

IN THE CIRCUIT COURT OF THE
FIFTEENTH JUDICIAL CIRCUIT IN AND
FOR PALM BEACH COUNTY, FLORIDA

Case No. 50-2009CA040800XXXXMBAG

JEFFREY EPSTEIN,

Plaintiff/Counter-Defendant,

v.

SCOTT ROTHSTEIN, individually, and
BRADLEY J. EDWARDS, individually,

Defendants/Counter-Plaintiff.

PART 1

PLAINTIFF/COUNTER-DEFENDANT JEFFREY EPSTEIN'S APPENDIX OF DOCUMENTS IN SUPPORT OF HIS REVISED OMNIBUS MOTION IN LIMINE

Plaintiff/Counter-Defendant Jeffrey Epstein ("Epstein") files this Appendix of Documents in support of his revised Omnibus Motion in Limine:

No.	Date	Document
1	1/5/11	Epstein's Motion to Amend Complaint (D.E. 195)
2	4/9/09	Plaintiff's Motion to Strike References to Non-Prosecution Agreement or, in the Alternative, to Lift Protective Order Barring Jane Doe's Attorneys from Revealing Provisions in the Agreement (D.E. 32); <i>Jane Doe v. Jeffrey Epstein</i> ; S.D. Fla. Case No. 9:08-cv-80893-KAM
3	4/17/09	Plaintiff's First Amended Complaint (D.E. 38) <i>Jane Doe v. Jeffrey Epstein</i> ; S.D. Fla. Case No. 9:08-cv-80893-KAM
4	4/30/09	Jeffrey Epstein's Deposition Transcript Excerpts (pp. 148, 151-152); <i>E.W. v. Jeffrey Epstein</i> ; 15 th Judicial Circuit Case No. 50-2008-CA-028058-XXXX-MB

No.	Date	Document
5	6/19/09	Plaintiff's Motion for Injunction Restraining Fraudulent Transfer of Assets, Appointment of a Receiver to Take Charge of Property of Epstein, and to Post a \$15 Million Bond to Secure Potential Judgment (D.E. 165); <i>Jane Doe 2 v. Jeffrey Epstein</i> ; S.D. Fla. Case No. 08-cv-80119-MARRA/JOHNSON
6	11/5/09	Order Denying Plaintiff's Motion for Injunction, etc. (D.E. 400) <i>Jane Doe 2 v. Jeffrey Epstein</i> ; S.D. Fla. Case No. 08-cv-80119-MARRA/JOHNSON
7	7/22/09	Letters from Edwards re depositions
8	7/27/09	Complaint (D.E. 1) <i>L.M. v. Jeffrey Epstein</i> ; S.D. Fla. Case No. 9:08-cv-81092-KAM
9	N/A	Court Docket <i>L.M. v. Jeffrey Epstein</i> ; S.D. Fla. Case No. 9:08-cv-81092-KAM
10	8/11/09 8/24/09	Re-Notices of Taking Videotaped Deposition of Donald Trump <i>Jane Doe v. Jeffrey Epstein</i> ; S.D. Fla. Case No. 9:08-cv-80893-KAM
11	8/10/09	Plaintiff's Request for Entry Upon Land (D.E. 143) <i>E.W. v. Jeffrey Epstein</i> ; 15 th Judicial Circuit Case No. 50-2008-CA-028058-XXXX-MB
12	8/24/09	Epstein's Motion for Protective Order Regarding Depositions of Lawrence Visoski and David Hart Rogers (D.E. 159) <i>L.M. v. Jeffrey Epstein</i> ; 15 th Judicial Circuit Case No. 50-2008-CA-028051-XXXX-MB
13	11/3/09	Article: <u>South Florida Sun-Sentinel</u> - Scott Rothstein's investment deals seemed too good to be true
14	11/6/09	Article: <u>New Times Broward-Palm Beach</u> – Scott Rothstein: The Jeffrey Epstein and Bill Clinton Ploy
15	11/9/09	Verified Complaint for Forfeiture In Rem (D.E. 1) <i>United States of America v. Scott W. Rothstein</i> (Forfeiture Action); S.D. Fla. Case No. 0:09-CV-61780-WJZ
16	11/12/09	Article: <u>South Florida Sun-Sentinel</u> – FBI doubts Rothstein ran a Ponzi scheme alone

No.	Date	Document
17	11/20/09	Complaint (without exhibits) (D.E. 3) <i>Razorback Funding, LLC v. Rothstein</i> 17th Jud. Cir. Case No. 062009CA062943AXXXCE
18	11/23/09	Amended Verified Complaint for Forfeiture <i>In Rem</i> (D.E. 14) <i>United States of America v. Scott W. Rothstein</i> (Forfeiture Action); S.D. Fla. Case No. 0:09-CV-61780-WJZ
19	11/23/09	Article: <u>South Florida Sun-Sentinel</u> – You’re in a town full of thieves
20	11/24/09	Article: <u>The Miami Herald</u> – Feds: Scott Rothstein Ponzi scheme paid salaries at law firm
21	11/25/09	Amended Complaint (without exhibits) (D.E. 12) <i>Razorback Funding, LLC v. Rothstein</i> 17th Jud. Cir. Case No. 062009CA062943AXXXCE
22	12/1/09	Information (D.E. 1) <i>United States v. Rothstein</i> ; S.D. Fla. Case No. 0:09-cr-60331-JJC
23	12/7/09	Complaint (without exhibits) (D.E. 5)
24	6/30/17	Affidavit of Jeffrey Epstein (D.E. 931)
25	11/10/17	Bradley J. Edwards’ Deposition Transcript Excerpts (pp. 163-164, 166, 227-229, 259-260, 276-278, 321-322, 338-339)
26	3/23/10	Bradley J. Edwards’ Deposition Transcript Excerpts (pp. 112, 116-117, 123-125, 230-231)
27	10/10/13	Bradley J. Edwards’ Deposition Transcript Excerpts (pp. 205)
28	7/26/09 8/13/09 10/23/09	Email from Pricilla Nascimento to Scott Rothstein Email from Bradley J. Edwards to Priscilla Nascimento Email from Ken Jenne to Scott Rothstein
29	6/14/12	Scott Rothstein’s Deposition Transcript Excerpts (pp. 23-26, 52-53)

No.	Date	Document
30	12/12/11	Scott Rothstein's Deposition Transcript Excerpts (pp. 59-62); <i>Razorback Funding, LLC v. Rothstein</i> ; 17th Jud. Cir. Case No. 062009CA062943AXXXCE
31	12/21/11	Scott Rothstein's Deposition Transcript Excerpts (p. 2278) <i>Razorback Funding, LLC v. Rothstein</i> ; 17th Jud. Cir. Case No. 062009CA062943AXXXCE
32	3/17/10	Jeffrey Epstein's Deposition Transcript Excerpts (pp. 13-14, 19-20, 23, 25-26, 28-34, 36-39, 48-55, 57, 59-60, 62-69, 73-74, 76-80, 83-88, 90-95, 116-123)
33	11/9/17	Edwards' Amended Exhibit List (D.E. 1043)
34	11/15/17	Epstein's Objections to Edwards' Amended Exhibit List (D.E. 1058)
35	11/9/17	Edwards' Seventh Amended and Supplemental Witness List (D.E. 1042)
36	1/25/12	Jeffrey Epstein's Deposition Transcript Excerpts (pp. 19-21)

CERTIFICATE OF SERVICE

I certify that the foregoing document has been furnished to the attorneys listed on the Service List below on November 21, 2017, through the Court's e-filing portal pursuant to Florida Rule of Judicial Administration 2.516(b)(1).

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APP.1

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IN THE CIRCUIT COURT OF THE FIFTEENTH
JUDICIAL CIRCUIT, IN AND FOR PALM
BEACH COUNTY, FLORIDA

JEFFREY EPSTEIN

Complex Litigation, Fla. R. Civ. Pro.1201

Plaintiff,

Case No. 50 2009CA040800XXXXMB AG

v.

SCOTT ROTHSTEIN, individually,
BRADLEY J. EDWARDS,
individually, and L.M., individually,

**PLAINTIFF, JEFFREY EPSTEIN'S
MOTION TO AMEND COMPLAINT**

Defendants.

Plaintiff, Jeffrey Epstein, ("Plaintiff or Epstein"), by and through undersigned counsel, and pursuant to the Florida Rules of Civil Procedure, files this Motion to Amend the Complaint in part for the reasons set forth below:

1. On or about December 7, 2009, the Plaintiff filed his action in this matter.
2. It is the essence of the Plaintiff's action that the Defendants used actual lawsuits against Epstein or fabricated others to market investments to third parties for a return of investment on the Epstein cases.
3. Is not the intention or position of the Plaintiff to put into issue whether or not the actions alleged against Epstein by various plaintiffs are true or not. Instead, the essence of the complaint is to focus on the alleged misconduct of filing legal motions and other actions in pursuit of civil litigation unrelated to the merits or value of the cases brought against the Plaintiff. More specifically, See the allegations contained on page 2 of the complaint, paragraphs 10, 21, 25, 26, 31-41.

Epstein v Rothstein, et al.
Case No. 502009CA040800XXXXMBAG
Plaintiff's Motion to Amend Complaint

4. While the Plaintiff believes his complaint is clear, in an abundance of caution so as to remove any doubt as to whether the Plaintiff has put into issue his alleged responsibility for the claims brought against him, the Plaintiff moves to amend his complaint to eliminate the following paragraphs:

- A. 42(e);
- B. 42(h);
- C. 46;
- D. 51;
- E. 52;
- F. 67(c);

5. The Plaintiff respectfully submits that additional amendments will be necessary once the records subpoenaed from the trustee have been received and depositions occur relating to those records. However, this amendment is requested at this time for the purpose of clearing up any alleged misapprehension that the Plaintiff has placed in issue his alleged actual liability in the cases brought against him by Rothstein, Rosenfeldt & Adler.

6. The undersigned counsel certifies that this motion is made in good faith and not for the purpose of delay.

7. The undersigned counsel certifies that he has and will continue to attempt to resolve this matter without the need of a hearing.

Epstein v Rothstein, et al.
Case No. 502009CA040800XXXXMBAG
Plaintiff's Motion to Amend Complaint

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing was faxed and mailed this 5 day of January, 2011 to Jack Scarola, Searcy Denney Scarola Barnhart & Shipley, Attorneys for Bradley J. Edwards, 2139 Palm Beach Lakes Boulevard, West Palm Beach, FL 33409 and Marc S. Nurik, Law Offices of Marc S. Nurik, Attorneys for Scott Rothstein, One E. Broward Blvd., Ste 700, Fort Lauderdale, FL 33301.

Respectfully submitted,

Joseph L. Ackerman, Jr.
Fla. Bar No. 235954

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Attorneys for Plaintiff

[nat] W:\80743\Epstein's Motion to Amend Complaint (1/5/11 14:59)

APP.2

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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

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

JANE DOE,

Plaintiff,

v.

JEFFREY EPSTEIN,

Defendant.

**MOTION TO STRIKE REFERENCES TO NON-PROSECUTION AGREEMENT OR, IN
THE ALTERNATIVE, TO LIFT PROTECTIVE ORDER BARRING JANE DOE'S
ATTORNEY'S FROM REVEALING PROVISIONS IN THE AGREEMENT**

Plaintiff, Jane Doe, hereby moves this Court to strike all references to a “non-prosecution agreement” contained in defendant, Jeffrey Epstein’s (“Epstein”) Motion to Stay these proceedings. Under the Best Evidence Rule, Fed. R. Evid. 1002, and the principles underlying the rule, Epstein is required to produce the written agreement (or a copy thereof) rather than simply rely on his own summary representations about what the agreement provides. In the alternative, the Court should lift the protective order it has entered in parallel litigation that precludes Jane Doe’s counsel from revealing in publicly-accessible pleadings the specific language in the non-prosecution agreement.

In his motion to stay these proceedings, defendant Epstein has argued that he must invoke his Fifth Amendment rights lest he be found in violation of a non-prosecution agreement with the U.S. Attorney’s Office. Indeed, his pleading makes a number of specific representations about the contents of that agreement. See, e.g., Epstein Motion to Stay at 3 (the non-prosecution agreement “outlines various obligations on the part of Epstein including, but not limited to, pleading guilty to the

Indictment and Information before the 15th Judicial Circuit, recommendations for his sentencing before the 15th Judicial Circuit, waiver of challenges to the Information filed by the SAO, waiver of right to appeal his conviction, . . . and the agreement to not prosecute others listed thereon so long as Epstein does not breach and fulfills the requirements of the NPA"). Epstein's pleading makes further representations about what is *not* contained in the agreement. See, e.g., *id.* (the non-prosecution agreement "does not outline or define . . . what constitutes a breach or what act of omission constitutes a breach thereof").

All references in his motion to the content of the non-prosecution agreement should be stricken. The Best Evidence Rule requires Epstein to produce the non-prosecution agreement itself to prove what the agreement says – not some second-hand summary. Federal Rule of Evidence 1002 directly provides: "To prove the content of a writing . . . , the original writing . . . is required, except as otherwise provided in these rules or by Act of Congress." The non-prosecution agreement is undoubtedly a "writing." See Epstein Motion to Stay at 2 (conceding this point). Moreover, it is obvious that Epstein is trying to prove its "content" in his motion to stay, as he is relying on various provisions within the agreement to make his case for a stay. As the moving party on his motion for a stay, he is therefore obligated to provide the best evidence of the written agreement – namely, a copy of the agreement itself.

The rationales underlying the Best Evidence Rule clearly apply here. As two leading commentators have explained:

The continuing existence of the Best Evidence Rule rests upon several considerations. First, writings occupy a central position in the law. The written word has special sanctity, justifying more stringent proof

requirements. Second, when the contents of a writing are in issue, any evidence other than the writing itself is distinctly inferior. Language is complex, and the slightest variation in wording can have enormous significance in determining the outcome of a legal dispute. Unless a writing is very short, it is beyond the power of most human memory to summarize the writing with the precision that is often needed in the courtroom. The burden on litigants of requiring them to introduce the writing if available is outweighed by the increased accuracy of the factfinding process. Third, production of the writing . . . ensures completeness and prevents any segments from being presented out of context.

CHRISTOPHER B. MUELLER & LAIRD C. KIRKPATRICK, EVIDENCE § 10.1 at p. 1067 (3d ed. 2003); see also *Seiler v. Lucasfilm, Ltd.*, 808 F.2d 1316, 1319 (9th Cir. 1986) (“when the terms are in dispute only the writing itself, or a true copy, provides reliable evidence”).

Epstein is making some rather remarkable assertions about what the agreement provides (or fails to provide) and how it operates in practice, as Jane Doe explains at greater length in her accompanying response to his motion for a stay. To prove those assertions, Epstein should not be able to rely on his own inferences from provisions contained in the agreement – but rather should be required to provide the specific language supporting those inferences.

(In the alternative, if Epstein is allowed to make his own representation about the contents of the agreement, then Jane Doe should likewise be allowed to make her own representations about what the document provides) Jane Doe’s undersigned attorneys have a copy of what is apparently the non-prosecution agreement. They obtained that agreement in parallel litigation under the Crime Victim’s Rights Act. *Doe v. United States*, No. 9:08-CV-80736-KAM. (The agreement, however, was provided to Jane Doe’s counsel subject to a protective order. That protective order precludes Jane Doe’s

attorneys from revealing “the Agreement or its terms to any third party absent further
court order” Protective Order, Doe v. United States, No. 9:08-CV-80736-KAM
(dkt. #26) (Aug. 21, 2008). That Protective Order thus precludes Jane Doe from responding to Epstein’s allegations in a publicly-filed motion because her response would necessarily involve disclosing the “terms” of the agreement. Jane Doe therefore requests the alternative relief of having the protective order lifted so that her attorney’s can respond directly to Epstein’s allegations about what the non-prosecution agreement provides.¹ If the protective order is lifted, Jane Doe would accordingly request an opportunity to file a supplemental pleading in opposition to the motion to stay to discuss those provisions.

CONCLUSION

For all these reasons, all references to the non-prosecution agreement in Epstein’s motion for a stay should be stricken. In the alternative, the Court should lift its protective order and permit Jane Doe’s counsel to file a supplemental response to the motion to stay discussing the specific provisions in the agreement. Because the United States may have an interest in this motion, a copy of the motion is being served on the U.S. Attorney’s Office for the Southern District of Florida.

DATED: April 9, 2009

¹ Lifting the protective order may be useful for other reasons as well. For example, Jane Doe intends to question Epstein about the terms of the non-prosecution agreement at his upcoming deposition. If the protective order remains in place, Jane Doe may be required to proceed cumbersomely by first have Epstein reveal the provisions of the agreement and then asking about the provisions. Because only the narrow issue of the motion to stay is currently before the Court, Jane Doe has confined her arguments to that issue. Jane Doe reserves her right to file an appropriate motion at the appropriate time for release of the non-prosecution agreement on other grounds.

Respectfully Submitted,
Plaintiff, by One of Her Counsel,

s/ Bradley J. Edwards
Bradley J. Edwards
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on April 9, 2009, I electronically filed the foregoing document with the Clerk of Court using CM/ECF. I also certify that the foregoing is being served this day upon all counsel of record identified on the attached Service List in the manner specified, either via transmission of Notices of Electronic Filing generated by CM/ECF or in some other authorized manner for those counsel or parties who are not authorized to receive electronically Notices of Electronic Filing.

s/ Bradley J. Edwards
Bradley J. Edwards

SERVICE LIST

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

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APP.3

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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

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

JANE DOE,

Plaintiff,

v.

JEFFREY EPSTEIN,

Defendant.

PLAINTIFF'S FIRST AMENDED COMPLAINT

Parties, Jurisdiction and Venue

Plaintiff, Jane Doe, hereby brings this First Amended Complaint against Defendant, Jeffrey Epstein, and states as follows:

1. This is an action for damages in an amount in excess of \$50,000,000.00, exclusive of interest and costs.
2. This First Amended Complaint is brought under a fictitious name in order to protect the identity of Plaintiff, Jane Doe, because this Complaint makes allegations of sexual assault and child abuse of a then minor.
3. At all times material to this cause of action, Plaintiff, Jane Doe, was a resident of Palm Beach County, Florida.
4. At all times material to this cause of action, Defendant, Jeffrey Epstein, was a resident of the State of New York.
5. At all times material to this cause of action, Defendant, Jeffrey Epstein, had a residence located in Palm Beach County, Florida.

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

7. This Court has jurisdiction of this action and the claim set forth herein pursuant to 28 U.S.C. §1332(a) as the matter in controversy exceeds \$75,000.00, exclusive of interest and costs and is between citizens of different states.

8. This Court has venue of this action pursuant to 28 U.S.C. §1391(a) as a substantial part of the events or omissions giving rise to the claim occurred in this district.

9. At all times material, Defendant, Jeffrey Epstein, owed a duty unto Plaintiff, Jane Doe, to treat her in a non-negligent manner and to not commit intentional or tortious or illegal acts against her.

Factual Allegations

10. Upon information and belief, Defendant, Jeffrey Epstein, has demonstrated a sexual preference and obsession for minor girls. He engaged in a plan, scheme, and enterprise in which he gained access to economically disadvantaged minor girls, such as Plaintiff, Jane Doe, and sexually battered these girls, and/or coerced them to engage in prostitution.

