



Elite Sex Trafficking as a Crime of the Powerful: A Comparative Case Study of Jeffrey Epstein and Peter Nygard's Alleged Trafficking **Enterprises**

Thomas Volscho

CUNY—College of Staten Island, Staten Island, NY, USA

ABSTRACT

In this paper, I distinguish elite sex trafficking from commercial sex trafficking, synthesizing sexual grooming theory with the sociology of organized deviance. While the organizational goal of commercial sex trafficking is to generate revenue, the goal of elite sex trafficking is to access and supply victims to the head (capo trafficante) of the organization. Through two case studies of alleged elite sex trafficking enterprises (Jeffrey Epstein and Peter Nygard), I show how sexual grooming and financial operations are partitioned into an organization's division of labor through specialized roles within a criminal hierarchy. The capo trafficante (and their surrogates) present themselves, in part, as powerful gatekeepers to opportunities in fashion, entertainment, modeling, academia, jobs, and business to lure victims into the enterprise. As they get wealthier, the organizational sophistication and victim count increase. Such enterprises have become more frequently "outed" as the #MeToo movement, media exposure, and updated laws have allowed victims to expose criminal enterprises through civil lawsuits that may influence the state's legal authorities to initiate prosecutions.

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Introduction

Recent high-profile cases of sex trafficking by elites have generated significant attention to this phenomenon. While sex trafficking is recognized as a major global social problem, less well understood is how high-net-worth individuals organize personal sex-trafficking enterprises. Such endeavors differ from purely commercial sex-trafficking enterprises but overlap in crucial ways. In this paper, I use records and primary-source information from a close multi-year observation of the exposure and prosecution of two high-profile cases of alleged sex trafficking operated by two multimillionaire North American men (American wealth defense strategist Jeffrey Epstein and Canadian fashion-apparel manufacturer Peter Nygard) to develop the concept of elite sex trafficking. This concept, I will argue, fits within the Crimes of the Powerful paradigm (Comack 2018; Rothe and Kauzlarich 2022; Twyman-Ghoshal 2019) and demonstrates how elites may use their vast wealth to engage in the systematic procurement, grooming, and sexual abuse of non-elites that can operate outside (or in subtle open defiance of) the purview and efforts of social control agents. As these two men became increasingly wealthier, they appear to have incrementally constructed a complex deviant organization around the process of sexual grooming and abuse. Importantly, their organizations did not generate revenue but were funded by and commingled with their outside economic activities, which benefited from taxsheltered incomes, a widening gap between the rich and the poor, a "halo" of legitimacy, political connections, and the veneer of philanthropy. Such elite sex trafficking enterprises differ from their commercial counterparts.

Human trafficking is a substantial commercial criminal enterprise. It is widely acknowledged to be a form of modern slavery. According to the International Labor Office, approximately 40 million people worldwide were trafficked into forced labor and/or forced marriage. At the same time, the U.S. State Department places the global estimate at 27.6 million (United States Department of State 2023). Readers should note that prevalence estimates from different sources often vary widely (Lerum and Brents 2016). Other analysts have pointed out that there is frequently a conflation and confusion of voluntary sex work with involuntary sex trafficking (Lerum et al. 2012; Nawyn, Birdal, and Glogower 2013). Yet, a substantial amount of human trafficking centers around sexual exploitation, where traffickers may force, defraud, groom, and/or coerce victims into a system of sexual exploitation.

Commercial sex-trafficking enterprises are criminal organizations that are designed to generate revenue for the entity. As noted by (Deshpande and Nour 2013: p. e25), "women and girls sold into sex trafficking earn profits for their pimps and traffickers over a great number of years" while the profits from consumables like drug and arms trafficking vanish after a single transaction. In contrast, the two cases explored in this paper illustrate how two elite men established self-serving sex trafficking enterprises, the goal of which was not to generate revenue for the organization but to maximize the number and frequency of victims brought to the head of the organization for sexual exploitation by the leader of the organization. Some victims of both conspiracies have alleged in court papers that they were subsequently trafficked by the head of the organization to other influential people, possibly to influence business deals and/or obtain preferential political treatment. In the next section, I situate the concept of elite sex trafficking within the Crimes of the Powerful and Elite Deviance paradigms.

Crimes of the powerful and elite deviance

Crimes and harmful activities committed by elite members of society have often been ignored due to a mainstream, popular, and traditional criminological approach that often myopically focuses on the crimes of non-elites (Pearce 1976; Reiman and Leighton 2023; Sutherland 1940). Crimes committed by the powerful in a capitalist system are often linked to the highly concentrated distribution of income and wealth and the ability to control organizational resources. Individuals with access to substantial wealth, property, assets, high-priced attorneys, political connections, and organizational power can engage in various types and scales of crime and deviance that are unavailable to non-elite offenders. As such, the massive growth in income and wealth concentration has led to "...an outbreak of criminal and unethical behavior at all levels of society" (Simon 2018:28). Deviance and crimes committed by the elite are different from that of the lower classes due to the superior resources commanded by elites (Braithwaite 2022; Simon 2018). This is primarily made possible by the substantial amount of hegemonic respect, trust, and authority granted to individuals in positions of power who have control over other people and resources (Rothe and Kauzlarich 2022; Sutherland 1940). Violating trust and authority is a recognized hallmark of uncontrolled, illegal, fraudulent, and/or unethical behavior that can be perpetrated by a chief executive officer (Black 2005). The two alleged elite sex traffickers examined in this case study, Jeffrey Epstein and Peter Nygard, were both the chief executive officers of their own privately held businesses that they are accused of transforming into and/or using components of such for their sex-trafficking crimes.

At the time of his death in 2019, Epstein's estate was worth \$628.3 million per his estate's accounting (Estate of Jeffrey E. Epstein 2019), while Nygard's wealth was reportedly valued as high as \$900 million in the 2010s (Castaldo 2012). As both men operated their own lucrative, privately held multinational businesses, they had minimal exposure to outside regulators, rarely needed to make public filings, and were not required to establish or enforce ethics guidelines, as would be the case if they had run publicly traded firms. Such closely held and secretive operations may lend themselves to specific moral patterns.

As far back as Mills (1956) work on the power elite, he argued that they embrace a "higher immorality." This term denoted a moral insensitivity among elite members of society toward non-elites. One example is hotel tycoon Leona Helmsley's famous quip, recounted by her housekeeper

during her tax evasion trial: "We don't pay taxes. Only the little people pay taxes." Another more directly relevant aspect of the "higher immorality" identified by Mills (1956) related to the use of "expense account girls" (Mills 1952; Simon 2018) and in today's parlance sex workers and/or sextrafficking victims to influence business deals. This raises questions of whether elite sex traffickers are not only engaged in the sexual exploitation of vulnerable non-elites but also put their victims at the disposal of other wealthy and powerful men, thereby providing them with further economic and political advantages. Lastly, such "exchanges" raise the possibility of scenarios where elites who consort with elite sex traffickers risk becoming the subject of a real or hypothetical blackmail or extortion scheme. In the next section, I discuss social psychological theories of sexual grooming and sociological models of deviant organizations to produce a theoretical model of elite sex trafficking.

Theoretical concepts

Sexual grooming

A necessary step before sexual abuse and/or sex trafficking is for an offender to identify potential targets from vulnerable populations in society (Craven, Brown, and Gilchrist 2006; Jeglic, Winters, and Johnson 2023). The basic sequence can be summarized as seek → groom → abuse (Brayley, Cockbain, and Laycock 2011; Lanning 2010). Psychologists and others have proposed various models to explain how offenders engage in different "grooming" behaviors both before, during, and after sexually abusing or trafficking victims. Winters, Kaylor, and Jeglic (2022) proposed an empirically derived Sexual Grooming Model (SGM). Winters et al. (2022a) have extended this to a model of child sex trafficking (SGM-CST). As a basis for understanding how elite sex trafficking operates, I will argue that elite sex traffickers, as they get wealthier, incrementally construct an increasingly complex deviant organization around the processes of sexual grooming that becomes the basis of their sex trafficking enterprise. In essence, elite sex traffickers conspire with others to develop and organize a criminal operation where multiple employees (with varying amounts of knowledge about the criminal enterprise and/or overt omerta stipulations such as non-disclosure agreements) are organized into roles with a division of labor that breaks up various steps of the grooming process to efficiently maximize the number of victims brought to the head for them to sexually abuse. Before outlining the sociological organization of such deviance, it is essential to understand the psychological concept of grooming.

The term "grooming" dates to the 1970s (Lanning 2018). What does it mean? The first published description of "grooming" minor victims for sexual abuse may have been Groth and Burgess' (1977) distinction between "sex pressure offenses" versus "sex force offenses" (Burgess 2018). The idea of "pressure" was essential to dissuade people of the notion that child molesters and other sex offenders simply use force or coercive tactics on victims or could merely be characterized as "a dirty old man in a wrinkled raincoat" (Lanning 2010:1; Salter 2003). As Winters and Jeglic (2017) noted of grooming, "Some types of sexual offending require an offender to use charm and manipulation to coerce a victim into a sexual relationship, a process that may take place over an extended period."

Many of the definitions proposed over the years specify pre-abuse behaviors by offenders that involve selecting a victim, gaining their trust, and breaking down boundaries (e.g., Brackenridge 2001; Craven, Brown, and Gilchrist 2006; Gross 1995; Knoll 2010). After a careful review, Winters, Kaylor, and Jeglic (2022:933) propose the following definition:

Sexual grooming is the deceptive process used by sexual abusers to facilitate sexual contact with a minor while simultaneously avoiding detection. Before the commission of the sexual abuse, the would-be sexual abuser may select a victim, gain access to and isolate the minor, develop trust with the minor and often their guardians, community, youth-serving institutions, and desensitize the minor to sexual content and physical contact. Postabuse, the offender may use maintenance strategies on the victim to facilitate future sexual abuse and/or to prevent disclosure.

