion of her privacy and other damages associated with defendant, Jeffrey Epstein, controlling, manipulating and coercing her into a perverse and conventional way of life for a minor. The then-minor plaintiff [REDACTED] incurred medical and psychological expenses and the plaintiff, [REDACTED], will in the future suffer medical and psychological expenses. The plaintiff, [REDACTED], has suffered a loss of income, a loss of the capacity to earn income in the future, and a loss of the capacity to enjoy life. These injuries are permanent in nature and the plaintiff, [REDACTED], will continue to suffer these losses in the future.

376. Wherefore, the plaintiff, [REDACTED], demands judgments against the defendant, Jeffrey Epstein, for compensatory damages of at least the minimum amount provided by law, attorney's fees, costs, and such other and further relief as this Court deems just and proper, and hereby demands trial by jury on all issues triable as of right by a jury.

COUNT 90

Cause of Action Pursuant to 18 U.S.C. § 2255

June 2004 – Incident 2

377. Plaintiff, [REDACTED], adopts and realleges paragraphs 1 through 20 above.

378. On or about June 2004, the exact date being unknown to [REDACTED], Defendant, Jeffrey Epstein, committed a federal sexual offense against her, including a violation of numerous federal criminal statutes condemning the coercion and enticement of a minor to engage in prostitution or sexual activity, travel with intent to engage in illicit sexual conduct, sex trafficking of children, sexual exploitation of minor children, transport of visual depictions of a minor engaging in sexually explicit conduct, child exploitation enterprises, and other crimes, specifically including, but not limited to, those crimes designated in 18 U.S.C. § 2422(b), § 2423(a), § 2423(b), and § 2423(e). [REDACTED] is therefore a victim of one or more offenses enumerated in 18 U.S.C. § 2255 and, as such, asserts a cause of action against the defendant, Jeffrey Epstein, pursuant to this Section of the United States Code and the agreement between the Defendant, Jeffrey Epstein, and the United States Government.

379. As a direct and proximate result of the offenses enumerated in Title 18, United States Code, Section 2255, being committed against her, [REDACTED] has in the past suffered, and will in the future suffer, physical injury pain and suffering, emotional distress, psychological trauma, mental anguish, humiliation, embarrassment, loss of self-esteem, loss of dignity, invasion of her privacy and other damages associated with defendant, Jeffrey Epstein, controlling, manipulating and coercing her into a perverse and conventional way of life for a minor. The then-minor plaintiff [REDACTED] incurred medical and psychological expenses and the plaintiff, [REDACTED], will in the future suffer medical and psychological expenses. The plaintiff, [REDACTED], has suffered a loss of income, a loss of the capacity to earn income in the future, and a loss of the capacity to enjoy life. These

injuries are permanent in nature and the plaintiff, [REDACTED], will continue to suffer these losses in the future.

380. Wherefore, the plaintiff, [REDACTED], demands judgments against the defendant, Jeffrey Epstein, for compensatory damages of at least the minimum amount provided by law, attorney's fees, costs, and such other and further relief as this Court deems just and proper, and hereby demands trial by jury on all issues triable as of right by a jury.

COUNT 91

Cause of Action Pursuant to 18 U.S.C. § 2255

June 2004 – Incident 3

381. Plaintiff, [REDACTED] adopts and realleges paragraphs 1 through 20 above.

382. On or about June 2004, the exact date being unknown to [REDACTED], Defendant, Jeffrey Epstein, committed a federal sexual offense against her, including a violation of numerous federal criminal statutes condemning the coercion and enticement of a minor to engage in prostitution or sexual activity, travel with intent to engage in illicit sexual conduct, sex trafficking of children, sexual exploitation of minor children, transport of visual depictions of a minor engaging in sexually explicit conduct, child exploitation enterprises, and other crimes, specifically including, but not limited to, those crimes designated in 18 U.S.C. § 2422(b), § 2423(a), § 2423(b), and § 2423(e). [REDACTED] is therefore a victim of one or more offenses enumerated in 18 U.S.C. § 2255 and, as such, asserts a cause of action against the defendant, Jeffrey Epstein, pursuant to this Section of the United States Code and the agreement between the Defendant, Jeffrey Epstein, and the United States Government.

383. As a direct and proximate result of the offenses enumerated in Title 18, United States Code, Section 2255, being committed against her, [REDACTED], has in the past suffered, and will in the future suffer, physical injury pain and suffering, emotional distress, psychological trauma, mental anguish, humiliation, embarrassment, loss of self-esteem, loss of dignity, invasion of her privacy and other damages associated with defendant, Jeffrey Epstein, controlling, manipulating and coercing her into a perverse and conventional way of life for a minor. The then-minor plaintiff [REDACTED], incurred medical and psychological expenses and the plaintiff, [REDACTED], will in the future suffer medical and psychological expenses. The plaintiff, [REDACTED], has suffered a loss of income, a loss of the capacity to earn income in the future, and a loss of the capacity to enjoy life. These injuries are permanent in nature and the plaintiff, [REDACTED], will continue to suffer these losses in the future.

384. Wherefore, the plaintiff, [REDACTED], demands judgments against the defendant, Jeffrey Epstein, for compensatory damages of at least the minimum amount provided by law, attorney's fees, costs, and such other and further relief as this Court deems just and proper, and hereby demands trial by jury on all issues triable as of right by a jury.

COUNT 92

Cause of Action Pursuant to 18 U.S.C. § 2255

June 2004 – Incident 4

385. Plaintiff, [REDACTED], adopts and realleges paragraphs 1 through 20 above.

386. On or about June 2004, the exact date being unknown to [REDACTED], Defendant, Jeffrey Epstein, committed a federal sexual offense against her, including a

violation of numerous federal criminal statutes condemning the coercion and enticement of a minor to engage in prostitution or sexual activity, travel with intent to engage in illicit sexual conduct, sex trafficking of children, sexual exploitation of minor children, transport of visual depictions of a minor engaging in sexually explicit conduct, child exploitation enterprises, and other crimes, specifically including, but not limited to, those crimes designated in 18 U.S.C. § 2422(b), § 2423(a), § 2423(b), and § 2423(e). ■■■ is therefore a victim of one or more offenses enumerated in 18 U.S.C. § 2255 and, as such, asserts a cause of action against the defendant, Jeffrey Epstein, pursuant to this Section of the United States Code and the agreement between the Defendant, Jeffrey Epstein, and the United States Government.

387. As a direct and proximate result of the offenses enumerated in Title 18, United States Code, Section 2255, being committed against her, ■■■ has in the past suffered, and will in the future suffer, physical injury pain and suffering, emotional distress, psychological trauma, mental anguish, humiliation, embarrassment, loss of self-esteem, loss of dignity, invasion of her privacy and other damages associated with defendant, Jeffrey Epstein, controlling, manipulating and coercing her into a perverse and conventional way of life for a minor. The then-minor plaintiff ■■■ incurred medical and psychological expenses and the plaintiff, ■■■, will in the future suffer medical and psychological expenses. The plaintiff, ■■■, has suffered a loss of income, a loss of the capacity to earn income in the future, and a loss of the capacity to enjoy life. These injuries are permanent in nature and the plaintiff, ■■■, will continue to suffer these losses in the future.

388. Wherefore, the plaintiff, [REDACTED], demands judgments against the defendant, Jeffrey Epstein, for compensatory damages of at least the minimum amount provided by law, attorney's fees, costs, and such other and further relief as this Court deems just and proper, and hereby demands trial by jury on all issues triable as of right by a jury.

COUNT 93

Cause of Action Pursuant to 18 U.S.C. § 2255

July 2004 – Incident 1

389. Plaintiff, [REDACTED], adopts and realleges paragraphs 1 through 20 above.

390. On or about July 2004, the exact date being unknown to [REDACTED], Defendant, Jeffrey Epstein, committed a federal sexual offense against her, including a violation of numerous federal criminal statutes condemning the coercion and enticement of a minor to engage in prostitution or sexual activity, travel with intent to engage in illicit sexual conduct, sex trafficking of children, sexual exploitation of minor children, transport of visual depictions of a minor engaging in sexually explicit conduct, child exploitation enterprises, and other crimes, specifically including, but not limited to, those crimes designated in 18 U.S.C. § 2422(b), § 2423(a), § 2423(b), and § 2423(e). L.M. is therefore a victim of one or more offenses enumerated in 18 U.S.C. § 2255 and, as such, asserts a cause of action against the defendant, Jeffrey Epstein, pursuant to this Section of the United States Code and the agreement between the Defendant, Jeffrey Epstein, and the United States Government.

391. As a direct and proximate result of the offenses enumerated in Title 18, United States Code, Section 2255, being committed against her, [REDACTED], has in the past

suffered, and will in the future suffer, physical injury pain and suffering, emotional distress, psychological trauma, mental anguish, humiliation, embarrassment, loss of self-esteem, loss of dignity, invasion of her privacy and other damages associated with defendant, Jeffrey Epstein, controlling, manipulating and coercing her into a perverse and conventional way of life for a minor. The then-minor plaintiff [REDACTED] incurred medical and psychological expenses and the plaintiff, [REDACTED], will in the future suffer medical and psychological expenses. The plaintiff, [REDACTED], has suffered a loss of income, a loss of the capacity to earn income in the future, and a loss of the capacity to enjoy life. These injuries are permanent in nature and the plaintiff, [REDACTED], will continue to suffer these losses in the future.

392. Wherefore, the plaintiff, [REDACTED], demands judgments against the defendant, Jeffrey Epstein, for compensatory damages of at least the minimum amount provided by law, attorney's fees, costs, and such other and further relief as this Court deems just and proper, and hereby demands trial by jury on all issues triable as of right by a jury.

COUNT 94

Cause of Action Pursuant to 18 U.S.C. § 2255

July 2004 – Incident 2

393. Plaintiff, [REDACTED], adopts and realleges paragraphs 1 through 20 above.

394. On or about July 2004, the exact date being unknown to [REDACTED], Defendant, Jeffrey Epstein, committed a federal sexual offense against her, including a violation of numerous federal criminal statutes condemning the coercion and enticement of a minor to engage in prostitution or sexual activity, travel with intent to engage in illicit sexual

conduct, sex trafficking of children, sexual exploitation of minor children, transport of visual depictions of a minor engaging in sexually explicit conduct, child exploitation enterprises, and other crimes, specifically including, but not limited to, those crimes designated in 18 U.S.C. § 2422(b), § 2423(a), § 2423(b), and § 2423(e). ■■■ is therefore a victim of one or more offenses enumerated in 18 U.S.C. § 2255 and, as such, asserts a cause of action against the defendant, Jeffrey Epstein, pursuant to this Section of the United States Code and the agreement between the Defendant, Jeffrey Epstein, and the United States Government.

395. As a direct and proximate result of the offenses enumerated in Title 18, United States Code, Section 2255, being committed against her, ■■■, has in the past suffered, and will in the future suffer, physical injury pain and suffering, emotional distress, psychological trauma, mental anguish, humiliation, embarrassment, loss of self-esteem, loss of dignity, invasion of her privacy and other damages associated with defendant, Jeffrey Epstein, controlling, manipulating and coercing her into a perverse and conventional way of life for a minor. The then-minor plaintiff ■■■ incurred medical and psychological expenses and the plaintiff, ■■■, will in the future suffer medical and psychological expenses. The plaintiff, ■■■, has suffered a loss of income, a loss of the capacity to earn income in the future, and a loss of the capacity to enjoy life. These injuries are permanent in nature and the plaintiff, ■■■, will continue to suffer these losses in the future.

396. Wherefore, the plaintiff, ■■■, demands judgments against the defendant, Jeffrey Epstein, for compensatory damages of at least the minimum amount provided

by law, attorney's fees, costs, and such other and further relief as this Court deems just and proper, and hereby demands trial by jury on all issues triable as of right by a jury.

COUNT 95

Cause of Action Pursuant to 18 U.S.C. § 2255

July 2004 – Incident 3

397. Plaintiff, ■■■, adopts and realleges paragraphs 1 through 20 above.

398. On or about July 2004, the exact date being unknown to ■■■, Defendant, Jeffrey Epstein, committed a federal sexual offense against her, including a violation of numerous federal criminal statutes condemning the coercion and enticement of a minor to engage in prostitution or sexual activity, travel with intent to engage in illicit sexual conduct, sex trafficking of children, sexual exploitation of minor children, transport of visual depictions of a minor engaging in sexually explicit conduct, child exploitation enterprises, and other crimes, specifically including, but not limited to, those crimes designated in 18 U.S.C. § 2422(b), § 2423(a), § 2423(b), and § 2423(e). ■■■ is therefore a victim of one or more offenses enumerated in 18 U.S.C. § 2255 and, as such, asserts a cause of action against the defendant, Jeffrey Epstein, pursuant to this Section of the United States Code and the agreement between the Defendant, Jeffrey Epstein, and the United States Government.

399. As a direct and proximate result of the offenses enumerated in Title 18, United States Code, Section 2255, being committed against her, ■■■ has in the past suffered, and will in the future suffer, physical injury pain and suffering, emotional distress, psychological trauma, mental anguish, humiliation, embarrassment, loss of

self-esteem, loss of dignity, invasion of her privacy and other damages associated with defendant, Jeffrey Epstein, controlling, manipulating and coercing her into a perverse and conventional way of life for a minor. The then-minor plaintiff [REDACTED] incurred medical and psychological expenses and the plaintiff, [REDACTED], will in the future suffer medical and psychological expenses. The plaintiff, [REDACTED], has suffered a loss of income, a loss of the capacity to earn income in the future, and a loss of the capacity to enjoy life. These injuries are permanent in nature and the plaintiff, [REDACTED], will continue to suffer these losses in the future.

400. Wherefore, the plaintiff, [REDACTED], demands judgments against the defendant, Jeffrey Epstein, for compensatory damages of at least the minimum amount provided by law, attorney's fees, costs, and such other and further relief as this Court deems just and proper, and hereby demands trial by jury on all issues triable as of right by a jury.

COUNT 96

Cause of Action Pursuant to 18 U.S.C. § 2255

July 2004 – Incident 4

401. Plaintiff, L.M. adopts and realleges paragraphs 1 through 20 above.

402. On or about July 2004, the exact date being unknown to L.M., Defendant, Jeffrey Epstein, committed a federal sexual offense against her, including a violation of numerous federal criminal statutes condemning the coercion and enticement of a minor to engage in prostitution or sexual activity, travel with intent to engage in illicit sexual conduct, sex trafficking of children, sexual exploitation of minor children, transport of visual depictions of a minor engaging in sexually explicit conduct, child exploitation

enterprises, and other crimes, specifically including, but not limited to, those crimes designated in 18 U.S.C. § 2422(b), § 2423(a), § 2423(b), and § 2423(e). ■■■ is therefore a victim of one or more offenses enumerated in 18 U.S.C. § 2255 and, as such, asserts a cause of action against the defendant, Jeffrey Epstein, pursuant to this Section of the United States Code and the agreement between the Defendant, Jeffrey Epstein, and the United States Government.

403. As a direct and proximate result of the offenses enumerated in Title 18, United States Code, Section 2255, being committed against her, ■■■, has in the past suffered, and will in the future suffer, physical injury pain and suffering, emotional distress, psychological trauma, mental anguish, humiliation, embarrassment, loss of self-esteem, loss of dignity, invasion of her privacy and other damages associated with defendant, Jeffrey Epstein, controlling, manipulating and coercing her into a perverse and conventional way of life for a minor. The then-minor plaintiff ■■■ incurred medical and psychological expenses and the plaintiff, ■■■, will in the future suffer medical and psychological expenses. The plaintiff, ■■■, has suffered a loss of income, a loss of the capacity to earn income in the future, and a loss of the capacity to enjoy life. These injuries are permanent in nature and the plaintiff, ■■■, will continue to suffer these losses in the future.

404. Wherefore, the plaintiff, ■■■, demands judgments against the defendant, Jeffrey Epstein, for compensatory damages of at least the minimum amount provided by law, attorney's fees, costs, and such other and further relief as this Court deems just and proper, and hereby demands trial by jury on all issues triable as of right by a jury.

COUNT 97

Cause of Action Pursuant to 18 U.S.C. § 2255

August 2004 – Incident 1

405. Plaintiff, ■■■, adopts and realleges paragraphs 1 through 20 above.

406. On or about August 2004, the exact date being unknown to ■■■, Defendant, Jeffrey Epstein, committed a federal sexual offense against her, including a violation of numerous federal criminal statutes condemning the coercion and enticement of a minor to engage in prostitution or sexual activity, travel with intent to engage in illicit sexual conduct, sex trafficking of children, sexual exploitation of minor children, transport of visual depictions of a minor engaging in sexually explicit conduct, child exploitation enterprises, and other crimes, specifically including, but not limited to, those crimes designated in 18 U.S.C. § 2422(b), § 2423(a), § 2423(b), and § 2423(e). ■■■ is therefore a victim of one or more offenses enumerated in 18 U.S.C. § 2255 and, as such, asserts a cause of action against the defendant, Jeffrey Epstein, pursuant to this Section of the United States Code and the agreement between the Defendant, Jeffrey Epstein, and the United States Government.

407. As a direct and proximate result of the offenses enumerated in Title 18, United States Code, Section 2255, being committed against her, ■■■ has in the past suffered, and will in the future suffer, physical injury pain and suffering, emotional distress, psychological trauma, mental anguish, humiliation, embarrassment, loss of self-esteem, loss of dignity, invasion of her privacy and other damages associated with defendant, Jeffrey Epstein, controlling, manipulating and coercing her into a perverse

and conventional way of life for a minor. The then-minor plaintiff [REDACTED], incurred medical and psychological expenses and the plaintiff, [REDACTED], will in the future suffer medical and psychological expenses. The plaintiff, [REDACTED], has suffered a loss of income, a loss of the capacity to earn income in the future, and a loss of the capacity to enjoy life. These injuries are permanent in nature and the plaintiff, [REDACTED], will continue to suffer these losses in the future.

408. Wherefore, the plaintiff, [REDACTED], demands judgments against the defendant, Jeffrey Epstein, for compensatory damages of at least the minimum amount provided by law, attorney's fees, costs, and such other and further relief as this Court deems just and proper, and hereby demands trial by jury on all issues triable as of right by a jury.

COUNT 98

Cause of Action Pursuant to 18 U.S.C. § 2255

August 2004 – Incident 2

409. Plaintiff, [REDACTED], adopts and realleges paragraphs 1 through 20 above.

410. On or about August 2004, the exact date being unknown to [REDACTED], Defendant, Jeffrey Epstein, committed a federal sexual offense against her, including a violation of numerous federal criminal statutes condemning the coercion and enticement of a minor to engage in prostitution or sexual activity, travel with intent to engage in illicit sexual conduct, sex trafficking of children, sexual exploitation of minor children, transport of visual depictions of a minor engaging in sexually explicit conduct, child exploitation enterprises, and other crimes, specifically including, but not limited to, those crimes designated in 18 U.S.C. § 2422(b), § 2423(a), § 2423(b), and § 2423(e).

█. is therefore a victim of one or more offenses enumerated in 18 U.S.C. § 2255 and, as such, asserts a cause of action against the defendant, Jeffrey Epstein, pursuant to this Section of the United States Code and the agreement between the Defendant, Jeffrey Epstein, and the United States Government.