11. Defendant's plan, scheme, and enterprise included an elaborate system wherein the then minor Plaintiff, and other minor girls, were contacted by telephone by Defendant Epstein, Sarah Kellen or other unknown employees or assistants working for Defendant Epstein, and Epstein's assistants would persuade the minor girls, including Jane Doe, to come over to defendant Epstein's house for the purpose of engaging in prostitution.

12. Plaintiff Jane Doe was contacted by Defendant Jeffrey Epstein himself or Sarah Kellen or other unknown employees or assistants of Defendant Epstein on numerous occasions, and she was often times brought to Defendant Epstein's residence with the assistance of Defendant Epstein's assistants.

13. Sarah Kellen or other employees/assistants of Defendant Epstein would often arrange with the Yellow Cab cab company to take minor girls, including Jane Doe, to Defendant Epstein's house.

14. Once the then minor girl, including Plaintiff Jane Doe, arrived at Epstein's house, the assistants and employees left the then minor Plaintiff and other minor girls alone in a room at the defendant's mansion. Subsequently, Defendant, Jeffrey Epstein, himself would appear, remove his clothing, and direct the then minor Plaintiff 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, using vibrators or sexual toys on the then minor Plaintiff, and digitally penetrating the then minor Plaintiff.

15. Defendant Epstein traveled to his mansion in Palm Beach for the purpose of luring minor girls to his mansion to sexually abuse or batter them; he used the telephone to contact these minor girls for the purpose of coercing them into acts of prostitution and to enable himself to commit sexual battery against them and acts of lewdness in their presence, and he conspired with others, including his assistants Sarah Kellen and Nadia Marcinkova, to further commit these acts and to avoid police detection.

16. Plaintiff, Jane Doe, was first brought to Defendant Epstein's mansion in early 2003, when she was a fourteen-year old in middle school.

17. 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.

18. Beginning in approximately February 2003 and continuing until approximately June 2005, the defendant coerced and enticed the impressionable, vulnerable, and economically deprived then minor Plaintiff in order to commit various acts of sexual misconduct against her. These acts included, but were not limited to, fondling and inappropriate and illegal sexual touching of the then minor Plaintiff, sexual misconduct and masturbation of Defendant, Jeffrey Epstein, in the presence of the then minor Plaintiff, and encouraging and coercing the then minor Plaintiff to become involved in prostitution.

19. Defendant, Jeffrey Epstein, used his money, wealth and power to unduly and improperly manipulate and influence the then minor Plaintiff into a deviant and delinquent lifestyle.

20. The above-described sexual acts took place in Palm Beach County, Florida at the residence of Defendant, Jeffrey Epstein. Any assertions by Defendant, Jeffrey Epstein, that he was unaware of the age of the then minor Plaintiff are belied by his actions and rendered irrelevant by the provisions of applicable Florida Statutes concerning the sexual exploitation, sexual battery, and abuse of a minor child.

Defendant, Jeffrey Epstein, at all times material to this cause of action, knew and should have known of the plaintiff, Jane Doe's minority.

21. The above-described acts were perpetrated upon the person of the then minor Plaintiff regularly and on dozens of occasions.

22. In June 2008, in the Fifteenth Judicial Circuit in Palm Beach County, 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, for which Defendant Epstein was sentenced to 18 months incarceration in Palm Beach County jail to be followed by 12 months community control (house arrest).

COUNT I

Sexual Battery upon a Minor

23. The Plaintiff, Jane Doe, repeats and realleges paragraphs 1 through 21 above.

24. On numerous occasions, Defendant Epstein did in fact intentionally touch Plaintiff, Jane Doe, on her person against her will and/or without her legal consent.

25. Defendant Epstein battered her sexually, in that he touched her in intimate areas of her body and person in an offensive manner while she was a minor child, and therefore the touchings were without legal consent.

26. Defendant Epstein touched her in intimate areas of her body on dozens of occasions between approximately February 2003 and approximately June 2005.

27. The conduct described in this count constitutes battery against the person of the then minor Plaintiff.

28. As a direct and proximate result of Defendant, Jeffrey Epstein's sexual battery on Plaintiff, Jane Doe, Plaintiff 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 her childhood, loss of dignity, invasion of her privacy and other damages associated with Defendant, Jeffrey Epstein, controlling, manipulating and coercing her into a perverse and unconventional way of life for a minor. The then minor Plaintiff incurred medical and psychological expenses and Plaintiff, Jane Doe, will in the future suffer additional medical and psychological expenses. Plaintiff, Jane Doe, 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 Plaintiff, Jane Doe, will continue to suffer these losses in the future.

WHEREFORE, Plaintiff, Jane Doe, demands judgment against Defendant, Jeffrey Epstein, for compensatory damages, punitive damages, 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 II

Cause of Action Pursuant to 18 USC §2255

29. Plaintiff, Jane Doe, adopts and realleges paragraphs 1 through 22 above.
30. The allegations contained herein in Count II are a separate and distinct legal remedy.
31. As a condition of Defendant, Jeffrey Epstein's criminal plea, and in exchange for the Federal Government not prosecuting the Defendant for numerous

federal offenses, the Defendant, Jeffrey Epstein, entered into a Non-Prosecution Agreement with the Federal Government, wherein he acknowledged Plaintiff Jane Doe as a victim of certain criminal offenses he committed against Jane Doe.

32. The Plaintiff, Jane Doe, was in fact a victim of one or more offenses enumerated in Title 18, United States Code, Section 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.

33. Specifically, Defendant Epstein:

(a) knowingly conspired with others known and unknown to use a facility or means of interstate commerce to knowingly persuade, induce, or entice minor females, including Plaintiff Jane Doe, to engage in prostitution, in violation of title 18, United States Code, Section 2422(b).

(b) knowingly and willfully conspired with others known (such as Sarah Kellen) and unknown to travel in interstate commerce for the purpose of engaging in illicit sexual conduct with minors, including Plaintiff Jane Doe, as defined in 18 U.S.C. § 2423(f), with minor females, in violation fo Title 18, United States Code, Section 2423(b); all in violation of Title 18, United States Code, Section 2423(e);

(c) used a facility or means of interstate or foreign commerce to knowingly persuade, induce, or entice minor females, including Plaintiff Jane Doe, to engage in prostitution; in violation of Title 18, United States Code, Section 2422(b);

(d) traveled in interstate commerce for the purpose of engaging in illicit sexual conduct, as defined in 18 U.S.C. § 2423(f), with minor females, including Plaintiff Jane Doe; in violation of Title 18, United States Code, Section 2423(b).

34. As a direct and proximate result of the aforementioned criminal offenses enumerated in Title 18, United States Code, Section 2255, being committed against the then minor Plaintiff, the Plaintiff Jane Doe 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 unconventional way of life for a minor. The then minor Plaintiff incurred medical and psychological expenses and the Plaintiff, Jane Doe, will in the future suffer additional medical and psychological expenses. The Plaintiff, Jane Doe, 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, Jane Doe, will continue to suffer these losses in the future.

WHEREFORE, Plaintiff, Jane Doe, demands judgment against Defendant, Jeffrey Epstein, for compensatory damages, punitive damages, attorney's fees, 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 III

Intentional Infliction of Emotional Distress

35. Plaintiff, Jane Doe, adopts and realleges paragraphs 1 through 22 above.

36. Defendant Jeffrey Epstein's inappropriate sexual conduct towards the then minor Plaintiff was extreme and outrageous; under the circumstances, his conduct was outrageous and so extreme in degree that it should not be tolerated in a civilized community.

37. Defendant Jeffrey Epstein acted with the intent to cause severe emotional distress or with reckless disregard of the high probability of causing severe emotional distress upon the then minor Plaintiff.

38. Defendant Jeffrey Epstein was well aware that Plaintiff was a minor child, and yet he continued to sexually abuse her, intentionally and recklessly causing Plaintiff to suffer extreme emotional distress.

39. Defendant Jeffrey Epstein's intentional, deliberate and reckless conduct caused severe emotional distress to the Plaintiff, Jane Doe. Defendant, at the time he committed these numerous sexual assaults on Plaintiff, Jane Doe, had a specific intent to harm the then minor Plaintiff, and his conduct did so harm the Plaintiff.

40. As a direct and proximate result of Defendant, Jeffrey Epstein's intentional and reckless conduct, Plaintiff, Jane Doe, has in the past suffered and in the future will continue to suffer severe emotional distress, physical injury, pain and suffering, 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

unconventional way of life for a minor. The then minor Plaintiff incurred medical and psychological expenses and Plaintiff, Jane Doe, will in the future suffer additional medical and psychological expenses. Plaintiff, Jane Doe, 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 Plaintiff, Jane Doe, will continue to suffer these losses in the future.

WHEREFORE, Plaintiff, Jane Doe, demands judgment against Defendant, Jeffrey Epstein, for compensatory damages, punitive damages, 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 IV

Civil Remedy for Criminal Practices

41. Plaintiff realleges paragraphs 1 through 22 above and for the purposes of this count incorporates and alleges the RICO Statement that has been contemporaneously herewith as Exhibit "A."

42. The allegations contained herein in Count IV are a separate and distinct legal remedy brought pursuant to Florida Statute 772.104(1) and (2).

43. Defendant, Jeffrey Epstein, was associated with an enterprise, a group of individuals associated in fact although not a legal entity, which was comprised of at least Defendant Jeffrey Epstein, Sarah Kellen, and Nadia Marcinkova (and likely many other yet unknown persons); Defendant Epstein participated in this enterprise, or conspired or endeavored to so participate, through a pattern of criminal activity in

violation of Florida Statutes §772.103(3)-(4), as further outlined in detail in the RICO statement filed with this court.

44. This enterprise was separate and distinct from Epstein himself and had a definite hierarchical structure. Epstein served informally but effectively as the leader, C.E.O, or "boss" of this organization, directing his underlings how to recruit and procure young girls for his sexual activities and when to bring the girls to his mansion. Epstein's key "lieutenant" in the organization was Kellen, who served as both his scheduler and a recruiter/procurer of the girls. Marcinkova also served as a recruiter and helped Epstein satisfy his criminal sexual desires by, on occasion, directly participating in sexual abuse and prostitution of the minor girls. Epstein also used otherwise-legitimate business activities to help further the purpose of the criminal enterprise. These apparently legitimate activities provided "cover" for Epstein and his associates to commit the crimes. Epstein and his associates maintained the appearance of running an upstanding investment business, as well as other legitimate businesses with connections to modeling agencies and other powerful business and political people, to discourage the minor girls from reporting the abuse to law enforcement.

45. Defendant Jeffrey Epstein participated in this enterprise through a pattern of criminal activity in that he engaged in at least two incidents of criminal activity, as defined in Florida Statute 772.102 and as described below, that have the same or similar intents, results, accomplices, victims, or methods of commission and are not isolated incidents.

46. Defendant Jeffrey Epstein engaged in criminal activity by committing, attempting to commit, conspiring to commit or soliciting, coercing or intimidating another

person to commit one or more of the following predicate acts as outlined and defined in Florida Statute 772.102:

- (a) Procuring for prostitution, or causing to be prostituted, any person who is under the age of 18 years in violation of Florida Statutes Chapter 796.03;
- (b) Acts of battery in violation of Florida Statutes Chapter 784;
- (c) Forcing, compelling or coercing another to become a prostitute in violation of Florida Statutes Chapter 796.04;
- (d) knowingly recruiting, enticing, harboring, transporting, providing or otherwise obtaining by any means a person, knowing that coercion would be used to cause that person to engage in prostitution in violation of Florida Statutes Chapter 796.045;
- (e) tampering with a witness in violation of Florida Statutes Chapter 914.22;
- (f) altering, destroying, removing, or concealing records or documents or other evidence with the purpose to impair its verity or availability in violation of Florida Statutes Chapter 918.13;
- (g) maintaining a place for the purpose of lewdness or prostitution; offering or securing another for the purpose of prostitution or for some other lewd or indecent act; receiving persons into his Palm Beach mansion for the purpose of prostitution or lewdness; directing, taking or transporting or agreeing to direct take or transport persons to his Palm Beach mansion with knowledge or reasonable belief that the purpose of such directing, taking or transporting was prostitution or lewdness; all in violation of Florida Statutes Chapter 796.07.

47. The criminal acts of Defendant Epstein occurred repeatedly over a substantial period of time and were not isolated events.

48. Under Defendant, Jeffrey Epstein's plan, scheme, and enterprise, Defendant, Jeffrey Epstein, paid employees and underlings, including but not limited to Sarah Kellen, to bring him minor girls to his Palm Beach mansion in order for the Defendant to solicit, induce, coerce, entice, compel or force such girls to engage in acts of prostitution and sexual misconduct with Defendant Epstein and sometimes Nadia Marcinkova, and to otherwise commit acts of sexual battery thereon.

49. Plaintiff, Jane Doe, was the victim of Defendant, Jeffrey Epstein's plan, scheme, and enterprise and was so injured by reason of his violations of the provisions of s. 772.104. Plaintiff, Jane Doe, was called on the telephone by Defendant Epstein and other employees of his, including Sarah Kellen, and transported to the Defendant, Jeffrey Epstein's residence, where she was placed in a room along with the Defendant, enticed to commit acts of prostitution, and had acts of sexual battery and sexual exploitation committed against her. Defendant, Jeffrey Epstein, conspired with his assistants and employees in order to accomplish their common motive or intent of seeking out, gaining access to, and exploiting minor children such as the Plaintiff, Jane Doe, in the aforementioned ways, and he further conspired with his employees, assistants and underlings to ensure that the crimes of this criminal enterprise were concealed or undetected by law enforcement.

50. After law enforcement began to detect the criminal activities of Defendant Epstein and the other persons involved in the criminal enterprise, the enterprise used resources and information to conceal the illegal activities of the enterprise, threaten the

victims of the crimes of the enterprise if they revealed the full scope of the enterprise to law enforcement, and concealed or destroyed documents relevant to the prosecution of the various members of the enterprise. The enterprise also made various efforts to discourage the victims from cooperating with law enforcement and from filing civil lawsuits to vindicate their rights. Epstein and other members of the enterprise made cash payments and gave gifts to the victims of the enterprise in order to discourage them from reporting crimes to law enforcement and other authorities.

51. The evidence clearly and convincingly establishes that Plaintiff Jane Doe was injured by reason of violations of the provisions of 772.103, and as such is entitled to threefold the actual damages sustained and a minimum of \$200, and reasonable attorney's fees and court costs.

52. In the alternative, and pursuant to s. 772.104, Plaintiff Jane Doe was injured due to sex trafficking committed in violation of s. 772.103 and is thus entitled to threefold the amount gained from the sex trafficking and to a minimum amount of damages not less than \$200, reasonable attorney's fees and court costs.

WHEREFORE, under the provisions of Florida Statutes Chapter 772, Plaintiff, Jane Doe, demands judgment against Defendant, Jeffrey Epstein, for any minimum damages authorized by law, all actual damages sustained (to be trebled as authorized by law), court costs and attorneys' fees, 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 V

Cause of Action Pursuant to Florida Statute 796.09 Against Defendant, Jeffrey Epstein

54. Plaintiff adopts and realleges paragraphs 1 through 22 above.

55. The allegations contained herein in Count II are a separate and distinct legal remedy.

56. Defendant, Jeffrey Epstein, was a wealthy and powerful man, and Plaintiff was an economically disadvantaged and impressionable minor.

57. Defendant, Jeffrey Epstein, used his vast wealth and power to coerce Plaintiff into prostitution and/or coerced her to remain in prostitution.

58. Defendant, Jeffrey Epstein, coerced Plaintiff into prostitution in one or more of the following ways:

- A. Domination of her mind and body through exploitive techniques;
- B. Inducement;
- C. Promise of greater financial rewards;
- D. Exploitation of a condition of developmental disability, cognitive limitation, affective disorder, and/or substance dependency;
- E. Exploitation of human needs for food, shelter or affection;
- F. Exploitation of underprivileged and vulnerable economic condition or situation;
- G. Use of a system of recruiting other similarly situated minor girls to further coerce and induce Plaintiff into the lifestyle of prostitution; and

H. Exploitation through demonstration of abundant wealth and power to impress a young and vulnerable then minor Plaintiff and to coerce her into prostitution.

59. As a direct and proximate result of the offenses committed by Defendant, Jeffrey Epstein, against Plaintiff pursuant to Florida Statutes §796.09, the Plaintiff 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 unconventional way of life for a minor. The then minor Plaintiff incurred medical and psychological expenses and Plaintiff will in the future suffer additional medical and psychological expenses. 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.

WHEREFORE, Plaintiff, Jane Doe, demands judgment against the Defendant, Jeffrey Epstein, for compensatory damages, attorney's fees, 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.

DATED: April 17, 2009

Respectfully Submitted,
Plaintiff, by One of Her Counsel,

s/ Bradley J. Edwards
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on April 17, 2009, I electronically filed the foregoing document with the Clerk of Court using CM/ECF. I also certify that the foregoing is being served this day upon all counsel of record identified on the attached Service List in the manner specified, either via transmission of Notices of Electronic Filing generated by CM/ECF or in some other authorized manner for those counsel or parties who are not authorized to receive electronically Notices of Electronic Filing.

s/ Bradley J. Edwards
Bradley J. Edwards

SERVICE LIST

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

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JANE DOE v. JEFFREY EPSTEIN

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

EXHIBIT “A”

NOT A CERTIFIED COPY

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

a clear pattern of criminal activity.

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

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

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

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

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

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

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

- c. Epstein served as the informal but effective leader or "C.E.O." of the enterprise.
- d. Epstein was associated with the enterprise as its informal but effective leader or "C.E.O."
- e. Epstein directed the affairs of the enterprise and the others in the enterprise responded to his commands.
- f. Based on the facts that she currently possesses, Jane Doe specifically alleges and intends to prove both that (i) Epstein was an individual separate from the enterprise and (ii) the defendant was a member of the enterprise, namely that he served as the effective leader of the enterprise. With regard to point (i), the illegal enterprise had a definite structure and operational function apart from Epstein. The structure is

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

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

8. The relationship between the pattern of criminal activity and the enterprise

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

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

in which Epstein would obtain sexual gratification.

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

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

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

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

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

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

a. The enterprise included persons unknown to Jane Doe, but at least included Epstein and his paid assistants Sarah Kellen and Nadia Marcinkova.

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

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

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

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

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

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

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

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

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

APP.4

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IN THE CIRCUIT COURT OF THE FIFTEENTH
JUDICIAL CIRCUIT, IN AND FOR
PALM BEACH COUNTY, FLORIDA

E.W.)
4 Plaintiff,)
5 vs.) No. 502008CA028058XXXXMBAD
6 JEFFREY EPSTEIN and SARAH)
7 KELLEN,)
8 Defendants.)

COPY

West Palm Beach, Florida

April 30th, 2009

10:08 o'clock A.M.

VIDEOTAPED DEPOSITION

OF

JEFFREY EPSTEIN

(Thereupon, a lunch break was taken

from 1:12 to 2:32 p.m.)

THE VIDEOGRAPHER: We're back on record at

2:32.

MR. EDWARDS: Ready?

MR. GOLDBERGER: Sure.

Q. (By Mr. Edwards) Mr. Epstein, did you

ever-care-about-any-of-the-feelings-of-the_minor

girls that you were engaging in sex with?

10 MR. BURMAN: Object to the form.

THE WITNESS: I intend to respond to all

relevant questions regarding this lawsuit.