This definition is intended to apply to a broad range of offenders. While the authors use the term "minor" (which is a legal concept that varies by jurisdiction), sexual grooming, they have argued

elsewhere, may also be used on would-be adult victims as well (Jeglic and Winters 2023). What may distinguish grooming of children and legal adults by offenders may be adjustments to their *modus operandi*—an expensive smartphone, a couple of hundred dollars, a rental car, and/or promises of a college scholarship might act as a lure to manipulate an adolescent, but promises (and the with-holding of such) of a job, career assistance, modeling or entertainment contracts, accommodations or business funding may be more effectively used to lure and groom adults. Concerning both case studies examined here, the age range of the victims and survivors transcends the age of consent – a mixture of minor-aged victims and adults.

The general sexual grooming model consists of five stages: (1) Victim selection, (2) Access to and isolation of the victim, (3) Trust Development, (4) Desensitizing the targeted person to sexual content and physical touch, and (5) Post-Abuse maintenance (Winters and Jeglic 2022). Before delving into the details of these five processes, I outline the organized deviance framework to situate the grooming activities.

The social organization of deviance

The concept of deviance is more encompassing than the concept of crime. Deviance is generally defined as behavior that violates social norms and provokes a strong reaction from social control agents (Best and Luckenbill 1994). In the case studies examined here, the leaders of both sex trafficking operations were ultimately charged (after years of resisting and quashing efforts) by social control agents (police and prosecutors) in the United States and Canada for violating criminal laws against trafficking in persons and/or laws against sexual violence. Since deviance includes, but is not limited to, criminal behavior, exploring the non-criminal behaviors that support their alleged criminal enterprises is crucial. For a substantial period, both enterprises remained "secret" from society at large even after various attempts by victims and others to report their behaviors to authorities and/or attempts at exposing them because both powerful men were able to mitigate, litigate against, quash, or at least exert significant editorial pressure on stories that potentially revealed their alleged deviant activities. But neither accused trafficker is alleged to have acted alone; instead, they increasingly employed others in various roles to carry out the sequence of sexual grooming processes.

The entire edifice of elite sex trafficking stipulates that there is a conspiratorial or cooperative deviant enterprise – the terms used by civil attorneys, police, and prosecutors in their lawsuits or charges ("organization," "co-conspirator," "enterprise," "conspiracy," and "racketeering") against Nygard and Epstein as well as in the criminal prosecution of Ghislaine Maxwell (convicted for her conspiratorial role in Epstein's trafficking crimes) and various civil suits against alleged Nygard recruiters, corporate employees, and associates (including potential overlapping sex-trafficking conspiracies) squarely places this analysis into questions of organized deviant activity. To wit, I apply Best and Luckenbill's (1994) perspective on the social organization of deviance to outline how Epstein and Nygard organized their sex trafficking and abuse activities.

The social organization of deviance approach introduced by Best and Luckenbill (1980, 1981, 1994) provides a valuable typology for understanding deviant activity, from individual deviants to complex deviant organizations. Best and Luckenbill (1980: 14) explain that this concept refers to the structure or patterns of relationships among deviant actors in the context of deviant pursuits. This typology has seen a resurgence in its application to understanding varied topics such as extremist perpetrators of terrorist violence (Holt et al. 2019), the buying and selling of stolen data (Holt et al. 2019), and people who engage in self-harm (Adler and Adler 2005, 2008) The advantage of applying this concept to elite sex trafficking is that it should allow us to understand better how a wealthy and powerful actor can develop a deviant organization to pursue their goal of maximizing and creating a steady stream of victims for their sexual exploitation and how the division of labor around sexual grooming can emerge in an organization.

Best and Luckenbill's (1980, 1994) typology enables analysts to position the social organization of deviants along a continuum of sophistication (see Table 1). The least organized deviant is a *Loner*—

they are isolated and operate independently (e.g., a solitary embezzler). The next group, Colleagues, are deviants who do not co-offend but associate with each other - they may exchange ideas, socialize, or otherwise support one another (e.g., convicts sharing tips and ideas in prison). A step up from this are Peers—they are like colleagues, but they also co-offend. However, they do not have a high division of labor and make "...roughly comparable contributions" (Best and Luckenbill 1994:33). The two final types, Teams and Formal Organizations, are the most sophisticated forms. Both involve co-offending and association, but an elaborate division of labor and, at their most complex, an extended organization lasting long periods and withstanding personnel changes. Holt et al. (2019:88) noted that this typology "provides a high degree of flexibility in identifying organizational structures within deviant communities" and allows researchers to track shifts in organizational structure over time.

Engaging in deviant acts requires time and resources and can impose costs on deviants. For a Loner to commit a classic bank robbery might involve approaching a bank teller with a weapon and demanding money. However, a three-member Team could divide the labor where Person A "covers" the bank (disarms security guard, ensures customers do not try to alert police), Person B takes the cash from multiple tellers and/or gets access to a vault, and Person C is outside the bank waiting in an idling fast car to ferry the group quickly away from the crime scene (Best and Luckenbill 1994:45). With its division of labor, the Team will likely be more efficient and leave successfully with much more money than an individual bank robber who tries to "multi-task" and carry out the robbery alone. The same principles, I argue, apply to crimes of the powerful, especially the grooming processes for an elite sex trafficking operation.

Combining the Best and Luckenbill (1994) typology with the processes found in the SGM (Winters and Jeglic 2022), we can better understand elite sex trafficking by understanding that sexual grooming is a process that may be carried out by individuals, colleagues, peers, teams, or organizations. The SGM posits five processes of sexual grooming that offenders engage in - while the model has been applied to child sexual abuse, there is substantial overlap with models of adult sexual grooming (Sinnamon 2017) and the SGM (Jeglic and Winters 2023).

Five-stage sexual grooming model (Winters and Jeglic 2022)

- (1) Victim Selection A victim is selected based on an exploitable vulnerability. This may include psychological and emotional factors, such as being from a single-parent home, and/or unmet financial needs, or an otherwise precarious economic situation.
- (2) Gaining Access and Isolating the Target This may involve gaining access to youth-serving organizations or removing the minor or adult target from the presence of capable guardians. In the case of trafficking adults, access may be easier, such as hiring someone for a job or walking around a college campus and approaching students.
- (3) Developing Trust—The offender makes efforts to establish a deceptive relationship of assurance, confidence, and care with potential victims, guardians, and the community, who may serve as "gatekeepers to the child" (Jeglic and Winters 2023).
- (4) Desensitization to Sexual Content and Physical Contact This process involves a gradual diminishment of the physical and intimate distance between the offender and the potential target. It may include conversations about sexual topics or activities.
- (5) Post-Abuse Maintenance After the sexual abuse occurs, the offender may continue to engage in various manipulative or coercive behaviors to prevent the disclosure of the sexual abuse to third parties, so they may continue the abuse without others detecting it.

I argue that both Epstein and Nygard created deviant organizations with a division of labor centered around the above five stages of sexual grooming. Each organization was hierarchical, with varying supervisory authority vested in different positions. As part of the analysis, each case will be evaluated concerning each of the five stages of grooming, and an organizational chart of each deviant organization will be presented. The following section describes the methods used in the case studies.



Data used in the case studies

Data collection for this case study commenced in the fall of 2018. During that period, I obtained and compiled existing court records and depositions available on federal and state public court databases or by visiting certain courts to obtain records. Sources sometimes allowed me to view unpublished documents, transcripts, or videotaped depositions. I also spoke to former associates of Jeffrey Epstein and Peter Nygard and obtained, where possible, police reports and other information through dozens of public records requests to various federal and state agencies and reviewed preexisting media reporting. Beginning in early 2019, a former business associate of Epstein's, Steven Hoffenberg (1945-2022), noted to me on numerous occasions his opinion that Jeffrey Epstein would soon be arrested for financial crimes, but then changed course and said he was certain that Epstein would be arrested in June for sex crimes. On July 6, 2019, Epstein was arrested for sex trafficking charges aboard his private jet in Teterboro, New Jersey. After his arrest, a barrage of information about him emerged from people speaking to the media and previously silent victims coming forward through the courts. About a month after his arrest, Epstein died by suicide in the federal institution in Manhattan in August 2019. Subsequently, I attended Epstein co-conspirator Ghislaine Maxwell's federal criminal trial in New York in 2021. I attended Peter Nygard's 2023 Toronto trial for sexual assaults against four Canadian women and an appellate hearing for Ghislaine Maxwell in 2024, which ultimately did not rule in her favor (His Majesty the King v Peter Nygard 2021; United States of America v Ghislaine Maxwell 2020).

The data used to examine organized sexual grooming in this study consist of 19 audio and/or video and transcriptions of law enforcement interviews of victims, sworn testimony by four victims from Ghislaine Maxwell's 2021 federal criminal trial, sworn testimony by five victims from Peter Nygard's 2023 Toronto criminal trial, depositions of Epstein and Nygard employees, and case accounts from two class action lawsuits against Peter Nygard as well as transcripts of interviews given to media outlets including the Canadian Broadcasting Corporation (CBC) and the Aboriginal People's Television Network (APTN). Such secondary data were produced and collected for litigation and media reporting purposes (c.f. Wincup 2017) and not necessarily academic research on sexual grooming. However, such investigations often produce information about the victimsurvivors, how they came to be introduced to their abuser(s), events leading up to the abuse, the context of the abuse, and what happened after the abuse that can be used to assess indicators of sexual grooming.

I used an open coding method based on the indicators of sexual grooming found in Table 1 of Winters, Jeglic, and Kaylor (2020). Victim-Selection has nine items: Gaining Access and Isolation (5 items), Trust Development (10 items), Desensitization to Sexual Content and Physical Contact (10 items), and Post-Abuse Maintenance Behaviors (8 items). There were 35 items not included in the SGM. Still, I also considered these because these two cases involve extremely wealthy and possibly atypical offenders whose grooming behaviors were performed by multiple actors and their surrogates within a conspiracy. The open-ended coding scheme (Esposito and Evans-Winters 2022:118) was used to qualitatively link victim assertions of their experiences to the five dimensions of the SGM and consideration of 35 items not included in the SGM.

Table 1. Typology of deviant organizations by attributes, adapted from Best and Luckenbill (1994).