411. As a direct and proximate result of the offenses enumerated in Title 18, United States Code, Section 2255, being committed against her, L.M. has in the past suffered, and will in the future suffer, physical injury pain and suffering, emotional distress, psychological trauma, mental anguish, humiliation, embarrassment, loss of self-esteem, loss of dignity, invasion of her privacy and other damages associated with defendant, Jeffrey Epstein, controlling, manipulating and coercing her into a perverse and conventional way of life for a minor. The then-minor plaintiff █. incurred medical and psychological expenses and the plaintiff, █., will in the future suffer medical and psychological expenses. The plaintiff, █., has suffered a loss of income, a loss of the capacity to earn income in the future, and a loss of the capacity to enjoy life. These injuries are permanent in nature and the plaintiff, █., will continue to suffer these losses in the future.

412. Wherefore, the plaintiff, █., demands judgments against the defendant, Jeffrey Epstein, for compensatory damages of at least the minimum amount provided by law, attorney's fees, costs, and such other and further relief as this Court deems just and proper, and hereby demands trial by jury on all issues triable as of right by a jury.

COUNT 99

Cause of Action Pursuant to 18 U.S.C. § 2255

August 2004 – Incident 3

413. Plaintiff, [REDACTED], adopts and realleges paragraphs 1 through 20 above.

414. On or about August 2004, the exact date being unknown to [REDACTED], Defendant, Jeffrey Epstein, committed a federal sexual offense against her, including a violation of numerous federal criminal statutes condemning the coercion and enticement of a minor to engage in prostitution or sexual activity, travel with intent to engage in illicit sexual conduct, sex trafficking of children, sexual exploitation of minor children, transport of visual depictions of a minor engaging in sexually explicit conduct, child exploitation enterprises, and other crimes, specifically including, but not limited to, those crimes designated in 18 U.S.C. § 2422(b), § 2423(a), § 2423(b), and § 2423(e). [REDACTED] is therefore a victim of one or more offenses enumerated in 18 U.S.C. § 2255 and, as such, asserts a cause of action against the defendant, Jeffrey Epstein, pursuant to this Section of the United States Code and the agreement between the Defendant, Jeffrey Epstein, and the United States Government.

415. As a direct and proximate result of the offenses enumerated in Title 18, United States Code, Section 2255, being committed against her, [REDACTED] has in the past suffered, and will in the future suffer, physical injury pain and suffering, emotional distress, psychological trauma, mental anguish, humiliation, embarrassment, loss of self-esteem, loss of dignity, invasion of her privacy and other damages associated with defendant, Jeffrey Epstein, controlling, manipulating and coercing her into a perverse and conventional way of life for a minor. The then-minor plaintiff [REDACTED] incurred medical and psychological expenses and the plaintiff, [REDACTED], will in the future suffer medical and

psychological expenses. The plaintiff, ■■■, has suffered a loss of income, a loss of the capacity to earn income in the future, and a loss of the capacity to enjoy life. These injuries are permanent in nature and the plaintiff, ■■■, will continue to suffer these losses in the future.

416. Wherefore, the plaintiff, ■■■, demands judgments against the defendant, Jeffrey Epstein, for compensatory damages of at least the minimum amount provided by law, attorney's fees, costs, and such other and further relief as this Court deems just and proper, and hereby demands trial by jury on all issues triable as of right by a jury.

COUNT 100

Cause of Action Pursuant to 18 U.S.C. § 2255

August 2004 – Incident 4

417. Plaintiff, ■■■, adopts and realleges paragraphs 1 through 20 above.

418. On or about August 2004, the exact date being unknown to ■■■, Defendant, Jeffrey Epstein, committed a federal sexual offense against her, including a violation of numerous federal criminal statutes condemning the coercion and enticement of a minor to engage in prostitution or sexual activity, travel with intent to engage in illicit sexual conduct, sex trafficking of children, sexual exploitation of minor children, transport of visual depictions of a minor engaging in sexually explicit conduct, child exploitation enterprises, and other crimes, specifically including, but not limited to, those crimes designated in 18 U.S.C. § 2422(b), § 2423(a), § 2423(b), and § 2423(e). ■■■ is therefore a victim of one or more offenses enumerated in 18 U.S.C. § 2255 and, as such, asserts a cause of action against the defendant, Jeffrey Epstein, pursuant to

this Section of the United States Code and the agreement between the Defendant, Jeffrey Epstein, and the United States Government.

419. As a direct and proximate result of the offenses enumerated in Title 18, United States Code, Section 2255, being committed against her, [REDACTED], has in the past suffered, and will in the future suffer, physical injury pain and suffering, emotional distress, psychological trauma, mental anguish, humiliation, embarrassment, loss of self-esteem, loss of dignity, invasion of her privacy and other damages associated with defendant, Jeffrey Epstein, controlling, manipulating and coercing her into a perverse and conventional way of life for a minor. The then-minor plaintiff [REDACTED], incurred medical and psychological expenses and the plaintiff, [REDACTED], will in the future suffer medical and psychological expenses. The plaintiff, [REDACTED], has suffered a loss of income, a loss of the capacity to earn income in the future, and a loss of the capacity to enjoy life. These injuries are permanent in nature and the plaintiff, [REDACTED], will continue to suffer these losses in the future.

420. Wherefore, the plaintiff, [REDACTED], demands judgments against the defendant, Jeffrey Epstein, for compensatory damages of at least the minimum amount provided by law, attorney's fees, costs, and such other and further relief as this Court deems just and proper, and hereby demands trial by jury on all issues triable as of right by a jury.

COUNT 101

Cause of Action Pursuant to 18 U.S.C. § 2255

September 2004 – Incident 1

421. Plaintiff, [REDACTED], adopts and realleges paragraphs 1 through 20 above.

422. On or about September 2004, the exact date being unknown to [REDACTED], Defendant, Jeffrey Epstein, committed a federal sexual offense against her, including a violation of numerous federal criminal statutes condemning the coercion and enticement of a minor to engage in prostitution or sexual activity, travel with intent to engage in illicit sexual conduct, sex trafficking of children, sexual exploitation of minor children, transport of visual depictions of a minor engaging in sexually explicit conduct, child exploitation enterprises, and other crimes, specifically including, but not limited to, those crimes designated in 18 U.S.C. § 2422(b), § 2423(a), § 2423(b), and § 2423(e). [REDACTED] is therefore a victim of one or more offenses enumerated in 18 U.S.C. § 2255 and, as such, asserts a cause of action against the defendant, Jeffrey Epstein, pursuant to this Section of the United States Code and the agreement between the Defendant, Jeffrey Epstein, and the United States Government.

423. As a direct and proximate result of the offenses enumerated in Title 18, United States Code, Section 2255, being committed against her, [REDACTED] has in the past suffered, and will in the future suffer, physical injury pain and suffering, emotional distress, psychological trauma, mental anguish, humiliation, embarrassment, loss of self-esteem, loss of dignity, invasion of her privacy and other damages associated with defendant, Jeffrey Epstein, controlling, manipulating and coercing her into a perverse and conventional way of life for a minor. The then-minor plaintiff [REDACTED] incurred medical and psychological expenses and the plaintiff, [REDACTED], will in the future suffer medical and psychological expenses. The plaintiff, [REDACTED], has suffered a loss of income, a loss of the capacity to earn income in the future, and a loss of the capacity to enjoy life. These

427. As a direct and proximate result of the offenses enumerated in Title 18, United States Code, Section 2255, being committed against her, [REDACTED], has in the past suffered, and will in the future suffer, physical injury pain and suffering, emotional distress, psychological trauma, mental anguish, humiliation, embarrassment, loss of self-esteem, loss of dignity, invasion of her privacy and other damages associated with defendant, Jeffrey Epstein, controlling, manipulating and coercing her into a perverse and conventional way of life for a minor. The then-minor plaintiff [REDACTED], incurred medical and psychological expenses and the plaintiff, [REDACTED], will in the future suffer medical and psychological expenses. The plaintiff, [REDACTED], has suffered a loss of income, a loss of the capacity to earn income in the future, and a loss of the capacity to enjoy life. These injuries are permanent in nature and the plaintiff, [REDACTED], will continue to suffer these losses in the future.

428. Wherefore, the plaintiff, [REDACTED], demands judgments against the defendant, Jeffrey Epstein, for compensatory damages of at least the minimum amount provided by law, attorney's fees, costs, and such other and further relief as this Court deems just and proper, and hereby demands trial by jury on all issues triable as of right by a jury.

COUNT 103

Cause of Action Pursuant to 18 U.S.C. § 2255

September 2004 – Incident 3

429. Plaintiff, [REDACTED], adopts and realleges paragraphs 1 through 20 above.

430. On or about September 2004, the exact date being unknown to [REDACTED], Defendant, Jeffrey Epstein, committed a federal sexual offense against her, including a

violation of numerous federal criminal statutes condemning the coercion and enticement of a minor to engage in prostitution or sexual activity, travel with intent to engage in illicit sexual conduct, sex trafficking of children, sexual exploitation of minor children, transport of visual depictions of a minor engaging in sexually explicit conduct, child exploitation enterprises, and other crimes, specifically including, but not limited to, those crimes designated in 18 U.S.C. § 2422(b), § 2423(a), § 2423(b), and § 2423(e).

█ is therefore a victim of one or more offenses enumerated in 18 U.S.C. § 2255 and, as such, asserts a cause of action against the defendant, Jeffrey Epstein, pursuant to this Section of the United States Code and the agreement between the Defendant, Jeffrey Epstein, and the United States Government.

431. As a direct and proximate result of the offenses enumerated in Title 18, United States Code, Section 2255, being committed against her, █ has in the past suffered, and will in the future suffer, physical injury pain and suffering, emotional distress, psychological trauma, mental anguish, humiliation, embarrassment, loss of self-esteem, loss of dignity, invasion of her privacy and other damages associated with defendant, Jeffrey Epstein, controlling, manipulating and coercing her into a perverse and conventional way of life for a minor. The then-minor plaintiff █ incurred medical and psychological expenses and the plaintiff, █, will in the future suffer medical and psychological expenses. The plaintiff, █, has suffered a loss of income, a loss of the capacity to earn income in the future, and a loss of the capacity to enjoy life. These injuries are permanent in nature and the plaintiff, █, will continue to suffer these losses in the future.

432. Wherefore, the plaintiff, ■■■, demands judgments against the defendant, Jeffrey Epstein, for compensatory damages of at least the minimum amount provided by law, attorney's fees, costs, and such other and further relief as this Court deems just and proper, and hereby demands trial by jury on all issues triable as of right by a jury.

COUNT 104

Cause of Action Pursuant to 18 U.S.C. § 2255

September 2004 – Incident 4

433. Plaintiff, ■■■, adopts and realleges paragraphs 1 through 20 above.

434. On or about September 2004, the exact date being unknown to ■■■, Defendant, Jeffrey Epstein, committed a federal sexual offense against her, including a violation of numerous federal criminal statutes condemning the coercion and enticement of a minor to engage in prostitution or sexual activity, travel with intent to engage in illicit sexual conduct, sex trafficking of children, sexual exploitation of minor children, transport of visual depictions of a minor engaging in sexually explicit conduct, child exploitation enterprises, and other crimes, specifically including, but not limited to, those crimes designated in 18 U.S.C. § 2422(b), § 2423(a), § 2423(b), and § 2423(e).

■■■ is therefore a victim of one or more offenses enumerated in 18 U.S.C. § 2255 and, as such, asserts a cause of action against the defendant, Jeffrey Epstein, pursuant to this Section of the United States Code and the agreement between the Defendant, Jeffrey Epstein, and the United States Government.

435. As a direct and proximate result of the offenses enumerated in Title 18, United States Code, Section 2255, being committed against her, ■■■ has in the past

suffered, and will in the future suffer, physical injury pain and suffering, emotional distress, psychological trauma, mental anguish, humiliation, embarrassment, loss of self-esteem, loss of dignity, invasion of her privacy and other damages associated with defendant, Jeffrey Epstein, controlling, manipulating and coercing her into a perverse and conventional way of life for a minor. The then-minor plaintiff [REDACTED] incurred medical and psychological expenses and the plaintiff, [REDACTED], will in the future suffer medical and psychological expenses. The plaintiff, [REDACTED], has suffered a loss of income, a loss of the capacity to earn income in the future, and a loss of the capacity to enjoy life. These injuries are permanent in nature and the plaintiff, [REDACTED], will continue to suffer these losses in the future.

436. Wherefore, the plaintiff, [REDACTED], demands judgments against the defendant, Jeffrey Epstein, for compensatory damages of at least the minimum amount provided by law, attorney's fees, costs, and such other and further relief as this Court deems just and proper, and hereby demands trial by jury on all issues triable as of right by a jury.

COUNT 105

Cause of Action Pursuant to 18 U.S.C. § 2255

October 2004 – Incident 1

437. Plaintiff, [REDACTED], adopts and realleges paragraphs 1 through 20 above.

438. On or about October 2004, the exact date being unknown to [REDACTED], Defendant, Jeffrey Epstein, committed a federal sexual offense against her, including a violation of numerous federal criminal statutes condemning the coercion and enticement of a minor to engage in prostitution or sexual activity, travel with intent to

engage in illicit sexual conduct, sex trafficking of children, sexual exploitation of minor children, transport of visual depictions of a minor engaging in sexually explicit conduct, child exploitation enterprises, and other crimes, specifically including, but not limited to, those crimes designated in 18 U.S.C. § 2422(b), § 2423(a), § 2423(b), and § 2423(e). ■■■ is therefore a victim of one or more offenses enumerated in 18 U.S.C. § 2255 and, as such, asserts a cause of action against the defendant, Jeffrey Epstein, pursuant to this Section of the United States Code and the agreement between the Defendant, Jeffrey Epstein, and the United States Government.

439. As a direct and proximate result of the offenses enumerated in Title 18, United States Code, Section 2255, being committed against her, ■■■ has in the past suffered, and will in the future suffer, physical injury pain and suffering, emotional distress, psychological trauma, mental anguish, humiliation, embarrassment, loss of self-esteem, loss of dignity, invasion of her privacy and other damages associated with defendant, Jeffrey Epstein, controlling, manipulating and coercing her into a perverse and conventional way of life for a minor. The then-minor plaintiff ■■■ incurred medical and psychological expenses and the plaintiff, ■■■, will in the future suffer medical and psychological expenses. The plaintiff, ■■■, has suffered a loss of income, a loss of the capacity to earn income in the future, and a loss of the capacity to enjoy life. These injuries are permanent in nature and the plaintiff, ■■■, will continue to suffer these losses in the future.

440. Wherefore, the plaintiff, ■■■, demands judgments against the defendant, Jeffrey Epstein, for compensatory damages of at least the minimum amount provided

by law, attorney's fees, costs, and such other and further relief as this Court deems just and proper, and hereby demands trial by jury on all issues triable as of right by a jury.

COUNT 106

Cause of Action Pursuant to 18 U.S.C. § 2255

October 2004 – Incident 2

441. Plaintiff, ■■■, adopts and realleges paragraphs 1 through 20 above.

442. On or about October 2004, the exact date being unknown to ■■■, Defendant, Jeffrey Epstein, committed a federal sexual offense against her, including a violation of numerous federal criminal statutes condemning the coercion and enticement of a minor to engage in prostitution or sexual activity, travel with intent to engage in illicit sexual conduct, sex trafficking of children, sexual exploitation of minor children, transport of visual depictions of a minor engaging in sexually explicit conduct, child exploitation enterprises, and other crimes, specifically including, but not limited to, those crimes designated in 18 U.S.C. § 2422(b), § 2423(a), § 2423(b), and § 2423(e). ■■■ is therefore a victim of one or more offenses enumerated in 18 U.S.C. § 2255 and, as such, asserts a cause of action against the defendant, Jeffrey Epstein, pursuant to this Section of the United States Code and the agreement between the Defendant, Jeffrey Epstein, and the United States Government.

443. As a direct and proximate result of the offenses enumerated in Title 18, United States Code, Section 2255, being committed against her, ■■■ has in the past suffered, and will in the future suffer, physical injury pain and suffering, emotional distress, psychological trauma, mental anguish, humiliation, embarrassment, loss of

self-esteem, loss of dignity, invasion of her privacy and other damages associated with defendant, Jeffrey Epstein, controlling, manipulating and coercing her into a perverse and conventional way of life for a minor. The then-minor plaintiff [REDACTED] incurred medical and psychological expenses and the plaintiff, [REDACTED], will in the future suffer medical and psychological expenses. The plaintiff, [REDACTED], has suffered a loss of income, a loss of the capacity to earn income in the future, and a loss of the capacity to enjoy life. These injuries are permanent in nature and the plaintiff, [REDACTED], will continue to suffer these losses in the future.

444. Wherefore, the plaintiff, [REDACTED], demands judgments against the defendant, Jeffrey Epstein, for compensatory damages of at least the minimum amount provided by law, attorney's fees, costs, and such other and further relief as this Court deems just and proper, and hereby demands trial by jury on all issues triable as of right by a jury.

COUNT 107

Cause of Action Pursuant to 18 U.S.C. § 2255

October 2004 – Incident 3

445. Plaintiff, [REDACTED], adopts and realleges paragraphs 1 through 20 above.

446. On or about October 2004, the exact date being unknown to [REDACTED], Defendant, Jeffrey Epstein, committed a federal sexual offense against her, including a violation of numerous federal criminal statutes condemning the coercion and enticement of a minor to engage in prostitution or sexual activity, travel with intent to engage in illicit sexual conduct, sex trafficking of children, sexual exploitation of minor children, transport of visual depictions of a minor engaging in sexually explicit conduct,

child exploitation enterprises, and other crimes, specifically including, but not limited to, those crimes designated in 18 U.S.C. § 2422(b), § 2423(a), § 2423(b), and § 2423(e).

█ is therefore a victim of one or more offenses enumerated in 18 U.S.C. § 2255 and, as such, asserts a cause of action against the defendant, Jeffrey Epstein, pursuant to this Section of the United States Code and the agreement between the Defendant, Jeffrey Epstein, and the United States Government.

447. As a direct and proximate result of the offenses enumerated in Title 18, United States Code, Section 2255, being committed against her, █ has in the past suffered, and will in the future suffer, physical injury pain and suffering, emotional distress, psychological trauma, mental anguish, humiliation, embarrassment, loss of self-esteem, loss of dignity, invasion of her privacy and other damages associated with defendant, Jeffrey Epstein, controlling, manipulating and coercing her into a perverse and conventional way of life for a minor. The then-minor plaintiff █ incurred medical and psychological expenses and the plaintiff, █, will in the future suffer medical and psychological expenses. The plaintiff, █, has suffered a loss of income, a loss of the capacity to earn income in the future, and a loss of the capacity to enjoy life. These injuries are permanent in nature and the plaintiff, █, will continue to suffer these losses in the future.

448. Wherefore, the plaintiff, █, demands judgments against the defendant, Jeffrey Epstein, for compensatory damages of at least the minimum amount provided by law, attorney's fees, costs, and such other and further relief as this Court deems just and proper, and hereby demands trial by jury on all issues triable as of right by a jury.

COUNT 108

Cause of Action Pursuant to 18 U.S.C. § 2255

October 2004 – Incident 4

449. Plaintiff, [REDACTED], adopts and realleges paragraphs 1 through 20 above.

450. On or about October 2004, the exact date being unknown to [REDACTED], Defendant, Jeffrey Epstein, committed a federal sexual offense against her, including a violation of numerous federal criminal statutes condemning the coercion and enticement of a minor to engage in prostitution or sexual activity, travel with intent to engage in illicit sexual conduct, sex trafficking of children, sexual exploitation of minor children, transport of visual depictions of a minor engaging in sexually explicit conduct, child exploitation enterprises, and other crimes, specifically including, but not limited to, those crimes designated in 18 U.S.C. § 2422(b), § 2423(a), § 2423(b), and § 2423(e). [REDACTED] is therefore a victim of one or more offenses enumerated in 18 U.S.C. § 2255 and, as such, asserts a cause of action against the defendant, Jeffrey Epstein, pursuant to this Section of the United States Code and the agreement between the Defendant, Jeffrey Epstein, and the United States Government.