13 However, at the present time my attorneys have
14 counseled me that I cannot provide answers to
15 any questions relevant to this lawsuit at this
16 time, so I must accept their advice or I lose
17 potential -- I risk losing my Sixth Amendment
18 right to effective representation.

19 And accordingly, I have to assert my
20 Federal Constitutional rights as guaranteed by
21 the Fifth, Sixth and Fourteenth Amendment to
22 the United States Constitution.

23 Q. (By Mr. Edwards) Did it ever occur to you
24 that any of these girls were somebody's daughter --

25 MR. BURMAN: Object to the form.

1 Q. (By Mr. Edwards) Isn't it true that at
2 the time that you were sexually battering these
3 minor girls, you didn't care what happened to them
4 and only cared about your only personal sexual
5 gratification?

6 MR. BURMAN: Object to the form. We need
7 to talk outside.

8 THE WITNESS: Me, too?

9 THE VIDEOGRAPHER: We're off the record at
10 2:35.

11 (Thereupon, a brief break was taken.)

12 THE VIDEOGRAPHER: We're back on the
13 record at 2:36.

14 MR. BURMAN: For the purposes of the
15 record, I will tell you that this line of
16 questioning, in my view, is way beyond the
17 bounds of permissible discovery-type questions,
18 and nothing but pure argument, and if you
19 continue in this vein, I will stop the
20 deposition and we will seek instruction from
21 Judge Hafele about what's permissible and
22 what's not.

23 Q. (By Mr. Edwards) Isn't it true that at
24 the time you were inserting your fingers into the
25 vagina of these little kids, all you cared about was

1 your own sexual gratification?

2 MR. BURMAN: The deposition is over.

3 THE VIDEOGRAPHER: Conclude at 2:37, end
4 of tape 2 of 2.

5 MR. BERGER: We're going to order instant
6 copy, and we want the tape, also,
7 Mr. Videographer.

8 MR. BURMAN: We want this as soon as they
9 get theirs, we want ours.

10 (Thereupon, the deposition was
11 adjourned at 2:38 p.m.)

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APP.5

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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

JANE DOE NO. 2,

CASE NO: 08-CV-80119-MARRA/JOHNSON

Plaintiff

vs.

JEFFREY EPSTEIN,

Defendant

JANE DOE NO. 3,

CASE NO: 08-CV-80232-MARRA/JOHNSON

Plaintiff

vs.

JEFFREY EPSTEIN,

Defendant

JANE DOE NO. 4,

CASE NO: 08-CV-80380-MARRA/JOHNSON

Plaintiff

vs.

JEFFREY EPSTEIN,

Defendant

/

CASE NO: 08-CV-80119-MARRA/JOHNSON

JANE DOE NO. 5,

CASE NO: 08-CV-80381-MARRA/JOHNSON

Plaintiff

vs.

JEFFREY EPSTEIN,

Defendant

JANE DOE NO. 6.

CASE NO: 08-CV-80994-MARRA/JOHNSON

Plaintiff

vs.

JEFFREY EPSTEIN,

Defendant

JANE DOE NO. 7,

CASE NO: 08-CV-80993-MARRA/JOHNSON

Plaintiff

vs.

JEFFREY EPSTEIN,

Defendant

/

CASE NO: 08-CV-80119-MARRA/JOHNSON

CASE NO: 08-CV-80811-MARRA/JOHNSON

C.M.A.,

Plaintiff

vs.

JEFFREY EPSTEIN,

Defendant

/

JANE DOE,

CASE NO. 08-CV-80893-CIV-MARRA/JOHNSON

Plaintiff,

Vs.

JEFFREY EPSTEIN, et al.

Defendant.

/

DOE II,

CASE NO: 09-CV-80469-MARRA/JOHNSON

Plaintiff

vs.

JEFFREY EPSTEIN, et al.

Defendants.

/

JANE DOE NO. 101,

CASE NO: 08-CV-80119-MARRA/JOHNSON
CASE NO: 09-CV-80591-MARRA/JOHNSON

Plaintiff

vs.

JEFFREY EPSTEIN,

Defendant

JANE DOE NO. 102,

CASE NO: 09-CV-80656-MARRA/JOHNSON

Plaintiff

vs.

JEFFREY EPSTEIN,

Defendant

**PLAINTIFF, JANE DOE'S MOTION FOR INJUNCTION RESTRAINING
FRAUDULENT TRANSFER OF ASSETS, APPOINTMENT OF A RECEIVER TO
TAKE CHARGE OF PROPERTY OF EPSTEIN, AND TO POST A \$15 MILLION BOND
TO SECURE POTENTIAL JUDGMENT**

COMES NOW Plaintiff Jane Doe, by and through undersigned counsel, and hereby files this Motion for Injunction, pursuant to Federal Rule of Civil Procedure 64, for appointment of a receiver to take charge of Epstein's property, and to post a \$15 million bond to secure any potential judgment in this case, for the reasons explained in the accompanying supporting memorandum.

Plaintiff Jane Doe, by and through her undersigned counsel, files this memorandum in support of her motion for appointment of a receiver to take charge of

CASE NO: 08-CV-80119-MARRA/JOHNSON

Epstein's property and to post a \$15 million bond to secure any potential judgment in this case.

Epstein is a billionaire who recently has been fraudulently transferring his assets overseas and elsewhere with the intent to prevent Jane Doe (and possibly numerous other victims of his sexual abuse) from satisfying any judgment they might obtain against him. Federal Rule of Civil Procedure 64 guarantees Jane Doe all available state law pre-judgment remedies to respond to these fraudulent transfers. Florida has adopted the Florida Uniform Fraudulent Transfer Act (FUFTA), Fla. Stat. Ann. § 726.101 *et seq.*, which gives the Court power to appoint a receiver to take charge of assets that are being fraudulently transferred. Given the serious allegations of sexual abuse against Jane Doe when she was a minor, this Court should appoint a receiver to control and account for Epstein's assets and direct the receiver to post a \$15 million bond with this Court on behalf of Epstein to satisfy any judgment that Jane Doe might obtain.

STATEMENT OF MATERIAL FACTS

1. Defendant Jeffrey Epstein is the defendant in this action, which involves claims by Jane Doe that Epstein repeatedly sexually abused her when she was a minor. Because of the egregious and repeated acts of sexual abuse committed by Epstein, her complaint seeks damages in excess of \$50 million, including punitive damages. See Amended Complaint, ¶ 2.

2. Defendant Jeffrey Epstein is extremely wealthy. According to reputable press reports in the *New York Times* and elsewhere, he is a billionaire. He is also the owner

CASE NO: 08-CV-80119-MARRA/JOHNSON

of a Caribbean island in the Virgin Islands (Little St. James Island), where he serves as a financial advisor to other billionaires. He was previously a financial trader at Bear Stearns. It is therefore reasonable to infer that he has a great deal of financial sophistication. See Affidavit of Paul Cassell at ¶ 2 Attachment A to this Pleading.

3. According to reputable press reports, before his recent incarceration (discussed below), he frequently traveled around the globe in the company of such famous persons as President Bill Clinton, Prince Andrew, and Donald Trump. It is therefore reasonable to infer that he has international contacts, including international financial contacts. See Affidavit of Paul Cassell at ¶ 3.

4. Over the past year, approximately 25 civil suits have been filed in Florida state courts and Florida federal courts raising similar allegations of sexual abuse by Jeffrey Epstein against minor girls. These complaints seek damages comparable to those sought by Jane Doe in this case. See Affidavit of Paul Cassell at ¶ 4. Accordingly, Epstein has currently pending against him lawsuits seeking more than \$1 billion in damages. He thus faces financial ruin. *Id.*

5. On June 30, 2008, Jeffrey Epstein pled guilty to one count of procuring a person under 18 for prostitution and one count of felony solicitation to prostitution before the Circuit Court of the Fifteenth Judicial circuit in and for Palm Beach County, Florida. He was sentenced to 18 months in jail.

6. Since those guilty pleas, he has been incarcerated in the Palm Beach County Detention facility. However, he has also been allowed out on a "work release" program, where he works at managing his financial interests. Affidavit of Paul Cassell at ¶ 5.

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7. Given the substantial claims against him, his international connections, and other information, Jane Doe's counsel has been gravely concerned that Epstein will fraudulently transfer all of his assets to overseas locations to defeat collection of any judgment that she might obtain against him. Accordingly, as part of discovery in this case, Jane Doe propounded requests for admissions by Epstein regarding whether he was fraudulently transferring assets. Rather than answering these requests for admission about on-going fraudulent transfers of his property, Jeffrey Epstein asserted his Fifth Amendment right against self-incrimination. Affidavit of Paul Cassell at ¶ 6.

8. Jeffrey Epstein's net worth is greater than \$1 billion. Jane Doe's First Request for Admissions (RFA's) #5, Attachment B to this Pleading; Epstein's Resp. to RFA's #5, Attachment C to this Pleading.

9. Since he was incarcerated, Jeffrey Epstein has, directly or indirectly (through the services or assistance of other persons) conveyed money and assets in an attempt to insulate and protect his money and assets from being captures in civil lawsuits filed against him. Epstein's Resp. to RFAs #6.

10. Epstein owns and controls real estate property in foreign countries, including the Caribbean. Epstein's Resp. to RFAs #7 and #8.

11. Epstein is currently moving significant financial assets overseas, outside of the direct territorial reach of federal and Florida courts. Epstein's Resp. to RFA #21.

12. Epstein is transferring these assets with the intent to defeat any judgment that might be entered against him in this and other similar cases. Epstein's Resp. to RFA #22.

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13. Epstein could currently post a \$15 million bond to satisfy a judgment in this case without financial or other difficulty. Epstein's Resp. to RFA #23.

14. Epstein has blocked all discovery, in this and other related cases, regarding his assets. Affidavit of Paul Cassell at ¶¶ 7, 8.

ARGUMENT

I. EPSTEIN IS FRAUDULENTLY TRANSFERRING HIS ASSETS.

As noted in the material facts above, defendant Epstein is currently making fraudulent transfers of his assets. In particular, he is currently moving significant financial assets overseas, outside of the direct territorial reach of Federal and Florida courts, and is doing so with the specific intent to defeat any judgment that might be entered against him in this and other similar cases. Statement of Material Facts #11 and #12.

Because these material facts rest, in part, on Epstein's invocation of his Fifth Amendment privilege against self-incrimination, it is pertinent to note that Jane Doe is entitled to an adverse inference from his invocation of his Fifth Amendment rights when asked whether he was fraudulently transferring his assets overseas. Jane Doe propounded requests for admission to Epstein that asked specifically about on-going fraudulent transfers of assets. In response, Epstein asserted his Fifth Amendment right to refuse to answer incriminating questions. Of course, Epstein's "invocation of his Fifth Amendment privilege, like the assertion of any privilege, stands in stark opposition to the otherwise liberal discovery rules, and 'undermine[s] to some degree the trial system's capacity to ascertain the truth.'" *United States ex rel. DRC, Inc. v. Custer Battles, LLC*, 415 F.Supp.2d 628, 632 (E.D. Va. 2006) (quoting Robert Heidt, *The*

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Conjurer's Circle – The Fifth Amendment Privilege in Civil Cases, 91 YALE L.J. 1062, 1082 (1982)). As a result, where a witness refuses to testify in a civil case on Fifth Amendment grounds, the permissible inference is that the witness's testimony, had it been given, "would not have been favorable to the claim." *United States v. A Single Family Residence*, 803 F.2d 625, 629 n.4 (11th Cir. 1986). Of course, the Fifth Amendment is not violated by such an inference. The concerns animating the Fifth Amendment right against self-incrimination are not in play "[i]n a civil suit involving only private parties" because "no party brings to the battle the awesome powers of the government, and therefore to permit an adverse inference to be drawn from exercise of the privilege does not implicate the policy considerations underlying the privilege." *Baxter v. Palmigiano*, 425 U.S.308, 335 (1976).

An adverse inference is entirely justified in this case. Epstein has remained silent when asked such straightforward requests for admissions:

- Since being incarcerated you have, directly or indirectly (through the services or assistance of other persons), conveyed money or assets in an attempt to insulate or protect your money or assets from being captured in any civil lawsuits filed against you. RFA's #6.
- You are moving significant financial assets overseas, outside of the direct territorial reach of the U.S. and Florida Courts. RFA's #21.
- You are making asset transfers with the intent to defeat any judgment that might be entered against you in this or similar cases. RFA's #22.

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The silence in the face of these questions speaks far louder than words. As Justice Brandeis recognized long ago, “[s]ilence is often evidence of the most persuasive character.” *Baxter v. Palmigiano*, 425 U.S. 308, 319 (1976) (quoting *U.S. ex rel. Bilokumsky v. Tod*, 263 U.S. 149, 153-54 (1923)). This is plainly one of those situations.

In a civil case, drawing an adverse inference is the proper action for a court to take when a litigant blocks legitimate discovery through exercise of a Fifth Amendment invocation. “[W]hile there is no doubt that a witness is entitled to assert the privilege in a civil case, it is also clear that an adverse inference based on a refusal to answer in a civil case is an appropriate remedy, as it provides some relief for the civil litigant whose case is unfairly prejudiced by a witness’ assertion of the Fifth Amendment privilege without placing the witness in the ‘cruel trilemma’ of choosing among incrimination, perjury, or contempt.” *United States ex rel. DRC, Inc. v. Custer Battles, LLC*, 415 F.Supp.2d 628, 633 (E.D. Va. 2006). The Eleventh Circuit has not hesitated to support district courts that draw an adverse inference from silence. For example, in *United States v. Two Parcels of Real Property*, 92 F.3d 1123, 1129 (11th Cir. 1996), the district court drew an adverse inference when claimants to real property refused to answer questions regarding the property. The Eleventh Circuit affirmed that decision, explaining that “[t]his Court has held . . . that the trier of fact may take an adverse inference against parties to a civil action refusing to testify on Fifth Amendment grounds. *Id.* at 1129 (citing *United States v. A Single Family Residence*, 803 F.2d 625, 629 n.4 (11th Cir. 1986)). Similarly, in *Arango v. U.S. Dept. of the Treasury*, 115 F.3d 922, 926 (11th Cir. 1997), the Eleventh Circuit explained that “the First Amendment

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does not forbid adverse inferences against civil litigants . . . who assert the privilege against self-incrimination."

Here an adverse inference is entirely appropriate. In addition to Epstein's refusal to answer questions, there are strong circumstantial reasons for believing he is hiding his assets. As explained above, see Statement of Material Facts #1 through #3, Epstein clearly has the *means* to hide his assets – he is a sophisticated financial advisor. And given that the sexual abuse lawsuits brought against Epstein threaten him with financial ruin – he has a clear *motive* for hiding his substantial assets. Finally, Epstein is currently on work release, running his financial affairs from his office – giving him the clear *opportunity* to make the necessary arrangements to move his assets to overseas or other unreachable locations. Thus, there is a "perfect circumstantial evidence case that [Epstein] ha[s] means, motive, and opportunity" to fraudulently transfer assets. See *United States v. Sparks*, 265 F.3d 825, 830 (9th Cir. 2001) (finding probable cause for an arrest based solely on a showing of means, motive, and opportunity). The fact that this evidence is circumstantial rather than direct proof of the transfers is irrelevant, because "circumstantial evidence is not less probative than direct evidence, and, in some cases is even more reliable." *United States v. Ranum*, 96 F.3d 1020, 1026 (7th Cir. 1996) (quoting *United States v. Hatchett*, 31 F.3d 1411, 1421 (7th Cir. 1994)).

For all these reasons, the Court should conclude that Epstein is fraudulently transferring assets.

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II. JANE DOE IS ENTITLED TO THE PROTECTIONS OF THE UNIFORM FRAUDULENT TRANSFER ACT AS ADOPTED BY FLORIDA

In light of Epstein's fraudulent asset transfers, Jane Doe is entitled to pre-judgment remedies to protect her against Epstein's efforts to block her from satisfying the judgment she is likely to ultimately obtain in this case. Federal Rule of Civil Procedure 64 guarantees Jane Doe during the course of this suit "all remedies providing for seizure of person or property for the purpose of securing satisfaction of the judgment ultimately to be entered in the action" that are "available under the circumstances and in the manner provided by the law of the state in which the court is held." The Rule goes on to provide that "[t]he remedies thus available include arrest, attachment, garnishment, replevin, sequestration, and other corresponding or equivalent remedies, however designated and regardless of whether by state procedure the remedy is ancillary to an action or must be obtained by an independent action." This "long-settled federal law provid[es] that in all cases in federal court, . . . state law is incorporated to determine the availability of pre-judgment remedies for the seizure of person or property to secure satisfaction of the judgment ultimately entered." *Rosen v. Cascade Intern., Inc.*, 21 F.3d 1520, 1531 (11th Cir. 1994). Accordingly, under this Rule, this Court looks to Florida law to determine Jane Doe's rights to pre-judgment relief.

To prevent fraudulent transfers of assets before judgment, Florida has adopted the Uniform Fraudulent Transfer Act. Fla. Stat. Ann. § 726.101 *et seq.* Under the Florida's Uniform Transfer Act (FUTA), courts are broadly empowered to take action to block certain "fraudulent transfers" of assets. Jane Doe is accordingly entitled to invoke the remedies under this Act if Epstein is making "fraudulent transfers" of his assets.

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The Act defines a “fraudulent” transfer of assets as one made “[w]ith actual intent to hinder, delay, or defraud any creditor of the debtor.” Fla. Stat. Ann. § 726.105(1)(a). The FUFTA also contains a “quite broad” definition of “transfer.” *Nationsbank, N.A. v. Coastal Utilities, Inc.*, 814 So.2d 1227, 1230 (Fla. Ct. Apps. 2002). It extends to “every mode, direct or indirect, absolute or conditional, voluntary or involuntary, of disposing of or parting with an asset or an interest in an asset, and includes payment of money, release, lease, and creation of a lien or other encumbrance.” Fla. Stat. Ann. § 726.102(12). This “broad definition includes ‘every’ mode of disposing of an asset and does not limit the statute to direct transactions made by the debtor him/herself.” *Nationsbank, N.A. v. Coastal Utilities, Inc.*, 814 So.2d 1230. As noted above, Epstein is transferring his assets with the intent to defeat any judgment that might be entered against him in this and other similar cases, see Statement of Material Facts #12, and therefore is plainly covered by the Act.

The FUFTA extends its protections to “creditors” -- such as Jane Doe, who is a “creditor” of Epstein’s within the meaning of the Act. The FUFTA extends its protections not merely to judgment creditors, but more widely to future creditors who have a “claim,” including a “claim” that has not yet been reduced to judgment. See Fla. Stat. Ann. § 726.102(2) (defining a claim as a “right to payment, whether or not the right is reduced to judgment, liquidated, unliquidated, fixed, contingent, matured, unmatured, disputed, undisputed, legal, equitable, secured, or unsecured.”); Fla. Stat. Ann. § (defining creditor protected by the act as “a person who has a claim”). See generally *Freeman v. First Union Nat. Bank*, 865 So.2d 1272, 1277 (Fla. 2004) (noting that the definition of

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claim is “broadly constructed” under the FUFTA). This means that “as is universally accepted, as well as settled in Florida, a ‘claim’ under the Act may be maintained even though contingent and not yet reduced to judgment.” *Freeman*, 865 at 1277 (internal quotations omitted). In Florida, then, “tort claimants are as fully protected against fraudulent transfers as holders of absolute claims.” *Id.* at 1277 (*quoting Money v. Powell*, 139 So.2d 702, 703 (Fla. Ct. Apps. 1962)). Jane Doe is, of course, a tort claimant against Epstein.