Forms of organization				
	Mutual association	Mutual participation	Elaborate division of labor	Extended organization
Loners	-	-	-	-
Colleagues	+	-	-	-
Peers	+	+	-	-
Teams	+	+	+	-
Formal Organizations	+	+	+	+



Analysis of cases

Case 1: Epstein organization elite sex trafficking

Perhaps the most well-known high-profile case of elite sex trafficking, the time frame spans from as early as the late 1980s through possibly as late as 2019. A police investigation of Epstein began in March 2005,³ and the first formal criminal charges against Epstein were levied in July 2006 by Florida (a single count of felony "prostitution" under Florida law). After an apparent reluctance by the Florida State Attorney's Office (SAO) to charge him with more serious crimes commensurate with evidence obtained by the Palm Beach Police Department investigation, the police chief decided to break rank and send the investigative file to the FBI,⁴ who performed an independent investigation that turned up even more evidence against Epstein than the local police investigation. As noted by journalist Julie K. Brown, in her characterization of the Palm Beach investigation, "The more evidence that [detective] Recarey collected, the more unwilling prosecutors were to move forward" (2021:87). Epstein was likely facing a 60-count federal sex-trafficking indictment (Sarnoff and Aitken 2011; United States Department of Justice Office of Professional Responsibility 2020), but after successful lobbying by Epstein's high-powered attorneys, he was granted a Non-Prosecution Agreement (NPA). The NPA bestowed immunity upon him, several named co-conspirators, and other unnamed participants. In exchange for immunity from federal charges in the Southern District of Florida (SDFL), Epstein reluctantly agreed by late June 2008 to plead guilty to Florida statelevel charges: (1) count of procuring a person under age 18 for prostitution and (1) count of felony solicitation of prostitution that required him to serve jail time and register as a sex offender (the very name used in the statutes stigmatized his victims and branded them "prostitutes" which they were not and legally could not be).⁵

Media exposure of Epstein, most prominently including the 2011 tabloid publication (Churcher 2011) of a picture of a victim with Prince Andrew and Ghislaine Maxwell (Epstein's madam), led to years of civil litigation and a steady hum of low-key media exposure about Epstein's crimes between 2011 and 2018 (see also Jane Doe No. 102 vs. Jeffrey Epstein 2009). This included a suit by some of Epstein's victims against the Department of Justice for violating the Crime Victims Rights Act - charging the government of withholding information about Epstein's NPA from victims (Cassell, Mitchell, and Edwards 2014; Hill and Mosk 2016). Southern District of New York prosecutors held talks with Epstein victims' civil attorneys in 2016, but no prosecution resulted (Berman 2022; Edwards and Henderson 2021). But things changed when President Trump in 2017 nominated and appointed the man who signed off on Epstein's NPA, former SDFL U.S. Attorney Alexander Acosta, to serve as his Secretary of Labor (Gerstein 2017; Stracqualursi and Hill 2017). After a fresh look at the case by Julie Brown of the Miami Herald in 2018 (Brown 2018, 2021) in the wake of the #MeToo movement (Burke 2021), the SDNY launched an investigation of Epstein based on sex trafficking crimes connected to New York in the 1990s and 2000s (United States of America v Jeffrey Epstein 2019). The FBI and NYPD hastily assembled a sting operation to arrest Epstein aboard his private plane after he landed in New Jersey in July 2019. According to a report from the Bureau of Prisons, Epstein's death was ruled a suicide (Office of the Inspector General, Department of Justice, 2023). In July 2020, Epstein's former girlfriend and employee, Ghislaine Maxwell, was arrested for her role in Epstein's sex trafficking conspiracy and was subsequently convicted of sex trafficking charges in 2021 (she appealed the sentence in 2022).⁷

The Epstein organization

The organized procurement and grooming of victims by Epstein's organization coalesced around milestones in his economic life. Epstein's first victim was an exchange student from Switzerland whom he abused in New York in 1989.8 At this time, Epstein's Swiss banking statement (Banca

della Svizzera Italiana 1988) listed his net worth at \$15.5 million, including a property in Riederalp, Switzerland (though some of his contemporaries believe he overstated the value of certain assets, see, e.g., Ward 2003). By mid-1991, after being listed on 1989 tax-year documents for one of billionaire Leslie Wexner's nonprofit foundations, Epstein convinced him that his current financial advisor (who had set up his family office with modern accounting controls) was not serving his needs, and Wexner granted Epstein power-of-attorney over his estimated \$2.5 billion fortune (Stewart et al. 2019; Wexner 1991). Within a few days of acquiring attorney power over his client's fortune, Epstein purchased a private jet, hired two pilots, and began flying extensively. One of his regular annual flights (according to private plane logs included as an exhibit in Ghislaine Maxwell's criminal trial) landed near a prestigious music school and summer camp Epstein attended at age 14 in 1967 (Briquelet 2019; Stewart 2022). Epstein and Maxwell's activities at this camp provide the documented starting point for the genesis of their sex trafficking organization. The case is elucidated using the concepts of the SGM and SGM-CST, consistent with another case-study application of this model (Jeglic and Winters 2023).

Victim selection

The SGM posits that victims and potential victims will exhibit various characteristics that offenders and traffickers look for. These include being compliant and trusting of adults, having low self-esteem, being from a single-mother household, having unmet financial needs, being distant from parents, having a lack of supervision, being lonely and isolated, and being troubled or needy.

Epstein and Maxwell collaborated as a team to identify potential victims in the earliest stages of the conspiracy. For instance, a 17-year-old Jane Doe, caring for her single mother who was ill and having a difficult time, recalled being lonely and having no friends. Through a partner, she met Ghislaine Maxwell, a sophisticated and well-educated woman who took an interest in her and invited her to her house for tea. She recalled: "I thought Ghislaine was going to be my friend." Likewise, another Jane Doe, who at age 14 was unable to grieve the recent loss of her father and described her mother as "manic depressive" and emotionally unavailable, noted that Ghislaine would tease her and engage her in conversations and told her to think of her "like an older sister."

A frequent theme seems to be family structure – many, but not all, came from single-mother households. For many, there were economic struggles with mothers who worked long hours or had substance abuse issues. One Jane Doe, a virtual straight-A student and "band geek" who had previously participated in cheerleading before meeting Epstein, reported being close to her mother. Still, she noted that her mother's long working hours and the stresses of making ends meet ultimately caused her mother to abuse substances, resulting in Jane living with friends and lacking supervision. Some victims came from households with both parents. One victim's mother described their large, blended family, which juggled taking kids to various sports practices: "We were a working family – but we made it work with all the children we had. . .one of us was always home. . .and made dinner every night." Conversely, economic struggles were often linked to family and household dynamics.

A Jane Doe, for instance, reported that her father died of leukemia, and unbeknownst to the family, his employer had canceled his medical insurance before his death: "My family went into complete bankruptcy, and we had to move out of our home." Another victim (age 15 when abused) noted, "I was homeless when I went to his house. I was a young child – he was taking advantage of my living situation." After Epstein's death, a woman who (along with her sister) was abused by Epstein at 17 likewise stated at a 2019 court hearing, "Jeffrey knew I had nowhere to go. He knew I was vulnerable, and he took advantage of that poor girl, who will never be the same."

In other cases, Epstein and his associates targeted art students, models, music students, dancers, and college students who had contingent and unstable incomes. For instance, one woman, a community college student, was approached by Maxwell on campus, who offered her a job answering phones. An art student, for example, was approached by Epstein, who offered to buy her drawings.

Epstein's organization developed a wide range of ways to access potential victims. A review of IRS Form 990 for his various nonprofits indicates that he was a prolific donor to organizations serving "underprivileged" youth. He also maintained a long-term business relationship with the late French modeling scout Jean Luc Brunel. Brunel would scout for models personally or obtain referrals from "mother agencies" in countries worldwide. This system had two tracks: models who earned high fees and commissions in legitimate and lucrative modeling work, while another track was for girls and women who used to supply "date farms for rich guys." An accountant from Brunel's agency noted in a deposition that Epstein housed some of these models in a building he owned (at no charge to Brunel) while Brunel invoiced the models for "rent."

Gaining access and isolation

Victims of Epstein and Maxwell described the conditions under which they met or were introduced to Epstein and Maxwell. The SGM posits five factors associated with grooming: involvement in youth-serving organizations, manipulating the family to gain access to the person, engaging in activities alone, overnight stays and outings, and separating the person from peers and family members.

In the earlier phases of the conspiracy from 1994, the predominant means for gaining access to potential victims involved Epstein using philanthropy to gain access to youth-serving institutions. Flight records show that beginning in the early 1990s, Epstein's planes made routine landings near a Michigan camp that Epstein himself attended in 1967. IRS 990 forms for Epstein's nonprofits show he made numerous financial and in-kind contributions to the camp, including a building called "The Jeffrey Epstein Scholarship Lodge," close to the girls' summer camp (Briquelet 2019).

In the summer of 1994, Maxwell, while walking a small dog, approached a group of girls eating ice cream at a picnic table at the camp. The girls asked to pet her dog, and Maxwell focused on one girl. After the other girls left the table, Maxwell continued talking to her, and soon, a man (Epstein) came up to join the conversation. They obtained her mother's phone number. A few weeks later, they invited the mother and daughter over for tea at Epstein's residence in Florida. Shortly thereafter, Epstein would have his driver bring the daughter by herself for "mentoring sessions" with Epstein, thereby isolating her at his property.

In another instance, Epstein spoke to the mother of another Jane Doe and explained that he and his presumed "wife," Ghislaine Maxwell, were hosting a study abroad conference for dozens of students at his desert ranch in New Mexico. Epstein and Maxwell bought Jane a plane ticket, and when she landed, she was picked up by Epstein's driver, but when she arrived at the isolated desert property, it was only her, Epstein, and Maxwell. The older sister of Jane Doe, an artist, was also isolated at Epstein's Ohio property, which was guarded by armed security, and told she could not leave the premises. She eventually had her father pick her up after she was cornered by both Maxwell and Epstein, then escaped to another room after they began to assault her sexually.