451. As a direct and proximate result of the offenses enumerated in Title 18, United States Code, Section 2255, being committed against her, [REDACTED] has in the past suffered, and will in the future suffer, physical injury pain and suffering, emotional distress, psychological trauma, mental anguish, humiliation, embarrassment, loss of self-esteem, loss of dignity, invasion of her privacy and other damages associated with defendant, Jeffrey Epstein, controlling, manipulating and coercing her into a perverse

and conventional way of life for a minor. The then-minor plaintiff [REDACTED] incurred medical and psychological expenses and the plaintiff, [REDACTED], will in the future suffer medical and psychological expenses. The plaintiff, [REDACTED], has suffered a loss of income, a loss of the capacity to earn income in the future, and a loss of the capacity to enjoy life. These injuries are permanent in nature and the plaintiff, [REDACTED], will continue to suffer these losses in the future.

452. Wherefore, the plaintiff, [REDACTED], demands judgments against the defendant, Jeffrey Epstein, for compensatory damages of at least the minimum amount provided by law, attorney's fees, costs, and such other and further relief as this Court deems just and proper, and hereby demands trial by jury on all issues triable as of right by a jury.

COUNT 109

Cause of Action Pursuant to 18 U.S.C. § 2255

November 2004 – Incident 1

453. Plaintiff, [REDACTED], adopts and realleges paragraphs 1 through 20 above.

454. On or about November 2004, the exact date being unknown to [REDACTED], Defendant, Jeffrey Epstein, committed a federal sexual offense against her, including a violation of numerous federal criminal statutes condemning the coercion and enticement of a minor to engage in prostitution or sexual activity, travel with intent to engage in illicit sexual conduct, sex trafficking of children, sexual exploitation of minor children, transport of visual depictions of a minor engaging in sexually explicit conduct, child exploitation enterprises, and other crimes, specifically including, but not limited to, those crimes designated in 18 U.S.C. § 2422(b), § 2423(a), § 2423(b), and § 2423(e).

█. is therefore a victim of one or more offenses enumerated in 18 U.S.C. § 2255 and, as such, asserts a cause of action against the defendant, Jeffrey Epstein, pursuant to this Section of the United States Code and the agreement between the Defendant, Jeffrey Epstein, and the United States Government.

455. As a direct and proximate result of the offenses enumerated in Title 18, United States Code, Section 2255, being committed against her, █. has in the past suffered, and will in the future suffer, physical injury pain and suffering, emotional distress, psychological trauma, mental anguish, humiliation, embarrassment, loss of self-esteem, loss of dignity, invasion of her privacy and other damages associated with defendant, Jeffrey Epstein, controlling, manipulating and coercing her into a perverse and conventional way of life for a minor. The then-minor plaintiff █. incurred medical and psychological expenses and the plaintiff, █., will in the future suffer medical and psychological expenses. The plaintiff, █., has suffered a loss of income, a loss of the capacity to earn income in the future, and a loss of the capacity to enjoy life. These injuries are permanent in nature and the plaintiff, █., will continue to suffer these losses in the future.

456. Wherefore, the plaintiff, █., demands judgments against the defendant, Jeffrey Epstein, for compensatory damages of at least the minimum amount provided by law, attorney's fees, costs, and such other and further relief as this Court deems just and proper, and hereby demands trial by jury on all issues triable as of right by a jury.

COUNT 110

Cause of Action Pursuant to 18 U.S.C. § 2255

November 2004 – Incident 2

457. Plaintiff, [REDACTED], adopts and realleges paragraphs 1 through 20 above.

458. On or about November 2004, the exact date being unknown to [REDACTED], Defendant, Jeffrey Epstein, committed a federal sexual offense against her, including a violation of numerous federal criminal statutes condemning the coercion and enticement of a minor to engage in prostitution or sexual activity, travel with intent to engage in illicit sexual conduct, sex trafficking of children, sexual exploitation of minor children, transport of visual depictions of a minor engaging in sexually explicit conduct, child exploitation enterprises, and other crimes, specifically including, but not limited to, those crimes designated in 18 U.S.C. § 2422(b), § 2423(a), § 2423(b), and § 2423(e). [REDACTED] is therefore a victim of one or more offenses enumerated in 18 U.S.C. § 2255 and, as such, asserts a cause of action against the defendant, Jeffrey Epstein, pursuant to this Section of the United States Code and the agreement between the Defendant, Jeffrey Epstein, and the United States Government.

459. As a direct and proximate result of the offenses enumerated in Title 18, United States Code, Section 2255, being committed against her, [REDACTED] has in the past suffered, and will in the future suffer, physical injury pain and suffering, emotional distress, psychological trauma, mental anguish, humiliation, embarrassment, loss of self-esteem, loss of dignity, invasion of her privacy and other damages associated with defendant, Jeffrey Epstein, controlling, manipulating and coercing her into a perverse and conventional way of life for a minor. The then-minor plaintiff [REDACTED] incurred medical and psychological expenses and the plaintiff, [REDACTED], will in the future suffer medical and

psychological expenses. The plaintiff, ■■■, has suffered a loss of income, a loss of the capacity to earn income in the future, and a loss of the capacity to enjoy life. These injuries are permanent in nature and the plaintiff, ■■■, will continue to suffer these losses in the future.

460. Wherefore, the plaintiff, ■■■, demands judgments against the defendant, Jeffrey Epstein, for compensatory damages of at least the minimum amount provided by law, attorney's fees, costs, and such other and further relief as this Court deems just and proper, and hereby demands trial by jury on all issues triable as of right by a jury.

COUNT 111

Cause of Action Pursuant to 18 U.S.C. § 2255

November 2004 – Incident 3

461. Plaintiff, ■■■, adopts and realleges paragraphs 1 through 20 above.

462. On or about November 2004, the exact date being unknown to ■■■, Defendant, Jeffrey Epstein, committed a federal sexual offense against her, including a violation of numerous federal criminal statutes condemning the coercion and enticement of a minor to engage in prostitution or sexual activity, travel with intent to engage in illicit sexual conduct, sex trafficking of children, sexual exploitation of minor children, transport of visual depictions of a minor engaging in sexually explicit conduct, child exploitation enterprises, and other crimes, specifically including, but not limited to, those crimes designated in 18 U.S.C. § 2422(b), § 2423(a), § 2423(b), and § 2423(e). ■■■ is therefore a victim of one or more offenses enumerated in 18 U.S.C. § 2255 and, as such, asserts a cause of action against the defendant, Jeffrey Epstein, pursuant to

this Section of the United States Code and the agreement between the Defendant, Jeffrey Epstein, and the United States Government.

463. As a direct and proximate result of the offenses enumerated in Title 18, United States Code, Section 2255, being committed against her, [REDACTED], has in the past suffered, and will in the future suffer, physical injury pain and suffering, emotional distress, psychological trauma, mental anguish, humiliation, embarrassment, loss of self-esteem, loss of dignity, invasion of her privacy and other damages associated with defendant, Jeffrey Epstein, controlling, manipulating and coercing her into a perverse and conventional way of life for a minor. The then-minor plaintiff [REDACTED], incurred medical and psychological expenses and the plaintiff, [REDACTED], will in the future suffer medical and psychological expenses. The plaintiff, [REDACTED], has suffered a loss of income, a loss of the capacity to earn income in the future, and a loss of the capacity to enjoy life. These injuries are permanent in nature and the plaintiff, [REDACTED], will continue to suffer these losses in the future.

464. Wherefore, the plaintiff, [REDACTED], demands judgments against the defendant, Jeffrey Epstein, for compensatory damages of at least the minimum amount provided by law, attorney's fees, costs, and such other and further relief as this Court deems just and proper, and hereby demands trial by jury on all issues triable as of right by a jury.

COUNT 112

Cause of Action Pursuant to 18 U.S.C. § 2255

November 2004 – Incident 4

465. Plaintiff, [REDACTED], adopts and realleges paragraphs 1 through 20 above.

466. On or about November 2004, the exact date being unknown to ■■■, Defendant, Jeffrey Epstein, committed a federal sexual offense against her, including a violation of numerous federal criminal statutes condemning the coercion and enticement of a minor to engage in prostitution or sexual activity, travel with intent to engage in illicit sexual conduct, sex trafficking of children, sexual exploitation of minor children, transport of visual depictions of a minor engaging in sexually explicit conduct, child exploitation enterprises, and other crimes, specifically including, but not limited to, those crimes designated in 18 U.S.C. § 2422(b), § 2423(a), § 2423(b), and § 2423(e). ■■■ is therefore a victim of one or more offenses enumerated in 18 U.S.C. § 2255 and, as such, asserts a cause of action against the defendant, Jeffrey Epstein, pursuant to this Section of the United States Code and the agreement between the Defendant, Jeffrey Epstein, and the United States Government.

467. As a direct and proximate result of the offenses enumerated in Title 18, United States Code, Section 2255, being committed against her, ■■■ has in the past suffered, and will in the future suffer, physical injury pain and suffering, emotional distress, psychological trauma, mental anguish, humiliation, embarrassment, loss of self-esteem, loss of dignity, invasion of her privacy and other damages associated with defendant, Jeffrey Epstein, controlling, manipulating and coercing her into a perverse and conventional way of life for a minor. The then-minor plaintiff ■■■ incurred medical and psychological expenses and the plaintiff, ■■■, will in the future suffer medical and psychological expenses. The plaintiff, ■■■, has suffered a loss of income, a loss of the capacity to earn income in the future, and a loss of the capacity to enjoy life. These

injuries are permanent in nature and the plaintiff, [REDACTED], will continue to suffer these losses in the future.

468. Wherefore, the plaintiff, [REDACTED], demands judgments against the defendant, Jeffrey Epstein, for compensatory damages of at least the minimum amount provided by law, attorney's fees, costs, and such other and further relief as this Court deems just and proper, and hereby demands trial by jury on all issues triable as of right by a jury.

COUNT 113

Cause of Action Pursuant to 18 U.S.C. § 2255

December 2004 – Incident 1

469. Plaintiff, [REDACTED], adopts and realleges paragraphs 1 through 20 above.

470. On or about December 2004, the exact date being unknown to [REDACTED], Defendant, Jeffrey Epstein, committed a federal sexual offense against her, including a violation of numerous federal criminal statutes condemning the coercion and enticement of a minor to engage in prostitution or sexual activity, travel with intent to engage in illicit sexual conduct, sex trafficking of children, sexual exploitation of minor children, transport of visual depictions of a minor engaging in sexually explicit conduct, child exploitation enterprises, and other crimes, specifically including, but not limited to, those crimes designated in 18 U.S.C. § 2422(b), § 2423(a), § 2423(b), and § 2423(e). [REDACTED] is therefore a victim of one or more offenses enumerated in 18 U.S.C. § 2255 and, as such, asserts a cause of action against the defendant, Jeffrey Epstein, pursuant to this Section of the United States Code and the agreement between the Defendant, Jeffrey Epstein, and the United States Government.

471. As a direct and proximate result of the offenses enumerated in Title 18, United States Code, Section 2255, being committed against her, [REDACTED] has in the past suffered, and will in the future suffer, physical injury pain and suffering, emotional distress, psychological trauma, mental anguish, humiliation, embarrassment, loss of self-esteem, loss of dignity, invasion of her privacy and other damages associated with defendant, Jeffrey Epstein, controlling, manipulating and coercing her into a perverse and conventional way of life for a minor. The then-minor plaintiff [REDACTED] incurred medical and psychological expenses and the plaintiff, [REDACTED], will in the future suffer medical and psychological expenses. The plaintiff, [REDACTED], has suffered a loss of income, a loss of the capacity to earn income in the future, and a loss of the capacity to enjoy life. These injuries are permanent in nature and the plaintiff, [REDACTED], will continue to suffer these losses in the future.

472. Wherefore, the plaintiff, [REDACTED], demands judgments against the defendant, Jeffrey Epstein, for compensatory damages of at least the minimum amount provided by law, attorney's fees, costs, and such other and further relief as this Court deems just and proper, and hereby demands trial by jury on all issues triable as of right by a jury.

COUNT 114

Cause of Action Pursuant to 18 U.S.C. § 2255

December 2004 – Incident 2

473. Plaintiff, [REDACTED], adopts and realleges paragraphs 1 through 20 above.

474. On or about December 2004, the exact date being unknown to [REDACTED], Defendant, Jeffrey Epstein, committed a federal sexual offense against her, including a

violation of numerous federal criminal statutes condemning the coercion and enticement of a minor to engage in prostitution or sexual activity, travel with intent to engage in illicit sexual conduct, sex trafficking of children, sexual exploitation of minor children, transport of visual depictions of a minor engaging in sexually explicit conduct, child exploitation enterprises, and other crimes, specifically including, but not limited to, those crimes designated in 18 U.S.C. § 2422(b), § 2423(a), § 2423(b), and § 2423(e).

█████ is therefore a victim of one or more offenses enumerated in 18 U.S.C. § 2255 and, as such, asserts a cause of action against the defendant, Jeffrey Epstein, pursuant to this Section of the United States Code and the agreement between the Defendant, Jeffrey Epstein, and the United States Government.

475. As a direct and proximate result of the offenses enumerated in Title 18, United States Code, Section 2255, being committed against her, █████ has in the past suffered, and will in the future suffer, physical injury pain and suffering, emotional distress, psychological trauma, mental anguish, humiliation, embarrassment, loss of self-esteem, loss of dignity, invasion of her privacy and other damages associated with defendant. Jeffrey Epstein, controlling, manipulating and coercing her into a perverse and conventional way of life for a minor. The then-minor plaintiff █████ incurred medical and psychological expenses and the plaintiff, █████, will in the future suffer medical and psychological expenses. The plaintiff, █████, has suffered a loss of income, a loss of the capacity to earn income in the future, and a loss of the capacity to enjoy life. These injuries are permanent in nature and the plaintiff, █████, will continue to suffer these losses in the future.

476. Wherefore, the plaintiff, ■■■, demands judgments against the defendant, Jeffrey Epstein, for compensatory damages of at least the minimum amount provided by law, attorney's fees, costs, and such other and further relief as this Court deems just and proper, and hereby demands trial by jury on all issues triable as of right by a jury.

COUNT 115

Cause of Action Pursuant to 18 U.S.C. § 2255

December 2004 – Incident 3

477. Plaintiff, ■■■, adopts and realleges paragraphs 1 through 20 above.

478. On or about December 2004, the exact date being unknown to ■■■, Defendant, Jeffrey Epstein, committed a federal sexual offense against her, including a violation of numerous federal criminal statutes condemning the coercion and enticement of a minor to engage in prostitution or sexual activity, travel with intent to engage in illicit sexual conduct, sex trafficking of children, sexual exploitation of minor children, transport of visual depictions of a minor engaging in sexually explicit conduct, child exploitation enterprises, and other crimes, specifically including, but not limited to, those crimes designated in 18 U.S.C. § 2422(b), § 2423(a), § 2423(b), and § 2423(e). ■■■ is therefore a victim of one or more offenses enumerated in 18 U.S.C. § 2255 and, as such, asserts a cause of action against the defendant, Jeffrey Epstein, pursuant to this Section of the United States Code and the agreement between the Defendant, Jeffrey Epstein, and the United States Government.

479. As a direct and proximate result of the offenses enumerated in Title 18, United States Code, Section 2255, being committed against her, ■■■ has in the past

suffered, and will in the future suffer, physical injury pain and suffering, emotional distress, psychological trauma, mental anguish, humiliation, embarrassment, loss of self-esteem, loss of dignity, invasion of her privacy and other damages associated with defendant, Jeffrey Epstein, controlling, manipulating and coercing her into a perverse and conventional way of life for a minor. The then-minor plaintiff [REDACTED] incurred medical and psychological expenses and the plaintiff, [REDACTED], will in the future suffer medical and psychological expenses. The plaintiff, [REDACTED], has suffered a loss of income, a loss of the capacity to earn income in the future, and a loss of the capacity to enjoy life. These injuries are permanent in nature and the plaintiff, [REDACTED], will continue to suffer these losses in the future.

480. Wherefore, the plaintiff, [REDACTED], demands judgments against the defendant, Jeffrey Epstein, for compensatory damages of at least the minimum amount provided by law, attorney's fees, costs, and such other and further relief as this Court deems just and proper, and hereby demands trial by jury on all issues triable as of right by a jury.

COUNT 116

Cause of Action Pursuant to 18 U.S.C. § 2255

December 2004 – Incident 4

481. Plaintiff, [REDACTED], adopts and realleges paragraphs 1 through 20 above.

482. On or about December 2004, the exact date being unknown to [REDACTED], Defendant, Jeffrey Epstein, committed a federal sexual offense against her, including a violation of numerous federal criminal statutes condemning the coercion and enticement of a minor to engage in prostitution or sexual activity, travel with intent to

engage in illicit sexual conduct, sex trafficking of children, sexual exploitation of minor children, transport of visual depictions of a minor engaging in sexually explicit conduct, child exploitation enterprises, and other crimes, specifically including, but not limited to, those crimes designated in 18 U.S.C. § 2422(b), § 2423(a), § 2423(b), and § 2423(e).

█ is therefore a victim of one or more offenses enumerated in 18 U.S.C. § 2255 and, as such, asserts a cause of action against the defendant, Jeffrey Epstein, pursuant to this Section of the United States Code and the agreement between the Defendant, Jeffrey Epstein, and the United States Government.

483. As a direct and proximate result of the offenses enumerated in Title 18, United States Code, Section 2255, being committed against her, █ has in the past suffered, and will in the future suffer, physical injury pain and suffering, emotional distress, psychological trauma, mental anguish, humiliation, embarrassment; loss of self-esteem, loss of dignity, invasion of her privacy and other damages associated with defendant, Jeffrey Epstein, controlling, manipulating and coercing her into a perverse and conventional way of life for a minor. The then-minor plaintiff █ incurred medical and psychological expenses and the plaintiff, █, will in the future suffer medical and psychological expenses. The plaintiff, █, has suffered a loss of income, a loss of the capacity to earn income in the future, and a loss of the capacity to enjoy life. These injuries are permanent in nature and the plaintiff, █, will continue to suffer these losses in the future.

484. Wherefore, the plaintiff, █, demands judgments against the defendant, Jeffrey Epstein, for compensatory damages of at least the minimum amount provided

by law, attorney's fees, costs, and such other and further relief as this Court deems just and proper, and hereby demands trial by jury on all issues triable as of right by a jury.

COUNT 117

Cause of Action Pursuant to 18 U.S.C. § 2255

January 2005 – Incident 1

485. Plaintiff, ■■■, adopts and realleges paragraphs 1 through 20 above.

486. On or about January 2005, the exact date being unknown to ■■■, Defendant, Jeffrey Epstein, committed a federal sexual offense against her, including a violation of numerous federal criminal statutes condemning the coercion and enticement of a minor to engage in prostitution or sexual activity, travel with intent to engage in illicit sexual conduct, sex trafficking of children, sexual exploitation of minor children, transport of visual depictions of a minor engaging in sexually explicit conduct, child exploitation enterprises, and other crimes, specifically including, but not limited to, those crimes designated in 18 U.S.C. § 2422(b), § 2423(a), § 2423(b), and § 2423(e). ■■■ is therefore a victim of one or more offenses enumerated in 18 U.S.C. § 2255 and, as such, asserts a cause of action against the defendant, Jeffrey Epstein, pursuant to this Section of the United States Code and the agreement between the Defendant, Jeffrey Epstein, and the United States Government.