For all these reasons, Jane is entitled to the full protections of the Florida Uniform Fraudulent Transfer Act.

III. UNDER THE UNIFORM FRAUDULENT TRANSFER ACT, JANE DOE IS ENTITLED TO THE REMEDIES OF APPOINTMENT OF A RECEIVER TO TAKE CHARGE OF EPSTEIN’S ASSETS, FILE AN ACCOUNTING OF THOSE ASSETS WITH THE COURT, AND TO POST A \$15 MILLION BOND

Under the Uniform Fraudulent Transfer Act, this Court is given broad powers to prevent fraudulent transfers of assets. The remedies provided by the Act specifically include:

1. An injunction against further disposition by the debtor . . . of the asset transferred;
2. Appointment of a receiver to take charge of the asset transferred or of other property of the transferee; or
3. Any other relief the circumstances may require. Fla. Stat. Ann. § 726.108(c).

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Jane Doe seeks one of these specifically provided remedies – namely, appointment of a receiver to take charge of Epstein's assets. Appointment of a receiver will serve three important goals: first, if a receiver has control of Epstein's assets, Epstein's ability to further transfer those assets will be blocked; second, the receiver can provide an accounting of Epstein's assets, allowing Jane Doe (and the Court) to take whatever other action may be appropriate; and, third, the receiver can post a bond of \$15 million with the Court so that Jane Doe will have funds to satisfy any judgment that she might obtain.

The Court should appoint a receiver to account for Epstein's assets. The appointment of a receiver is directly authorized by the FUFTA. Fla. Stat. Ann. § 726.108(c); see *Freeman v. First Union Nat. Bank*, 865 So.2d 1272, 1277 (Fla. 2004) (noting that appointment of a receiver is remedy provided by the FUFTA). A receiver is the only way to start to block further dissipation of assets – by, first, gaining control over Epstein's assets and then, second, making an accounting of what assets of Epstein's remain in this country or are otherwise subject to control by this Court. Given Epstein's Fifth Amendment invocations and other obstructions regarding any discovery concerning his assets, see Statement of Material Facts #14, it is currently impossible for Jane Doe to protect her interests in blocking Epstein's fraudulent transfers. Indeed, one of the other remedies specifically specified in the Act – “[a]n injunction against further disposition by the debtor . . . of the asset transferred” – is presumably unworkable given that there is no way to know what assets Epstein possesses, much less where he is transferring them to. Cf. *Special Purpose Accounts Receivable Co-op Corp. v. Prime One Capital Co., L.L.C.*, 2007 WL 4482611 (S.D. Fla. 2007) (Marra, J.) (refusing to

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apply any heightened pleading requirements to UFTA claims “[g]iven this lack of access to information on the part of a plaintiff in a fraudulent transfer case”). Jane Doe therefore needs a receiver to account for Epstein’s assets to the Court.

The receiver should make a report to the Court regarding Epstein’s assets so that Jane Doe can determine what additional further action is required. For example, Jane Doe might need to take action to set aside various transfers. But even now, it is clear that the receiver should take one additional step: Once a receiver is appointed and accounts for Epstein’s assets, the receiver should post a \$15 million bond on behalf of Epstein with the Clerk of the Court in order to satisfy any judgment that Jane Doe might obtain in this case.

A \$15 million bond is reasonable. First, given Epstein’s tremendous net worth, he can post a \$15 million bond without any financial or other difficulty. See Statement of Material Facts #13. Second, given the egregious acts of sexual abuse Epstein committed against Jane Doe (who was a minor at the time) – and the punitive damages claim present in this case -- \$15 million is a reasonable bond amount given the nature of the judgment that Jane Doe is likely to obtain at trial. Jane Doe seeks more than \$50 million damages. See First Amended Complaint, ¶ 1. Her complaint alleges that Jeffrey Epstein had a sexual obsession for minor girls. *Id.* at ¶ 10. To satisfy that obsession, Epstein engaged in an elaborate scheme whereby his assistants recruited minor girls for the purpose of engaging in prostitution. *Id.* at ¶ 11. Her complaint explains that:

Beginning in approximately February 2003 and continuing until approximately June 2005, the defendant coerced and enticed the impressionable, vulnerable, and economically deprived then minor [Jane

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Doe] in order to commit various acts of sexual misconduct against her. These acts included, but were not limited to, fondling and inappropriate and illegal sexual touching of the then minor [Jane Doe], sexual misconduct and masturbation of Defendant, Jeffrey Epstein, in the presence of the then minor Plaintiff, and encouraging and coercing the then minor Plaintiff to become involved in prostitution.

Id. at ¶ 18. Jane Doe finally notes that in June 2009, 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, for which Defendant Epstein was sentenced to 18 months incarceration in Palm Beach County jail to be followed by 12 months community control (house arrest). *Id.* at ¶ 22.

Jane Doe has propounded various discovery requests regarding these allegations to Jeffrey Epstein. It is noteworthy that Epstein has asserted a Fifth Amendment self-incrimination privilege to these requests, rather than provide answers. For example, Jane Doe has asked Epstein to admit that he committed sexual assault against Jane Doe when she was minor. Plaintiff's First Request for Admissions to Defendant Epstein 11. In response, Epstein asserted his Fifth Amendment privilege not to incriminate himself.

For all these reasons, directing the receiver to post a \$15 million bond on behalf of Epstein is reasonable under the circumstances.

The UFTA "also grants the court equity powers to remedy . . . fraud." *Invo Florida, Inc. v. Somerset Venturer, Inc.*, 751 So.2d 1263, 1267 (Fla. Ct. Apps. 2000). The FUFTA's provisions are "supplement[ed]" by "the principles of law and equity." Fla. Stat. Ann. § 726.111. It is well-settled that "[a]n equitable action requires equitable relief." *Prince v. Tyler*, 890 So.2d 246, 251 (Fla. 2004), and "equity will do what ought to

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be done.” *Sterling v. Brevard County*, 776 So.2d 281, 284 (Fla. Ct. Apps. 2000). The Court should therefore also exercise its equitable powers to impose the same remedies that Jane Doe requests.

Of course, in equity, the Court considers the relative positions of the two claimants. Here, Jane Doe has presented substantial claims of sexual abuse against her while a minor, while Epstein (who pled guilty to felony charges involving such conduct) has taken the Fifth Amendment rather than answer questions about his sexual abuse of Jane Doe. If Jane Doe does not obtain the remedy that she is requesting, then Epstein may well be able to move all of his assets to unreachable locations, leaving her with a substantial tort claim and no possible way to satisfy it. On the other hand, appointing a receiver will not interfere with any legitimate interest of Epstein, particularly given his phenomenal wealth.

When this Court proceeds in equity, it “will not suffer a wrong to be without a remedy.” *Connell v. Mittendorf*, 147 So.2d 169, 172 (Fla. Ct. Apps. 1962). This case cries out for the Court to intercede and take action to avoid allowing a confessed and wealthy sex offender from concealing his assets and depriving his victims – including Jane Doe – from satisfying any judgment that they may well obtain against him. A receiver with control over Epstein’s assets is a modest and entirely appropriate step to take given Epstein’s actions.

For the consideration of the Court, a proposed order adopting these remedies is attached to this pleading.

**CASE NO: 08-CV-80119-MARRA/JOHNSON
CONCLUSION**

WHEREFORE, in view of the fraudulent transfers being made by Jeffrey Epstein to prevent Jane Doe from satisfying any judgment she might obtain in this case, the Court should appoint a receiver to take charge of Epstein's property and direct the receiver to provide the Court with an accounting of Epstein's assets and post a \$15 million bond to secure any potential judgment that Jane Doe might obtain in this case.

DATED this 19th day of June, 2009.

Respectfully Submitted,

s/ Bradley J. Edwards
Bradley J. Edwards
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CASE NO: 08-CV-80119-MARRA/JOHNSON
CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on June 19, 2009, I electronically filed the foregoing document with the Clerk of the Court using CM/ECF. I also certify that the foregoing document is being served this day on all parties on the attached Service List in the manner specified, either via transmission of Notices of Electronic Filing generated by CM/ECF or in some other authorized manner for those parties who are not authorized to receive electronically filed Notices of Electronic Filing.

s/ Bradley J. Edwards

Bradley J. Edwards

CASE NO: 08-CV-80119-MARRA/JOHNSON

SERVICE LIST

Jane Doe v. Jeffrey Epstein
United States District Court, Southern District of Florida

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AFFIDAVIT OF PAUL G. CASSELL, ESQUIRE

1. I, Paul Cassell, have personal knowledge of the matters set forth herein. I am an attorney licensed to practice in the State of Utah since 1992. My office is located at the University of Utah College of Law, where I am a law professor. Along with other attorneys, I represent plaintiff Jane Doe in this matter.

2. It appears that defendant Jeffrey Epstein is an extremely wealthy individual. According to reputable press reports, his net worth is in the hundreds of millions of dollars – if not, indeed, a billion dollars. *See, e.g.*, New York Times, July 1, 2008, at A2 (“Over the weekend Jeffrey E. Epstein, who after years of advising billionaires became a billionaire himself, left his estate on Little St. James Island, with its staff of 70 and its flamingo-stocked lagoon, boarded a private helicopter and flew to Florida. There, he turned himself in at the Palm Beach County jail and began serving 18 months for soliciting prostitution.”). According to the Wikipedia entry about Jeffrey Epstein, he is a billionaire and owner of a private island in the Virgin Islands (Little St. James Island), and was a financial trader at Bear Stearns. He then founded his own financial management firm, J.



Epstein and Col, later called Financial Trust Co., located on his private island in the U.S. Virgin Island. He reportedly only took billionaire clients.

3. Other attorneys and I have made repeated efforts to find published information about defendant Jeffrey Epstein in general and his financial dealings in particular. The most detailed published source of information about defendant Jeffrey Epstein that I have been able to locate is an article that was published in *Vanity Fair* by Vicky Ward. Vicky Ward is a contributing editor to *Vanity Fair*, a contributor to CNBC, and a weekly columnist for the *London Evening Standard*. The article can be found in the internet at <http://vickyward.com/wordpress/archives/30>.

4. According to the *Vanity Fair* article, defendant Jeffrey Epstein became wealthy by managing the financial assets of other billionaires. He reportedly limited his clients to those whose net worth was more than \$1 billion. Unlike other fund managers, however, Epstein kept all his deals and clients secret (with one exception – billionaire Leslie Wexner – who Epstein claims was his mentor). He has great skills in trading in international currency markets, which helped him make money for himself and his clients. As a result, it is reasonable to infer that he

has significant financial sophistication, including sophistication about the international transfer of financial instruments and other assets.

5. According to the *Vanity Fair* article, defendant Jeffrey Epstein's real mentor was not Leslie Wexner, but Steven Jude Hoffenberg, who was sent to federal prison for twenty years for bilking investors out of more than \$450 million in one of the largest Ponzi schemes in American history. Epstein assisted Hoffenberg with (failed) takeover bids of Pan American World Airways and Emery Air Freight.

6. According to the *Vanity Fair* article, before working with Wexner and Hoffenberg, defendant Jeffrey Epstein worked with Bearn Stearns. He left the firm very suddenly in 1981 after being questioned by S.E.C. investigators in an insider trading scandal involving several Italian and Swiss investors.

7. According to the *Vanity Fair* article, Epstein recently owned (and thus may still own) a Boeing 727 with a trading room.

8. Vicky Ward published a follow-up note to her earlier article in May 2008. It can be found at <http://www.vanityfair.com/online/daily/2008/05/vicky->

ward-you.html. According to this note, rumors were circulating (to celebrities such as Dustin Hoffman, Alec Baldwin, and filmmaker Michael Mailer) that Epstein was moving all of his considerable assets to Israel. The note also indicated that, having written the earlier detailed article about Epstein, Ward was now frequently viewed as an “expert” on Epstein.

9. According to reputable press reports, Jeffrey Epstein has travelled internationally with Donald Trump, former President Bill Clinton, and Prince Andrew. *See, e.g.*, The Daily Mail, *Prince Andrew's Billionaire Friend is Accused of Preying on Girl of 14*, Apr. 29, 2007, <http://www.dailymail.co.uk/news/article-451372/Prince-Andrews-billionaire-friend-accused-preying-girl-14.html> (“One of Prince Andrew’s closest friends [Jeffrey Epstein] is being investigated by the FBI for allegedly paying under-age girls for tawdry sexual encounters.”). It is therefore reasonable to infer that he has international contacts, including international financial contacts.

10. Approximately 25 civil suits have been filed in Florida state courts and Florida federal courts raising similar allegations against Jeffrey Epstein. These complaints seek damages comparable to those sought by Jane Doe in this case. Accordingly, Epstein has currently pending against him lawsuits seeking more than

\$1 billion in damages. Even given his great wealth, it appears that the lawsuits against him could well lead to his financial ruin, unless he is able to conceal his assets so that the plaintiffs in these cases are unable to reach them.

11. Since his guilty plea in state court, he has been incarcerated in the Palm Beach County Detention facility. I have been advised, however, that he has currently been allowed out on a "work release" program, where he works at managing his financial interests.

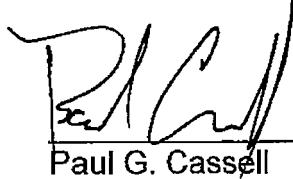
12. Because of his overseas contacts, other plaintiff attorneys and I have been greatly concerned that Epstein might attempt to transfer many of his assets overseas with the intent to defeat any judgment that might be entered against him. I have also received reports, that I am attempting to substantiate, that Epstein is transferring his assets out of the country at this time with the intent to make it impossible for Jane Doe and other plaintiffs to satisfy any significant judgment that they might obtain against him. In light of these reports, other attorneys and I have propounded the requests for admission regarding fraudulent asset transfers discussed in the pending motion.

13. In this case, Epstein has blocked all discovery regarding the current location of his assets and recent fraudulent transfers of his assets, by asserting a Fifth Amendment privilege against self-incrimination. With other attorneys working on this case (and related cases), I have wanted to obtain direct, first hand information regarding Epstein's financial dealings, but have been blocked for doing so by Epstein. Therefore, I have been forced to rely on reputable press reports for information about these dealings.

14. In the similar sexual abuse lawsuits filed against Epstein, other plaintiffs attorneys have advised that Epstein has likewise blocked all discovery regarding his finances with Fifth Amendment invocations or other interposed obstructions.

I swear the foregoing to be truthful under the penalty of perjury.

FURTHER THE AFFIANT SAYETH NAUGHT.



Paul G. Cassell

NOT A CERTIFIED COPY

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

CASE NO: 08-CV-80893-MARRA/JOHNSON

JANE DOE,

Plaintiff

vs.

JEFFREY EPSTEIN,

Defendant

PLAINTIFF'S FIRST REQUEST FOR ADMISSIONS TO DEFENDANT

COMES NOW the Plaintiff, Jane Doe, by and through her undersigned counsel, and files this her First Request for Admissions to the Defendant, JEFFREY EPSTEIN, and requests said Defendant admit or deny the following facts, in accordance with Federal Rules of Civil Procedure:

DEFINITIONS

The term "you" means and refers to the Defendant, JEFFREY EPSTEIN.

ADMISSIONS

1. Your net worth is greater than \$10 million.
2. Your net worth is greater than \$50 million.
3. Your net worth is greater than \$100 million.
4. Your net worth is greater than \$500 million.



5. Your net worth is greater than \$1 billion.
6. Since being incarcerated you have, directly or indirectly (through the services or assistance of other persons), conveyed money or assets in an attempt to insulate or protect your money or assets from being captured in any civil lawsuits filed against you.
7. You own or control, directly or indirectly, real estate property in the Caribbean.
8. You own or control, directly or indirectly, real estate property in foreign countries.
9. In the last 2 years you have transferred assets and/or money and/or financial instruments to countries outside the United States.
10. You have provided financial support to the modeling agency MC2.
11. You committed sexual assault against Plaintiff, a minor.
12. You committed battery against Plaintiff.
13. You digitally penetrated Plaintiff when she was a minor.
14. You offered Plaintiff more money contingent upon her having sex with you or giving you oral sex.
15. You intended to harm Plaintiff when you committed these sexual acts against her.
16. You knew Plaintiff was under the age of 16 when you sexually touched and fondled her.
17. You intend to hire investigators to intimidate and harass Plaintiff during this litigation.
18. You were engaged in the act of trafficking minors across state or country borders for the purposes of sex or prostitution between 2000 and the present.
19. You coerced Plaintiff into being a prostitute and remaining in prostitution.

20. You are guilty of the following offenses against Jane Doe:

- A. Procuring a minor for the purpose of prostitution as defined in F.S. 796.03
- B. Battery as defined by Florida Statutes
- C. Sexual Battery

21. You are moving significant financial assets overseas, outside of the direct territorial reach of the U.S. and Florida Courts.

22. You are making asset transfers with the intent to defeat any judgment that might be entered against you in this or similar cases.

23. You currently have the ability to post a bond of \$15 million to satisfy a judgment in this case without financial or other difficulty.

CERTIFICATE OF SERVICE

WE HEREBY CERTIFY that a true and correct copy of the above and foregoing has been provided via United States mail to the following addressees, this 23 day of March, 2009.

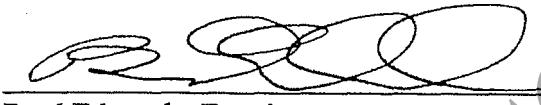
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Respectfully Submitted,

THE LAW OFFICE OF BRAD EDWARDS &
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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

CASE NO.: 08-CIV- 80893 – MARRA/JOHNSON

JANE DOE,

Plaintiff,

v.

JEFFREY EPSTEIN,

Defendant.

**DEFENDANT EPSTEIN'S RESPONSE TO PLAINTIFF JANE DOE'S
FIRST REQUEST FOR ADMISSIONS (dated 03/23/09)**

Defendant, JEFFREY EPSTEIN, ("EPSTEIN"), by and through his undersigned attorneys, serves his response to Plaintiff's First Request for Admission, dated March 23, 2009.

1. In response, Defendant asserts his U.S. constitutional privileges as specified herein. I intend to respond to all relevant discovery regarding this lawsuit, however, my attorneys have counseled me that I cannot provide answers to any discovery relevant to this lawsuit and I must accept this advice or risk losing my Sixth Amendment right to effective representation. Accordingly, I assert my federal constitutional rights under the Fifth, Sixth, and Fourteenth Amendments as guaranteed by the United States Constitution. Drawing an adverse inference under these circumstances would unconstitutionally burden my exercise of my constitutional rights, would be unreasonable, and would therefore violate the Constitution.

2. In response, Defendant asserts his U.S. constitutional privileges as specified herein. I intend to respond to all relevant discovery regarding this lawsuit, however, my



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3. In response, Defendant asserts his U.S. constitutional privileges as specified herein. I intend to respond to all relevant discovery regarding this lawsuit, however, my attorneys have counseled me that I cannot provide answers to any discovery relevant to this lawsuit and I must accept this advice or risk losing my Sixth Amendment right to effective representation. Accordingly, I assert my federal constitutional rights under the Fifth, Sixth, and Fourteenth Amendments as guaranteed by the United States Constitution. Drawing an adverse inference under these circumstances would unconstitutionally burden my exercise of my constitutional rights, would be unreasonable, and would therefore violate the Constitution.