Through a friend, an actress in her twenties was referred to Jeffrey Epstein, who she believed to be a model recruiter for a large fashion corporation. She was asked to mail her portfolio to Epstein's office on Madison Avenue. Shortly after, Epstein's office assistant set up an appointment for the audition at an exclusive hotel in California. When the actress arrived and was directed to a large, expensive hotel suite, she expected to see staff, photographers, and others. Still, she was surprised that it was only Jeffrey Epstein (flight records included in a lawsuit a decade later showed his aircraft landed at a nearby airport on the same date of the assault memorialized in her 1997 police report). A teenager who worked at a Florida members-only club, owned by a then-close friend of Jeffrey Epstein, was approached during work hours by Ghislaine Maxwell, who was later dropped off by her father for an interview to be a massage therapist that included getting licensed. When she arrived for the interview, she was isolated with Epstein and Maxwell in his mansion's massage room.

By the early 2000s, the access and isolation avenues and the complexity of the conspiracy appear to shift. A key method of gaining access to potential victims is measured by an item that was considered but not validated for the SGM: gaining access after being approached by a child/having a child recruit

other children.¹¹ However, this technique plays a significant role in the child-specific version of the SGM for sex trafficking (Winters et al. 2022).

Many victims of Epstein's trafficking endeavor were recruited by other victims. This peerrecruitment pattern was highly prevalent among the working-class minor girls whom Epstein abused at his Florida residence in Palm Beach. Around this time, a new participant in the sex trafficking venture appeared, Sarah Kellen, a woman in her early 20s who made scheduling arrangements for the teenage girls and interacted with them when they came to Epstein's property and escorted them to his isolated massage room. Here we see the manifestation of a peer-to-peer recruitment strategy for gaining access to victims described as a "daisy-chain" or "friends who bring friends who bring friends" by another victim turned recruiter, consistent with the child sex trafficking version of the SGM (Jeglic et al. 2023). Given that the girls were from poorer areas outside Palm Beach, Epstein used financial incentives to manipulate and lure these underage girls to his residence.

Many victims attended school and worked at one or more minimum-wage jobs. A friend or acquaintance might approach them "...to massage this guy Jeffrey and that's all I would have to do, and I would get \$200 for giving him a massage" or "we go in there and make \$200 in 30 minutes." As one victim noted, "I was short on rent one month and she (friend) told me all I had to do was give him a massage and he would give me \$200," after she had unsuccessfully asked parents and friends for help with money. Many victims had reservations and suspicions. One victim noted, "I'll go and feel it out and if I don't like it, I'll leave." Another victim said her friend divulged, "The more you go, the more he expects, so that kind of scared me." In one case, a friend passed Jane Doe a note in school saying she found an easy way to make money. Jane Doe wanted to raise money to get gifts for all her siblings for Christmas and believed she was going to a business-type setting and instead got extremely anxious as the car pulled into Epstein's driveway upon realizing that it was a private residence.

Many were nervous about the situation and often went to Epstein's massage room with the person who recruited them (implicitly trusting them). During the massage, Epstein would direct the peer recruiter to leave. This created a very fearful situation for many. One Jane Doe noted in a police interview with her voice shaking, "I told her that I didn't want to be left alone with someone because – I was molested when I was 12, so just like me being alone – like right now I'm kind of uncomfortable, so – and I told her that, like 'I'm not going if you are not going to be in the room with me' and I was unaware that I was going to be alone with him for that 10 minutes and I thought I was going to die."

Some victims resisted Epstein. One victim who a friend recruited said, "I was one of the girls who refused to do that...I didn't let him touch me." Epstein was upset and offered her: "I will pay you \$200 for every girl you bring to me. I don't want you to massage me anymore, you know, bring girls to me and whatever." Another minor victim got into a heated confrontation with Epstein when he tried to undress her, and she reported that she fought with him.

Upon realizing their "friend" or acquaintance brought them for payment, many added, "We're not friends anymore." After being abused by Epstein, one victim called her friend and asked, "Why would you bring me there?" while crying to which her friend replied, "Because you're my only hope – I don't have anything else, I don't have anything else to do" and promised "we won't go back." However, the minor victim returned and explained how she feared Epstein "because he has my number, and he said that he will call the cops and get us in trouble and it's our fault this is going on." She said she went back because "I was afraid that he was going to harm my family" and he "...made threats to start something - bad things would happen if I told anybody." Another minor victim said she "felt threatened by his authority." He demanded that she recruit other teenage girls for him: "I told him at times I did not want to bring girls," and Epstein told her, "You need to do it anyway." Another victim, who was 16 when Epstein abused her, said of the peer who recruited her, "I felt like she lied to me and betrayed me." Much of this underscores the ability of a wealthy man to manipulate working-class adolescent girls into sexual abuse in the context of isolation and victim recruitment, even convincing the victims that they are in the wrong. It also indicates Epstein and his co-conspirators' strategy to manipulate a presumed trust between female peers not to place one another in a dangerous situation that pivoted on a fulcrum of their financial vulnerability.

One of Epstein's house managers noted that when one of the "masseuses" came to the house, he understood that it was his job to coordinate with Kellen, the "scheduler," and vacate the premises for the external staff quarters when the "masseuse" went upstairs to meet Epstein. The manager said, "I would be sure who they are... I would make them comfortable in the kitchen and offer them a drink, and sometimes he would give me an order to send these people upstairs." Reflecting on Epstein during a police interview, "He wanted to be alone... I'm not supposed to go up to the second floor when he was there," and that Epstein "would close his shutter, no light in his room, no natural light." One victim reported that Epstein asked her if she could ask her parents if they would legally "emancipate me so I could live with him."

Other aspects of isolation made possible by Epstein's wealth were his ability to lure victims to isolated real estate he owned. His New York City mansion outside Central Park is not in an isolated location. Still, once inside, its doors were like a fortress with on-site security staff and multiple floors with isolated rooms and extensive surveillance equipment. 12 The New Mexico ranch he acquired in 1993 was certainly isolated from other properties and people. Perhaps the most isolated was his island in the U.S. Virgin Islands (acquired in 1998 after the sale of his Ohio mansion), which could only be accessed by boat or helicopter, and where the rule of law only operated in theory.

Other victims were recruited by third parties such as modeling scouts and agencies. In 2005, Epstein bankrolled a modeling agency operator with a long and sordid history of sexually assaulting models, Jean Luc Brunel (1946-2022), to help him start an agency "MC2" (with the "E" missing for the silent partner, Epstein). Brunel would scout for models or obtain referrals from "mother agencies" in countries around the world and there would be two tracks: models who earned high fees and commissions in legitimate modeling work or women and girls used to supply "date farms for rich guys."13 Other places where Epstein's women recruiters sought victims was at a coffee shop in New York City's Union Square that was known for temporarily hiring models and actresses who were in between jobs and needed to supplement their incomes (Jane Does 1-7, Plaintiffs vs. Darren K. Indyke et al. Defendants 2021) as well as outside a New York City high school for performing arts students (Jennifer Danielle Araoz vs. Jeffrey Edward Epstein and Jane Does 1-3 2019). After Epstein served time for sexual abuse of minors in 2008, his victim-selection areas changed to focus on young women, predominantly from Eastern Europe, where people would likely be unaware of his status as a registered sex offender. At a 2010 fashion show in Paris, for example, a Ukrainian woman was approached by a Russian woman who accompanied Epstein and explained to her how important Epstein was and that he was friends with the supermodel who ran the event. That Russian woman had been directed to Epstein by the MC2 modeling agency two years prior (Safdar 2023). Epstein displayed his connections to other wealthy and powerful men as the bait to lure women from Eastern Europe into his sex trafficking operation. This was an apparent shift in the criminal strategy of his sex trafficking organization after he became a registered sex offender in the United States and served a lax prison sentence between 2008 and 2009 with community supervision until 2010.

Trust development

As previously noted, Epstein became extremely wealthy and engaged in philanthropy. He was reportedly charming and "nice," though others reported a vindictive streak for those he saw as crossing him. A former employer of his and convicted Ponzi schemer Steven Hoffenberg said, "He is the best salesman I've ever met."14

Getting potential victims to trust the offender is posited by the SGM to involve being a "pillar of the community," affectionate and loving, providing attention to the potential victim, favoritism, compliments, spending time with the child, engaging in childlike activities, gifts, toys, money, and giving potential victims alcohol or drugs. There is no evidence that Epstein and his organization provided drugs or alcohol to victims. However, there is substantial evidence that he (and/or his associates) dispensed money, gifts, and promises of financial support to lure victims into his trafficking organization.

In the early stages of the conspiracy, when Epstein and Maxwell approached a 14-year-old camper, they asked her where she was from, and Epstein replied, "What a coincidence we live there too. . . what are your parents' names?" After noting that her father recently passed away, Epstein said, "I think we know your mom." Jane said they seemed friendly and inquisitive with questions about classes and the campus. Another Jane Doe said that, while taking care of her sick mother, she liked the attention and affection that Maxwell showed to her before Maxwell introduced her to Epstein, and that Maxwell seemed excited to be friends with her. A Jane Doe who thought Epstein and Maxwell were going to help her with college said Maxwell "made me feel special" and discussed British authors with her when she completed a writing assignment for school. Epstein and Maxwell appeared to be a married philanthropic couple. Yet another Jane Doe noted, "I thought Ghislaine was his romantic partner, but I didn't think he would do anything like that while they were together."

Victims reported that Epstein claimed he liked to help students with scholarships. Another noted that he promised to help set her up with a career in modeling. In the phases of the conspiracy before the early 2000s, multiple victims who went through a long-term grooming process noted that Epstein would speak on the phone with their mothers. Trust was also obtained in the early phases of the conspiracy when Epstein and Maxwell targeted siblings. The pattern followed was that Epstein would employ an older sibling, find out they had a teenage sister, and then offer to help pay for college or vocational training, which seemed legitimate because he employed their older sibling. A victim who later introduced her sister to him, relayed, "I just thought he was a wealthy nerdy art collector."

