

2. In New Mexico, MAXWELL began her efforts to groom Minor Victim-2 for abuse by Epstein by, among other things, providing an unsolicited massage to Minor Victim-2, during which Minor Victim-2 was topless. MAXWELL also encouraged Minor Victim-2 to massage Epstein.

c. MAXWELL groomed and befriended Minor Victim-3 in London, England between approximately 1994 and 1995, including during a period of time in which MAXWELL knew that Minor Victim-3 was under the age of 18. Among other things, MAXWELL discussed Minor Victim-3's life and family with Minor Victim-3. MAXWELL introduced Minor Victim-3 to Epstein and arranged for multiple interactions between Minor Victim-3 and Epstein. During those interactions, MAXWELL encouraged Minor Victim-3 to massage Epstein, knowing that Epstein would engage in sex acts with Minor Victim-3 during those massages. Minor Victim-3 provided Epstein with the requested massages, and during those massages, Epstein sexually abused Minor Victim-3. MAXWELL was aware that Epstein engaged in sexual activity with Minor Victim-3 on multiple occasions, including at times when Minor Victim-3 was under the age of 18, including in the context of a sexualized massage.

d. Minor Victim-4 was recruited to provide Epstein with sexualized massages for which Minor Victim-4 was paid by Epstein and/or one of his associates, including, at

times, MAXWELL, at the Palm Beach Residence beginning in or around 2001. MAXWELL met Minor Victim-4 at Epstein's Palm Beach Residence when Minor Victim-4 was approximately 14 years old. MAXWELL subsequently interacted with Minor Victim-4 on multiple occasions at Epstein's Palm Beach Residence, knowing that Minor Victim-4 was under the age of 18 at the time. During these interactions, which took place between approximately 2001 and 2004, MAXWELL groomed Minor Victim-4 to engage in sexual acts with Epstein through multiple means. For example, MAXWELL asked Minor Victim-4 about her family and other aspects of her life. MAXWELL also sought to normalize inappropriate and abusive conduct by, among other things, discussing sexual topics in front of Minor Victim-4 and being present when Minor Victim-4 was nude in the massage room of the Palm Beach Residence. On multiple occasions between approximately 2001 and 2004, Minor Victim-4 provided nude massages to Epstein at the Palm Beach Residence, during which Epstein engaged in multiple sex acts with Minor Victim-4. Epstein's employees, including at times MAXWELL, called Minor Victim-4, including from New York, to schedule appointments for Minor Victim-4 to massage Epstein. After each massage, Epstein or one of his employees, including at times MAXWELL, paid Minor Victim-4 hundreds of dollars in cash. At some point during this period, both Epstein and MAXWELL invited Minor Victim-4 to travel with Epstein and

offered to assist Minor Victim-4 with obtaining a passport for purposes of such travel, but Minor Victim-4 declined the invitation. On multiple occasions between approximately 2001 and 2004, Epstein's employees, including at times MAXWELL, sent Minor Victim-4 gifts, including lingerie, from an address in Manhattan, New York to Minor Victim-4's residence in Florida. Epstein and MAXWELL each also encouraged Minor Victim-4 to recruit other young females to provide sexualized massages to Epstein. In response, Minor Victim-4 brought multiple females, including girls under the age of 18, to provide sexualized massages for Epstein at the Palm Beach Residence. On such occasions, both Minor Victim-4 and the girl she brought were paid hundreds of dollars in cash.

MAXWELL'S EFFORTS TO CONCEAL HER CONDUCT

10. In or around 2016, in the context of a deposition as part of civil litigation, GHISLAINE MAXWELL, the defendant, repeatedly provided false and perjurious statements, under oath, regarding, among other subjects, her role in facilitating the abuse of minor victims by Jeffrey Epstein, including some of the specific events and acts of abuse detailed above.

STATUTORY ALLEGATIONS

11. From at least in or about 1994, up to and including in or about 2004, in the Southern District of New York and elsewhere, GHISLAINE MAXWELL, the defendant, Jeffrey