4. In response, Defendant asserts his U.S. constitutional privileges as specified herein. I intend to respond to all relevant discovery regarding this lawsuit, however, my attorneys have counseled me that I cannot provide answers to any discovery relevant to this lawsuit and I must accept this advice or risk losing my Sixth Amendment right to effective representation. Accordingly, I assert my federal constitutional rights under the Fifth, Sixth, and Fourteenth Amendments as guaranteed by the United States Constitution. Drawing an adverse inference under these circumstances would unconstitutionally burden my exercise of my constitutional rights, would be unreasonable, and would therefore violate the Constitution.

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effective representation. Accordingly, I assert my federal constitutional rights under the Fifth, Sixth, and Fourteenth Amendments as guaranteed by the United States Constitution. Drawing an adverse inference under these circumstances would unconstitutionally burden my exercise of my constitutional rights, would be unreasonable, and would therefore violate the Constitution.

6. In response, Defendant asserts his U.S. constitutional privileges as specified herein. I intend to respond to all relevant discovery regarding this lawsuit, however, my attorneys have counseled me that I cannot provide answers to any discovery relevant to this lawsuit and I must accept this advice or risk losing my Sixth Amendment right to effective representation. Accordingly, I assert my federal constitutional rights under the Fifth, Sixth, and Fourteenth Amendments as guaranteed by the United States Constitution. Drawing an adverse inference under these circumstances would unconstitutionally burden my exercise of my constitutional rights, would be unreasonable, and would therefore violate the Constitution.

7. In response, Defendant asserts his U.S. constitutional privileges as specified herein. I intend to respond to all relevant discovery regarding this lawsuit, however, my attorneys have counseled me that I cannot provide answers to any discovery relevant to this lawsuit and I must accept this advice or risk losing my Sixth Amendment right to effective representation. Accordingly, I assert my federal constitutional rights under the Fifth, Sixth, and Fourteenth Amendments as guaranteed by the United States Constitution. Drawing an adverse inference under these circumstances would unconstitutionally burden my exercise of my constitutional rights, would be unreasonable, and would therefore violate the Constitution.

8. In response, Defendant asserts his U.S. constitutional privileges as specified herein. I intend to respond to all relevant discovery regarding this lawsuit, however, my attorneys have counseled me that I cannot provide answers to any discovery relevant to this lawsuit and I must accept this advice or risk losing my Sixth Amendment right to effective representation. Accordingly, I assert my federal constitutional rights under the Fifth, Sixth, and Fourteenth Amendments as guaranteed by the United States

Jane Doe v. Epstein, et al.

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Constitution. Drawing an adverse inference under these circumstances would unconstitutionally burden my exercise of my constitutional rights, would be unreasonable, and would therefore violate the Constitution.

9. In response, Defendant asserts his U.S. constitutional privileges as specified herein. I intend to respond to all relevant discovery regarding this lawsuit, however, my attorneys have counseled me that I cannot provide answers to any discovery relevant to this lawsuit and I must accept this advice or risk losing my Sixth Amendment right to effective representation. Accordingly, I assert my federal constitutional rights under the Fifth, Sixth, and Fourteenth Amendments as guaranteed by the United States Constitution. Drawing an adverse inference under these circumstances would unconstitutionally burden my exercise of my constitutional rights, would be unreasonable, and would therefore violate the Constitution.

10. In response, Defendant asserts his U.S. constitutional privileges as specified herein. I intend to respond to all relevant discovery regarding this lawsuit, however, my attorneys have counseled me that I cannot provide answers to any discovery relevant to this lawsuit and I must accept this advice or risk losing my Sixth Amendment right to effective representation. Accordingly, I assert my federal constitutional rights under the Fifth, Sixth, and Fourteenth Amendments as guaranteed by the United States Constitution. Drawing an adverse inference under these circumstances would unconstitutionally burden my exercise of my constitutional rights, would be unreasonable, and would therefore violate the Constitution.

11. In response, Defendant asserts his U.S. constitutional privileges as specified herein. I intend to respond to all relevant discovery regarding this lawsuit, however, my attorneys have counseled me that I cannot provide answers to any discovery relevant to this lawsuit and I must accept this advice or risk losing my Sixth Amendment right to effective representation. Accordingly, I assert my federal constitutional rights under the Fifth, Sixth, and Fourteenth Amendments as guaranteed by the United States Constitution. Drawing an adverse inference under these circumstances would

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Page 5

unconstitutionally burden my exercise of my constitutional rights, would be unreasonable, and would therefore violate the Constitution.

12. In response, Defendant asserts his U.S. constitutional privileges as specified herein. I intend to respond to all relevant discovery regarding this lawsuit, however, my attorneys have counseled me that I cannot provide answers to any discovery relevant to this lawsuit and I must accept this advice or risk losing my Sixth Amendment right to effective representation. Accordingly, I assert my federal constitutional rights under the Fifth, Sixth, and Fourteenth Amendments as guaranteed by the United States Constitution. Drawing an adverse inference under these circumstances would unconstitutionally burden my exercise of my constitutional rights, would be unreasonable, and would therefore violate the Constitution.

13. In response, Defendant asserts his U.S. constitutional privileges as specified herein. I intend to respond to all relevant discovery regarding this lawsuit, however, my attorneys have counseled me that I cannot provide answers to any discovery relevant to this lawsuit and I must accept this advice or risk losing my Sixth Amendment right to effective representation. Accordingly, I assert my federal constitutional rights under the Fifth, Sixth, and Fourteenth Amendments as guaranteed by the United States Constitution. Drawing an adverse inference under these circumstances would unconstitutionally burden my exercise of my constitutional rights, would be unreasonable, and would therefore violate the Constitution.

14. In response, Defendant asserts his U.S. constitutional privileges as specified herein. I intend to respond to all relevant discovery regarding this lawsuit, however, my attorneys have counseled me that I cannot provide answers to any discovery relevant to this lawsuit and I must accept this advice or risk losing my Sixth Amendment right to effective representation. Accordingly, I assert my federal constitutional rights under the Fifth, Sixth, and Fourteenth Amendments as guaranteed by the United States Constitution. Drawing an adverse inference under these circumstances would unconstitutionally burden my exercise of my constitutional rights, would be unreasonable, and would therefore violate the Constitution.

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15. In response, Defendant asserts his U.S. constitutional privileges as specified herein. I intend to respond to all relevant discovery regarding this lawsuit, however, my attorneys have counseled me that I cannot provide answers to any discovery relevant to this lawsuit and I must accept this advice or risk losing my Sixth Amendment right to effective representation. Accordingly, I assert my federal constitutional rights under the Fifth, Sixth, and Fourteenth Amendments as guaranteed by the United States Constitution. Drawing an adverse inference under these circumstances would unconstitutionally burden my exercise of my constitutional rights, would be unreasonable, and would therefore violate the Constitution.

16. In response, Defendant asserts his U.S. constitutional privileges as specified herein. I intend to respond to all relevant discovery regarding this lawsuit, however, my attorneys have counseled me that I cannot provide answers to any discovery relevant to this lawsuit and I must accept this advice or risk losing my Sixth Amendment right to effective representation. Accordingly, I assert my federal constitutional rights under the Fifth, Sixth, and Fourteenth Amendments as guaranteed by the United States Constitution. Drawing an adverse inference under these circumstances would unconstitutionally burden my exercise of my constitutional rights, would be unreasonable, and would therefore violate the Constitution.

17. In response, Defendant asserts his U.S. constitutional privileges as specified herein. I intend to respond to all relevant discovery regarding this lawsuit, however, my attorneys have counseled me that I cannot provide answers to any discovery relevant to this lawsuit and I must accept this advice or risk losing my Sixth Amendment right to effective representation. Accordingly, I assert my federal constitutional rights under the Fifth, Sixth, and Fourteenth Amendments as guaranteed by the United States Constitution. Drawing an adverse inference under these circumstances would unconstitutionally burden my exercise of my constitutional rights, would be unreasonable, and would therefore violate the Constitution.

18. In response, Defendant asserts his U.S. constitutional privileges as specified herein. I intend to respond to all relevant discovery regarding this lawsuit, however, my

Jane Doe v. Epstein, et al.

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attorneys have counseled me that I cannot provide answers to any discovery relevant to this lawsuit and I must accept this advice or risk losing my Sixth Amendment right to effective representation. Accordingly, I assert my federal constitutional rights under the Fifth, Sixth, and Fourteenth Amendments as guaranteed by the United States Constitution. Drawing an adverse inference under these circumstances would unconstitutionally burden my exercise of my constitutional rights, would be unreasonable, and would therefore violate the Constitution.

19. In response, Defendant asserts his U.S. constitutional privileges as specified herein. I intend to respond to all relevant discovery regarding this lawsuit, however, my attorneys have counseled me that I cannot provide answers to any discovery relevant to this lawsuit and I must accept this advice or risk losing my Sixth Amendment right to effective representation. Accordingly, I assert my federal constitutional rights under the Fifth, Sixth, and Fourteenth Amendments as guaranteed by the United States Constitution. Drawing an adverse inference under these circumstances would unconstitutionally burden my exercise of my constitutional rights, would be unreasonable, and would therefore violate the Constitution.

20. In response to 20 A, B, and C, Defendant asserts his U.S. constitutional privileges as specified herein. I intend to respond to all relevant discovery regarding this lawsuit, however, my attorneys have counseled me that I cannot provide answers to any discovery relevant to this lawsuit and I must accept this advice or risk losing my Sixth Amendment right to effective representation. Accordingly, I assert my federal constitutional rights under the Fifth, Sixth, and Fourteenth Amendments as guaranteed by the United States Constitution. Drawing an adverse inference under these circumstances would unconstitutionally burden my exercise of my constitutional rights, would be unreasonable, and would therefore violate the Constitution.

21. In response, Defendant asserts his U.S. constitutional privileges as specified herein. I intend to respond to all relevant discovery regarding this lawsuit, however, my attorneys have counseled me that I cannot provide answers to any discovery relevant to this lawsuit and I must accept this advice or risk losing my Sixth Amendment right to

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Page 8

effective representation. Accordingly, I assert my federal constitutional rights under the Fifth, Sixth, and Fourteenth Amendments as guaranteed by the United States Constitution. Drawing an adverse inference under these circumstances would unconstitutionally burden my exercise of my constitutional rights, would be unreasonable, and would therefore violate the Constitution.

22. In response, Defendant asserts his U.S. constitutional privileges as specified herein. I intend to respond to all relevant discovery regarding this lawsuit, however, my attorneys have counseled me that I cannot provide answers to any discovery relevant to this lawsuit and I must accept this advice or risk losing my Sixth Amendment right to effective representation. Accordingly, I assert my federal constitutional rights under the Fifth, Sixth, and Fourteenth Amendments as guaranteed by the United States Constitution. Drawing an adverse inference under these circumstances would unconstitutionally burden my exercise of my constitutional rights, would be unreasonable, and would therefore violate the Constitution.

23. In response, Defendant asserts his U.S. constitutional privileges as specified herein. I intend to respond to all relevant discovery regarding this lawsuit, however, my attorneys have counseled me that I cannot provide answers to any discovery relevant to this lawsuit and I must accept this advice or risk losing my Sixth Amendment right to effective representation. Accordingly, I assert my federal constitutional rights under the Fifth, Sixth, and Fourteenth Amendments as guaranteed by the United States Constitution. Drawing an adverse inference under these circumstances would unconstitutionally burden my exercise of my constitutional rights, would be unreasonable, and would therefore violate the Constitution.

Certificate of Service

WE HEREBY CERTIFY that a true copy of the foregoing has been sent via U.S. Mail and facsimile to the following addressees this 18 day of May, 2009.

Jane Doe v. Epstein, et al.
Page 9

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Co-Counsel for Defendant Jeffrey Epstein

Respectfully submitted,

By: 
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(Counsel for Defendant Jeffrey Epstein)

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

JANE DOE NO. 2,

CASE NO: 08-CV-80119- MARRA/JOHNSON

Plaintiff

vs.

JEFFREY EPSTEIN,

Defendant

JANE DOE NO. 3,

CASE NO: 08-CV-80232-MARRA/JOHNSON

Plaintiff

vs.

JEFFREY EPSTEIN,

Defendant

JANE DOE NO. 4,

CASE NO: 08-CV-80380-MARRA/JOHNSON

Plaintiff

vs.

JEFFREY EPSTEIN,

Defendant

JANE DOE NO. 5,

CASE NO: 08-CV-80381-MARRA/JOHNSON

Plaintiff

vs.

JEFFREY EPSTEIN,

Defendant

/

JANE DOE NO. 6.

CASE NO: 08-CV-80994-MARRA/JOHNSON

Plaintiff

vs.

JEFFREY EPSTEIN,

Defendant

/

JANE DOE NO. 7,

CASE NO: 08-CV-80993-MARRA/JOHNSON

Plaintiff

vs.

JEFFREY EPSTEIN,

Defendant

/

CASE NO: 08-CV-80119-MARRA/JOHNSON

CASE NO: 08-CV-80811-MARRA/JOHNSON

C.M.A.,

Plaintiff

vs.

JEFFREY EPSTEIN,

Defendant

/

JANE DOE,

CASE NO. 8-CV-80893-MARRA/JOHNSON

Plaintiff,

vs.

JEFFREY EPSTEIN, et al.

Defendant.

/

DOE II,

CASE NO: 09-CV-80469-MARRA/JOHNSON

Plaintiff

vs.

JEFFREY EPSTEIN, et al.

Defendants.

/

CASE NO: 08-CV-80119-MARRA/JOHNSON

JANE DOE NO. 101,

CASE NO: 09-CV-80591-MARRA/JOHNSON

Plaintiff

vs.

JEFFREY EPSTEIN,

Defendant

/

JANE DOE NO. 102,

CASE NO: 09-CV-80656-MARRA/JOHNSON

Plaintiff

vs.

JEFFREY EPSTEIN,

Defendant

/

**ORDER APPOINTING RECEIVER AND DIRECTING RECEIVER TO SECURE
ASSETS FOR POSTING OF A BOND**

For the reasons provided in Jane Doe's Memorandum in Support of Motion for Appointment of a Receiver to Take Charge Property of Epstein, and for Posting of a \$15 Million Bond to Secure Potential Judgment, it is adjudged:

1. The defendant, Jeffrey Epstein, is hereby ordered not to make any further transfers of assets that are fraudulent, as defined in the Florida Uniform Fraudulent Transfer Act, Fla. Stat. Ann. § 726.101 *et seq.* Epstein also shall not transfer any of his assets outside the fifty states of the United States or the District of Columbia without first seeking leave of court, after providing notice and an opportunity to be heard by plaintiff Jane Doe.

CASE NO: 08-CV-80119-MARRA/JOHNSON

2. _____ is appointed as receiver of all the real property, good, chattels, moneys, financial instruments, stocks, or other assets of any type of defendant Jeffrey Epstein, and all the rents, income, interest, and profits from them, all called the "property" in this order, and the receiver is directed to immediately enter upon, receive and take complete possession of all of the property and the rents, income and profits.

3. Defendant Jeffrey Epstein, and his servants, agents and employees are ordered to deliver immediately to the receiver all of the property and they, and each of them, are enjoined from interfering in any way with the receiver or with any of the property until the further order of this court.

4. Defendant Jeffrey Epstein and his servants, agents and employees are further ordered to deliver to the receiver or his representative, all keys or combinations to locks required to open or gain access to any of the property and all money deposited in any bank to the credit of the defendant, and any other money, financial instruments, or things of value of the defendant wherever they may be.

5. The receiver is granted all the usual, necessary and incidental powers for the purpose of managing and maintain the property, including the power to appoint such agents as the receiver considers necessary to enable the receiver to perform the receiver's duties.

6. The receiver shall, within 60 days of this order, if sufficient assets are available, post a \$15 million bond on behalf of Jeffrey Epstein with the Clerk of the Court to secure any potential judgment the plaintiff might obtain. The

CASE NO: 08-CV-80119-MARRA/JOHNSON

receiver shall also by that time file an accounting of all significant assets of Jeffrey Epstein with the Court. The receiver shall be entitled to reasonable compensation and coverage of expenses, as approved by the Court.

DONE AND ORDERED in Chambers at West Palm Beach, Palm Beach County, Florida, this _____ day of _____, 2009.

KENNETH A. MARRA
United States District Judge

Copies furnished to:
All counsel of record

APP. 6

NOT A CERTIFIED COPY

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

CASE NO.: 08-CIV-80119-MARRA/JOHNSON ✓

JANE DOE NO. 2,

Plaintiff,

vs.

JEFFREY EPSTEIN,

Defendant.

Related cases:

08-80232, 08-80380, 08-80381, 08-80994,
08-80993, 08-80811, 08-80893, 09-80469,
09-80591, 09-80656, 09-80802, 09-81092

ORDER

____ This cause is before the Court upon Plaintiff Jane Doe's Motion for Injunction Restraining Fraudulent Transfer of Assets, Appointment of a Receiver to Take Charge of Property of Epstein, and to Post a \$15 Million Bond to Secure Potential Judgment (DE 165). Defendant Jeffrey Epstein filed a response in opposition to the motion (DE 198), and Plaintiff filed a reply (DE 217). The motion is now fully briefed and ripe for review.

____ Plaintiff's motion argues that Defendant is fraudulently transferring his assets with the specific intent to defeat any judgment that might be entered against him in this and other similar cases. Plaintiff therefore seeks an order enjoining Defendant from fraudulent transfers of his assets, appointing a receiver to take charge of Defendant's property, and requiring Defendant to post a \$15 million dollar bond against any potential judgment in this case.

The relief sought by Plaintiff is injunctive and, essentially, amounts to a prejudgment writ of attachment. Rosen v. Cascade Intern., Inc., 21 F.3d 1520, 1530 (11th Cir. 1994) (vacating district court's preliminary injunction freezing defendant's assets). "No relief of this character has been thought justified in the long history of equity jurisprudence." De Beers Consol. Mines, Ltd. v. United States, 325 U.S. 212, 222-23 (1945).

"Preliminary injunctive relief freezing a defendant's assets in order to establish a fund with which to satisfy a potential judgment for money damages is simply not an appropriate exercise of a federal district court's authority." Rosen, 21 F.3d at 1530. Indeed, "[i]t is entirely settled by a long and unbroken line of Florida cases that in an action at law for money damages, there is simply no judicial authority for an order requiring the deposit of the amount in controversy into the registry of the court ... or indeed for any restraint upon the use of a defendant's unrestricted assets prior to the entry of judgment." Id. at 1531, quoting Konover Realty Assoc., Ltd. v. Mladen, 511 So.2d 705, 706 (Fla. 3d DCA 1987).

In Florida, an injunction cannot be entered to prevent a party from using or disposing of his assets prior to the conclusion of a legal action. Briceno v. Bryden Investments, Ltd., 973 So.2d 614, 616 (Fla. 3d DCA 2008). See also SME Racks, Inc. v. Sistemas Mecanicos Para, Electronica, S.A., 243 Fed.Appx. 502 (11th Cir. 2007) (affirming district's court's denial of preliminary injunction to freeze defendant's assets); Proctor v. Eason, 651 So.2d 1301, 1301-02 (Fla. 2d DCA 1995) (Defendant not required to deposit funds in court registry prior to final judgment where Plaintiff failed to show unavailability of an adequate remedy at law and the likelihood of irreparable harm, two elements essential to entry of an injunction); Lawhon v. Mason, 611 So.2d 1367 (Fla. 2d DCA 1993) (quashing trial court order requiring defendant to

give plaintiffs ten days notice prior to the transfer of any assets in excess of \$500).