487. As a direct and proximate result of the offenses enumerated in Title 18, United States Code, Section 2255, being committed against her, ■■■ has in the past suffered, and will in the future suffer, physical injury pain and suffering, emotional distress, psychological trauma, mental anguish, humiliation, embarrassment, loss of

self-esteem, loss of dignity, invasion of her privacy and other damages associated with defendant, Jeffrey Epstein, controlling, manipulating and coercing her into a perverse and conventional way of life for a minor. The then-minor plaintiff [REDACTED] incurred medical and psychological expenses and the plaintiff, [REDACTED], will in the future suffer medical and psychological expenses. The plaintiff, [REDACTED], has suffered a loss of income, a loss of the capacity to earn income in the future, and a loss of the capacity to enjoy life. These injuries are permanent in nature and the plaintiff, [REDACTED], will continue to suffer these losses in the future.

488. Wherefore, the plaintiff, [REDACTED], demands judgments against the defendant, Jeffrey Epstein, for compensatory damages of at least the minimum amount provided by law, attorney's fees, costs, and such other and further relief as this Court deems just and proper, and hereby demands trial by jury on all issues triable as of right by a jury.

COUNT 118

Cause of Action Pursuant to 18 U.S.C. § 2255

January 2005 – Incident 2

489. Plaintiff, L.M. adopts and realleges paragraphs 1 through 20 above.

490. On or about January 2005, the exact date being unknown to [REDACTED], Defendant, Jeffrey Epstein, committed a federal sexual offense against her, including a violation of numerous federal criminal statutes condemning the coercion and enticement of a minor to engage in prostitution or sexual activity, travel with intent to engage in illicit sexual conduct, sex trafficking of children, sexual exploitation of minor children, transport of visual depictions of a minor engaging in sexually explicit conduct,

child exploitation enterprises, and other crimes, specifically including, but not limited to, those crimes designated in 18 U.S.C. § 2422(b), § 2423(a), § 2423(b), and § 2423(e). ■■■ is therefore a victim of one or more offenses enumerated in 18 U.S.C. § 2255 and, as such, asserts a cause of action against the defendant, Jeffrey Epstein, pursuant to this Section of the United States Code and the agreement between the Defendant, Jeffrey Epstein, and the United States Government.

491. As a direct and proximate result of the offenses enumerated in Title 18, United States Code, Section 2255, being committed against her, ■■■ has in the past suffered, and will in the future suffer, physical injury pain and suffering, emotional distress, psychological trauma, mental anguish, humiliation, embarrassment, loss of self-esteem, loss of dignity, invasion of her privacy and other damages associated with defendant, Jeffrey Epstein, controlling, manipulating and coercing her into a perverse and conventional way of life for a minor. The then-minor plaintiff ■■■ incurred medical and psychological expenses and the plaintiff, ■■■, will in the future suffer medical and psychological expenses. The plaintiff, ■■■, has suffered a loss of income, a loss of the capacity to earn income in the future, and a loss of the capacity to enjoy life. These injuries are permanent in nature and the plaintiff, ■■■, will continue to suffer these losses in the future.

492. Wherefore, the plaintiff, ■■■, demands judgments against the defendant, Jeffrey Epstein, for compensatory damages of at least the minimum amount provided by law, attorney's fees, costs, and such other and further relief as this Court deems just and proper, and hereby demands trial by jury on all issues triable as of right by a jury.

COUNT 119

Cause of Action Pursuant to 18 U.S.C. § 2255

January 2005 – Incident 3

493. Plaintiff, [REDACTED], adopts and realleges paragraphs 1 through 20 above.

494. On or about January 2005, the exact date being unknown to [REDACTED],

Defendant, Jeffrey Epstein, committed a federal sexual offense against her, including a violation of numerous federal criminal statutes condemning the coercion and enticement of a minor to engage in prostitution or sexual activity, travel with intent to engage in illicit sexual conduct, sex trafficking of children, sexual exploitation of minor children, transport of visual depictions of a minor engaging in sexually explicit conduct, child exploitation enterprises, and other crimes, specifically including, but not limited to, those crimes designated in 18 U.S.C. § 2422(b), § 2423(a), § 2423(b), and § 2423(e). L.M. is therefore a victim of one or more offenses enumerated in 18 U.S.C. § 2255 and, as such, asserts a cause of action against the defendant, Jeffrey Epstein, pursuant to this Section of the United States Code and the agreement between the Defendant, Jeffrey Epstein, and the United States Government.

495. As a direct and proximate result of the offenses enumerated in Title 18, United States Code, Section 2255, being committed against her, [REDACTED] has in the past suffered, and will in the future suffer, physical injury pain and suffering, emotional distress, psychological trauma, mental anguish, humiliation, embarrassment, loss of self-esteem, loss of dignity, invasion of her privacy and other damages associated with defendant, Jeffrey Epstein, controlling, manipulating and coercing her into a perverse

and conventional way of life for a minor. The then-minor plaintiff [REDACTED] incurred medical and psychological expenses and the plaintiff, [REDACTED], will in the future suffer medical and psychological expenses. The plaintiff, [REDACTED], has suffered a loss of income, a loss of the capacity to earn income in the future, and a loss of the capacity to enjoy life. These injuries are permanent in nature and the plaintiff, [REDACTED], will continue to suffer these losses in the future.

496. Wherefore, the plaintiff, [REDACTED], demands judgments against the defendant, Jeffrey Epstein, for compensatory damages of at least the minimum amount provided by law, attorney's fees, costs, and such other and further relief as this Court deems just and proper, and hereby demands trial by jury on all issues triable as of right by a jury.

COUNT 120

Cause of Action Pursuant to 18 U.S.C. § 2255

January 2005 – Incident 4

497. Plaintiff, [REDACTED], adopts and realleges paragraphs 1 through 20 above.

498. On or about January 2005, the exact date being unknown to [REDACTED], Defendant, Jeffrey Epstein, committed a federal sexual offense against her, including a violation of numerous federal criminal statutes condemning the coercion and enticement of a minor to engage in prostitution or sexual activity, travel with intent to engage in illicit sexual conduct, sex trafficking of children, sexual exploitation of minor children, transport of visual depictions of a minor engaging in sexually explicit conduct, child exploitation enterprises, and other crimes, specifically including, but not limited to, those crimes designated in 18 U.S.C. § 2422(b), § 2423(a), § 2423(b), and § 2423(e).

█ is therefore a victim of one or more offenses enumerated in 18 U.S.C. § 2255 and, as such, asserts a cause of action against the defendant, Jeffrey Epstein, pursuant to this Section of the United States Code and the agreement between the Defendant, Jeffrey Epstein, and the United States Government.

499. As a direct and proximate result of the offenses enumerated in Title 18, United States Code, Section 2255, being committed against her, █ has in the past suffered, and will in the future suffer, physical injury pain and suffering, emotional distress, psychological trauma, mental anguish, humiliation, embarrassment, loss of self-esteem, loss of dignity, invasion of her privacy and other damages associated with defendant, Jeffrey Epstein, controlling, manipulating and coercing her into a perverse and conventional way of life for a minor. The then-minor plaintiff █ incurred medical and psychological expenses and the plaintiff, █, will in the future suffer medical and psychological expenses. The plaintiff, █, has suffered a loss of income, a loss of the capacity to earn income in the future, and a loss of the capacity to enjoy life. These injuries are permanent in nature and the plaintiff, █, will continue to suffer these losses in the future.

500. Wherefore, the plaintiff, █, demands judgments against the defendant, Jeffrey Epstein, for compensatory damages of at least the minimum amount provided by law, attorney's fees, costs, and such other and further relief as this Court deems just and proper, and hereby demands trial by jury on all issues triable as of right by a jury.

COUNT 121

Cause of Action Pursuant to 18 U.S.C. § 2255

February 2005 – Incident 1

501. Plaintiff, [REDACTED], adopts and realleges paragraphs 1 through 20 above.

502. On or about February 2005, the exact date being unknown to [REDACTED], Defendant, Jeffrey Epstein, committed a federal sexual offense against her, including a violation of numerous federal criminal statutes condemning the coercion and enticement of a minor to engage in prostitution or sexual activity, travel with intent to engage in illicit sexual conduct, sex trafficking of children, sexual exploitation of minor children, transport of visual depictions of a minor engaging in sexually explicit conduct, child exploitation enterprises, and other crimes, specifically including, but not limited to, those crimes designated in 18 U.S.C. § 2422(b), § 2423(a), § 2423(b), and § 2423(e). [REDACTED] is therefore a victim of one or more offenses enumerated in 18 U.S.C. § 2255 and, as such, asserts a cause of action against the defendant, Jeffrey Epstein, pursuant to this Section of the United States Code and the agreement between the Defendant, Jeffrey Epstein, and the United States Government.

503. As a direct and proximate result of the offenses enumerated in Title 18, United States Code, Section 2255, being committed against her, [REDACTED] has in the past suffered, and will in the future suffer, physical injury pain and suffering, emotional distress, psychological trauma, mental anguish, humiliation, embarrassment, loss of self-esteem, loss of dignity, invasion of her privacy and other damages associated with defendant, Jeffrey Epstein, controlling, manipulating and coercing her into a perverse and conventional way of life for a minor. The then-minor plaintiff [REDACTED] incurred medical and psychological expenses and the plaintiff, [REDACTED], will in the future suffer medical and

psychological expenses. The plaintiff, ■■■, has suffered a loss of income, a loss of the capacity to earn income in the future, and a loss of the capacity to enjoy life. These injuries are permanent in nature and the plaintiff, ■■■, will continue to suffer these losses in the future.

504. Wherefore, the plaintiff, ■■■, demands judgments against the defendant, Jeffrey Epstein, for compensatory damages of at least the minimum amount provided by law, attorney's fees, costs, and such other and further relief as this Court deems just and proper, and hereby demands trial by jury on all issues triable as of right by a jury.

COUNT 122

Cause of Action Pursuant to 18 U.S.C. § 2255

February 2005 – Incident 2

505. Plaintiff, ■■■, adopts and realleges paragraphs 1 through 20 above.

506. On or about February 2005, the exact date being unknown to ■■■, Defendant, Jeffrey Epstein, committed a federal sexual offense against her, including a violation of numerous federal criminal statutes condemning the coercion and enticement of a minor to engage in prostitution or sexual activity, travel with intent to engage in illicit sexual conduct, sex trafficking of children, sexual exploitation of minor children, transport of visual depictions of a minor engaging in sexually explicit conduct, child exploitation enterprises, and other crimes, specifically including, but not limited to, those crimes designated in 18 U.S.C. § 2422(b), § 2423(a), § 2423(b), and § 2423(e). ■■■ is therefore a victim of one or more offenses enumerated in 18 U.S.C. § 2255 and, as such, asserts a cause of action against the defendant, Jeffrey Epstein, pursuant to

this Section of the United States Code and the agreement between the Defendant, Jeffrey Epstein, and the United States Government.

507. As a direct and proximate result of the offenses enumerated in Title 18, United States Code, Section 2255, being committed against her, [REDACTED], has in the past suffered, and will in the future suffer, physical injury pain and suffering, emotional distress, psychological trauma, mental anguish, humiliation, embarrassment, loss of self-esteem, loss of dignity, invasion of her privacy and other damages associated with defendant, Jeffrey Epstein, controlling, manipulating and coercing her into a perverse and conventional way of life for a minor. The then-minor plaintiff [REDACTED], incurred medical and psychological expenses and the plaintiff, [REDACTED], will in the future suffer medical and psychological expenses. The plaintiff, [REDACTED], has suffered a loss of income, a loss of the capacity to earn income in the future, and a loss of the capacity to enjoy life. These injuries are permanent in nature and the plaintiff, [REDACTED], will continue to suffer these losses in the future.

508. Wherefore, the plaintiff, [REDACTED], demands judgments against the defendant, Jeffrey Epstein, for compensatory damages of at least the minimum amount provided by law, attorney's fees, costs, and such other and further relief as this Court deems just and proper, and hereby demands trial by jury on all issues triable as of right by a jury.

COUNT 123

Cause of Action Pursuant to 18 U.S.C. § 2255

February 2005 – Incident 3

509. Plaintiff, [REDACTED], adopts and realleges paragraphs 1 through 20 above.

510. On or about February 2005, the exact date being unknown to [REDACTED], Defendant, Jeffrey Epstein, committed a federal sexual offense against her, including a violation of numerous federal criminal statutes condemning the coercion and enticement of a minor to engage in prostitution or sexual activity, travel with intent to engage in illicit sexual conduct, sex trafficking of children, sexual exploitation of minor children, transport of visual depictions of a minor engaging in sexually explicit conduct, child exploitation enterprises, and other crimes, specifically including, but not limited to, those crimes designated in 18 U.S.C. § 2422(b), § 2423(a), § 2423(b), and § 2423(e). [REDACTED] is therefore a victim of one or more offenses enumerated in 18 U.S.C. § 2255 and, as such, asserts a cause of action against the defendant, Jeffrey Epstein, pursuant to this Section of the United States Code and the agreement between the Defendant, Jeffrey Epstein, and the United States Government.

511. As a direct and proximate result of the offenses enumerated in Title 18, United States Code, Section 2255, being committed against her, [REDACTED] has in the past suffered, and will in the future suffer, physical injury pain and suffering, emotional distress, psychological trauma, mental anguish, humiliation, embarrassment, loss of self-esteem, loss of dignity, invasion of her privacy and other damages associated with defendant, Jeffrey Epstein, controlling, manipulating and coercing her into a perverse and conventional way of life for a minor. The then-minor plaintiff [REDACTED] incurred medical and psychological expenses and the plaintiff, [REDACTED], will in the future suffer medical and psychological expenses. The plaintiff, [REDACTED], has suffered a loss of income, a loss of the capacity to earn income in the future, and a loss of the capacity to enjoy life. These

injuries are permanent in nature and the plaintiff, [REDACTED], will continue to suffer these losses in the future.

512. Wherefore, the plaintiff, [REDACTED], demands judgments against the defendant, Jeffrey Epstein, for compensatory damages of at least the minimum amount provided by law, attorney's fees, costs, and such other and further relief as this Court deems just and proper, and hereby demands trial by jury on all issues triable as of right by a jury.

COUNT 124

Cause of Action Pursuant to 18 U.S.C. § 2255

February 2005 – Incident 4

513. Plaintiff, [REDACTED], adopts and realleges paragraphs 1 through 20 above.

514. On or about February 2005, the exact date being unknown to [REDACTED], Defendant, Jeffrey Epstein, committed a federal sexual offense against her, including a violation of numerous federal criminal statutes condemning the coercion and enticement of a minor to engage in prostitution or sexual activity, travel with intent to engage in illicit sexual conduct, sex trafficking of children, sexual exploitation of minor children, transport of visual depictions of a minor engaging in sexually explicit conduct, child exploitation enterprises, and other crimes, specifically including, but not limited to, those crimes designated in 18 U.S.C. § 2422(b), § 2423(a), § 2423(b), and § 2423(e). [REDACTED] is therefore a victim of one or more offenses enumerated in 18 U.S.C. § 2255 and, as such, asserts a cause of action against the defendant, Jeffrey Epstein, pursuant to this Section of the United States Code and the agreement between the Defendant, Jeffrey Epstein, and the United States Government.

515. As a direct and proximate result of the offenses enumerated in Title 18, United States Code, Section 2255, being committed against her, [REDACTED] has in the past suffered, and will in the future suffer, physical injury pain and suffering, emotional distress, psychological trauma, mental anguish, humiliation, embarrassment, loss of self-esteem, loss of dignity, invasion of her privacy and other damages associated with defendant, Jeffrey Epstein, controlling, manipulating and coercing her into a perverse and conventional way of life for a minor. The then-minor plaintiff [REDACTED] incurred medical and psychological expenses and the plaintiff, [REDACTED], will in the future suffer medical and psychological expenses. The plaintiff, [REDACTED], has suffered a loss of income, a loss of the capacity to earn income in the future, and a loss of the capacity to enjoy life. These injuries are permanent in nature and the plaintiff, [REDACTED], will continue to suffer these losses in the future.

516. Wherefore, the plaintiff, [REDACTED], demands judgments against the defendant, Jeffrey Epstein, for compensatory damages of at least the minimum amount provided by law, attorney's fees, costs, and such other and further relief as this Court deems just and proper, and hereby demands trial by jury on all issues triable as of right by a jury.

COUNT 125

Cause of Action Pursuant to 18 U.S.C. § 2255

March 2005 – Incident 1

517. Plaintiff, [REDACTED], adopts and realleges paragraphs 1 through 20 above.

518. On or about March 2005, the exact date being unknown to [REDACTED], Defendant, Jeffrey Epstein, committed a federal sexual offense against her, including a

violation of numerous federal criminal statutes condemning the coercion and enticement of a minor to engage in prostitution or sexual activity, travel with intent to engage in illicit sexual conduct, sex trafficking of children, sexual exploitation of minor children, transport of visual depictions of a minor engaging in sexually explicit conduct, child exploitation enterprises, and other crimes, specifically including, but not limited to, those crimes designated in 18 U.S.C. § 2422(b), § 2423(a), § 2423(b), and § 2423(e). ■■■ is therefore a victim of one or more offenses enumerated in 18 U.S.C. § 2255 and, as such, asserts a cause of action against the defendant, Jeffrey Epstein, pursuant to this Section of the United States Code and the agreement between the Defendant, Jeffrey Epstein, and the United States Government.

519. As a direct and proximate result of the offenses enumerated in Title 18, United States Code, Section 2255, being committed against her, ■■■ has in the past suffered, and will in the future suffer, physical injury pain and suffering, emotional distress, psychological trauma, mental anguish, humiliation, embarrassment, loss of self-esteem, loss of dignity, invasion of her privacy and other damages associated with defendant, Jeffrey Epstein, controlling, manipulating and coercing her into a perverse and conventional way of life for a minor. The then-minor plaintiff ■■■ incurred medical and psychological expenses and the plaintiff, ■■■, will in the future suffer medical and psychological expenses. The plaintiff, ■■■, has suffered a loss of income, a loss of the capacity to earn income in the future, and a loss of the capacity to enjoy life. These injuries are permanent in nature and the plaintiff, ■■■, will continue to suffer these losses in the future.

520. Wherefore, the plaintiff, [REDACTED], demands judgments against the defendant, Jeffrey Epstein, for compensatory damages of at least the minimum amount provided by law, attorney's fees, costs, and such other and further relief as this Court deems just and proper, and hereby demands trial by jury on all issues triable as of right by a jury.

COUNT 126

Cause of Action Pursuant to 18 U.S.C. § 2255

March 2005 – Incident 2

521. Plaintiff, [REDACTED], adopts and realleges paragraphs 1 through 20 above.

522. On or about March 2005, the exact date being unknown to [REDACTED], Defendant, Jeffrey Epstein, committed a federal sexual offense against her, including a violation of numerous federal criminal statutes condemning the coercion and enticement of a minor to engage in prostitution or sexual activity, travel with intent to engage in illicit sexual conduct, sex trafficking of children, sexual exploitation of minor children, transport of visual depictions of a minor engaging in sexually explicit conduct, child exploitation enterprises, and other crimes, specifically including, but not limited to, those crimes designated in 18 U.S.C. § 2422(b), § 2423(a), § 2423(b), and § 2423(e). [REDACTED] is therefore a victim of one or more offenses enumerated in 18 U.S.C. § 2255 and, as such, asserts a cause of action against the defendant, Jeffrey Epstein, pursuant to this Section of the United States Code and the agreement between the Defendant, Jeffrey Epstein, and the United States Government.