Epstein provided various gifts to victims. For many working-class girls outside Palm Beach, Epstein would pay them just for coming to his house with their friend at the initial meeting. A 14-year-old from the early phase of the conspiracy recalled leaving his home after a mentoring session and Epstein putting cash in her hand. She was polite and told him it was "okay," but he insisted she take the money and told her, "This is for your mother. I know she's having a hard time, so it's not a big deal." He also paid for music lessons and other extracurricular expenses. Others often received concert tickets, airline tickets, tickets to Broadway shows, clothing, iPod devices, digital cameras, and other gifts before any abuse occurred.

For the working-class minors in Palm Beach, it seemed as if a significant number of classmates were "working" for Epstein, which suggested it might be legitimate. Epstein told several of the minors in Palm Beach that he was a "brain scientist" or a "doctor," and combined with his lavish lifestyle, it seemed plausible to victims. Some victims noted that Maxwell would discuss all the prominent people Epstein knew, such as presidents and presidents-to-be, and celebrities, coupled with all the photos of Epstein and Maxwell with well-known people, making them seem legitimate yet powerful and connected.

Some of the teenage peer recruiters were upfront about what "work" at Epstein's meant - some convinced their friends that it was a topless massage, but that he doesn't touch you, or that "You can say no, and he'll be ok with it." One woman who worked as a professional masseuse under a "healer to the stars" was offered a job as Maxwell's masseuse and did not learn that she was hiring her for Epstein until after she flew from California to Palm Beach. For the teenage girls in Palm Beach who recruited their peers, the access, isolation, and trust development components were condensed and achieved more quickly, likely because of the implicit trust between peers.

Desensitization to sexual content and physical touch

The fourth component of the SGM encompasses a variety of behaviors that may escalate from discussions of sexual topics to increasing physical touching through sexual abuse. These processes include asking questions about the person or child's sexual experience, relationships, divulging sexual activities of the offender, inappropriate sexual language, jokes, accidental touching/distraction while touching, watching the person or child undressing, exposure of naked body, showing a person or child pornography, seemingly innocent/non-sexual contact, desensitizing to touch and increasing sexual touching.

For the teenage working-class minors and others at Epstein's Palm Beach residence, the desensitization to touch occurred relatively quickly. This accelerated behavior was likely because the alleged employment opportunity involved the provision of a massage. By offering employment as a masseuse, there is a pretext of legally questionable touching built into the scenario that an offender can quickly convert into sexual abuse.

A significant number of minor victims who were lured into working for Epstein as a massage therapist reported walking up a staircase off the kitchen in his Palm Beach residence. On display were nude pictures that victims reported seeing on the way to his massage room. Likewise, a house manager who worked for Epstein reported seeing nude photos of "masseuses" displayed throughout his home as well as a large hidden closet, the walls of which were covered floor-to-ceiling with such images. Victims noted "odd" and "shocking" nudity-infused artwork and sculptures adorning the walls and on display in nearly all of Epstein's properties, interspersed with pictures of Epstein and/or Maxwell with world leaders, business elites, and celebrities, describing the feeling of being in his homes as "intimidating." In an interview with police detectives, one victim remarked, "He is a freaking pervert. I don't know what the hell he is...he has pictures of his family naked, his children naked, celebrities naked, models naked..." and he "... would never discuss what he does for a living." The displays of erotic art, nude photographs of adults and minors, and other sexually suggestive material are consistent with practices of desensitization to sexual content noted in the SGM and SGM-CST.

Some of the working-class girls, who Epstein abused at his Florida property, reported (if they went to his home more than once) that at the first massage, he would give them \$200-\$300 before the massage but after the initial encounter would only provide money after the massage with more money paid for those he favored and/or those who complied with his escalatingly inappropriate demands. At a first "massage appointment," one victim recounted she thought, "It was kind of weird; he asked me to take my clothes off," while another stated she "held her breath" when he used a device on her private parts that caused her pain.

A girl who went to give him a massage told a police detective in an interview that he got irate because she was fully dressed and said, "C'mon, you're not showing!" while others reported that he just started putting his hands on their bodies without "consent" or warning. For some Jane Does who went to his house more than once, he would try to do more each time. Some interviews show fear and apprehension: "I wasn't comfortable, but I didn't tell him." During police interviews, one worriedly asked, "Is Jeff in custody?" And at least on one occasion, he violently sexually assaulted a teenage minor girl despite a prior verbal "agreement" to limitations and her protests to stop during the assault. Epstein later explained away his crime to the victim by saying that a woman 15 who was in the room "wanted" to see it. A Jane Doe who had been abused over a sustained period as a minor by Epstein told police, "He doesn't know I hate him the way I do."

After thinking her friend was being introduced into a fashion modeling career by Epstein, she attended his home where both girls were brought to his private massage room and Epstein "told me to massage him and I didn't know what to do so I just did it...things that were not right." Several victims reported resisting his sexual abuse, as in the case of one Jane Doe: "I massaged him and he tried touching me and I fought him...he tried to tear off my shirt...I was praying to God he wouldn't touch me. . .he tried to and I pushed him away and I told him no, I don't feel comfortable, to touch me."

Combined with pretending to be a 14-year-old Jane Doe's "older sister," Maxwell asked her about boyfriends and told her that if she has sex with a boyfriend, she can always engage in subsequent sexual activity with them because "they are grandfathered in" (which the victim did not understand). Another victim whose abuse started at age 17 said Maxwell would use a "childlike voice to discuss sexual topics with her," and when Maxwell introduced her to Epstein, she had her squeeze his feet to show him how strong she was. Epstein and Maxwell would take several victims shopping for school supplies while also visiting lingerie stores to purchase underwear. For one of the first known Epstein victims, a massage scenario was not part of the initial abuse. Instead, Epstein abruptly stopped the 14-year-old's "mentoring session," discussing career goals, led her to another location, sexually abused her there, and then acted as if



nothing happened when he was finished. With later victims, most report that abuse was connected in some way to being lured or tricked into being in his massage room. In other instances, Epstein would order victims to engage in sexual activity with another adult or minor female, including Ghislaine Maxwell.

Post abuse maintenance

Post-abuse maintenance tactics often involve emotional manipulation of the victims (Winters et al. 2022) and an attempt by the trafficker to maintain control over the victim to allow for a continuation of the sexual abuse without disclosure (Jeglic and Winters 2023). Epstein used various practices to sustain his sexual abuse of different victims.

For one of his long-term victims in the 1990s, Epstein paid rent on a Manhattan apartment for the victim's mother. Epstein's house manager recalled being ordered to pick up a victim from her mother's house or her school and transporting her, Maxwell, and others to Epstein's private jet. When the victim (who Epstein had been abusing since she was 14) eventually attempted to avoid being contacted by him, Epstein left increasingly irate voicemails conveying " ... that I need to be grateful and remember what he's done for me." Likewise, a Jane Doe abused by Epstein and Maxwell in the 1990s did not disclose the abuse immediately because Epstein was her sister's employer; she thought her sister could lose her job, "so I just decided not to say anything." Another minor victim who Epstein abused over a period in Florida stated, "... he used to tell me I was his favorite. He bought me a car... I got a plane ticket to New York. I got spending money whenever I wanted" in addition to a \$2,000 bonus and front row seats to a famous Broadway show. She stated, "I think the reason I held on so long is he promised me that I would get into NYU. That I would get into NYU, and he would pay for it." After doing well on her SATs and maintaining a high GPA, Epstein told her that her application was "not good enough."

A Jane Doe in Florida with economic troubles noted how Epstein gave her \$500 when she was short on her rent and funded a baby shower after she got pregnant (through her boyfriend). She volunteered to the police why she would not go back to Epstein's, "I have a son now, and I didn't feel like it was right for me." Epstein asked one minor victim, "How much do you make at work? You can make more money with me."

The primary method of maintenance after the initial abuse was through obtaining contact info and having a member of Epstein's staff call to schedule "work" or "massages" in the criminal vocabulary of the conspiracy. All victims were asked for their phone numbers. Victims reported that Maxwell or Sarah Kellen would (sometimes incessantly) call to schedule "massages." Over time, the phone calls mostly came from Kellen. A Jane Doe said she would receive phone calls from Epstein's scheduler no matter where she went, "I don't know how they got the numbers, but they did." Many victims did not have cars or were not old enough to drive.

One minor-aged victim told of how Epstein would pay her cab fare to go to his house, but she would have to pay out of pocket for her taxi ride home. Another victim (in disbelief after being sexually abused by Epstein the first time), who a friend brought, told police in an interview, "Afterwards he had one of his employees drive us home and so we couldn't really talk about it on the way home, and he specifically dropped her off at her house and me off at my house - like he wouldn't let us to each other's house." Due to fear she returned and Epstein "would ask me if I told anybody and he would ask me if I'm lying and that he would know if I'm lying." Likewise, while being interviewed by police, a Jane Doe victim from Palm Beach said her mother believed she was his secretary and added, "Jeffrey's gonna get me, you guys realize that, right?" She also said, "I've been in the room when he's on the phone with like Bill Clinton." Victim-survivors of Epstein who were abused over a sustained time often returned for financial reasons, some returned due to fear, and others never returned after the first act of abuse.

The social organization of the Epstein enterprise

Jeffrey Epstein was the boss or *capo-trafficante* of his elite sex trafficking enterprise. As such, he was the primary sexual abuser who gave the orders, specified and directed recruiters, orchestrated the scheme's objectives, and controlled the operation's finances (see Figure 1). Below him in the supervisory hierarchy was Ghislaine Maxwell, playing an underboss-like role who helped Epstein recruit, lure and isolate victims and once in their orbit pretended to be their friend, showered them with attention, provided them with gifts, and incrementally normalized sexual conduct between Epstein, (sometimes participating herself) and victims (Comey et al. 2023). Maxwell's duties included acting as the "lady of the house" or "major domo" according to household staff. A household manual for Epstein's Palm Beach properties United States of America v Ghislaine Maxwell (2020): Government Exhibit 606) was authored using a computer belonging to her that specified extensive details and directed employees to observe a strict code of *omertà* concerning the happenings inside Epstein's household.