Additionally, as the Eleventh Circuit explained in Rosen:

In actions at law, plaintiffs in Florida possess an adequate, exclusive prejudgment remedy for the sequestration of assets under the attachment statute, Fla.Stat.Ann. § 76.04-.05 (West 1987), provided that they can satisfy the enumerated statutory grounds for relief. Accordingly, **the use of injunctive relief as a substitute for the remedy of prejudgment attachment, with its attendant safeguards, is improper.**

21 F.3d at 1531 (emphasis added). Here, Plaintiff did not move to amend her complaint to allege a claim under the Florida Uniform Fraudulent Transfers Act ("FUFTA"), Fla. Stat. § 726.101, et seq.¹ Rather, she filed the present motion for injunctive relief. Even if she had moved to amend her complaint, it is certainly not clear that she could meet the required statutory elements.

Plaintiff's motion is premised on the contention that Defendant is fraudulently transferring his assets. However, Plaintiff's motion is entirely devoid of evidence of Defendant's alleged fraudulent transfers. The Court declines to conclude that Defendant is fraudulently transferring assets based upon the adverse inferences relied upon by Plaintiff. (Plaintiff's supplemental filing regarding the titles of approximately five of Defendant's vehicles is clearly de minimis, particularly in light of Plaintiff's repeated characterization of Defendant as a "billionaire."

Based upon the foregoing, it is hereby

ORDERED AND ADJUDGED that

¹Fraudulent transfer claims under Florida law arise under the Florida Uniform Fraudulent Transfers Act ("FUFTA"), Fla. Stat. § 726.101, et seq. FUFTA, as set forth in Florida Statute § 726.105, provides the substantive requirements that must be pled to state a valid fraudulent transfer claim. Nationsbank, N.A. v. Coastal Utilities, Inc., 814 So.2d 1227, 1229 (Fla. Dist Ct. App. 2002). The plaintiff must show that "(1) there was a creditor to be defrauded; (2) a debtor intending fraud; and (3) a conveyance of property which could have been applicable to the payment of the debt due." Id.

(1) Plaintiff Jane Doe's Motion for leave to Provide Recently-obtained Deposition

Testimony and Affidavit (DE 386 in 08-80119) is **GRANTED**.

(2) Plaintiff Jane Doe's Motion for Injunction Restraining Fraudulent Transfer of Assets,

Appointment of a Receiver to Take Charge of Property of Epstein, and to Post a \$15 Million

Bond to Secure Potential Judgment (DE 165 in 08-80119) is **DENIED**.

DONE AND ORDERED in Chambers at West Palm Beach, Palm Beach County, Florida, this 5th day of November, 2009.

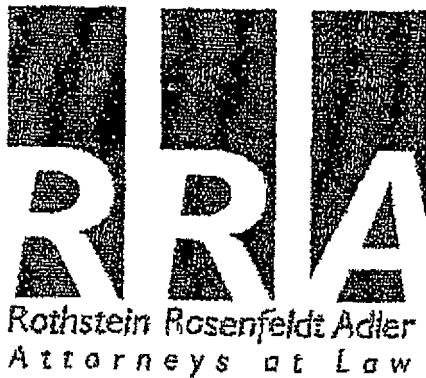


KENNETH A. MARRA
United States District Judge

Copies to:
all counsel of record

APP.7

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Bradley J. Edwards
Direct Dial: 954-315-7266
bedwards@rra-law.com

July 22, 2009

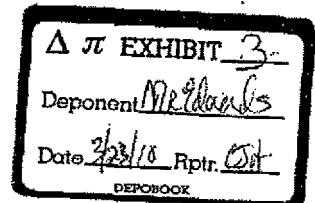
Via Facsimile:

305-931-0877 Adam D. Horowitz, Esquire
 561-832-7137 Stuart S. Mermelstein, Esquire
 561-832-7137 Isidro Manuel Garcia, Esquire
 305-931-0877 Jeffrey Marc Herman, Esquire
 305-358-2382 Katherine Earthen Ezell, Esquire
 561-684-5707 Robert C. Josefsberg, Esquire
 561-684-5707 Jack Hill, Esquire

Dear Counsel,

We have recently received Notice for Depositions from Adam Horowitz for several witnesses and the lever from Jack Hill indicating an intent to take others. We intend to Cross-Notice each deposition. Additionally, we intend to set the following other individuals for video deposition:

1. Donald Trump (West Palm Beach)
2. Glen Dubin (West Palm Beach)
3. Ghislain Maxwell (New York)
4. Sara Keller (New York)
5. Leslie Wexner (Ohio)
6. Bill Clinton (D.C.)
7. Paula-Heil-(New York)
8. Jean -Luc Bruhel (New York)



Reply To: Las Olas City Centre • 401 East Las Olas Boulevard • Suite 1650 • Fort Lauderdale, Florida 33301 Telephone: (954) 522-3456 • Fax: (954) 527-8663
 BOCA RATON • FORT LAUDERDALE • MIAMI • NEW YORK CITY • TALLAHASSEE • WASHINGTON D.C. • WEST PALM BEACH

EXHIBIT M

#3

July 22, 2009
Page 2 of 3

We will choose dates that have not already been occupied by other depositions already set in this case. If you would like to be included in the scheduling of these depositions, please provide me with your scheduling secretaries' names and e-mail addresses. If any of you do not need to be consulted regarding the scheduling of these depositions, please advise me of that as well.

Very truly yours,
ROTHSTEIN ROSENFELDT ADLER



Bradley J. Edwards, Esquire
Partner
Fot the Firm
BJE/mgl

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APP.8

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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

L.M.,

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, L.M., hereby sues the Defendant, Jeffrey Epstein, and states as follows:

1. At all times material to this cause of action, L.M., was a resident of Palm Beach County, Florida.
2. This Complaint is brought under a fictitious name to protect the identity of L.M., 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

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. L.M. 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 L.M. 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 L.M. (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 L.M. 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 L.M. to perform oral sex on him, using vibrators or sexual toys on the then-minor L.M., coercing the

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

10. L.M. 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 L.M. 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 L.M. to commit various acts of sexual misconduct and sexually abused L.M. These acts included, but were not limited to, fondling and inappropriate and illegal sexual touching of the then-minor L.M., forcing the then-minor L.M. into oral sex, sexual misconduct and masturbation of the Defendant, Jeffrey Epstein, in the presence of the then-minor L.M., handling and fondling of the then-minor L.M.'s sexual organs for the purpose of masturbation, and encouraging the then-minor L.M. 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 L.M. Defendant Jeffrey

Epstein knowingly transported L.M. and other minors in interstate commerce with the intent that the L.M. 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 knowing persuade and induce minors, including L.M., 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 L.M., Defendant, Jeffrey Epstein, instructed, coerced and otherwise induced the then-minor L.M. to bring him numerous other minor girls (some as young at 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 L.M. to bring him these other minor girls for purposes of prostitution and in exchange for money. This influence led the then-minor L.M. away from the life of a middle school aged child and into a delinquent lifestyle. This conduct also involved transporting L.M. and other minors in interstate commerce and using means of interstate commerce, to persuade and induce L.M. 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 L.M.'s minority. The Defendant, Jeffrey Epstein, at all times

material to this Complaint, knew and should have known 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 L.M. 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 L.M. 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 L.M. 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 L.M..

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 L.M. 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, L.M., including admitting liability for all counts enumerated in this Complaint. Plaintiff L.M. 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, L.M. adopts and realleges paragraphs 1 through 20 above.

22. On or about August 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). 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.

23. 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 L.M. incurred medical and psychological expenses and the plaintiff, L.M., 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, L.M., will continue to suffer these losses in the future.

24. Wherefore, the plaintiff, L.M., 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, L.M. adopts and realleges paragraphs 1 through 20 above.

26. On or about August 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). 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.

27. 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 L.M. incurred medical and psychological expenses and the plaintiff, L.M., 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, L.M., will continue to suffer these losses in the future.

28. Wherefore, the plaintiff, L.M., 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, L.M. adopts and realleges paragraphs 1 through 20 above.

30. On or about August 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). 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.

31. 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 L.M. incurred medical and psychological expenses and the plaintiff, L.M., 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, L.M., will continue to suffer these losses in the future.

32. Wherefore, the plaintiff, L.M., 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, L.M. adopts and realleges paragraphs 1 through 20 above.

34. On or about August 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). 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.

35. 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 L.M. incurred medical and psychological expenses and the plaintiff, L.M., 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, L.M., will continue to suffer these losses in the future.

36. Wherefore, the plaintiff, L.M., 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, L.M. adopts and realleges paragraphs 1 through 20 above.

38. On or about September 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). 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, 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 L.M. incurred medical and psychological expenses and the plaintiff, L.M., 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, L.M., will continue to suffer these losses in the future.

40. Wherefore, the plaintiff, L.M., 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, L.M. adopts and realleges paragraphs 1 through 20 above.

42. On or about September 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). 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.

43. 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 L.M. incurred medical and psychological expenses and the plaintiff, L.M., 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, L.M., will continue to suffer these losses in the future.

44. Wherefore, the plaintiff, L.M., 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, L.M. adopts and realleges paragraphs 1 through 20 above.

46. On or about September 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). 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.

47. 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 L.M. incurred medical and psychological expenses and the plaintiff, L.M., 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, L.M., will continue to suffer these losses in the future.

48. Wherefore, the plaintiff, L.M., 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, L.M. adopts and realleges paragraphs 1 through 20 above.

50. On or about September 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). 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.

51. 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 L.M. incurred medical and psychological expenses and the plaintiff, L.M., 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, L.M., will continue to suffer these losses in the future.

52. Wherefore, the plaintiff, L.M., 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, L.M. adopts and realleges paragraphs 1 through 20 above.

54. 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). 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.

55. 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 L.M. incurred medical and psychological expenses and the plaintiff, L.M., 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, L.M., will continue to suffer these losses in the future.

56. Wherefore, the plaintiff, L.M., 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, L.M. 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).

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.

59. 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 L.M. incurred medical and psychological expenses and the plaintiff, L.M., 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, L.M., will continue to suffer these losses in the future.

60. Wherefore, the plaintiff, L.M., 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, L.M. adopts and realleges paragraphs 1 through 20 above.

62. 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). 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.

63. 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 L.M. incurred medical and psychological expenses and the plaintiff, L.M., 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, L.M., will continue to suffer these losses in the future.

64. Wherefore, the plaintiff, L.M., 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, L.M. adopts and realleges paragraphs 1 through 20 above.

66. 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). 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.

67. 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 L.M. incurred medical and psychological expenses and the plaintiff, L.M., 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, L.M., will continue to suffer these losses in the future.

68. Wherefore, the plaintiff, L.M., 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, L.M. adopts and realleges paragraphs 1 through 20 above.

70. On or about November 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). 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.

71. 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 L.M. incurred medical and psychological expenses and the plaintiff, L.M., 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, L.M., will continue to suffer these losses in the future.

72. Wherefore, the plaintiff, L.M., 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, L.M. adopts and realleges paragraphs 1 through 20 above.

74. On or about November 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). 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.

75. 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 L.M. incurred medical and psychological expenses and the plaintiff, L.M., 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, L.M., will continue to suffer these losses in the future.

76. Wherefore, the plaintiff, L.M., 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, L.M. adopts and realleges paragraphs 1 through 20 above.

78. On or about November 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). 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.

79. 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 L.M. incurred medical and psychological expenses and the plaintiff, L.M., 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, L.M., will continue to suffer these losses in the future.

80. Wherefore, the plaintiff, L.M., 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, L.M. adopts and realleges paragraphs 1 through 20 above.

82. On or about November 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). 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.

83. 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 L.M. incurred medical and psychological expenses and the plaintiff, L.M., 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, L.M., will continue to suffer these losses in the future.

84. Wherefore, the plaintiff, L.M., 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, L.M. adopts and realleges paragraphs 1 through 20 above.

86. On or about December 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). 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.

87. 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 L.M. incurred medical and psychological expenses and the plaintiff, L.M., 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, L.M., will continue to suffer these losses in the future.

88. Wherefore, the plaintiff, L.M., 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, L.M. adopts and realleges paragraphs 1 through 20 above.

90. On or about December 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). 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.

91. 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 L.M. incurred medical and psychological expenses and the plaintiff, L.M., 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, L.M., will continue to suffer these losses in the future.

92. Wherefore, the plaintiff, L.M., 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 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). 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, 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 L.M. incurred medical and psychological expenses and the plaintiff, L.M., 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, L.M., will continue to suffer these losses in the future.

96. Wherefore, the plaintiff, L.M., 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, L.M. adopts and realleges paragraphs 1 through 20 above.

98. On or about December 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). 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.

99. 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 L.M. incurred medical and psychological expenses and the plaintiff, L.M., 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, L.M., will continue to suffer these losses in the future.

100. Wherefore, the plaintiff, L.M., 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, L.M. adopts and realleges paragraphs 1 through 20 above.

102. On or about January 2003, 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).

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.

103. 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 L.M. incurred medical and psychological expenses and the plaintiff, L.M., 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, L.M., will continue to suffer these losses in the future.

104. Wherefore, the plaintiff, L.M., 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, L.M. adopts and realleges paragraphs 1 through 20 above.

106. On or about January 2003, 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). 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.

107. 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 L.M. incurred medical and psychological expenses and the plaintiff, L.M., 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, L.M., will continue to suffer these losses in the future.

108. Wherefore, the plaintiff, L.M., 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, L.M. adopts and realleges paragraphs 1 through 20 above.

110. On or about January 2003, 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). 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.

111. 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 L.M. incurred medical and psychological expenses and the plaintiff, L.M., 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, L.M., will continue to suffer these losses in the future.

112. Wherefore, the plaintiff, L.M., 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, L.M. adopts and realleges paragraphs 1 through 20 above.

114. On or about January 2003, 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). 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.

115. 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 L.M. incurred medical and psychological expenses and the plaintiff, L.M., 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, L.M., will continue to suffer these losses in the future.

116. Wherefore, the plaintiff, L.M., 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, L.M. adopts and realleges paragraphs 1 through 20 above.

118. On or about February 2003, 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). 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.

119. 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 L.M. incurred medical and psychological expenses and the plaintiff, L.M., 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, L.M., will continue to suffer these losses in the future.

120. Wherefore, the plaintiff, L.M., 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, L.M. adopts and realleges paragraphs 1 through 20 above.

122. On or about February 2003, 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). 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.

123. 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 L.M. incurred medical and psychological expenses and the plaintiff, L.M., 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, L.M., will continue to suffer these losses in the future.

124. Wherefore, the plaintiff, L.M., 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, L.M. adopts and realleges paragraphs 1 through 20 above.

126. On or about February 2003, 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). 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.

127. 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 L.M. incurred medical and psychological expenses and the plaintiff, L.M., 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, L.M., will continue to suffer these losses in the future.

128. Wherefore, the plaintiff, L.M., 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, L.M. adopts and realleges paragraphs 1 through 20 above.

130. On or about February 2003, 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). 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.

131. 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 L.M. incurred medical and psychological expenses and the plaintiff, L.M., 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, L.M., will continue to suffer these losses in the future.

132. Wherefore, the plaintiff, L.M., 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, L.M. adopts and realleges paragraphs 1 through 20 above.

134. On or about March 2003, 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). 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.

135. 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 L.M. incurred medical and psychological expenses and the plaintiff, L.M., 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, L.M., will continue to suffer these losses in the future.

136. Wherefore, the plaintiff, L.M., 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, L.M. adopts and realleges paragraphs 1 through 20 above.

138. On or about March 2003, 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). 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.

139. 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 L.M. incurred medical and psychological expenses and the plaintiff, L.M., 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, L.M., will continue to suffer these losses in the future.

140. Wherefore, the plaintiff, L.M., 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 31

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

March 2003 – Incident 3

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

142. On or about March 2003, 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). 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.

143. 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 L.M. incurred medical and psychological expenses and the plaintiff, L.M., 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, L.M., will continue to suffer these losses in the future.

144. Wherefore, the plaintiff, L.M., 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 32

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

March 2003 – Incident 4

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

146. On or about March 2003, 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).

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.

147. 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 L.M. incurred medical and psychological expenses and the plaintiff, L.M., 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, L.M., will continue to suffer these losses in the future.

148. Wherefore, the plaintiff, L.M., 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 33

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

April 2003 – Incident 1

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

150. On or about April 2003, 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). 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.

151. 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 L.M. incurred medical and psychological expenses and the plaintiff, L.M., 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, L.M., will continue to suffer these losses in the future.

152. Wherefore, the plaintiff, L.M., 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 34

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

April 2003 – Incident 2

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

154. On or about April 2003, 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). 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.

155. 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 L.M. incurred medical and psychological expenses and the plaintiff, L.M., 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, L.M., will continue to suffer these losses in the future.

156. Wherefore, the plaintiff, L.M., 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 35

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

April 2003 – Incident 3

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

158. On or about April 2003, 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). 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.

159. 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 L.M. incurred medical and psychological expenses and the plaintiff, L.M., 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, L.M., will continue to suffer these losses in the future.

160. Wherefore, the plaintiff, L.M., 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 36

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

April 2003 – Incident 4

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

162. On or about April 2003, 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). 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.

163. 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 L.M. incurred medical and psychological expenses and the plaintiff, L.M., 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, L.M., will continue to suffer these losses in the future.

164. Wherefore, the plaintiff, L.M., 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 37

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

May 2003 – Incident 1

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

166. On or about May 2003, 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). 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.

167. 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 L.M. incurred medical and psychological expenses and the plaintiff, L.M., 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, L.M., will continue to suffer these losses in the future.

168. Wherefore, the plaintiff, L.M., 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 38

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

May 2003 – Incident 2

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

170. On or about Mayl 2003, 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). 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.

171. 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 L.M. incurred medical and psychological expenses and the plaintiff, L.M., 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, L.M., will continue to suffer these losses in the future.

172. Wherefore, the plaintiff, L.M., 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 39

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

May 2003 – Incident 3

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

174. On or about May 2003, 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). 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.

175. 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 L.M. incurred medical and psychological expenses and the plaintiff, L.M., 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, L.M., will continue to suffer these losses in the future.

176. Wherefore, the plaintiff, L.M., 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 40

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

May 2003 – Incident 4

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

178. On or about May 2003, 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). 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.

179. 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 L.M. incurred medical and psychological expenses and the plaintiff, L.M., 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, L.M., will continue to suffer these losses in the future.

180. Wherefore, the plaintiff, L.M., 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 41

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

June 2003 – Incident 1

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

182. On or about June 2003, 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). 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.

183. 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 L.M. incurred medical and psychological expenses and the plaintiff, L.M., 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, L.M., will continue to suffer these losses in the future.

184. Wherefore, the plaintiff, L.M., 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 42

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

June 2003 – Incident 2

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

186. On or about June 2003, 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). 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.

187. 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 L.M. incurred medical and psychological expenses and the plaintiff, L.M., 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, L.M., will continue to suffer these losses in the future.

188. Wherefore, the plaintiff, L.M., 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 43

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

June 2003 – Incident 3

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

190. On or about June 2003, 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).

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.

191. 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 L.M. incurred medical and psychological expenses and the plaintiff, L.M., 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, L.M., will continue to suffer these losses in the future.