523. As a direct and proximate result of the offenses enumerated in Title 18, United States Code, Section 2255, being committed against her, [REDACTED] has in the past

suffered, and will in the future suffer, physical injury pain and suffering, emotional distress, psychological trauma, mental anguish, humiliation, embarrassment, loss of self-esteem, loss of dignity, invasion of her privacy and other damages associated with defendant, Jeffrey Epstein, controlling, manipulating and coercing her into a perverse and conventional way of life for a minor. The then-minor plaintiff [REDACTED] incurred medical and psychological expenses and the plaintiff, [REDACTED], will in the future suffer medical and psychological expenses. The plaintiff, [REDACTED], has suffered a loss of income, a loss of the capacity to earn income in the future, and a loss of the capacity to enjoy life. These injuries are permanent in nature and the plaintiff, [REDACTED], will continue to suffer these losses in the future.

524. Wherefore, the plaintiff, [REDACTED], demands judgments against the defendant, Jeffrey Epstein, for compensatory damages of at least the minimum amount provided by law, attorney's fees, costs, and such other and further relief as this Court deems just and proper, and hereby demands trial by jury on all issues triable as of right by a jury.

COUNT 127

Cause of Action Pursuant to 18 U.S.C. § 2255

March 2005 – Incident 3

525. Plaintiff, [REDACTED], adopts and realleges paragraphs 1 through 20 above.

526. On or about March 2005, the exact date being unknown to [REDACTED], Defendant, Jeffrey Epstein, committed a federal sexual offense against her, including a violation of numerous federal criminal statutes condemning the coercion and enticement of a minor to engage in prostitution or sexual activity, travel with intent to

engage in illicit sexual conduct, sex trafficking of children, sexual exploitation of minor children, transport of visual depictions of a minor engaging in sexually explicit conduct, child exploitation enterprises, and other crimes, specifically including, but not limited to, those crimes designated in 18 U.S.C. § 2422(b), § 2423(a), § 2423(b), and § 2423(e).

█ is therefore a victim of one or more offenses enumerated in 18 U.S.C. § 2255 and, as such, asserts a cause of action against the defendant, Jeffrey Epstein, pursuant to this Section of the United States Code and the agreement between the Defendant, Jeffrey Epstein, and the United States Government.

527. As a direct and proximate result of the offenses enumerated in Title 18, United States Code, Section 2255, being committed against her, █ has in the past suffered, and will in the future suffer, physical injury pain and suffering, emotional distress, psychological trauma, mental anguish, humiliation, embarrassment, loss of self-esteem, loss of dignity, invasion of her privacy and other damages associated with defendant, Jeffrey Epstein, controlling, manipulating and coercing her into a perverse and conventional way of life for a minor. The then-minor plaintiff █ incurred medical and psychological expenses and the plaintiff, L.M., will in the future suffer medical and psychological expenses. The plaintiff, █, has suffered a loss of income, a loss of the capacity to earn income in the future, and a loss of the capacity to enjoy life. These injuries are permanent in nature and the plaintiff, █, will continue to suffer these losses in the future.

528. Wherefore, the plaintiff, █, demands judgments against the defendant, Jeffrey Epstein, for compensatory damages of at least the minimum amount provided

by law, attorney's fees, costs, and such other and further relief as this Court deems just and proper, and hereby demands trial by jury on all issues triable as of right by a jury.

COUNT 128

Cause of Action Pursuant to 18 U.S.C. § 2255

March 2005 – Incident 4

529. Plaintiff, ■■■, adopts and realleges paragraphs 1 through 20 above.

530. On or about March 2005, the exact date being unknown to ■■■,.

Defendant, Jeffrey Epstein, committed a federal sexual offense against her, including a violation of numerous federal criminal statutes condemning the coercion and enticement of a minor to engage in prostitution or sexual activity, travel with intent to engage in illicit sexual conduct, sex trafficking of children, sexual exploitation of minor children, transport of visual depictions of a minor engaging in sexually explicit conduct, child exploitation enterprises, and other crimes, specifically including, but not limited to, those crimes designated in 18 U.S.C. § 2422(b), § 2423(a), § 2423(b), and § 2423(e).

■■■ is therefore a victim of one or more offenses enumerated in 18 U.S.C. § 2255 and, as such, asserts a cause of action against the defendant, Jeffrey Epstein, pursuant to this Section of the United States Code and the agreement between the Defendant, Jeffrey Epstein, and the United States Government.

531. As a direct and proximate result of the offenses enumerated in Title 18, United States Code, Section 2255, being committed against her, ■■■ has in the past suffered, and will in the future suffer, physical injury pain and suffering, emotional distress, psychological trauma, mental anguish, humiliation, embarrassment, loss of

self-esteem, loss of dignity, invasion of her privacy and other damages associated with defendant, Jeffrey Epstein, controlling, manipulating and coercing her into a perverse and conventional way of life for a minor. The then-minor plaintiff [REDACTED]. Incurred medical and psychological expenses and the plaintiff, [REDACTED], will in the future suffer medical and psychological expenses. The plaintiff, [REDACTED], has suffered a loss of income, a loss of the capacity to earn income in the future, and a loss of the capacity to enjoy life. These injuries are permanent in nature and the plaintiff, [REDACTED], will continue to suffer these losses in the future.

532. Wherefore, the plaintiff, [REDACTED], demands judgments against the defendant, Jeffrey Epstein, for compensatory damages of at least the minimum amount provided by law, attorney's fees, costs, and such other and further relief as this Court deems just and proper, and hereby demands trial by jury on all issues triable as of right by a jury.

COUNT 129

Cause of Action Pursuant to 18 U.S.C. § 2255

April 2005 – Incident 1

533. Plaintiff, L.M. adopts and realleges paragraphs 1 through 20 above.

534. On or about April 2005, the exact date being unknown to [REDACTED], Defendant, Jeffrey Epstein, committed a federal sexual offense against her, including a violation of numerous federal criminal statutes condemning the coercion and enticement of a minor to engage in prostitution or sexual activity, travel with intent to engage in illicit sexual conduct, sex trafficking of children, sexual exploitation of minor children, transport of visual depictions of a minor engaging in sexually explicit conduct, child exploitation

enterprises, and other crimes, specifically including, but not limited to, those crimes designated in 18 U.S.C. § 2422(b), § 2423(a), § 2423(b), and § 2423(e). ■■■ is therefore a victim of one or more offenses enumerated in 18 U.S.C. § 2255 and, as such, asserts a cause of action against the defendant, Jeffrey Epstein, pursuant to this Section of the United States Code and the agreement between the Defendant, Jeffrey Epstein, and the United States Government.

535. As a direct and proximate result of the offenses enumerated in Title 18, United States Code, Section 2255, being committed against her, ■■■. has in the past suffered, and will in the future suffer, physical injury pain and suffering, emotional distress, psychological trauma, mental anguish, humiliation, embarrassment, loss of self-esteem, loss of dignity, invasion of her privacy and other damages associated with defendant, Jeffrey Epstein, controlling, manipulating and coercing her into a perverse and conventional way of life for a minor. The then-minor plaintiff ■■■. incurred medical and psychological expenses and the plaintiff, ■■■., will in the future suffer medical and psychological expenses. The plaintiff, ■■■., has suffered a loss of income, a loss of the capacity to earn income in the future, and a loss of the capacity to enjoy life. These injuries are permanent in nature and the plaintiff, ■■■., will continue to suffer these losses in the future.

536. Wherefore, the plaintiff, ■■■., demands judgments against the defendant, Jeffrey Epstein, for compensatory damages of at least the minimum amount provided by law, attorney's fees, costs, and such other and further relief as this Court deems just and proper, and hereby demands trial by jury on all issues triable as of right by a jury.

COUNT 130

Cause of Action Pursuant to 18 U.S.C. § 2255

April 2005 – Incident 2

537. Plaintiff, ■■■, adopts and realleges paragraphs 1 through 20 above.

538. On or about April 2005, the exact date being unknown to ■■■, Defendant, Jeffrey Epstein, committed a federal sexual offense against her, including a violation of numerous federal criminal statutes condemning the coercion and enticement of a minor to engage in prostitution or sexual activity, travel with intent to engage in illicit sexual conduct, sex trafficking of children, sexual exploitation of minor children, transport of visual depictions of a minor engaging in sexually explicit conduct, child exploitation enterprises, and other crimes, specifically including, but not limited to, those crimes designated in 18 U.S.C. § 2422(b), § 2423(a), § 2423(b), and § 2423(e). ■■■ is therefore a victim of one or more offenses enumerated in 18 U.S.C. § 2255 and, as such, asserts a cause of action against the defendant, Jeffrey Epstein, pursuant to this Section of the United States Code and the agreement between the Defendant, Jeffrey Epstein, and the United States Government.

539. As a direct and proximate result of the offenses enumerated in Title 18, United States Code, Section 2255, being committed against her, ■■■ has in the past suffered, and will in the future suffer, physical injury pain and suffering, emotional distress, psychological trauma, mental anguish, humiliation, embarrassment, loss of self-esteem, loss of dignity, invasion of her privacy and other damages associated with defendant, Jeffrey Epstein, controlling, manipulating and coercing her into a perverse

and conventional way of life for a minor. The then-minor plaintiff [REDACTED] incurred medical and psychological expenses and the plaintiff, [REDACTED], will in the future suffer medical and psychological expenses. The plaintiff, [REDACTED], has suffered a loss of income, a loss of the capacity to earn income in the future, and a loss of the capacity to enjoy life. These injuries are permanent in nature and the plaintiff, [REDACTED], will continue to suffer these losses in the future.

540. Wherefore, the plaintiff, [REDACTED], demands judgments against the defendant, Jeffrey Epstein, for compensatory damages of at least the minimum amount provided by law, attorney's fees, costs, and such other and further relief as this Court deems just and proper, and hereby demands trial by jury on all issues triable as of right by a jury.

COUNT 131

Cause of Action Pursuant to 18 U.S.C. § 2255

April 2005 – Incident 3

541. Plaintiff, [REDACTED], adopts and realleges paragraphs 1 through 20 above.

542. On or about April 2005, the exact date being unknown to [REDACTED], Defendant, Jeffrey Epstein, committed a federal sexual offense against her, including a violation of numerous federal criminal statutes condemning the coercion and enticement of a minor to engage in prostitution or sexual activity, travel with intent to engage in illicit sexual conduct, sex trafficking of children, sexual exploitation of minor children, transport of visual depictions of a minor engaging in sexually explicit conduct, child exploitation enterprises, and other crimes, specifically including, but not limited to, those crimes designated in 18 U.S.C. § 2422(b), § 2423(a), § 2423(b), and § 2423(e). [REDACTED] is

therefore a victim of one or more offenses enumerated in 18 U.S.C. § 2255 and, as such, asserts a cause of action against the defendant, Jeffrey Epstein, pursuant to this Section of the United States Code and the agreement between the Defendant, Jeffrey Epstein, and the United States Government.

543. As a direct and proximate result of the offenses enumerated in Title 18, United States Code, Section 2255, being committed against her, [REDACTED], has in the past suffered, and will in the future suffer, physical injury pain and suffering, emotional distress, psychological trauma, mental anguish, humiliation, embarrassment, loss of self-esteem, loss of dignity, invasion of her privacy and other damages associated with defendant, Jeffrey Epstein, controlling, manipulating and coercing her into a perverse and conventional way of life for a minor. The then-minor plaintiff [REDACTED], incurred medical and psychological expenses and the plaintiff, [REDACTED], will in the future suffer medical and psychological expenses. The plaintiff, [REDACTED], has suffered a loss of income, a loss of the capacity to earn income in the future, and a loss of the capacity to enjoy life. These injuries are permanent in nature and the plaintiff, [REDACTED], will continue to suffer these losses in the future.

544. Wherefore, the plaintiff, [REDACTED], demands judgments against the defendant, Jeffrey Epstein, for compensatory damages of at least the minimum amount provided by law, attorney's fees, costs, and such other and further relief as this Court deems just and proper, and hereby demands trial by jury on all issues triable as of right by a jury.

COUNT 132

Cause of Action Pursuant to 18 U.S.C. § 2255

April 2005 – Incident 4

545. Plaintiff, [REDACTED] adopts and realleges paragraphs 1 through 20 above.

546. On or about April 2005, the exact date being unknown to [REDACTED], Defendant, Jeffrey Epstein, committed a federal sexual offense against her, including a violation of numerous federal criminal statutes condemning the coercion and enticement of a minor to engage in prostitution or sexual activity, travel with intent to engage in illicit sexual conduct, sex trafficking of children, sexual exploitation of minor children, transport of visual depictions of a minor engaging in sexually explicit conduct, child exploitation enterprises, and other crimes, specifically including, but not limited to, those crimes designated in 18 U.S.C. § 2422(b), § 2423(a), § 2423(b), and § 2423(e). [REDACTED] is therefore a victim of one or more offenses enumerated in 18 U.S.C. § 2255 and, as such, asserts a cause of action against the defendant, Jeffrey Epstein, pursuant to this Section of the United States Code and the agreement between the Defendant, Jeffrey Epstein, and the United States Government.

547. As a direct and proximate result of the offenses enumerated in Title 18, United States Code, Section 2255, being committed against her, [REDACTED] has in the past suffered, and will in the future suffer, physical injury pain and suffering, emotional distress, psychological trauma, mental anguish, humiliation, embarrassment, loss of self-esteem, loss of dignity, invasion of her privacy and other damages associated with defendant, Jeffrey Epstein, controlling, manipulating and coercing her into a perverse and conventional way of life for a minor. The then-minor plaintiff [REDACTED] incurred medical and psychological expenses and the plaintiff, [REDACTED], will in the future suffer medical and

psychological expenses. The plaintiff, ■■■, has suffered a loss of income, a loss of the capacity to earn income in the future, and a loss of the capacity to enjoy life. These injuries are permanent in nature and the plaintiff, ■■■, will continue to suffer these losses in the future.

548. Wherefore, the plaintiff, ■■■, demands judgments against the defendant, Jeffrey Epstein, for compensatory damages of at least the minimum amount provided by law, attorney's fees, costs, and such other and further relief as this Court deems just and proper, and hereby demands trial by jury on all issues triable as of right by a jury.

COUNT 133

Cause of Action Pursuant to 18 U.S.C. § 2255

May 2005 – Incident 1

549. Plaintiff, ■■■, adopts and realleges paragraphs 1 through 20 above.

550. On or about May 2005, the exact date being unknown to ■■■, Defendant, Jeffrey Epstein, committed a federal sexual offense against her, including a violation of numerous federal criminal statutes condemning the coercion and enticement of a minor to engage in prostitution or sexual activity, travel with intent to engage in illicit sexual conduct, sex trafficking of children, sexual exploitation of minor children, transport of visual depictions of a minor engaging in sexually explicit conduct, child exploitation enterprises, and other crimes, specifically including, but not limited to, those crimes designated in 18 U.S.C. § 2422(b), § 2423(a), § 2423(b), and § 2423(e). ■■■ is therefore a victim of one or more offenses enumerated in 18 U.S.C. § 2255 and, as such, asserts a cause of action against the defendant, Jeffrey Epstein, pursuant to this

Section of the United States Code and the agreement between the Defendant, Jeffrey Epstein, and the United States Government.

551. As a direct and proximate result of the offenses enumerated in Title 18, United States Code, Section 2255, being committed against her, [REDACTED] has in the past suffered, and will in the future suffer, physical injury pain and suffering, emotional distress, psychological trauma, mental anguish, humiliation, embarrassment, loss of self-esteem, loss of dignity, invasion of her privacy and other damages associated with defendant, Jeffrey Epstein, controlling, manipulating and coercing her into a perverse and conventional way of life for a minor. The then-minor plaintiff [REDACTED] incurred medical and psychological expenses and the plaintiff, [REDACTED], will in the future suffer medical and psychological expenses. The plaintiff, [REDACTED], has suffered a loss of income, a loss of the capacity to earn income in the future, and a loss of the capacity to enjoy life. These injuries are permanent in nature and the plaintiff, [REDACTED], will continue to suffer these losses in the future.

552. Wherefore, the plaintiff, [REDACTED], demands judgments against the defendant, Jeffrey Epstein, for compensatory damages of at least the minimum amount provided by law, attorney's fees, costs, and such other and further relief as this Court deems just and proper, and hereby demands trial by jury on all issues triable as of right by a jury.

COUNT 134

Cause of Action Pursuant to 18 U.S.C. § 2255

May 2005 – Incident 2

553. Plaintiff, [REDACTED], adopts and realleges paragraphs 1 through 20 above.

554. On or about May 2005, the exact date being unknown to [REDACTED], Defendant, Jeffrey Epstein, committed a federal sexual offense against her, including a violation of numerous federal criminal statutes condemning the coercion and enticement of a minor to engage in prostitution or sexual activity, travel with intent to engage in illicit sexual conduct, sex trafficking of children, sexual exploitation of minor children, transport of visual depictions of a minor engaging in sexually explicit conduct, child exploitation enterprises, and other crimes, specifically including, but not limited to, those crimes designated in 18 U.S.C. § 2422(b), § 2423(a), § 2423(b), and § 2423(e). [REDACTED] is therefore a victim of one or more offenses enumerated in 18 U.S.C. § 2255 and, as such, asserts a cause of action against the defendant, Jeffrey Epstein, pursuant to this Section of the United States Code and the agreement between the Defendant, Jeffrey Epstein, and the United States Government.

555. As a direct and proximate result of the offenses enumerated in Title 18, United States Code, Section 2255, being committed against her, [REDACTED] has in the past suffered, and will in the future suffer, physical injury pain and suffering, emotional distress, psychological trauma, mental anguish, humiliation, embarrassment, loss of self-esteem, loss of dignity, invasion of her privacy and other damages associated with defendant, Jeffrey Epstein, controlling, manipulating and coercing her into a perverse and conventional way of life for a minor. The then-minor plaintiff [REDACTED] incurred medical and psychological expenses and the plaintiff, [REDACTED], will in the future suffer medical and psychological expenses. The plaintiff, [REDACTED], has suffered a loss of income, a loss of the capacity to earn income in the future, and a loss of the capacity to enjoy life. These

injuries are permanent in nature and the plaintiff, [REDACTED], will continue to suffer these losses in the future.

556. Wherefore, the plaintiff, [REDACTED], demands judgments against the defendant, Jeffrey Epstein, for compensatory damages of at least the minimum amount provided by law, attorney's fees, costs, and such other and further relief as this Court deems just and proper, and hereby demands trial by jury on all issues triable as of right by a jury.