The sex trafficking enterprise was funded by Epstein's tax shelter advisory business, where he primarily helped wealthy people avoid taxation on the sale and/or bequeathing of their assets and incomes, as well as offering miscellaneous consulting and advising (e.g., prenuptial agreements) and introducing his bankers to wealthy clients. Epstein's finances grew rapidly between 2000 and 2006. Still, a dual crisis of his getting arrested and pleading guilty to abusing minors in Florida and the 2008 financial crisis created a significant legal and financial shock to his criminal enterprise. Still, by 2012, his business records show a substantial economic recovery (Goldstein and Eder 2019). Epstein's

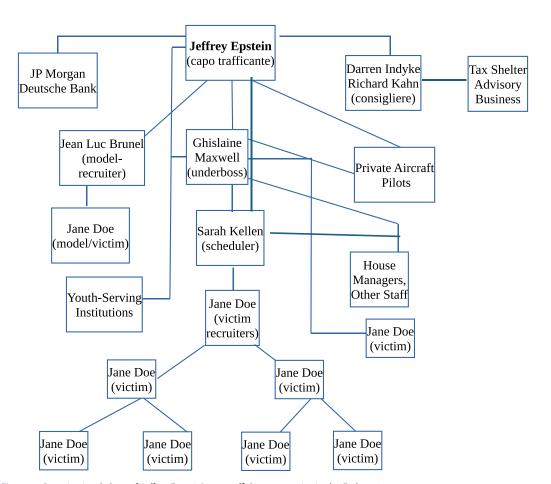


Figure 1. Organizational chart of Jeffrey Epstein's sex-trafficking enterprise in the Early 2000s.

attorney, Darren Indyke, allegedly served as a consigliere or advisor to Epstein in his tax shelter advising business and general legal advice, including attending depositions for his victims (Edwards and Henderson 2021). Indyke primarily operated as a "fixer" (Edwards and Henderson 2021) and an accountant, Richard Kahn, both allegedly "personally participated in the Epstein Enterprise [sex trafficking] from approximately 1995 onward" (2024, complaint: 3). As the "right-hand mystery men" of Epstein (Briquelet and Bredderman 2020), their association may have extended back to when Indyke's father shared an attorney in common with Epstein - William Wachtel whose firm represented Epstein in various matters including when Epstein sued the IRS in 1988 (Jeffrey Epstein, Petitioner v. Commissioner of Internal Revenue, Respondent 1988). According to a federal lawsuit filed by a woman and a Jane Doe victim of Epstein, these consigliere engineered "...the Epstein Enterprise's complex financial infrastructure, which involved dozens of bank accounts at various banking institutions, many of which were held in the name of corporate entities with no legitimate business purpose that appear to have been created to simply facilitate the illegal sex-trafficking venture" (2024, complaint: 3). For example, a Western Union money order dated around the holidays for \$200 was located by police in Epstein's trash in 2005 that was sent from New York by one of Epstein's accountants to an address in a working-class neighborhood where many of Epstein's victims lived with their parents. 16

Other (in some cases de facto) members of Epstein's organization included pilots, house managers, chefs who interacted with his victims in greeting them, transporting them, cooking, and preparing food for them. In a similar vein, two large banks, JP Morgan and Deutsche Bank, have both settled class action claims lodged by Epstein victims who charged that the banks facilitated his sexual abuse organization. A review of hundreds of e-mail correspondences between JP Morgan compliance officers and other senior personnel (obtained by the author under a public records request to the United States Virgin Islands), shows that in the years after his 2008 conviction, compliance and other personnel at JP Morgan communicated about his banking patterns and his possible sex trafficking allegations (Government of the U.S. Virgin Islands v. JP Morgan Chase Bank N.A. 2022). JP Morgan bankers formed a "Rapid Response Team" to discuss fallout from stories appearing in the press about Epstein and his association with Jean Luc Brunel's modeling agency. In one e-mail, a JP Morgan banker wrote concerning a news article "...about the DOJ investigation [is] saying they brought under age girls to the US via a modeling agency M2[sic] that is owned by a guy named Brunel. Turns out the banker said today we extended Epstein a loan in relation to this modeling agency" (2022, Docket 123-35, Exhibit 31). Outside attorneys also allegedly participated in arranging for sham marriages between Epstein victims to aid them in acquiring U.S. citizenship after New York State legalized gay

Yet even more sophisticated procedures utilized by Epstein concerning his aircraft seem to have been part of his sex trafficking enterprise. As early as 2003, according to documents obtained by the author from the State Department, Jeffrey Epstein's shell companies that owned his private jets and helicopters were enrolled in the Visa Waiver Program (a program that would allow a passenger departing Epstein's jets or helicopters to stay up to 90 days in the United States without a visa). A public records request to U.S. Customs and Border Protection of Epstein's pre-arrival flight manifests shows that in 2018 and 2019, at least two female passengers entered the United States on Epstein's aircraft through the Visa Waiver Program. Such programs are ripe for exploitation by human traffickers (McCabe 2008).

Case 2: Nygard organization elite sex trafficking

The alleged trafficking case of Peter Nygard (1941-), although the subject of documentaries on network television (The Fifth Estate, Dateline, the four-part Unseamly documentary), streaming services, and other media, is less well-known than the case of Jeffrey Epstein (Cronin 2020). Until his December 2020 arrest, Nygard was a Canadian down-market garment, apparel, and fashion company owner worth several hundred million dollars. After a dispute with a very wealthy neighbor in the Bahamas, allegations of sex trafficking and sexual assault were unearthed in a civil lawsuit (Jane Does Nos. 1-10 et al. vs. Peter J. Nygard et al. 2020) and a subsequent federal investigation and indictment on charges of sex trafficking and racketeering (United States of America vs. Peter Nygard 2020). While incarcerated and awaiting extradition to the United States, numerous alleged Canadian victims subsequently came forward, resulting in criminal charges in three provinces where Nygard and his company had a presence (Ontario, Quebec, and Manitoba).

In November 2023, Nygard was found guilty, after a Toronto jury trial, of four counts of rape committed at his Toronto office suite spanning between the late 1980s and early 2000s (His Majesty the King v Peter Nygard 2021). Some of the victims are also claimants in the U.S. sex trafficking civil lawsuit and a subsequent civil lawsuit that names senior Nygard company executives, including a hotel Nygard used, as co-defendants (Jane Does No. 1-13 vs. Peter Nygard et al 2023). As early as 2003, a husband-wife couple whom Nygard hired to manage his private resort in the Bahamas, alleged in a civil employment suit that women and minors were being lured to his property for sexual purposes (Allan May and Michelle May vs Nygard Holdings Limited et al 2003). According to the former U.S. Attorney in the Southern District of New York, federal investigations into Nygard's alleged trafficking (that subsequently stalled) were initiated in 2015 and 2017 (Barker, Porter, and Ashford 2020; Berman 2022). The Despite these recent complaints, there appears to have been a long history of sexual harassment and assault complaints lodged against Nygard in Canada going back to the 1960s.

The first publicly reported charges of sexual assault against Peter Nygard were in Winnipeg, Manitoba, in January 1980. According to a newspaper report at the time, he was charged with sexual assault against an 18-year-old victim (Edmonton Journal 1980: A11). Later that spring, the charge was dropped inexplicably (Goldspink 1980). Following the apparent vindication, Nygard criticized the police for "poor judgment in charging him" (The Calgary Herald 1980). Many years later, a retired police detective now in his nineties recalled working on a sexual offense case involving Nygard in 1968, where Nygard is alleged to have sexually assaulted an employee of his who was approximately 18 to 19 years of age, with charges being subsequently dropped as well (Sawa et al. 2021). In the mid-1990s, several women employees filed complaints against Nygard with the Manitoba Human Rights Commission for a multitude of sexual harassment offenses (Mitchell and Sinclair 1996). Nygard's company settled these claims (the author has also seen copies of two earlier 1991 confidential settlements filed with Toronto's Human Rights Commission). 18 In April 2010, the Canadian Broadcasting Company's (CBC) Fifth Estate aired a documentary, Peter Nygard: Larger than Life, that for the first time exposed Nygard's alleged sexual assaults on women and girls. But even before the show aired, Nygard hastily filed two lawsuits against the CBC concerning the documentary even utilizing a rarely used Canadian statute that allowed him to pursue criminal charges of libel against the television producers and reporters (McKeown 2021).

In February 2020, beginning with 10 Jane Doe victims, a class action suit citing the Trafficking Victims Protection Act (TVPA) against Nygard and his companies was filed in New York. This civil case charges that "Defendants, using interstate and foreign commerce, recruited, lured, and enticed young, impressionable, and often impoverished children and women, with cash payments and false promises of lucrative modeling opportunities to assault, rape, and sodomize them" (2020). About one week later, the New York Times published an investigative story after interviewing dozens of women and former Nygard employees about the allegations of widespread sexual assault and sex trafficking (Barker, Porter, and Ashford 2020). A few days after the New York Times story was published, the FBI executed a raid on Nygard's New York headquarters in Times Square in search of evidence for their investigation (Katersky 2020). On the same day as the FBI raid, Nygard was served with a search warrant for his electronic devices at the airport in Minnesota before he boarded a plane to Canada. Subsequent electronic surveillance on his associate's phone suggested he was considering fleeing to Malta or Bermuda (Court of Queen's Bench between The Attorney General of Canada on behalf of the United States of America and Peter Nygard 2020). In December 2020, Nygard was arrested at his home in Winnipeg, Manitoba. Between the initial filing of the original February 2020 TVPA class action suit (where 9 of 10 alleged victims were Bahamian), many women from Canada, the United States, and other countries came forward with similar allegations stretching back to the 1970s, such that the class action sex trafficking lawsuit now has 135 plaintiffs. 19 One of the key differences between Nygard and Epstein is in the criminal charges levied by the state.

Nygard's criminal sex trafficking charges, unlike Epstein's, are combined with racketeering charges in his federal indictment because he is alleged in to have used his public-facing clothing company and its employees "...to recruit, entice, transport, harbor, and maintain adult and minor-aged female victims for Nygard's sexual gratification and, on occasion, the gratification of Nygard's personal friends and business associates" using a mixture of "force, fraud, and coercion" to compel women and minors to engage in sexual activities and "remain with Nygard against their will," (United States vs. Peter Nygard 2020:2). The victim-selection techniques used by Nygard's sex trafficking enterprise are varied.