192. Wherefore, the plaintiff, L.M., 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 44

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

June 2003 – Incident 4

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

194. On or about June 2003, 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). 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.

195. 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 L.M. incurred medical and psychological expenses and the plaintiff, L.M., 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, L.M., will continue to suffer these losses in the future.

196. Wherefore, the plaintiff, L.M., 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 45

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

July 2003 – Incident 1

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

198. On or about July 2003, 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). 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.

199. 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 L.M. incurred medical and psychological expenses and the plaintiff, L.M., 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, L.M., will continue to suffer these losses in the future.

200. Wherefore, the plaintiff, L.M., 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 46

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

July 2003 – Incident 2

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

202. On or about July 2003, 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). 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.

203. 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 L.M. incurred medical and psychological expenses and the plaintiff, L.M., 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, L.M., will continue to suffer these losses in the future.

204. Wherefore, the plaintiff, L.M., 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 47

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

July 2003 – Incident 3

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

206. On or about July 2003, 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). 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.

207. 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 L.M. incurred medical and psychological expenses and the plaintiff, L.M., 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, L.M., will continue to suffer these losses in the future.

208. Wherefore, the plaintiff, L.M., 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 48

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

July 2003 – Incident 4

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

210. On or about July 2003, 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). 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.

211. 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 L.M. incurred medical and psychological expenses and the plaintiff, L.M., 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, L.M., will continue to suffer these losses in the future.

212. Wherefore, the plaintiff, L.M., 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 49

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

August 2003 – Incident 1

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

214. On or about August 2003, 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). 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.

215. 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 L.M. incurred medical and psychological expenses and the plaintiff, L.M., 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, L.M., will continue to suffer these losses in the future.

216. Wherefore, the plaintiff, L.M., 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 50

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

August 2003 – Incident 2

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

218. On or about August 2003, 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). 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.

219. 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 L.M. incurred medical and psychological expenses and the plaintiff, L.M., 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, L.M., will continue to suffer these losses in the future.

220. Wherefore, the plaintiff, L.M., 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 51

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

August 2003 – Incident 3

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

222. On or about August 2003, 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). 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.

223. 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 L.M. incurred medical and psychological expenses and the plaintiff, L.M., 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, L.M., will continue to suffer these losses in the future.

224. Wherefore, the plaintiff, L.M., 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 52

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

August 2003 – Incident 4

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

226. On or about August 2003, 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). 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.

227. 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 L.M. incurred medical and psychological expenses and the plaintiff, L.M., 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, L.M., will continue to suffer these losses in the future.

228. Wherefore, the plaintiff, L.M., 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 53

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

September 2003 – Incident 1

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

230. On or about September 2003, 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). 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.

231. 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 L.M. incurred medical and psychological expenses and the plaintiff, L.M., 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, L.M., will continue to suffer these losses in the future.

232. Wherefore, the plaintiff, L.M., 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 54

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

September 2003 – Incident 2

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

234. On or about September 2003, 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).

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.

235. 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 L.M. incurred medical and psychological expenses and the plaintiff, L.M., 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, L.M., will continue to suffer these losses in the future.

236. Wherefore, the plaintiff, L.M., 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 55

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

September 2003 – Incident 3

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

238. On or about September 2003, 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). 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.

239. 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 L.M. incurred medical and psychological expenses and the plaintiff, L.M., 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, L.M., will continue to suffer these losses in the future.

240. Wherefore, the plaintiff, L.M., 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 56

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

September 2003 – Incident 4

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

242. On or about September 2003, 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). 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.

243. 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 L.M. incurred medical and psychological expenses and the plaintiff, L.M., 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, L.M., will continue to suffer these losses in the future.

244. Wherefore, the plaintiff, L.M., 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 57

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

October 2003 – Incident 1

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

246. On or about October 2003, 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). 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.

247. 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 L.M. incurred medical and psychological expenses and the plaintiff, L.M., 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, L.M., will continue to suffer these losses in the future.

248. Wherefore, the plaintiff, L.M., 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 58

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

October 2003 – Incident 2

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

250. On or about October 2003, 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). 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.

251. 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 L.M. incurred medical and psychological expenses and the plaintiff, L.M., 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, L.M., will continue to suffer these losses in the future.

252. Wherefore, the plaintiff, L.M., 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 59

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

October 2003 – Incident 3

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

254. On or about October 2003, 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). 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.

255. 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 L.M. incurred medical and psychological expenses and the plaintiff, L.M., 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, L.M., will continue to suffer these losses in the future.

256. Wherefore, the plaintiff, L.M., 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 60

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

October 2003 – Incident 4

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

258. On or about October 2003, 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). 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.

259. 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 L.M. incurred medical and psychological expenses and the plaintiff, L.M., 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, L.M., will continue to suffer these losses in the future.

260. Wherefore, the plaintiff, L.M., 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 61

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

November 2003 – Incident 1

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

262. On or about November 2003, 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). 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.

263. 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 L.M. incurred medical and psychological expenses and the plaintiff, L.M., 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, L.M., will continue to suffer these losses in the future.

264. Wherefore, the plaintiff, L.M., 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 62

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

November 2003 – Incident 2

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

266. On or about November 2003, 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). 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.

267. 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 L.M. incurred medical and psychological expenses and the plaintiff, L.M., 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, L.M., will continue to suffer these losses in the future.

268. Wherefore, the plaintiff, L.M., 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 63

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

November 2003 – Incident 3

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

270. On or about November 2003, 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). 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.

271. 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 L.M. incurred medical and psychological expenses and the plaintiff, L.M., 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, L.M., will continue to suffer these losses in the future.

272. Wherefore, the plaintiff, L.M., 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 64

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

November 2003 – Incident 4

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

274. On or about November 2003, 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). 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.

275. 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 L.M. incurred medical and psychological expenses and the plaintiff, L.M., 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, L.M., will continue to suffer these losses in the future.

276. Wherefore, the plaintiff, L.M., 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 65

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

December 2003 – Incident 1

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

278. On or about December 2003, 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).

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.

279. 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 L.M. incurred medical and psychological expenses and the plaintiff, L.M., 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, L.M., will continue to suffer these losses in the future.

280. Wherefore, the plaintiff, L.M., 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, L.M. adopts and realleges paragraphs 1 through 20 above.

282. On or about December 2003, 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). 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.

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 L.M. incurred medical and psychological expenses and the plaintiff, L.M., 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, L.M., will continue to suffer these losses in the future.

284. Wherefore, the plaintiff, L.M., 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, L.M. adopts and realleges paragraphs 1 through 20 above.

286. On or about December 2003, 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). 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.

287. 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 L.M. incurred medical and psychological expenses and the plaintiff, L.M., 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, L.M., will continue to suffer these losses in the future.

288. Wherefore, the plaintiff, L.M., 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, L.M. adopts and realleges paragraphs 1 through 20 above.

290. On or about December 2003, 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). 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.

291. 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 L.M. incurred medical and psychological expenses and the plaintiff, L.M., 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, L.M., will continue to suffer these losses in the future.

292. Wherefore, the plaintiff, L.M., 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, L.M. adopts and realleges paragraphs 1 through 20 above.

294. On or about January 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). 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.

295. 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 L.M. incurred medical and psychological expenses and the plaintiff, L.M., 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, L.M., will continue to suffer these losses in the future.

296. Wherefore, the plaintiff, L.M., 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, L.M. adopts and realleges paragraphs 1 through 20 above.

298. On or about January 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). 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.

299. 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 L.M. incurred medical and psychological expenses and the plaintiff, L.M., 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, L.M., will continue to suffer these losses in the future.

300. Wherefore, the plaintiff, L.M., 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, L.M. adopts and realleges paragraphs 1 through 20 above.

302. On or about January 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). 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.

303. 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 L.M. incurred medical and psychological expenses and the plaintiff, L.M., 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, L.M., will continue to suffer these losses in the future.

304. Wherefore, the plaintiff, L.M., 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, L.M. adopts and realleges paragraphs 1 through 20 above.

306. On or about January 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). 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.

307. 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 L.M. incurred medical and psychological expenses and the plaintiff, L.M., 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, L.M., will continue to suffer these losses in the future.

308. Wherefore, the plaintiff, L.M., 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, L.M. adopts and realleges paragraphs 1 through 20 above.

310. On or about February 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). 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.

311. 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 L.M. incurred medical and psychological expenses and the plaintiff, L.M., 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, L.M., will continue to suffer these losses in the future.

312. Wherefore, the plaintiff, L.M., 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, L.M. adopts and realleges paragraphs 1 through 20 above.

314. On or about February 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). 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, 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 L.M. incurred medical and psychological expenses and the plaintiff, L.M., 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, L.M., will continue to suffer these losses in the future.

316. Wherefore, the plaintiff, L.M., 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, L.M. adopts and realleges paragraphs 1 through 20 above.

318. On or about February 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). 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.

319. 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 L.M. incurred medical and psychological expenses and the plaintiff, L.M., 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, L.M., will continue to suffer these losses in the future.

320. Wherefore, the plaintiff, L.M., 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, L.M. adopts and realleges paragraphs 1 through 20 above.

322. On or about February 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).

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.

323. 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 L.M. incurred medical and psychological expenses and the plaintiff, L.M., 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, L.M., will continue to suffer these losses in the future.

324. Wherefore, the plaintiff, L.M., 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, L.M. adopts and realleges paragraphs 1 through 20 above.

326. On or about March 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). 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.

327. 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 L.M. incurred medical and psychological expenses and the plaintiff, L.M., 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, L.M., will continue to suffer these losses in the future.

328. Wherefore, the plaintiff, L.M., 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, L.M. adopts and realleges paragraphs 1 through 20 above.

330. On or about March 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). 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.

331. 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 L.M. incurred medical and psychological expenses and the plaintiff, L.M., 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, L.M., will continue to suffer these losses in the future.

332. Wherefore, the plaintiff, L.M., 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, L.M. adopts and realleges paragraphs 1 through 20 above.

334. On or about March 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). 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.

335. 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 L.M. incurred medical and psychological expenses and the plaintiff, L.M., 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, L.M., will continue to suffer these losses in the future.

336. Wherefore, the plaintiff, L.M., 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, L.M. adopts and realleges paragraphs 1 through 20 above.

338. On or about March 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). 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.

339. 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 L.M. incurred medical and psychological expenses and the plaintiff, L.M., 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, L.M., will continue to suffer these losses in the future.

340. Wherefore, the plaintiff, L.M., 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, L.M. adopts and realleges paragraphs 1 through 20 above.

342. On or about April 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). 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.

343. 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 L.M. incurred medical and psychological expenses and the plaintiff, L.M., 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, L.M., will continue to suffer these losses in the future.

344. Wherefore, the plaintiff, L.M., 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, L.M. adopts and realleges paragraphs 1 through 20 above.

346. On or about April 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). 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.

347. 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 L.M. incurred medical and psychological expenses and the plaintiff, L.M., 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, L.M., will continue to suffer these losses in the future.

348. Wherefore, the plaintiff, L.M., 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, L.M. adopts and realleges paragraphs 1 through 20 above.

350. On or about April 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). 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.

351. 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 L.M. incurred medical and psychological expenses and the plaintiff, L.M., 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, L.M., will continue to suffer these losses in the future.

352. Wherefore, the plaintiff, L.M., 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, L.M. adopts and realleges paragraphs 1 through 20 above.

354. On or about April 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). 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.

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 L.M. incurred medical and psychological expenses and the plaintiff, L.M., 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, L.M., will continue to suffer these losses in the future.

356. Wherefore, the plaintiff, L.M., 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, L.M. adopts and realleges paragraphs 1 through 20 above.

358. On or about May 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). 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.

359. 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 L.M. incurred medical and psychological expenses and the plaintiff, L.M., 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, L.M., will continue to suffer these losses in the future.

360. Wherefore, the plaintiff, L.M., 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, L.M. adopts and realleges paragraphs 1 through 20 above.

362. On or about May 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). 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.

363. 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 L.M. incurred medical and psychological expenses and the plaintiff, L.M., 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, L.M., will continue to suffer these losses in the future.

364. Wherefore, the plaintiff, L.M., 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, L.M. adopts and realleges paragraphs 1 through 20 above.

366. On or about May 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). 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.

367. 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 L.M. incurred medical and psychological expenses and the plaintiff, L.M., 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, L.M., will continue to suffer these losses in the future.

368. Wherefore, the plaintiff, L.M., 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, L.M. adopts and realleges paragraphs 1 through 20 above.

370. On or about May 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). 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.

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 L.M. incurred medical and psychological expenses and the plaintiff, L.M., 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, L.M., will continue to suffer these losses in the future.

372. Wherefore, the plaintiff, L.M., 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, L.M. adopts and realleges paragraphs 1 through 20 above.

374. On or about June 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). 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.

375. 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 L.M. incurred medical and psychological expenses and the plaintiff, L.M., 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, L.M., will continue to suffer these losses in the future.

376. Wherefore, the plaintiff, L.M., 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, L.M. adopts and realleges paragraphs 1 through 20 above.

378. On or about June 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). 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.

379. 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 L.M. incurred medical and psychological expenses and the plaintiff, L.M., 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, L.M., will continue to suffer these losses in the future.

380. Wherefore, the plaintiff, L.M., 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, L.M. adopts and realleges paragraphs 1 through 20 above.

382. On or about June 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). 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.

383. 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 L.M. incurred medical and psychological expenses and the plaintiff, L.M., 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, L.M., will continue to suffer these losses in the future.

384. Wherefore, the plaintiff, L.M., 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, L.M. adopts and realleges paragraphs 1 through 20 above.

386. On or about June 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). 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.

387. 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 L.M. incurred medical and psychological expenses and the plaintiff, L.M., 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, L.M., will continue to suffer these losses in the future.

388. Wherefore, the plaintiff, L.M., 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, L.M. adopts and realleges paragraphs 1 through 20 above.

390. 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). 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, 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 L.M. incurred medical and psychological expenses and the plaintiff, L.M., 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, L.M., will continue to suffer these losses in the future.

392. Wherefore, the plaintiff, L.M., 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, L.M. adopts and realleges paragraphs 1 through 20 above.

394. 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). 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.

395. 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 L.M. incurred medical and psychological expenses and the plaintiff, L.M., 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, L.M., will continue to suffer these losses in the future.

396. Wherefore, the plaintiff, L.M., 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, L.M. adopts and realleges paragraphs 1 through 20 above.

398. 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). 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.

399. 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 L.M. incurred medical and psychological expenses and the plaintiff, L.M., 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, L.M., will continue to suffer these losses in the future.

400. Wherefore, the plaintiff, L.M., 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). 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.

403. 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 L.M. incurred medical and psychological expenses and the plaintiff, L.M., 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, L.M., will continue to suffer these losses in the future.

404. Wherefore, the plaintiff, L.M., 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, L.M. adopts and realleges paragraphs 1 through 20 above.

406. On or about August 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). 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.

407. 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 L.M. incurred medical and psychological expenses and the plaintiff, L.M., 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, L.M., will continue to suffer these losses in the future.

408. Wherefore, the plaintiff, L.M., 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, L.M. adopts and realleges paragraphs 1 through 20 above.

410. On or about August 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).

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.

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 L.M. incurred medical and psychological expenses and the plaintiff, L.M., 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, L.M., will continue to suffer these losses in the future.

412. Wherefore, the plaintiff, L.M., 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, L.M. adopts and realleges paragraphs 1 through 20 above.

414. On or about August 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). 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.

415. 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 L.M. incurred medical and psychological expenses and the plaintiff, L.M., 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, L.M., will continue to suffer these losses in the future.

416. Wherefore, the plaintiff, L.M., 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, L.M. adopts and realleges paragraphs 1 through 20 above.

418. On or about August 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). 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.

419. 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 L.M. incurred medical and psychological expenses and the plaintiff, L.M., 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, L.M., will continue to suffer these losses in the future.

420. Wherefore, the plaintiff, L.M., 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, L.M. adopts and realleges paragraphs 1 through 20 above.

422. On or about September 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). 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.

423. 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 L.M. incurred medical and psychological expenses and the plaintiff, L.M., 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

427. 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 L.M. incurred medical and psychological expenses and the plaintiff, L.M., 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, L.M., will continue to suffer these losses in the future.

428. Wherefore, the plaintiff, L.M., 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, L.M. adopts and realleges paragraphs 1 through 20 above.

430. On or about September 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). 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.

431. 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 L.M. incurred medical and psychological expenses and the plaintiff, L.M., 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, L.M., will continue to suffer these losses in the future.

432. Wherefore, the plaintiff, L.M., 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, L.M. adopts and realleges paragraphs 1 through 20 above.

434. On or about September 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). 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.

435. 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 L.M. incurred medical and psychological expenses and the plaintiff, L.M., 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, L.M., will continue to suffer these losses in the future.

436. Wherefore, the plaintiff, L.M., 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, L.M. adopts and realleges paragraphs 1 through 20 above.

438. On or about October 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). 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.

439. 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 L.M. incurred medical and psychological expenses and the plaintiff, L.M., 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, L.M., will continue to suffer these losses in the future.

440. Wherefore, the plaintiff, L.M., 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, L.M. adopts and realleges paragraphs 1 through 20 above.

442. On or about October 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). 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.

443. 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 L.M. incurred medical and psychological expenses and the plaintiff, L.M., 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, L.M., will continue to suffer these losses in the future.

444. Wherefore, the plaintiff, L.M., 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, L.M. adopts and realleges paragraphs 1 through 20 above.

446. On or about October 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). 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.

447. 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 L.M. incurred medical and psychological expenses and the plaintiff, L.M., 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, L.M., will continue to suffer these losses in the future.

448. Wherefore, the plaintiff, L.M., 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, L.M. adopts and realleges paragraphs 1 through 20 above.

450. On or about October 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). 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.

451. 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 L.M. incurred medical and psychological expenses and the plaintiff, L.M., 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, L.M., will continue to suffer these losses in the future.

452. Wherefore, the plaintiff, L.M., 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, L.M. adopts and realleges paragraphs 1 through 20 above.

454. On or about November 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).

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.

455. 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 L.M. incurred medical and psychological expenses and the plaintiff, L.M., 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, L.M., will continue to suffer these losses in the future.

456. Wherefore, the plaintiff, L.M., 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, L.M. adopts and realleges paragraphs 1 through 20 above.

458. On or about November 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). 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.

459. 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 L.M. incurred medical and psychological expenses and the plaintiff, L.M., 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, L.M., will continue to suffer these losses in the future.

460. Wherefore, the plaintiff, L.M., 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, L.M. adopts and realleges paragraphs 1 through 20 above.

462. On or about November 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). 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.

463. 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 L.M. incurred medical and psychological expenses and the plaintiff, L.M., 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, L.M., will continue to suffer these losses in the future.

464. Wherefore, the plaintiff, L.M., 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, L.M. adopts and realleges paragraphs 1 through 20 above.

466. On or about November 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). 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.

467. 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 L.M. incurred medical and psychological expenses and the plaintiff, L.M., 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, L.M., will continue to suffer these losses in the future.

468. Wherefore, the plaintiff, L.M., 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, L.M. adopts and realleges paragraphs 1 through 20 above.

470. On or about December 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). 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.

471. 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 L.M. incurred medical and psychological expenses and the plaintiff, L.M., 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, L.M., will continue to suffer these losses in the future.

472. Wherefore, the plaintiff, L.M., 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, L.M. adopts and realleges paragraphs 1 through 20 above.