COUNT 135

Cause of Action Pursuant to 18 U.S.C. § 2255

May 2005 – Incident 3

557. Plaintiff, [REDACTED], adopts and realleges paragraphs 1 through 20 above.

558. On or about May 2005, the exact date being unknown to [REDACTED], Defendant, Jeffrey Epstein, committed a federal sexual offense against her, including a violation of numerous federal criminal statutes condemning the coercion and enticement of a minor to engage in prostitution or sexual activity, travel with intent to engage in illicit sexual conduct, sex trafficking of children, sexual exploitation of minor children, transport of visual depictions of a minor engaging in sexually explicit conduct, child exploitation enterprises, and other crimes, specifically including, but not limited to, those crimes designated in 18 U.S.C. § 2422(b), § 2423(a), § 2423(b), and § 2423(e). [REDACTED] is therefore a victim of one or more offenses enumerated in 18 U.S.C. § 2255 and, as such, asserts a cause of action against the defendant, Jeffrey Epstein, pursuant to this Section of the United States Code and the agreement between the Defendant, Jeffrey Epstein, and the United States Government.

559. As a direct and proximate result of the offenses enumerated in Title 18, United States Code, Section 2255, being committed against her, [REDACTED], has in the past suffered, and will in the future suffer, physical injury pain and suffering, emotional distress, psychological trauma, mental anguish, humiliation, embarrassment, loss of self-esteem, loss of dignity, invasion of her privacy and other damages associated with defendant, Jeffrey Epstein, controlling, manipulating and coercing her into a perverse and conventional way of life for a minor. The then-minor plaintiff [REDACTED] incurred medical and psychological expenses and the plaintiff, [REDACTED], will in the future suffer medical and psychological expenses. The plaintiff, [REDACTED], has suffered a loss of income, a loss of the capacity to earn income in the future, and a loss of the capacity to enjoy life. These injuries are permanent in nature and the plaintiff, [REDACTED], will continue to suffer these losses in the future.

560. Wherefore, the plaintiff, [REDACTED], demands judgments against the defendant, Jeffrey Epstein, for compensatory damages of at least the minimum amount provided by law, attorney's fees, costs, and such other and further relief as this Court deems just and proper, and hereby demands trial by jury on all issues triable as of right by a jury.

COUNT 136

Cause of Action Pursuant to 18 U.S.C. § 2255

May 2005 – Incident 4

561. Plaintiff, [REDACTED], adopts and realleges paragraphs 1 through 20 above.

562. On or about May 2005, the exact date being unknown to [REDACTED], Defendant, Jeffrey Epstein, committed a federal sexual offense against her, including a violation of

numerous federal criminal statutes condemning the coercion and enticement of a minor to engage in prostitution or sexual activity, travel with intent to engage in illicit sexual conduct, sex trafficking of children, sexual exploitation of minor children, transport of visual depictions of a minor engaging in sexually explicit conduct, child exploitation enterprises, and other crimes, specifically including, but not limited to, those crimes designated in 18 U.S.C. § 2422(b), § 2423(a), § 2423(b), and § 2423(e). ■■■ is therefore a victim of one or more offenses enumerated in 18 U.S.C. § 2255 and, as such, asserts a cause of action against the defendant, Jeffrey Epstein, pursuant to this Section of the United States Code and the agreement between the Defendant, Jeffrey Epstein, and the United States Government.

563. As a direct and proximate result of the offenses enumerated in Title 18, United States Code, Section 2255, being committed against her, ■■■. has in the past suffered, and will in the future suffer, physical injury pain and suffering, emotional distress, psychological trauma, mental anguish, humiliation, embarrassment, loss of self-esteem, loss of dignity, invasion of her privacy and other damages associated with defendant, Jeffrey Epstein, controlling, manipulating and coercing her into a perverse and conventional way of life for a minor. The then-minor plaintiff ■■■. incurred medical and psychological expenses and the plaintiff, ■■■., will in the future suffer medical and psychological expenses. The plaintiff, ■■■., has suffered a loss of income, a loss of the capacity to earn income in the future, and a loss of the capacity to enjoy life. These injuries are permanent in nature and the plaintiff, ■■■., will continue to suffer these losses in the future.

564. Wherefore, the plaintiff, ■■■, demands judgments against the defendant, Jeffrey Epstein, for compensatory damages of at least the minimum amount provided by law, attorney's fees, costs, and such other and further relief as this Court deems just and proper, and hereby demands trial by jury on all issues triable as of right 137

COUNT 137

Cause of Action Pursuant to 18 U.S.C. § 2255

June 2005 – Incident 1

565. Plaintiff, ■■■, adopts and realleges paragraphs 1 through 20 above.

566. On or about June 2005, the exact date being unknown to ■■■, Defendant, Jeffrey Epstein, committed a federal sexual offense against her, including a violation of numerous federal criminal statutes condemning the coercion and enticement of a minor to engage in prostitution or sexual activity, travel with intent to engage in illicit sexual conduct, sex trafficking of children, sexual exploitation of minor children, transport of visual depictions of a minor engaging in sexually explicit conduct, child exploitation enterprises, and other crimes, specifically including, but not limited to, those crimes designated in 18 U.S.C. § 2422(b), § 2423(a), § 2423(b), and § 2423(e). ■■■ is therefore a victim of one or more offenses enumerated in 18 U.S.C. § 2255 and, as such, asserts a cause of action against the defendant, Jeffrey Epstein, pursuant to this Section of the United States Code and the agreement between the Defendant, Jeffrey Epstein, and the United States Government.

567. As a direct and proximate result of the offenses enumerated in Title 18, United States Code, Section 2255, being committed against her, ■■■ has in the past

suffered, and will in the future suffer, physical injury pain and suffering, emotional distress, psychological trauma, mental anguish, humiliation, embarrassment, loss of self-esteem, loss of dignity, invasion of her privacy and other damages associated with defendant, Jeffrey Epstein, controlling, manipulating and coercing her into a perverse and conventional way of life for a minor. The then-minor plaintiff [REDACTED] incurred medical and psychological expenses and the plaintiff, [REDACTED], will in the future suffer medical and psychological expenses. The plaintiff, [REDACTED], has suffered a loss of income, a loss of the capacity to earn income in the future, and a loss of the capacity to enjoy life. These injuries are permanent in nature and the plaintiff, [REDACTED], will continue to suffer these losses in the future.

568. Wherefore, the plaintiff, [REDACTED], demands judgments against the defendant, Jeffrey Epstein, for compensatory damages of at least the minimum amount provided by law, attorney's fees, costs, and such other and further relief as this Court deems just and proper, and hereby demands trial by jury on all issues triable as of right by a jury.

COUNT 138

Cause of Action Pursuant to 18 U.S.C. § 2255

June 2005 – Incident 2

569. Plaintiff, [REDACTED], adopts and realleges paragraphs 1 through 20 above.

570. On or about June 2005, the exact date being unknown to [REDACTED], Defendant, Jeffrey Epstein, committed a federal sexual offense against her, including a violation of numerous federal criminal statutes condemning the coercion and enticement of a minor to engage in prostitution or sexual activity, travel with intent to

engage in illicit sexual conduct, sex trafficking of children, sexual exploitation of minor children, transport of visual depictions of a minor engaging in sexually explicit conduct, child exploitation enterprises, and other crimes, specifically including, but not limited to, those crimes designated in 18 U.S.C. § 2422(b), § 2423(a), § 2423(b), and § 2423(e). ■■■ is therefore a victim of one or more offenses enumerated in 18 U.S.C. § 2255 and, as such, asserts a cause of action against the defendant, Jeffrey Epstein, pursuant to this Section of the United States Code and the agreement between the Defendant, Jeffrey Epstein, and the United States Government.

571. As a direct and proximate result of the offenses enumerated in Title 18, United States Code, Section 2255, being committed against her, ■■■ has in the past suffered, and will in the future suffer, physical injury pain and suffering, emotional distress, psychological trauma, mental anguish, humiliation, embarrassment, loss of self-esteem, loss of dignity, invasion of her privacy and other damages associated with defendant, Jeffrey Epstein, controlling, manipulating and coercing her into a perverse and conventional way of life for a minor. The then-minor plaintiff ■■■ incurred medical and psychological expenses and the plaintiff, L. M., will in the future suffer medical and psychological expenses. The plaintiff, ■■■, has suffered a loss of income, a loss of the capacity to earn income in the future, and a loss of the capacity to enjoy life. These injuries are permanent in nature and the plaintiff, ■■■, will continue to suffer these losses in the future.

572. Wherefore, the plaintiff, ■■■, demands judgments against the defendant, Jeffrey Epstein, for compensatory damages of at least the minimum amount provided

by law, attorney's fees, costs, and such other and further relief as this Court deems just and proper, and hereby demands trial by jury on all issues triable as of right by a jury.

COUNT 139

Cause of Action Pursuant to 18 U.S.C. § 2255

June 2005 – Incident 3

573. Plaintiff, ■■■, adopts and realleges paragraphs 1 through 20 above.

574. On or about June 2005, the exact date being unknown to ■■■,

Defendant, Jeffrey Epstein, committed a federal sexual offense against her, including a violation of numerous federal criminal statutes condemning the coercion and enticement of a minor to engage in prostitution or sexual activity, travel with intent to engage in illicit sexual conduct, sex trafficking of children, sexual exploitation of minor children, transport of visual depictions of a minor engaging in sexually explicit conduct, child exploitation enterprises, and other crimes, specifically including, but not limited to, those crimes designated in 18 U.S.C. § 2422(b), § 2423(a), § 2423(b), and § 2423(e).

■■■ is therefore a victim of one or more offenses enumerated in 18 U.S.C. § 2255 and, as such, asserts a cause of action against the defendant, Jeffrey Epstein, pursuant to this Section of the United States Code and the agreement between the Defendant, Jeffrey Epstein, and the United States Government.

575. As a direct and proximate result of the offenses enumerated in Title 18, United States Code, Section 2255, being committed against her, ■■■ has in the past suffered, and will in the future suffer, physical injury pain and suffering, emotional distress, psychological trauma, mental anguish, humiliation, embarrassment, loss of

self-esteem, loss of dignity, invasion of her privacy and other damages associated with defendant, Jeffrey Epstein, controlling, manipulating and coercing her into a perverse and conventional way of life for a minor. The then-minor plaintiff [REDACTED] incurred medical and psychological expenses and the plaintiff, [REDACTED], will in the future suffer medical and psychological expenses. The plaintiff, [REDACTED], has suffered a loss of income, a loss of the capacity to earn income in the future, and a loss of the capacity to enjoy life. These injuries are permanent in nature and the plaintiff, [REDACTED], will continue to suffer these losses in the future.

576. Wherefore, the plaintiff, [REDACTED], demands judgments against the defendant, Jeffrey Epstein, for compensatory damages of at least the minimum amount provided by law, attorney's fees, costs, and such other and further relief as this Court deems just and proper, and hereby demands trial by jury on all issues triable as of right by a jury.

COUNT 140

Cause of Action Pursuant to 18 U.S.C. § 2255

June 2005 – Incident 4

577. Plaintiff, [REDACTED], adopts and realleges paragraphs 1 through 20 above.

578. On or about June 2005, the exact date being unknown to [REDACTED], Defendant, Jeffrey Epstein, committed a federal sexual offense against her, including a violation of numerous federal criminal statutes condemning the coercion and enticement of a minor to engage in prostitution or sexual activity, travel with intent to engage in illicit sexual conduct, sex trafficking of children, sexual exploitation of minor children, transport of visual depictions of a minor engaging in sexually explicit conduct,

child exploitation enterprises, and other crimes, specifically including, but not limited to, those crimes designated in 18 U.S.C. § 2422(b), § 2423(a), § 2423(b), and § 2423(e).

█ is therefore a victim of one or more offenses enumerated in 18 U.S.C. § 2255 and, as such, asserts a cause of action against the defendant, Jeffrey Epstein, pursuant to this Section of the United States Code and the agreement between the Defendant, Jeffrey Epstein, and the United States Government.

579. As a direct and proximate result of the offenses enumerated in Title 18, United States Code, Section 2255, being committed against her, █ has in the past suffered, and will in the future suffer, physical injury pain and suffering, emotional distress, psychological trauma, mental anguish, humiliation, embarrassment, loss of self-esteem, loss of dignity, invasion of her privacy and other damages associated with defendant, Jeffrey Epstein, controlling, manipulating and coercing her into a perverse and conventional way of life for a minor. The then-minor plaintiff █ incurred medical and psychological expenses and the plaintiff, █, will in the future suffer medical and psychological expenses. The plaintiff, █, has suffered a loss of income, a loss of the capacity to earn income in the future, and a loss of the capacity to enjoy life. These injuries are permanent in nature and the plaintiff, █, will continue to suffer these losses in the future.

580. Wherefore, the plaintiff █ demands judgments against the defendant, Jeffrey Epstein, for compensatory damages of at least the minimum amount provided by law, attorney's fees, costs, and such other and further relief as this Court deems just and proper, and hereby demands trial by jury on all issues triable as of right by a jury.

COUNT 141

Cause of Action Pursuant to 18 U.S.C. § 2255

July 2005 – Incident 1

581. Plaintiff, ■■■, adopts and realleges paragraphs 1 through 20 above.

582. On or about July 2005, the exact date being unknown to ■■■, Defendant, Jeffrey Epstein, committed a federal sexual offense against her, including a violation of numerous federal criminal statutes condemning the coercion and enticement of a minor to engage in prostitution or sexual activity, travel with intent to engage in illicit sexual conduct, sex trafficking of children, sexual exploitation of minor children, transport of visual depictions of a minor engaging in sexually explicit conduct, child exploitation enterprises, and other crimes, specifically including, but not limited to, those crimes designated in 18 U.S.C. § 2422(b), § 2423(a), § 2423(b), and § 2423(e). ■■■ is therefore a victim of one or more offenses enumerated in 18 U.S.C. § 2255 and, as such, asserts a cause of action against the defendant, Jeffrey Epstein, pursuant to this Section of the United States Code and the agreement between the Defendant, Jeffrey Epstein, and the United States Government.

583. As a direct and proximate result of the offenses enumerated in Title 18, United States Code, Section 2255, being committed against her, ■■■ has in the past suffered, and will in the future suffer, physical injury pain and suffering, emotional distress, psychological trauma, mental anguish, humiliation, embarrassment, loss of self-esteem, loss of dignity, invasion of her privacy and other damages associated with defendant, Jeffrey Epstein, controlling, manipulating and coercing her into a perverse

and conventional way of life for a minor. The then-minor plaintiff [REDACTED], incurred medical and psychological expenses and the plaintiff, [REDACTED], will in the future suffer medical and psychological expenses. The plaintiff, [REDACTED], has suffered a loss of income, a loss of the capacity to earn income in the future, and a loss of the capacity to enjoy life. These injuries are permanent in nature and the plaintiff, [REDACTED], will continue to suffer these losses in the future.

584. Wherefore, the plaintiff, [REDACTED], demands judgments against the defendant, Jeffrey Epstein, for compensatory damages of at least the minimum amount provided by law, attorney's fees, costs, and such other and further relief as this Court deems just and proper, and hereby demands trial by jury on all issues triable as of right by a jury.

COUNT 142

Cause of Action Pursuant to 18 U.S.C. § 2255

July 2005 – Incident 2

585. Plaintiff, [REDACTED], adopts and realleges paragraphs 1 through 20 above.

586. On or about July 2005, the exact date being unknown to [REDACTED], Defendant, Jeffrey Epstein, committed a federal sexual offense against her, including a violation of numerous federal criminal statutes condemning the coercion and enticement of a minor to engage in prostitution or sexual activity, travel with intent to engage in illicit sexual conduct, sex trafficking of children, sexual exploitation of minor children, transport of visual depictions of a minor engaging in sexually explicit conduct, child exploitation enterprises, and other crimes, specifically including, but not limited to, those crimes designated in 18 U.S.C. § 2422(b), § 2423(a), § 2423(b), and § 2423(e). [REDACTED] is

therefore a victim of one or more offenses enumerated in 18 U.S.C. § 2255 and, as such, asserts a cause of action against the defendant, Jeffrey Epstein, pursuant to this Section of the United States Code and the agreement between the Defendant, Jeffrey Epstein, and the United States Government.

587. As a direct and proximate result of the offenses enumerated in Title 18, United States Code, Section 2255, being committed against her, [REDACTED], has in the past suffered, and will in the future suffer, physical injury pain and suffering, emotional distress, psychological trauma, mental anguish, humiliation, embarrassment, loss of self-esteem, loss of dignity, invasion of her privacy and other damages associated with defendant, Jeffrey Epstein, controlling, manipulating and coercing her into a perverse and conventional way of life for a minor. The then-minor plaintiff [REDACTED], incurred medical and psychological expenses and the plaintiff, [REDACTED], will in the future suffer medical and psychological expenses. The plaintiff, [REDACTED], has suffered a loss of income, a loss of the capacity to earn income in the future, and a loss of the capacity to enjoy life. These injuries are permanent in nature and the plaintiff, [REDACTED], will continue to suffer these losses in the future.

588. Wherefore, the plaintiff, [REDACTED], demands judgments against the defendant, Jeffrey Epstein, for compensatory damages of at least the minimum amount provided by law, attorney's fees, costs, and such other and further relief as this Court deems just and proper, and hereby demands trial by jury on all issues triable as of right by a jury.

COUNT 143

Cause of Action Pursuant to 18 U.S.C. § 2255

July 2005 – Incident 3

589. Plaintiff, [REDACTED], adopts and realleges paragraphs 1 through 20 above.

590. On or about July 2005, the exact date being unknown to [REDACTED], Defendant, Jeffrey Epstein, committed a federal sexual offense against her, including a violation of numerous federal criminal statutes condemning the coercion and enticement of a minor to engage in prostitution or sexual activity, travel with intent to engage in illicit sexual conduct, sex trafficking of children, sexual exploitation of minor children, transport of visual depictions of a minor engaging in sexually explicit conduct, child exploitation enterprises, and other crimes, specifically including, but not limited to, those crimes designated in 18 U.S.C. § 2422(b), § 2423(a), § 2423(b), and § 2423(e). [REDACTED] is therefore a victim of one or more offenses enumerated in 18 U.S.C. § 2255 and, as such, asserts a cause of action against the defendant, Jeffrey Epstein, pursuant to this Section of the United States Code and the agreement between the Defendant, Jeffrey Epstein, and the United States Government.

591. As a direct and proximate result of the offenses enumerated in Title 18, United States Code, Section 2255, being committed against her, [REDACTED] has in the past suffered, and will in the future suffer, physical injury pain and suffering, emotional distress, psychological trauma, mental anguish, humiliation, embarrassment, loss of self-esteem, loss of dignity, invasion of her privacy and other damages associated with defendant, Jeffrey Epstein, controlling, manipulating and coercing her into a perverse and conventional way of life for a minor. The then-minor plaintiff [REDACTED] incurred medical and psychological expenses and the plaintiff, [REDACTED], will in the future suffer medical and

psychological expenses. The plaintiff, ■■■, has suffered a loss of income, a loss of the capacity to earn income in the future, and a loss of the capacity to enjoy life. These injuries are permanent in nature and the plaintiff, ■■■, will continue to suffer these losses in the future.

592. Wherefore, the plaintiff, ■■■, demands judgments against the defendant, Jeffrey Epstein, for compensatory damages of at least the minimum amount provided by law, attorney's fees, costs, and such other and further relief as this Court deems just and proper, and hereby demands trial by jury on all issues triable as of right by a jury.