Victim selection

Nygard's victim-selection patterns over his alleged long-run (potentially fifty-year) sex trafficking scheme involve victims who vary in nationality, ethnicity, and age (including many girls and women of color). Some were working-class and/or career-aspiring girls and young women, though some came from middle-class or, in some cases, affluent backgrounds and attended elite private schools and selective colleges. The earliest known alleged victims tended to be Canadians of European descent.

Beginning in the 1990s, there was a noticeable shift toward very young girls and young women of African descent from the Bahamas and the United States, as well as Indigenous Canadian women and girls. Some of Nygard's earliest alleged victims were employees of his company. As a victim (now in her 60s) recalled, "I was working with the clothing industry, and I got pregnant when I was 18, so I never got a degree, but I was very good at being a seamstress and designing things . . . I was hired in January '80, and I didn't see Nygard until sometime in February where he announced that he was going take me on a trip to the Far East." Another alleged victim, an Indigenous Canadian woman, a 20year-old new mother in the early 1990s, recalled, "I was looking for part-time jobs, and I was hired at a store owned by Peter Nygard." In the early 1970s, a woman who was between 19 and 20 years old worked in a clerical position at Nygard's company and noted his office was at the front of the building and overlooked the female employees in his Winnipeg factory: "When I think back I guess it was kind of odd that he would get my phone number I guess from the company records . . . he phoned and asked if I wanted to go [the] next evening to a hockey game."

During the earliest phases, many of his alleged victims were drawn from the employee pool of his factory in Winnipeg. Starting in the late 1970s, he sometimes initiated contact with women at commercial airports or on aircraft, as well as met alleged victims in nightclubs in both Canada and the United States. Some victims were friends of Nygard's family, though, by the 2000s, a significant share of victims were lured to his residences for what he called "pamper parties" with the support of corporate staff under the veneer of professional events. For example, one 14-year-old victim invited to a Nygard party at his Bahamian cay recounted, "I grew up on a small island. I moved to Nassau when I was five . . . I wanted to be a pediatrician when I grew up, but first I wanted to be a model." Many of the younger Bahamian alleged victims came from poor neighborhoods in the Bahamas referred to as "the villages," where electricity and running water may be a luxury. According to a Nygard Cay employee who later became a victim herself, "He loves the less privileged." A Jane Doe who was employed as a "girlfriend" recounted that Nygard said, "I like them real young . . . he wanted girls from broken homes ... that didn't have a support system." Some of the alleged Indigenous victims of Nygard in Winnipeg were in and out of foster care and trafficked by wealthy European American men in Winnipeg (Guyot and Moore 2021). Nygard's attacks on Indigenous Canadian women could be seen as a continuation of colonial racist practices where Indigenous children were placed in residential schools and subjected to sexual and physical abuse (see Comack 2018).



Access and isolation

The pathways for Nygard to gain access and isolate alleged victims depended on the locations and time frame of abuse. Between the 1970s and the 1990s, a significant share of his alleged victims were employees of his clothing company, and Nygard could access them by being the owner of his company (including his presumptive access to personnel files). Nygard is also posited to have used his retail store to target minor-aged females, utilizing models to lure them inside. For example, a then-14-yearold Jane Doe recounted how in 2015 she was with her sister and cousin walking through the mall in Nassau, Bahamas, when two models invited them into Nygard's store to try on pants. Eventually, Nygard himself appeared on the showroom floor and took the 9th grader's measurements personally (including inappropriate touching) and asked her what grade she was in and if she wanted to be a model.²⁰ At the store, a female employee then recorded her phone number. Within days, the employee called and arranged to drive the 14-year-old to Nygard's Bahamian estate to attend a "pamper party" and discuss what she believed was a modeling opportunity with the Nygard companies. Later at the party, Nygard isolated her (under the pretext of employment as a model), stating, "Let's go somewhere quiet where we can discuss business."

Likewise, in the early 1990s, a woman who worked at a Nygard retail store was kept working late, and Nygard cornered her in a dressing room while the store manager counted money from the cash registers. In Winnipeg in the late 1970s, one victim (then aged 16 or 17) recounted that Nygard (then in his 40s) was a frequent presence at nightclubs, where he would try to dance with young patrons: "I guess it was approaching midnight, and for whatever reason, I wanted to go home. Peter Nygard injected himself into that departure process and offered me a ride." Reluctantly, she accepted the ride, and on the drive, Nygard kept missing the turns toward her parents' house and said, "I just need to stop by my office to pick something up." He then brought her to his factory complex and isolated her in his locked executive office suite. In 1993, another alleged victim was introduced to Nygard by a family relative as a possible model for his company. Nygard's company mailed her an airline ticket, and she flew to Winnipeg, where the relative then drove her to Nygard's industrial district factory; she was told she would be staying in "the executive suites" but after the relative left, Nygard informed her she was staying with him in his suite (she was allegedly held there against her will for 2 to 3 days a security guard at the warehouse told her she could not leave without Nygard's permission). 21 Nygard brought an employee in the early 1980s on a business trip to various cities in Southeast Asia. Suffering jet lag, according to the former employee's account, she woke up in the middle of the night when Nygard gained access to her suite, climbed into her bed, put his hand over her mouth and said, "Don't worry, you're a nice girl, I'm not going to hurt you ..."

Several victims reported a similar pattern of isolation in Nygard's 2023 civil trial - they were given a tour of his building complex in Toronto that terminated at a bedroom office suite hidden behind a mirrored glass wall that required an electronic keycode to enter and exit (the Winnipeg office suite also had a keyed lock on the inside of the door). At his 2023 criminal trial in Toronto, one victim noted in her testimony, "I was a prisoner in that room ... the door sliding open is seared in my psyche." Nygard testified under cross-examination at his 2023 criminal trial that he was extensively involved in the design of his company buildings. At Nygard's 2024 sentencing hearing, Justice Robert Goldstein noted "the manipulations used to get the victims into the private apartment at 1 Niagara Street" as one of several aggravating factors in the case. Regarding isolation, Nygard's former Cay property in the Bahamas is surrounded by water on three sides. The property was otherwise only accessible through a massive gate and a razor-wire fence overseen by a security team, which prevented people from leaving. Nygard's permission was needed for the gate to go up or down.

By the 1990s and 2000s, there was evidence of extensive organized alleged third-party recruitment practices - in essence, using paid employees specifically to access potential victims. A Canadian teenager visiting the Bahamas was lured to Nygard's property by a tennis instructor who invited her to use the tennis courts at Nygard Cay. The tennis instructor referred to Nygard as his "boss." She said, "When I got to Nygard Cay, I very soon found out that I was not free to come and go as I pleased...



you had to have Peter's permission for the gate to open . . . he had my passport. He said that anybody that comes to the property, he just keeps it in a safe and that it was just, I guess, protocol."

In 2020, a Jane Doe claimant against Nygard filed an additional civil suit against her alleged Nygard recruiter (Jane Doe 1 vs. Medeiros 2020). The alleged recruiter is a well-known model with over 5 million Instagram followers who has starred in music videos for a famous R&B singer. According to her civil complaint, Medeiros invited Jane to a party in Miami and had Nygard's company pay for her to fly to the Bahamas. Medeiros said she had a friend who owned a fashion company. After she arrived at Nygard Cay, Jane realized that she was not free to leave, and Medeiros allegedly told her she was required to have sex with Nygard, which she reportedly told her "Wasn't that bad" and is "fast and easy." When Jane refused, Medeiros suddenly said she had to depart the compound, leaving Jane alone with Nygard. Medeiros had a checking account tied to Nygard's California property and was able to use Nygard's Ferrari and other sports cars, as well as get stem cell injections, jewelry, plastic surgery, a salary, and enjoy other amenities, allegedly in exchange for acting as his top recruiter. This role was compared to that of Ghislaine Maxwell in Epstein's case by people familiar with the case.

According to the class action suit against Nygard and his company, he hired an extensive number of women, titled "models" or "girlfriends," who participated in luring victims to his properties or for "pamper parties" where they could be subject to sexual assaults. One woman who worked for Nygard described how Nygard told her, "You're going to go get me some girls today, I need girls, you're going to get girls at the mall." The civil suit notes how corporate funds from Nygard's fashion-apparel company were used to pay the people in these roles, replete with falsified paperwork and invoices. Social media postings also recruited and enticed potential victims to attend Nygard "pamper parties." Notably, much sexual grooming occurs online, and Nygard's organization allegedly followed this trend - "pamper party" invites were exclusively directed toward women and young girls, whereas males were allowed only if they brought 4-5 girls or women with them (Medeiros denies these allegations).²²

A young Bahamian woman who was assaulted by Nygard as a child in 2011 when she was 14 explained how she was accessed and isolated by a Nygard recruiter:

We have something in Bahamas we call a ghetto . . . more like a community of people. And this lady she came to us and ask if we were willing to work summer jobs at the Cay. When I got there she wanted me to meet Mr. Nygard. It was a like a dark little room, he was sitting there and she left.

A minor female from the Bahamas who attended one of the "pamper parties" at Nygard Cay kept mainly to herself, enjoying the food. Ultimately, a member of Nygard's security staff approached her, telling her his boss wanted to see her. She thought that was good because "I was trying to ask him, how do I get home now?" The security staffer told her, "The only person who could answer that was Peter" because his property was " ... shut down, ain't nobody could leave for the night. He [Nygard] said I could sleep there with him 'til the morning." Much like with Epstein, the geographic isolation of victims involved the use of exclusive properties, including two islands in the case of Epstein's Little St. James or an isthmus in the case of Nygard Cay.

On one occasion, the mother/aunt of two girls (age 14 and 15) who were sexually assaulted showed up at the gate outside Nygard Cay shouting that she would call the police if they did not let her come inside to retrieve the girls during a "pamper party." Eventually, she left with both girls. In another alleged assault, a woman reported to a Nygard security employee what happened to her, but he did nothing.