474. On or about December 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). 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.

475. 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 L.M. incurred medical and psychological expenses and the plaintiff, L.M., 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, L.M., will continue to suffer these losses in the future.

476. Wherefore, the plaintiff, L.M., 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, L.M. adopts and realleges paragraphs 1 through 20 above.

478. On or about December 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). 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.

479. 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 L.M. incurred medical and psychological expenses and the plaintiff, L.M., 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, L.M., will continue to suffer these losses in the future.

480. Wherefore, the plaintiff, L.M., 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, L.M. adopts and realleges paragraphs 1 through 20 above.

482. On or about December 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).

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.

483. 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 L.M. incurred medical and psychological expenses and the plaintiff, L.M., 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, L.M., will continue to suffer these losses in the future.

484. Wherefore, the plaintiff, L.M., 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, L.M. adopts and realleges paragraphs 1 through 20 above.

486. On or about January 2005, 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). 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.

487. 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 L.M. incurred medical and psychological expenses and the plaintiff, L.M., 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, L.M., will continue to suffer these losses in the future.

488. Wherefore, the plaintiff, L.M., 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 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). 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.

491. 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 L.M. incurred medical and psychological expenses and the plaintiff, L.M., 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, L.M., will continue to suffer these losses in the future.

492. Wherefore, the plaintiff, L.M., 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, L.M. adopts and realleges paragraphs 1 through 20 above.

494. On or about January 2005, 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). 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, 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 L.M. incurred medical and psychological expenses and the plaintiff, L.M., 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, L.M., will continue to suffer these losses in the future.

496. Wherefore, the plaintiff, L.M., 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, L.M. adopts and realleges paragraphs 1 through 20 above.

498. On or about January 2005, 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).

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.

499. 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 L.M. incurred medical and psychological expenses and the plaintiff, L.M., 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, L.M., will continue to suffer these losses in the future.

500. Wherefore, the plaintiff, L.M., 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, L.M. adopts and realleges paragraphs 1 through 20 above.

502. On or about February 2005, 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). 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.

503. 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 L.M. incurred medical and psychological expenses and the plaintiff, L.M., 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, L.M., will continue to suffer these losses in the future.

504. Wherefore, the plaintiff, L.M., 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, L.M. adopts and realleges paragraphs 1 through 20 above.

506. On or about February 2005, 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). 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.

507. 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 L.M. incurred medical and psychological expenses and the plaintiff, L.M., 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, L.M., will continue to suffer these losses in the future.

508. Wherefore, the plaintiff, L.M., 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, L.M. adopts and realleges paragraphs 1 through 20 above.

510. On or about February 2005, 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). 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.

511. 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 L.M. incurred medical and psychological expenses and the plaintiff, L.M., 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, L.M., will continue to suffer these losses in the future.

512. Wherefore, the plaintiff, L.M., 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, L.M. adopts and realleges paragraphs 1 through 20 above.

514. On or about February 2005, 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). 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.

515. 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 L.M. incurred medical and psychological expenses and the plaintiff, L.M., 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, L.M., will continue to suffer these losses in the future.

516. Wherefore, the plaintiff, L.M., 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, L.M. adopts and realleges paragraphs 1 through 20 above.

518. On or about March 2005, 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). 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.

519. 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 L.M. incurred medical and psychological expenses and the plaintiff, L.M., 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, L.M., will continue to suffer these losses in the future.

520. Wherefore, the plaintiff, L.M., 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, L.M. adopts and realleges paragraphs 1 through 20 above.

522. On or about March 2005, 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). 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.

523. 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 L.M. incurred medical and psychological expenses and the plaintiff, L.M., 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, L.M., will continue to suffer these losses in the future.

524. Wherefore, the plaintiff, L.M., 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, L.M. adopts and realleges paragraphs 1 through 20 above.

526. On or about March 2005, 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). 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.

527. 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 L.M. incurred medical and psychological expenses and the plaintiff, L.M., 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, L.M., will continue to suffer these losses in the future.

528. Wherefore, the plaintiff, L.M., 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, L.M. adopts and realleges paragraphs 1 through 20 above.

530. On or about March 2005, 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). 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.

531. 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 L.M. incurred medical and psychological expenses and the plaintiff, L.M., 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, L.M., will continue to suffer these losses in the future.

532. Wherefore, the plaintiff, L.M., 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 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). 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.

535. 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 L.M. incurred medical and psychological expenses and the plaintiff, L.M., 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, L.M., will continue to suffer these losses in the future.

536. Wherefore, the plaintiff, L.M., 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, L.M. adopts and realleges paragraphs 1 through 20 above.

538. On or about April 2005, 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). 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.

539. 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 L.M. incurred medical and psychological expenses and the plaintiff, L.M., 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, L.M., will continue to suffer these losses in the future.

540. Wherefore, the plaintiff, L.M., 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, L.M. adopts and realleges paragraphs 1 through 20 above.

542. On or about April 2005, 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). 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.

543. 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 L.M. incurred medical and psychological expenses and the plaintiff, L.M., 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, L.M., will continue to suffer these losses in the future.

544. Wherefore, the plaintiff, L.M., 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, L.M. adopts and realleges paragraphs 1 through 20 above.

546. On or about April 2005, 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). 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.

547. 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 L.M. incurred medical and psychological expenses and the plaintiff, L.M., 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, L.M., will continue to suffer these losses in the future.

548. Wherefore, the plaintiff, L.M., 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, L.M. adopts and realleges paragraphs 1 through 20 above.

550. On or about May 2005, 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). 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.

551. 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 L.M. incurred medical and psychological expenses and the plaintiff, L.M., 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, L.M., will continue to suffer these losses in the future.

552. Wherefore, the plaintiff, L.M., 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, L.M. adopts and realleges paragraphs 1 through 20 above.

554. On or about May 2005, 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). 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.

555. 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 L.M. incurred medical and psychological expenses and the plaintiff, L.M., 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, L.M., will continue to suffer these losses in the future.

556. Wherefore, the plaintiff, L.M., 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, L.M. adopts and realleges paragraphs 1 through 20 above.

558. On or about May 2005, 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). 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.

559. 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 L.M. incurred medical and psychological expenses and the plaintiff, L.M., 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, L.M., will continue to suffer these losses in the future.

560. Wherefore, the plaintiff, L.M., 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, L.M. adopts and realleges paragraphs 1 through 20 above.

562. On or about May 2005, 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). 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.

563. 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 L.M. incurred medical and psychological expenses and the plaintiff, L.M., 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, L.M., will continue to suffer these losses in the future.

564. Wherefore, the plaintiff, L.M., 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, L.M. adopts and realleges paragraphs 1 through 20 above.

566. On or about June 2005, 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). 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.

567. 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 L.M. incurred medical and psychological expenses and the plaintiff, L.M., 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, L.M., will continue to suffer these losses in the future.

568. Wherefore, the plaintiff, L.M., 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, L.M. adopts and realleges paragraphs 1 through 20 above.

570. On or about June 2005, 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). 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.

571. 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 L.M. incurred medical and psychological expenses and the plaintiff, L.M., 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, L.M., will continue to suffer these losses in the future.

572. Wherefore, the plaintiff, L.M., 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, L.M. adopts and realleges paragraphs 1 through 20 above.

574. On or about June 2005, 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). 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.

575. 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 L.M. incurred medical and psychological expenses and the plaintiff, L.M., 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, L.M., will continue to suffer these losses in the future.

576. Wherefore, the plaintiff, L.M., 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, L.M. adopts and realleges paragraphs 1 through 20 above.

578. On or about June 2005, 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). 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.

579. 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 L.M. incurred medical and psychological expenses and the plaintiff, L.M., 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, L.M., will continue to suffer these losses in the future.

580. Wherefore, the plaintiff, L.M., 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, L.M. adopts and realleges paragraphs 1 through 20 above.

582. On or about July 2005, 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). 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.

583. 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 L.M. incurred medical and psychological expenses and the plaintiff, L.M., 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, L.M., will continue to suffer these losses in the future.

584. Wherefore, the plaintiff, L.M., 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, L.M. adopts and realleges paragraphs 1 through 20 above.

586. On or about July 2005, 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). 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.

587. 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 L.M. incurred medical and psychological expenses and the plaintiff, L.M., 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, L.M., will continue to suffer these losses in the future.

588. Wherefore, the plaintiff, L.M., 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, L.M. adopts and realleges paragraphs 1 through 20 above.

590. On or about July 2005, 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). 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.

591. 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 L.M. incurred medical and psychological expenses and the plaintiff, L.M., 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, L.M., will continue to suffer these losses in the future.

592. Wherefore, the plaintiff, L.M., 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, L.M. adopts and realleges paragraphs 1 through 20 above.

594. On or about July 2005, 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). 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.

595. 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 L.M. incurred medical and psychological expenses and the plaintiff, L.M., 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, L.M., will continue to suffer these losses in the future.

596. Wherefore, the plaintiff, L.M., 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, L.M. adopts and realleges paragraphs 1 through 20 above.

598. On or about August 2005, 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). 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.

599. 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 L.M. incurred medical and psychological expenses and the plaintiff, L.M., 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, L.M., will continue to suffer these losses in the future.

600. Wherefore, the plaintiff, L.M., 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, L.M. adopts and realleges paragraphs 1 through 20 above.

602. On or about August 2005, 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). 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.

603. 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 L.M. incurred medical and psychological expenses and the plaintiff, L.M., 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, L.M., will continue to suffer these losses in the future.

604. Wherefore, the plaintiff, L.M., 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, L.M. adopts and realleges paragraphs 1 through 20 above.

606. On or about August 2005, 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). 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.

607. 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 L.M. incurred medical and psychological expenses and the plaintiff, L.M., 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, L.M., will continue to suffer these losses in the future.

608. Wherefore, the plaintiff, L.M., 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, L.M. adopts and realleges paragraphs 1 through 20 above.

610. On or about August 2005, 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). 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.

611. 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 L.M. incurred medical and psychological expenses and the plaintiff, L.M., 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, L.M., will continue to suffer these losses in the future.

612. Wherefore, the plaintiff, L.M., 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, L.M. adopts and realleges paragraphs 1 through 20 above.

614. On or about September 2005, 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). 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.

615. 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 L.M. incurred medical and psychological expenses and the plaintiff, L.M., 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, L.M., will continue to suffer these losses in the future.

616. Wherefore, the plaintiff, L.M., 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, L.M. adopts and realleges paragraphs 1 through 20 above.

618. On or about September 2005, 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). 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.

619. 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 L.M. incurred medical and psychological expenses and the plaintiff, L.M., 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, L.M., will continue to suffer these losses in the future.

620. Wherefore, the plaintiff, L.M., 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, L.M. adopts and realleges paragraphs 1 through 20 above.

622. On or about September 2005, 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). 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.

623. 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 L.M. incurred medical and psychological expenses and the plaintiff, L.M., 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, L.M., will continue to suffer these losses in the future.

624. Wherefore, the plaintiff, L.M., 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, L.M. adopts and realleges paragraphs 1 through 20 above.

626. On or about September 2005, 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). 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.

627. 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 L.M. incurred medical and psychological expenses and the plaintiff, L.M., 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, L.M., will continue to suffer these losses in the future.

628. Wherefore, the plaintiff, L.M., 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, L.M. adopts and realleges paragraphs 1 through 20 above.

630. On or about October 2005, 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).

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.

631. 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 L.M. incurred medical and psychological expenses and the plaintiff, L.M., 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, L.M., will continue to suffer these losses in the future.

632. Wherefore, the plaintiff, L.M., 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, L.M. adopts and realleges paragraphs 1 through 20 above.

634. On or about October 2005, 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). 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.

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 L.M. incurred medical and psychological expenses and the plaintiff, L.M., 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, L.M., will continue to suffer these losses in the future.

636. Wherefore, the plaintiff, L.M., 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, L.M. adopts and realleges paragraphs 1 through 20 above.

638. On or about October 2005, 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). 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.

639. 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 L.M. incurred medical and psychological expenses and the plaintiff, L.M., 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, L.M., will continue to suffer these losses in the future.

640. Wherefore, the plaintiff, L.M., 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, L.M. adopts and realleges paragraphs 1 through 20 above.

642. On or about October 2005, 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). 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, 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 L.M. incurred medical and psychological expenses and the plaintiff, L.M., 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, L.M., will continue to suffer these losses in the future.

644. Wherefore, the plaintiff, L.M., 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.

I. (a) PLAINTIFFS

L.M.

(b) County of Residence of First Listed Plaintiff Palm Beach
(EXCEPT IN U.S. PLAINTIFF CASES)

(c) Attorney's (Firm Name, Address, and Telephone Number)

Rothstein Rosenfeldt Adler
401 East Las Olas Blvd., Suite 1650
Fort Lauderdale, FL 33301 - Phone 954-522-3456

DEFENDANTS

JEFFREY EPSTEIN

County of Residence of First Listed Defendant Palm Beach
(IN U.S. PLAINTIFF CASES ONLY)

NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF THE TRACT LAND INVOLVED.

Attorneys (If Known)

Bradley J. Edwards

(d) Check County Where Action Arose: MIAMI- DADE MONROE BROWARD PALM BEACH MARTIN ST. LUCIE INDIAN RIVER OKEECHOBEE
HIGHLANDS

II. BASIS OF JURISDICTION (Place an "X" in One Box Only)

 1 U.S. Government Plaintiff 3 Federal Question (U.S. Government Not a Party) 2 U.S. Government Defendant 4 Diversity
(Indicate Citizenship of Parties in Item III)

9:09CV81092-Cohn-Soltzer

III. CITIZENSHIP OF PRINCIPAL PARTIES (Place an "X" in One Box for Plaintiff and One Box for Defendant)

	PTF	DEF		PTF	DEF
Citizen of This State	<input type="checkbox"/>	<input type="checkbox"/> 1	Incorporated or Principal Place of Business In This State	<input type="checkbox"/>	<input type="checkbox"/> 4

Citizen of Another State	<input type="checkbox"/>	<input type="checkbox"/> 2	Incorporated and Principal Place of Business In Another State	<input type="checkbox"/>	<input type="checkbox"/> 5
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Citizen or Subject of a Foreign Country	<input type="checkbox"/>	<input type="checkbox"/> 3	Foreign Nation	<input type="checkbox"/>	<input type="checkbox"/> 6
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IV. NATURE OF SUIT (Place an "X" in One Box Only)

CONTRACT	TORTS	FORFEITURE/PENALTY	BANKRUPTCY	OTHER STATUTES
<input type="checkbox"/> 110 Insurance	<input type="checkbox"/> PERSONAL INJURY	<input type="checkbox"/> PERSONAL INJURY	<input type="checkbox"/> 422 Appeal 28 USC 158	<input type="checkbox"/> 400 State Reapportionment
<input type="checkbox"/> 120 Marine	<input type="checkbox"/> 310 Airplane	<input type="checkbox"/> 362 Personal Injury - Med. Malpractice	<input type="checkbox"/> 423 Withdrawal 28 USC 157	<input type="checkbox"/> 410 Antitrust
<input type="checkbox"/> 130 Miller Act	<input type="checkbox"/> 315 Airplane Product Liability	<input type="checkbox"/> 365 Personal Injury - Product Liability	<input type="checkbox"/> 430 Banks and Banking	
<input type="checkbox"/> 140 Negotiable Instrument	<input type="checkbox"/> 320 Assault, Libel & Slander	<input type="checkbox"/> 368 Asbestos Personal Injury Product Liability	<input type="checkbox"/> 450 Commerce	
<input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment	<input type="checkbox"/> 330 Federal Employers' Liability	<input type="checkbox"/> 370 Other Fraud	<input type="checkbox"/> 460 Deportation	
<input type="checkbox"/> 151 Medicare Act	<input type="checkbox"/> 340 Marine	<input type="checkbox"/> 371 Truth in Lending	<input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations	
<input type="checkbox"/> 152 Recovery of Defaulted Student Loans (Excl. Veterans)	<input type="checkbox"/> 345 Marine Product Liability	<input type="checkbox"/> 380 Other Personal Property Damage	<input type="checkbox"/> 480 Consumer Credit	
<input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits	<input type="checkbox"/> 350 Motor Vehicle	<input type="checkbox"/> 385 Property Damage Product Liability	<input type="checkbox"/> 490 Cable/Sat TV	
<input type="checkbox"/> 160 Stockholders' Suits	<input type="checkbox"/> 355 Motor Vehicle Product Liability	<input type="checkbox"/> 390 Other	<input type="checkbox"/> 510 Selective Service	
<input type="checkbox"/> 190 Other Contract	<input type="checkbox"/> 360 Other Personal Injury	<input type="checkbox"/> 400 Trademark	<input type="checkbox"/> 850 Securities/Commodities/ Exchange	
<input type="checkbox"/> 195 Contract Product Liability		<input type="checkbox"/> LABOR	<input type="checkbox"/> 875 Customer Challenge 12 USC 3410	
<input type="checkbox"/> 290 All Other Franchise		<input type="checkbox"/> 710 Fair Labor Standards Act	<input type="checkbox"/> 890 Other Statutory Actions	
<input type="checkbox"/> REAL PROPERTY	<input type="checkbox"/> CIVIL RIGHTS	<input type="checkbox"/> 720 Labor/Mgmt. Relations	<input type="checkbox"/> 891 Agricultural Acts	
<input type="checkbox"/> 210 Land Condemnation	<input type="checkbox"/> 441 Voting	<input type="checkbox"/> 730 Labor/Mgmt. Reporting & Disclosure Act	<input type="checkbox"/> 892 Economic Stabilization Act	
<input type="checkbox"/> 220 Foreclosure	<input type="checkbox"/> 442 Employment	<input type="checkbox"/> 740 Railway Labor Act	<input type="checkbox"/> 893 Environmental Matters	
<input type="checkbox"/> 230 Rent Lease & Ejectment	<input type="checkbox"/> 443 Housing/ Accommodations	<input type="checkbox"/> 790 Other Labor Litigation	<input type="checkbox"/> 894 Energy Allocation Act	
<input type="checkbox"/> 240 Torts to Land	<input type="checkbox"/> 444 Welfare	<input type="checkbox"/> 791 Empl. Ret. Inc. Security Act	<input type="checkbox"/> 895 Freedom of Information Act	
<input type="checkbox"/> 245 Tort Product Liability	<input type="checkbox"/> 445 Amer. w/Disabilities Employment	<input type="checkbox"/> IMMIGRATION	<input type="checkbox"/> 900 Appeal of Fee Determination Under Equal Access to Justice	
<input type="checkbox"/> 290 All Other Real Property	<input type="checkbox"/> 446 Amer. w/Disabilities Other	<input type="checkbox"/> 462 Naturalization Application	<input type="checkbox"/> 950 Constitutionality of State Statutes	
	<input type="checkbox"/> 440 Other Civil Rights	<input type="checkbox"/> 463 Habeas Corpus-Alien Detainee		
		<input type="checkbox"/> 465 Other Immigration Actions		

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 Recopened

Transferred from another district (specify)

 6 Multidistrict Litigation

Appeal to District Judge from Magistrate Judgment

VI. RELATED/RE-FILED CASE(S)

(See instructions second page):

a) Re-filed Case YES NOb) Related Cases YES NO

DOCKET NUMBER 9:08-cv-80119

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):

VII. CAUSE OF ACTION

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. 23DEMAND \$ 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 #

IFP

546977