COUNT 144

Cause of Action Pursuant to 18 U.S.C. § 2255

July 2005 – Incident 4

593. Plaintiff, ■■■, adopts and realleges paragraphs 1 through 20 above.

594. On or about July 2005, the exact date being unknown to ■■■, Defendant, Jeffrey Epstein, committed a federal sexual offense against her, including a violation of numerous federal criminal statutes condemning the coercion and enticement of a minor to engage in prostitution or sexual activity, travel with intent to engage in illicit sexual conduct, sex trafficking of children, sexual exploitation of minor children, transport of visual depictions of a minor engaging in sexually explicit conduct, child exploitation enterprises, and other crimes, specifically including, but not limited to, those crimes designated in 18 U.S.C. § 2422(b), § 2423(a), § 2423(b), and § 2423(e). ■■■ is therefore a victim of one or more offenses enumerated in 18 U.S.C. § 2255 and, as such, asserts a cause of action against the defendant, Jeffrey Epstein, pursuant to this

Section of the United States Code and the agreement between the Defendant, Jeffrey Epstein, and the United States Government.

595. As a direct and proximate result of the offenses enumerated in Title 18, United States Code, Section 2255, being committed against her, [REDACTED], has in the past suffered, and will in the future suffer, physical injury pain and suffering, emotional distress, psychological trauma, mental anguish, humiliation, embarrassment, loss of self-esteem, loss of dignity, invasion of her privacy and other damages associated with defendant, Jeffrey Epstein, controlling, manipulating and coercing her into a perverse and conventional way of life for a minor. The then-minor plaintiff [REDACTED], incurred medical and psychological expenses and the plaintiff, [REDACTED], will in the future suffer medical and psychological expenses. The plaintiff, [REDACTED], has suffered a loss of income, a loss of the capacity to earn income in the future, and a loss of the capacity to enjoy life. These injuries are permanent in nature and the plaintiff, [REDACTED], will continue to suffer these losses in the future.

596. Wherefore, the plaintiff, [REDACTED], demands judgments against the defendant, Jeffrey Epstein, for compensatory damages of at least the minimum amount provided by law, attorney's fees, costs, and such other and further relief as this Court deems just and proper, and hereby demands trial by jury on all issues triable as of right by a jury.

COUNT 145

Cause of Action Pursuant to 18 U.S.C. § 2255

August 2005 – Incident 1

597. Plaintiff, [REDACTED], adopts and realleges paragraphs 1 through 20 above.

598. On or about August 2005, the exact date being unknown to ■■■, Defendant, Jeffrey Epstein, committed a federal sexual offense against her, including a violation of numerous federal criminal statutes condemning the coercion and enticement of a minor to engage in prostitution or sexual activity, travel with intent to engage in illicit sexual conduct, sex trafficking of children, sexual exploitation of minor children, transport of visual depictions of a minor engaging in sexually explicit conduct, child exploitation enterprises, and other crimes, specifically including, but not limited to, those crimes designated in 18 U.S.C. § 2422(b), § 2423(a), § 2423(b), and § 2423(e). ■■■ is therefore a victim of one or more offenses enumerated in 18 U.S.C. § 2255 and, as such, asserts a cause of action against the defendant, Jeffrey Epstein, pursuant to this Section of the United States Code and the agreement between the Defendant, Jeffrey Epstein, and the United States Government.

599. As a direct and proximate result of the offenses enumerated in Title 18, United States Code, Section 2255, being committed against her, ■■■ has in the past suffered, and will in the future suffer, physical injury pain and suffering, emotional distress, psychological trauma, mental anguish, humiliation, embarrassment, loss of self-esteem, loss of dignity, invasion of her privacy and other damages associated with defendant, Jeffrey Epstein, controlling, manipulating and coercing her into a perverse and conventional way of life for a minor. The then-minor plaintiff ■■■ incurred medical and psychological expenses and the plaintiff, ■■■, will in the future suffer medical and psychological expenses. The plaintiff, ■■■, has suffered a loss of income, a loss of the capacity to earn income in the future, and a loss of the capacity to enjoy life. These

injuries are permanent in nature and the plaintiff, ■■■, will continue to suffer these losses in the future.

600. Wherefore, the plaintiff, ■■■, demands judgments against the defendant, Jeffrey Epstein, for compensatory damages of at least the minimum amount provided by law, attorney's fees, costs, and such other and further relief as this Court deems just and proper, and hereby demands trial by jury on all issues triable as of right by a jury.

COUNT 146

Cause of Action Pursuant to 18 U.S.C. § 2255

August 2005 – Incident 2

601. Plaintiff, ■■■, adopts and realleges paragraphs 1 through 20 above.

602. On or about August 2005, the exact date being unknown to ■■■, Defendant, Jeffrey Epstein, committed a federal sexual offense against her, including a violation of numerous federal criminal statutes condemning the coercion and enticement of a minor to engage in prostitution or sexual activity, travel with intent to engage in illicit sexual conduct, sex trafficking of children, sexual exploitation of minor children, transport of visual depictions of a minor engaging in sexually explicit conduct, child exploitation enterprises, and other crimes, specifically including, but not limited to, those crimes designated in 18 U.S.C. § 2422(b), § 2423(a), § 2423(b), and § 2423(e). ■■■ is therefore a victim of one or more offenses enumerated in 18 U.S.C. § 2255 and, as such, asserts a cause of action against the defendant, Jeffrey Epstein, pursuant to this Section of the United States Code and the agreement between the Defendant, Jeffrey Epstein, and the United States Government.

603. As a direct and proximate result of the offenses enumerated in Title 18, United States Code, Section 2255, being committed against her, [REDACTED] has in the past suffered, and will in the future suffer, physical injury pain and suffering, emotional distress, psychological trauma, mental anguish, humiliation, embarrassment, loss of self-esteem, loss of dignity, invasion of her privacy and other damages associated with defendant, Jeffrey Epstein, controlling, manipulating and coercing her into a perverse and conventional way of life for a minor. The then-minor plaintiff [REDACTED] incurred medical and psychological expenses and the plaintiff, [REDACTED], will in the future suffer medical and psychological expenses. The plaintiff, [REDACTED], has suffered a loss of income, a loss of the capacity to earn income in the future, and a loss of the capacity to enjoy life. These injuries are permanent in nature and the plaintiff, [REDACTED], will continue to suffer these losses in the future.

604. Wherefore, the plaintiff, [REDACTED], demands judgments against the defendant, Jeffrey Epstein, for compensatory damages of at least the minimum amount provided by law, attorney's fees, costs, and such other and further relief as this Court deems just and proper, and hereby demands trial by jury on all issues triable as of right by a jury.

COUNT 147

Cause of Action Pursuant to 18 U.S.C. § 2255

August 2005 – Incident 3

605. Plaintiff, [REDACTED], adopts and realleges paragraphs 1 through 20 above.

606. On or about August 2005, the exact date being unknown to [REDACTED], Defendant, Jeffrey Epstein, committed a federal sexual offense against her, including a

violation of numerous federal criminal statutes condemning the coercion and enticement of a minor to engage in prostitution or sexual activity, travel with intent to engage in illicit sexual conduct, sex trafficking of children, sexual exploitation of minor children, transport of visual depictions of a minor engaging in sexually explicit conduct, child exploitation enterprises, and other crimes, specifically including, but not limited to, those crimes designated in 18 U.S.C. § 2422(b), § 2423(a), § 2423(b), and § 2423(e).

█████. is therefore a victim of one or more offenses enumerated in 18 U.S.C. § 2255 and, as such, asserts a cause of action against the defendant, Jeffrey Epstein, pursuant to this Section of the United States Code and the agreement between the Defendant, Jeffrey Epstein, and the United States Government.

607. As a direct and proximate result of the offenses enumerated in Title 18, United States Code, Section 2255, being committed against her, █████. has in the past suffered, and will in the future suffer, physical injury pain and suffering, emotional distress, psychological trauma, mental anguish, humiliation, embarrassment, loss of self-esteem, loss of dignity, invasion of her privacy and other damages associated with defendant, Jeffrey Epstein, controlling, manipulating and coercing her into a perverse and conventional way of life for a minor. The then-minor plaintiff █████. incurred medical and psychological expenses and the plaintiff, █████., will in the future suffer medical and psychological expenses. The plaintiff, █████., has suffered a loss of income, a loss of the capacity to earn income in the future, and a loss of the capacity to enjoy life. These injuries are permanent in nature and the plaintiff, █████., will continue to suffer these losses in the future.

608. Wherefore, the plaintiff, ■■■, demands judgments against the defendant, Jeffrey Epstein, for compensatory damages of at least the minimum amount provided by law, attorney's fees, costs, and such other and further relief as this Court deems just and proper, and hereby demands trial by jury on all issues triable as of right by a jury.

COUNT 148

Cause of Action Pursuant to 18 U.S.C. § 2255

August 2005 – Incident 4

609. Plaintiff, ■■■, adopts and realleges paragraphs 1 through 20 above.

610. On or about August 2005, the exact date being unknown to ■■■, Defendant, Jeffrey Epstein, committed a federal sexual offense against her, including a violation of numerous federal criminal statutes condemning the coercion and enticement of a minor to engage in prostitution or sexual activity, travel with intent to engage in illicit sexual conduct, sex trafficking of children, sexual exploitation of minor children, transport of visual depictions of a minor engaging in sexually explicit conduct, child exploitation enterprises, and other crimes, specifically including, but not limited to, those crimes designated in 18 U.S.C. § 2422(b), § 2423(a), § 2423(b), and § 2423(e). ■■■ is therefore a victim of one or more offenses enumerated in 18 U.S.C. § 2255 and, as such, asserts a cause of action against the defendant, Jeffrey Epstein, pursuant to this Section of the United States Code and the agreement between the Defendant, Jeffrey Epstein, and the United States Government.

611. As a direct and proximate result of the offenses enumerated in Title 18, United States Code, Section 2255, being committed against her, ■■■ has in the past

suffered, and will in the future suffer, physical injury pain and suffering, emotional distress, psychological trauma, mental anguish, humiliation, embarrassment, loss of self-esteem, loss of dignity, invasion of her privacy and other damages associated with defendant, Jeffrey Epstein, controlling, manipulating and coercing her into a perverse and conventional way of life for a minor. The then-minor plaintiff [REDACTED] incurred medical and psychological expenses and the plaintiff, [REDACTED], will in the future suffer medical and psychological expenses. The plaintiff, [REDACTED], has suffered a loss of income, a loss of the capacity to earn income in the future, and a loss of the capacity to enjoy life. These injuries are permanent in nature and the plaintiff, [REDACTED], will continue to suffer these losses in the future.

612. Wherefore, the plaintiff, [REDACTED], demands judgments against the defendant, Jeffrey Epstein, for compensatory damages of at least the minimum amount provided by law, attorney's fees, costs, and such other and further relief as this Court deems just and proper, and hereby demands trial by jury on all issues triable as of right by a jury.

COUNT 149

Cause of Action Pursuant to 18 U.S.C. § 2255

September 2005 – Incident 1

613. Plaintiff, [REDACTED], adopts and realleges paragraphs 1 through 20 above.

614. On or about September 2005, the exact date being unknown to [REDACTED], Defendant, Jeffrey Epstein, committed a federal sexual offense against her, including a violation of numerous federal criminal statutes condemning the coercion and enticement of a minor to engage in prostitution or sexual activity, travel with intent to

engage in illicit sexual conduct, sex trafficking of children, sexual exploitation of minor children, transport of visual depictions of a minor engaging in sexually explicit conduct, child exploitation enterprises, and other crimes, specifically including, but not limited to, those crimes designated in 18 U.S.C. § 2422(b), § 2423(a), § 2423(b), and § 2423(e).

█████ is therefore a victim of one or more offenses enumerated in 18 U.S.C. § 2255 and, as such, asserts a cause of action against the defendant, Jeffrey Epstein, pursuant to this Section of the United States Code and the agreement between the Defendant, Jeffrey Epstein, and the United States Government.

615. As a direct and proximate result of the offenses enumerated in Title 18, United States Code, Section 2255, being committed against her, █████. has in the past suffered, and will in the future suffer, physical injury pain and suffering, emotional distress, psychological trauma, mental anguish, humiliation, embarrassment, loss of self-esteem, loss of dignity, invasion of her privacy and other damages associated with defendant, Jeffrey Epstein, controlling, manipulating and coercing her into a perverse and conventional way of life for a minor. The then-minor plaintiff █████. incurred medical and psychological expenses and the plaintiff, L M . will in the future suffer medical and psychological expenses. The plaintiff, █████., has suffered a loss of income, a loss of the capacity to earn income in the future, and a loss of the capacity to enjoy life. These injuries are permanent in nature and the plaintiff, █████., will continue to suffer these losses in the future.

616. Wherefore, the plaintiff, █████., demands judgments against the defendant, Jeffrey Epstein, for compensatory damages of at least the minimum amount provided

by law, attorney's fees, costs, and such other and further relief as this Court deems just and proper, and hereby demands trial by jury on all issues triable as of right by a jury.

COUNT 10

Cause of Action Pursuant to 18 U.S.C. § 2255

September 2005 – Incident 2

617. Plaintiff, [REDACTED] adopts and realleges paragraphs 1 through 20 above.

618. On or about September 2005, the exact date being unknown to [REDACTED], Defendant, Jeffrey Epstein, committed a federal sexual offense against her, including a violation of numerous federal criminal statutes condemning the coercion and enticement of a minor to engage in prostitution or sexual activity, travel with intent to engage in illicit sexual conduct, sex trafficking of children, sexual exploitation of minor children, transport of visual depictions of a minor engaging in sexually explicit conduct, child exploitation enterprises, and other crimes, specifically including, but not limited to, those crimes designated in 18 U.S.C. § 2422(b), § 2423(a), § 2423(b), and § 2423(e). [REDACTED] is therefore a victim of one or more offenses enumerated in 18 U.S.C. § 2255 and, as such, asserts a cause of action against the defendant, Jeffrey Epstein, pursuant to this Section of the United States Code and the agreement between the Defendant, Jeffrey Epstein, and the United States Government.

619. As a direct and proximate result of the offenses enumerated in Title 18, United States Code, Section 2255, being committed against her, [REDACTED] has in the past suffered, and will in the future suffer, physical injury pain and suffering, emotional distress, psychological trauma, mental anguish, humiliation, embarrassment, loss of

self-esteem, loss of dignity, invasion of her privacy and other damages associated with defendant, Jeffrey Epstein, controlling, manipulating and coercing her into a perverse and conventional way of life for a minor. The then-minor plaintiff [REDACTED] incurred medical and psychological expenses and the plaintiff, [REDACTED], will in the future suffer medical and psychological expenses. The plaintiff, [REDACTED], has suffered a loss of income, a loss of the capacity to earn income in the future, and a loss of the capacity to enjoy life. These injuries are permanent in nature and the plaintiff, [REDACTED], will continue to suffer these losses in the future.

620. Wherefore, the plaintiff, [REDACTED] demands judgments against the defendant, Jeffrey Epstein, for compensatory damages of at least the minimum amount provided by law, attorney's fees, costs, and such other and further relief as this Court deems just and proper, and hereby demands trial by jury on all issues triable as of right by a jury.

COUNT 151

Cause of Action Pursuant to 18 U.S.C. § 2255

September 2005 – Incident 3

621. Plaintiff, [REDACTED] adopts and realleges paragraphs 1 through 20 above.

622. On or about September 2005, the exact date being unknown to [REDACTED], Defendant, Jeffrey Epstein, committed a federal sexual offense against her, including a violation of numerous federal criminal statutes condemning the coercion and enticement of a minor to engage in prostitution or sexual activity, travel with intent to engage in illicit sexual conduct, sex trafficking of children, sexual exploitation of minor children, transport of visual depictions of a minor engaging in sexually explicit conduct,

child exploitation enterprises, and other crimes, specifically including, but not limited to, those crimes designated in 18 U.S.C. § 2422(b), § 2423(a), § 2423(b), and § 2423(e).

█ is therefore a victim of one or more offenses enumerated in 18 U.S.C. § 2255 and, as such, asserts a cause of action against the defendant, Jeffrey Epstein, pursuant to this Section of the United States Code and the agreement between the Defendant, Jeffrey Epstein, and the United States Government.

623. As a direct and proximate result of the offenses enumerated in Title 18, United States Code, Section 2255, being committed against her, █ has in the past suffered, and will in the future suffer, physical injury pain and suffering, emotional distress, psychological trauma, mental anguish, humiliation, embarrassment, loss of self-esteem, loss of dignity, invasion of her privacy and other damages associated with defendant, Jeffrey Epstein, controlling, manipulating and coercing her into a perverse and conventional way of life for a minor. The then-minor plaintiff █ incurred medical and psychological expenses and the plaintiff, █, will in the future suffer medical and psychological expenses. The plaintiff, █, has suffered a loss of income, a loss of the capacity to earn income in the future, and a loss of the capacity to enjoy life. These injuries are permanent in nature and the plaintiff, █, will continue to suffer these losses in the future.

624. Wherefore, the plaintiff, █, demands judgments against the defendant, Jeffrey Epstein, for compensatory damages of at least the minimum amount provided by law, attorney's fees, costs, and such other and further relief as this Court deems just and proper, and hereby demands trial by jury on all issues triable as of right by a jury.

COUNT 152

Cause of Action Pursuant to 18 U.S.C. § 2255

September 2005 – Incident 4

625. Plaintiff, [REDACTED], adopts and realleges paragraphs 1 through 20 above.

626. On or about September 2005, the exact date being unknown to [REDACTED], Defendant, Jeffrey Epstein, committed a federal sexual offense against her, including a violation of numerous federal criminal statutes condemning the coercion and enticement of a minor to engage in prostitution or sexual activity, travel with intent to engage in illicit sexual conduct, sex trafficking of children, sexual exploitation of minor children, transport of visual depictions of a minor engaging in sexually explicit conduct, child exploitation enterprises, and other crimes, specifically including, but not limited to, those crimes designated in 18 U.S.C. § 2422(b), § 2423(a), § 2423(b), and § 2423(e). [REDACTED] is therefore a victim of one or more offenses enumerated in 18 U.S.C. § 2255 and, as such, asserts a cause of action against the defendant, Jeffrey Epstein, pursuant to this Section of the United States Code and the agreement between the Defendant, Jeffrey Epstein, and the United States Government.

627. As a direct and proximate result of the offenses enumerated in Title 18, United States Code, Section 2255, being committed against her, [REDACTED] has in the past suffered, and will in the future suffer, physical injury pain and suffering, emotional distress, psychological trauma, mental anguish, humiliation, embarrassment, loss of self-esteem, loss of dignity, invasion of her privacy and other damages associated with defendant, Jeffrey Epstein, controlling, manipulating and coercing her into a perverse

and conventional way of life for a minor. The then-minor plaintiff [REDACTED] incurred medical and psychological expenses and the plaintiff, [REDACTED], will in the future suffer medical and psychological expenses. The plaintiff, [REDACTED], has suffered a loss of income, a loss of the capacity to earn income in the future, and a loss of the capacity to enjoy life. These injuries are permanent in nature and the plaintiff, [REDACTED], will continue to suffer these losses in the future.

628. Wherefore, the plaintiff, [REDACTED], demands judgments against the defendant, Jeffrey Epstein, for compensatory damages of at least the minimum amount provided by law, attorney's fees, costs, and such other and further relief as this Court deems just and proper, and hereby demands trial by jury on all issues triable as of right by a jury.

COUNT 153

Cause of Action Pursuant to 18 U.S.C. § 2255

October 2005 – Incident 1

629. Plaintiff, [REDACTED] adopts and realleges paragraphs 1 through 20 above.

630. On or about October 2005, the exact date being unknown to [REDACTED], Defendant, Jeffrey Epstein, committed a federal sexual offense against her, including a violation of numerous federal criminal statutes condemning the coercion and enticement of a minor to engage in prostitution or sexual activity, travel with intent to engage in illicit sexual conduct, sex trafficking of children, sexual exploitation of minor children, transport of visual depictions of a minor engaging in sexually explicit conduct, child exploitation enterprises, and other crimes, specifically including, but not limited to, those crimes designated in 18 U.S.C. § 2422(b), § 2423(a), § 2423(b), and § 2423(e).

█████ is therefore a victim of one or more offenses enumerated in 18 U.S.C. § 2255 and, as such, asserts a cause of action against the defendant, Jeffrey Epstein, pursuant to this Section of the United States Code and the agreement between the Defendant, Jeffrey Epstein, and the United States Government.

631. As a direct and proximate result of the offenses enumerated in Title 18, United States Code, Section 2255, being committed against her, █████ has in the past suffered, and will in the future suffer, physical injury pain and suffering, emotional distress, psychological trauma, mental anguish, humiliation, embarrassment, loss of self-esteem, loss of dignity, invasion of her privacy and other damages associated with defendant, Jeffrey Epstein, controlling, manipulating and coercing her into a perverse and conventional way of life for a minor. The then-minor plaintiff █████ incurred medical and psychological expenses and the plaintiff, █████, will in the future suffer medical and psychological expenses. The plaintiff, █████, has suffered a loss of income, a loss of the capacity to earn income in the future, and a loss of the capacity to enjoy life. These injuries are permanent in nature and the plaintiff, █████, will continue to suffer these losses in the future.

632. Wherefore, the plaintiff, █████, demands judgments against the defendant, Jeffrey Epstein, for compensatory damages of at least the minimum amount provided by law, attorney's fees, costs, and such other and further relief as this Court deems just and proper, and hereby demands trial by jury on all issues triable as of right by a jury.

COUNT 154

Cause of Action Pursuant to 18 U.S.C. § 2255

October 2005 – Incident 2

633. Plaintiff, [REDACTED], adopts and realleges paragraphs 1 through 20 above.

634. On or about October 2005, the exact date being unknown to [REDACTED], Defendant, Jeffrey Epstein, committed a federal sexual offense against her, including a violation of numerous federal criminal statutes condemning the coercion and enticement of a minor to engage in prostitution or sexual activity, travel with intent to engage in illicit sexual conduct, sex trafficking of children, sexual exploitation of minor children, transport of visual depictions of a minor engaging in sexually explicit conduct, child exploitation enterprises, and other crimes, specifically including, but not limited to, those crimes designated in 18 U.S.C. § 2422(b), § 2423(a), § 2423(b), and § 2423(e). [REDACTED] is therefore a victim of one or more offenses enumerated in 18 U.S.C. § 2255 and, as such, asserts a cause of action against the defendant, Jeffrey Epstein, pursuant to this Section of the United States Code and the agreement between the Defendant, Jeffrey Epstein, and the United States Government.

635. As a direct and proximate result of the offenses enumerated in Title 18, United States Code, Section 2255, being committed against her, L. M. has in the past suffered, and will in the future suffer, physical injury pain and suffering, emotional distress, psychological trauma, mental anguish, humiliation, embarrassment, loss of self-esteem, loss of dignity, invasion of her privacy and other damages associated with defendant, Jeffrey Epstein, controlling, manipulating and coercing her into a perverse and conventional way of life for a minor. The then-minor plaintiff [REDACTED] incurred medical and psychological expenses and the plaintiff, [REDACTED], will in the future suffer medical and

psychological expenses. The plaintiff, ■■■, has suffered a loss of income, a loss of the capacity to earn income in the future, and a loss of the capacity to enjoy life. These losses are permanent in nature and the plaintiff, ■■■, will continue to suffer these losses in the future.

636. Wherefore, the plaintiff, ■■■, demands judgments against the defendant, Jeffrey Epstein, for compensatory damages of at least the minimum amount provided by law, attorney's fees, costs, and such other and further relief as this Court deems just and proper, and hereby demands trial by jury on all issues triable as of right by a jury.

COUNT 155

Cause of Action Pursuant to 18 U.S.C. § 2255

October 2005 – Incident 3

637. Plaintiff, ■■■, adopts and realleges paragraphs 1 through 20 above.

638. On or about October 2005, the exact date being unknown to ■■■, Defendant, Jeffrey Epstein, committed a federal sexual offense against her, including a violation of numerous federal criminal statutes condemning the coercion and enticement of a minor to engage in prostitution or sexual activity, travel with intent to engage in illicit sexual conduct, sex trafficking of children, sexual exploitation of minor children, transport of visual depictions of a minor engaging in sexually explicit conduct, child exploitation enterprises, and other crimes, specifically including, but not limited to, those crimes designated in 18 U.S.C. § 2422(b), § 2423(a), § 2423(b), and § 2423(e). ■■■ is therefore a victim of one or more offenses enumerated in 18 U.S.C. § 2255 and, as such, asserts a cause of action against the defendant, Jeffrey Epstein, pursuant to

this Section of the United States Code and the agreement between the Defendant, Jeffrey Epstein, and the United States Government.

639. As a direct and proximate result of the offenses enumerated in Title 18, United States Code, Section 2255, being committed against her, [REDACTED], has in the past suffered, and will in the future suffer, physical injury pain and suffering, emotional distress, psychological trauma, mental anguish, humiliation, embarrassment, loss of self-esteem, loss of dignity, invasion of her privacy and other damages associated with defendant, Jeffrey Epstein, controlling, manipulating and coercing her into a perverse and conventional way of life for a minor. The then-minor plaintiff [REDACTED], incurred medical and psychological expenses and the plaintiff, [REDACTED], will in the future suffer medical and psychological expenses. The plaintiff, [REDACTED], has suffered a loss of income, a loss of the capacity to earn income in the future, and a loss of the capacity to enjoy life. These injuries are permanent in nature and the plaintiff, [REDACTED], will continue to suffer these losses in the future.

640. Wherefore, the plaintiff, [REDACTED], demands judgments against the defendant, Jeffrey Epstein, for compensatory damages of at least the minimum amount provided by law, attorney's fees, costs, and such other and further relief as this Court deems just and proper, and hereby demands trial by jury on all issues triable as of right by a jury.

COUNT 156

Cause of Action Pursuant to 18 U.S.C. § 2255

October 2005 – Incident 4

641. Plaintiff, [REDACTED], adopts and realleges paragraphs 1 through 20 above.

642. On or about October 2005, the exact date being unknown to [REDACTED], Defendant, Jeffrey Epstein, committed a federal sexual offense against her, including a violation of numerous federal criminal statutes condemning the coercion and enticement of a minor to engage in prostitution or sexual activity, travel with intent to engage in illicit sexual conduct, sex trafficking of children, sexual exploitation of minor children, transport of visual depictions of a minor engaging in sexually explicit conduct, child exploitation enterprises, and other crimes, specifically including, but not limited to, those crimes designated in 18 U.S.C. § 2422(b), § 2423(a), § 2423(b), and § 2423(e). L.M. is therefore a victim of one or more offenses enumerated in 18 U.S.C. § 2255 and, as such, asserts a cause of action against the defendant, Jeffrey Epstein, pursuant to this Section of the United States Code and the agreement between the Defendant, Jeffrey Epstein, and the United States Government.

643. As a direct and proximate result of the offenses enumerated in Title 18, United States Code, Section 2255, being committed against her, [REDACTED], has in the past suffered, and will in the future suffer, physical injury pain and suffering, emotional distress, psychological trauma, mental anguish, humiliation, embarrassment, loss of self-esteem, loss of dignity, invasion of her privacy and other damages associated with defendant, Jeffrey Epstein, controlling, manipulating and coercing her into a perverse and conventional way of life for a minor. The then-minor plaintiff [REDACTED], incurred medical and psychological expenses and the plaintiff, [REDACTED], will in the future suffer medical and psychological expenses. The plaintiff, [REDACTED], has suffered a loss of income, a loss of the capacity to earn income in the future, and a loss of the capacity to enjoy life. These

injuries are permanent in nature and the plaintiff, [REDACTED], will continue to suffer these losses in the future.

644. Wherefore, the plaintiff, [REDACTED], demands judgments against the defendant, Jeffrey Epstein, for compensatory damages of at least the minimum amount provided by law, attorney's fees, costs, and such other and further relief as this Court deems just and proper.

DEMAND FOR JURY TRIAL

Plaintiff hereby demands trial by jury on all issues triable as of right by a jury.

DATED July 24, 2009

Respectfully Submitted,



Bradley J. Edwards
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JS 44 (Rev. 2/08)

CIVIL COVER SHEET

The JS 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON THE REVERSE OF THE FORM.) **NOTICE: Attorneys MUST Indicate All Re-filed Cases Below.**

<p>I. (a) PLAINTIFFS</p> <p>█</p> <p>(b) County of Residence of First Listed Plaintiff <u>Palm Beach</u> (EXCEPT IN U.S. PLAINTIFF CASES)</p> <p>(c) Attorney's (Firm Name, Address, and Telephone Number)</p> <p>Rothstein Rosenfeldt Adler 401 East Las Olas Blvd., Suite 1650 Fort Lauderdale, FL 33301 - Phone 954-522-3456</p>	<p>DEFENDANTS</p> <p>JEFFREY EPSTEIN</p> <p>County of Residence of First Listed Defendant <u>Palm Beach</u> (IN U.S. PLAINTIFF CASES ONLY)</p> <p>NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF THE TRACT LAND INVOLVED.</p> <p>Attorneys (if known) Bradley J. Edwards</p>
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(d) Check County Where Action Arose: MIAMI-DADE MONROE BROWARD PALM BEACH MARTIN ST. LUCIE INDIAN RIVER OKEECHOBEE HIGHLANDS

<p>II. BASIS OF JURISDICTION (Place an "X" in One Box Only)</p> <p><input type="checkbox"/> 1 U.S. Government Plaintiff</p> <p><input checked="" type="checkbox"/> 3 Federal Question (U.S. Government Not a Party)</p> <p><input type="checkbox"/> 2 U.S. Government Defendant</p> <p><input type="checkbox"/> 4 Diversity (Indicate Citizenship of Parties in Item III)</p>	<p>III. CITIZENSHIP OF PRINCIPAL PARTIES (Place an "X" in One Box for Plaintiff and One Box for Defendant)</p> <table border="1" style="width:100%; border-collapse: collapse;"> <tr> <th></th> <th>PTF</th> <th>DEF</th> <th></th> <th>PTF</th> <th>DEF</th> </tr> <tr> <td>Citizen of This State</td> <td><input type="checkbox"/> 1</td> <td><input type="checkbox"/> 1</td> <td>Incorporated or Principal Place of Business in This State</td> <td><input type="checkbox"/> 4</td> <td><input type="checkbox"/> 4</td> </tr> <tr> <td>Citizen of Another State</td> <td><input type="checkbox"/> 2</td> <td><input type="checkbox"/> 2</td> <td>Incorporated and Principal Place of Business in Another State</td> <td><input type="checkbox"/> 5</td> <td><input type="checkbox"/> 5</td> </tr> <tr> <td>Citizen or Subject of a Foreign Country</td> <td><input type="checkbox"/> 3</td> <td><input type="checkbox"/> 3</td> <td>Foreign Nation</td> <td><input type="checkbox"/> 6</td> <td><input type="checkbox"/> 6</td> </tr> </table>		PTF	DEF		PTF	DEF	Citizen of This State	<input type="checkbox"/> 1	<input type="checkbox"/> 1	Incorporated or Principal Place of Business in This State	<input type="checkbox"/> 4	<input type="checkbox"/> 4	Citizen of Another State	<input type="checkbox"/> 2	<input type="checkbox"/> 2	Incorporated and Principal Place of Business in Another State	<input type="checkbox"/> 5	<input type="checkbox"/> 5	Citizen or Subject of a Foreign Country	<input type="checkbox"/> 3	<input type="checkbox"/> 3	Foreign Nation	<input type="checkbox"/> 6	<input type="checkbox"/> 6
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Citizen of This State	<input type="checkbox"/> 1	<input type="checkbox"/> 1	Incorporated or Principal Place of Business in This State	<input type="checkbox"/> 4	<input type="checkbox"/> 4																				
Citizen of Another State	<input type="checkbox"/> 2	<input type="checkbox"/> 2	Incorporated and Principal Place of Business in Another State	<input type="checkbox"/> 5	<input type="checkbox"/> 5																				
Citizen or Subject of a Foreign Country	<input type="checkbox"/> 3	<input type="checkbox"/> 3	Foreign Nation	<input type="checkbox"/> 6	<input type="checkbox"/> 6																				

9:09CV 81092 - Cohen - Seltzer

IV. NATURE OF SUIT (Place an "X" in One Box Only)

<p>CONTRACT</p> <p><input type="checkbox"/> 110 Insurance</p> <p><input type="checkbox"/> 120 Marine</p> <p><input type="checkbox"/> 130 Miller Act</p> <p><input type="checkbox"/> 140 Negotiable Instrument</p> <p><input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment</p> <p><input type="checkbox"/> 151 Medicare Act</p> <p><input type="checkbox"/> 152 Recovery of Defaulted Student Loans (Excl. Veterans)</p> <p><input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits</p> <p><input type="checkbox"/> 160 Stockholders' Suits</p> <p><input type="checkbox"/> 190 Other Contract</p> <p><input type="checkbox"/> 195 Contract Product Liability</p> <p><input type="checkbox"/> 196 Franchise</p>	<p>TORTS</p> <p>PERSONAL INJURY</p> <p><input type="checkbox"/> 310 Airplane</p> <p><input type="checkbox"/> 315 Airplane Product Liability</p> <p><input type="checkbox"/> 320 Assault, Libel & Slander</p> <p><input type="checkbox"/> 330 Federal Employers' Liability</p> <p><input type="checkbox"/> 340 Marine</p> <p><input type="checkbox"/> 345 Marine Product Liability</p> <p><input type="checkbox"/> 350 Motor Vehicle</p> <p><input type="checkbox"/> 355 Motor Vehicle Product Liability</p> <p><input checked="" type="checkbox"/> 360 Other Personal Injury</p> <p>PERSONAL INJURY - Med. Malpractice</p> <p><input type="checkbox"/> 362 Personal Injury - Med. Malpractice</p> <p><input type="checkbox"/> 365 Personal Injury - Product Liability</p> <p><input type="checkbox"/> 368 Asbestos Personal Injury Product Liability</p> <p>PERSONAL PROPERTY</p> <p><input type="checkbox"/> 370 Other Fraud</p> <p><input type="checkbox"/> 371 Truth in Lending</p> <p><input type="checkbox"/> 380 Other Personal Property Damage</p> <p><input type="checkbox"/> 385 Property Damage Product Liability</p>	<p>FORFEITURE/PENALTY</p> <p><input type="checkbox"/> 610 Agriculture</p> <p><input type="checkbox"/> 620 Other Food & Drug</p> <p><input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881</p> <p><input type="checkbox"/> 630 Liquor Laws</p> <p><input type="checkbox"/> 640 R. R. & Truck</p> <p><input type="checkbox"/> 650 Airline Regs.</p> <p><input type="checkbox"/> 660 Occupational Safety/Health</p> <p><input type="checkbox"/> 690 Other</p> <p>LABOR</p> <p><input type="checkbox"/> 710 Fair Labor Standards Act</p> <p><input type="checkbox"/> 720 Labor/Mgmt. Relations</p> <p><input type="checkbox"/> 730 Labor/Mgmt. Reporting & Disclosure Act</p> <p><input type="checkbox"/> 740 Railway Labor Act</p> <p><input type="checkbox"/> 790 Other Labor Litigation</p> <p><input type="checkbox"/> 791 Empl. Ret. Inc. Security Act</p> <p>IMMIGRATION</p> <p><input type="checkbox"/> 462 Naturalization Application</p> <p><input type="checkbox"/> 463 Habeas Corpus-Allen Detainee</p> <p><input type="checkbox"/> 465 Other Immigration Actions</p>	<p>BANKRUPTCY</p> <p><input type="checkbox"/> 422 Appeal 28 USC 158</p> <p><input type="checkbox"/> 423 Withdrawal 28 USC 157</p> <p>PROPERTY RIGHTS</p> <p><input type="checkbox"/> 820 Copyright</p> <p><input type="checkbox"/> 830 Patent</p> <p><input type="checkbox"/> 840 Trademark</p> <p>SOCIAL SECURITY</p> <p><input type="checkbox"/> 861 HIA (1395f)</p> <p><input type="checkbox"/> 862 Black Lung (923)</p> <p><input type="checkbox"/> 863 DIWC/DIWW (405(g))</p> <p><input type="checkbox"/> 864 SSID Title XVI</p> <p><input type="checkbox"/> 865 RSI (605(g))</p> <p>FEDERAL TAX SUITS</p> <p><input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant)</p> <p><input type="checkbox"/> 871 IRS - Third Party 26 USC 1609</p>	<p>OTHER STATUTES</p> <p><input type="checkbox"/> 400 State Reapportionment</p> <p><input type="checkbox"/> 410 Antitrust</p> <p><input type="checkbox"/> 430 Banks and Banking</p> <p><input type="checkbox"/> 450 Commerce</p> <p><input type="checkbox"/> 460 Deportation</p> <p><input type="checkbox"/> 490 KKK/Influenced and Corrupt Organizations</p> <p><input type="checkbox"/> 490 Consumer Credit</p> <p><input type="checkbox"/> 490 Cable/Sat TV</p> <p><input type="checkbox"/> 810 Selective Service</p> <p><input type="checkbox"/> 850 Securities/Commodities/Exchange</p> <p><input type="checkbox"/> 875 Customer Challenge 12 USC 3410</p> <p><input type="checkbox"/> 890 Other Statutory Actions</p> <p><input type="checkbox"/> 891 Agricultural Act</p> <p><input type="checkbox"/> 892 Economic Stabilization Act</p> <p><input type="checkbox"/> 893 Environmental Matters</p> <p><input type="checkbox"/> 894 Energy Allocation Act</p> <p><input type="checkbox"/> 895 Freedom of Information Act</p> <p><input type="checkbox"/> 900 Appeal of Fcc Determination Under Equal Access to Justice</p> <p><input type="checkbox"/> 950 Constitutionality of State Statutes</p>
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V. ORIGIN (Place an "X" in One Box Only)

1 Original Proceeding 2 Removed from State Court 3 Re-filed (see VI below) 4 Reinstated or Reopened 5 Transferred from another district (specify) 6 Multidistrict Litigation 7 Appeal to District Judge from Magistrate Judgment

VI. RELATED/RE-FILED CASE(S). (See instructions second page):

a) Re-filed Case YES NO b) Related Cases YES NO

JUDGE _____ DOCKET NUMBER 9:08-cv-80119

VII. CAUSE OF ACTION

Cite the U.S. Civil Statute under which you are filing and Write a Brief Statement of Cause (Do not cite jurisdictional statutes unless diversity):

18 USC Section 2255

LENGTH OF TRIAL via 10-14 days estimated (for both sides to try entire case)

VIII. REQUESTED IN COMPLAINT: CHECK IF THIS IS A CLASS ACTION UNDER F.R.C.P. 23 DEMAND \$ IN EXCESS 1,000,000.00

CHECK YES only if demanded in complaint: JURY DEMAND: Yes No

ABOVE INFORMATION IS TRUE & CORRECT TO THE BEST OF MY KNOWLEDGE

SIGNATURE OF ATTORNEY OF RECORD _____ DATE 7-24-09

FOR OFFICE USE ONLY

AMOUNT 35000 RECEIPT # 546977

EP-264