Trust development

Nygard's status as a major employer and wealthy business leader in Winnipeg and his ability to court and be courted by political leaders may have made him appear trustworthy. A similar scenario played out when he established a residence in the Bahamas. A woman who was victimized in her teens reflected that before being invited to his property, she did not know him, "But I heard about him

everywhere ... He was this big fashion designer who was always on our news. Like he was always giving to the community . . . he always had something good about him to give back to the Bahamas." In the late 1980s, Nygard invited Jane Doe to a Rolling Stones concert in Canada. He allegedly boasted of his closeness to the Prime Minister of Canada, another cabinet minister, and how he helped forge Canada's free trade policies. A 14-year-old Canadian, who says she was assaulted in the late 1970s, knew Nygard because Nygard was a customer of her father's business that sold fur items to Nygard.

Nygard Cay had a history of hosting high-profile visitors, including a former U.S. president and first lady, famous singers, Hollywood actors and actresses, British royalty, and local Bahamian political elites. Such legitimate elite visitors can aid in trust development by strengthening the perception of Nygard as a "pillar of the community." Nygard also hosted a summer camp for minor children at his Bahamas property. According to one woman (and later victim) who Nygard employed at the camp, he "... fed and provided amenities for the kids, girls and boys. And in that crowd was my sister. Now she is 19. Then she was about 14 ... bear in mind that my sister is very young. We come from a church home. She doesn't understand the real world." The sister intervened when she witnessed Nygard attempting to lure her younger sister to his bedroom.

Nygard's promises to help women and girls financially were an aspect of trust development. A Jane Doe, who was said to have been lured to Nygard's factory complex and isolated, recounted that Nygard told her, "Look, I'll take care of you, and you take care of me, we take care of each other." A Bahamian employee-turned-victim explained her family's economic struggles to Nygard: "And after I informed him of my financial status, certain things that were going on in my life, he was like, 'I can assist you. I'd like to help you." A Jane Doe minor victim from the Bahamas noted, "He gave me large sums of money and made me feel like I was special."

One aspect of trust development is providing potential victims with alcohol and drugs. One Jane Doe reported that she was at a "pamper party" at Nygard Cay, where Nygard approached her and asked her what she was drinking. She replied, "I said, oh, I'm 14," and Nygard allegedly said to her, "This is a private party, you can do whatever you want," and had his bartender bring her a drink (she had never consumed alcohol before). Another minor Jane Doe at one of his parties recalled how he told her to come to his room so he could give her marijuana. When she got there with him, he quickly got undressed and ran into his jacuzzi and ordered her to get in it with him. She told him, "I did not come up for that." In the early 2000s, a professional model recounted being brought to Nygard's California property by a colleague (she had never heard of Nygard before). When she arrived at his beachfront mansion, she was required to view a biographical film reel about Nygard's life, replete with footage from a segment on Lifestyles of the Rich and Famous that featured Nygard.

Desensitization to sexual content and physical contact

Nygard is alleged to have engaged in various behaviors and practices to desensitize or normalize sexual activity before his alleged sexual assaults. Many victims reported aggressive behavior by Nygard. A Jane Doe victim, for instance, attended a rock concert with him, and he invited her to his corporate building in Toronto. Once inside his private, hidden suite, he berated her with degrading language, called her a vulgar name, and said, "You're wasting my time!" As she tried to leave, he chased her, cornered her, and pinned her down with his body weight, where she felt powerless. He proceeded to remove her clothing and sexually assault her even after she brought up the possibility of AIDS to thwart him; he instead moved to wear a condom while assaulting her. Another Jane Doe (age 21 at the time) testified she was attacked similarly a few months earlier in the same year. A tour of his Toronto headquarters ended up with him revealing his hidden bedroom suite concealed by a wall that opened when he entered a code into a keypad. Immediately upon entering, she noticed pornography (which she had never seen before) playing on wall-mounted video monitors, and Nygard said, "I'm going to do that to you later." Likewise, he also pinned this victim down using force, ripped off some of her clothing, and proceeded to assault her in multiple ways. Some victims described Nygard as a "practiced



rapist" in the relatively quick manner in which he would pin women down, disrobe them, and put his forearm over their neck and apply pressure to their windpipe the more they resisted.

A third victim testified at trial that Nygard attacked her at the end of a daytime tour of his Toronto headquarters. As she felt uncomfortable after entering his suite and asked to leave, he then attacked her. He ripped off her blouse and forcibly touched her, which caused her immense pain, and when she told him it hurt, and said "no" and "get off of me," he ignored her. In the middle of the attack, a business intercom went off, alerting Nygard to an important business meeting, effectively interrupting his sexual assault. Nygard told the victim, "It's your lucky day," and ordered her to pick a shirt from a nearby clothing rack to substitute for the blouse he had damaged during his alleged assault.

Victims from later years in the alleged assaults describe situations where they would consume a drink at a Nygard "Pamper Party" and then shortly after feeling nauseous or ill and need to lie down. One Jane Doe recounted being incapacitated and unable to move her legs, "I remember just lying there and the tears rolling, falling down my eyes because I wanted to scream ... I just wanted to get out of there because I knew what was happening." A victim who worked for Nygard says she observed a bartender at a "Pamper Party" slip something into a drink right before handing it to someone, and she confronted the bartender, who told her, "That's the party pill." She also noted that she would arrive at Nygard Cay to work the morning after a "pamper party," and it was not uncommon to find a disheveled woman or girl unsure of how they got there, trying to get home, and confused as to what happened to them the night before.

According to one of the attorneys for the victims, Lisa Haba, Nygard has an extensive array of sexual paraphilias. One behavior a significant cross-section of victims allege (in the 2020 civil lawsuit) is that he requested or pressured victims to defecate in his mouth, and for some long-term victims, he allegedly structured their diets to facilitate this process. Nygard was also interested in stem cell therapies as a possible "anti-aging" regimen (including founding an offshore company called "Nygard Biotec"). Some victims report that Nygard sought to impregnate them so they could have an abortion for purposes of harvesting their fetal stem cells for his anti-aging treatments.²³

Post abuse maintenance

After the alleged sexual assaults, the women and girls who made complaints in the 2020 civil lawsuit reported that Nygard "paid" them, nearly always in U.S. currency. An alleged victim, who was 14 at the time of the assault, reported that after the event, she was driven home by the two Nygard employees who initially transported her to his compound. In another instance, Jane Doe reported that she was asked by a Nygard employee, after her alleged assault (when she was age 15), if she was okay, and she told her she was "afraid." The assistant then asked her if she would return and noted, "Nygard was not really a bad person but was just selfish at times." She reported that after he assaulted her, he gave her an envelope of \$5,000 in U.S. currency denominated in \$100 bills. Some victims reported that Nygard would "throw" money at them in a derogatory manner after he sexually assaulted them.

Another alleged minor victim, after being sexually assaulted, reported that Nygard attempted to put a wad of cash in her hand, but she refused - he eventually gave her and another minor friend permission to leave his compound. Several minor victims reported being sodomized and bleedingone reported going to a hospital and requiring stitches. Several alleged victims reported being given a "morning after pill" or "Plan B" pill by Nygard or his associates after their alleged assaults. At his 2023 Toronto criminal trial, Nygard did not dispute that he gave "girlfriends" this drug but disputed when he did and reported not knowing when it was available without a prescription (in Canada). Many minor victims in the Bahamas also reported being pressured or coerced into recruiting victims for Nygard, according to the 2020 class action lawsuit against Nygard. An adult victim alleged that Nygard used his company funds to hire people (police or thugs) to harass, threaten, and intimidate her in the event she disclosed the sexual assaults. One adult victim in the class action suit says that after Nygard assaulted her, he had one of his employees pack her bags and then drop her off at an isolated bus stop in the Bahamas. Nearly all "pamper party" attendees had their information stored in



a computer database that Nygard and his employees maintained so they could be called for future parties.

The social organization of Nygard's enterprise

The charges of racketeering against Nygard suggest an extensive and complex organization that he used for his charged sex trafficking crimes. Nygard's large alleged victim count suggests that his organization had very sophisticated victim-selection techniques.

While Nygard often allegedly used company assets (in part) when he personally selected potential victims, the sophistication of his deviant enterprise involved third party referrals and even the use of a sophisticated two-stage screening process that appears to have emulated *Playboy* magazine publisher Hugh Hefner's practices for inviting young women (and sometimes minors) to parties at a flagship residence.²⁴ Nygard maintained a close association with Hefner in the early 1980s.²⁵ In a profile of Nygard in 1980, he openly professed, "I envy Hefner. He's gone one step further. That's the way to live" (Grescoe 1980). With the decline of magazine publisher's parties by the 1990s, a group of sycophants created their own small-scale version of the mansions called "mini" or "shadow mansions."26

Nygard's two-stage victim selection procedure was first reported by a husband-wife couple who were hired as resort managers for Nygard's property in the Bahamas after, they alleged, being falsely lured into an employment contract under the belief that his property was being converted to a commercial resort. In their 2003 civil suit (17 years prior to his arrest), they alleged "Nygard failed to disclose to the Mays that many of the parties supporting Nygard's lifestyle activities on the property were organized under the guise of a model talent search when they were nothing more than the luring of women (some of which the Mays learned were underage girls), with the false hope of becoming a model, when instead the primary purpose of the women being invited was for the sexual gratification of Nygard" (Allan May and Michelle May vs Nygard Holdings Limited et al 2003, 5-6). In contrast to the representations about the scope of her job duties, Ms. May claimed in the suit she was required to invite up to 100 women per week to Nygard's "pamper party" (held every Sunday when he was in residence). Women and minors invited to the parties (under the false front of a model talent search event) were plied with water sports, manicures, pedicures, massages, barbecue, Karaoke, and encouraged to drink alcohol throughout the event. Many of the minor girls and young women who attended "pamper parties" were enticed from the "villages," which refer to poorer areas outside Nassau in the Bahamas.

May's job duties, per the lawsuit, included calling women from a database of previous attendees and being directed to ask them if they knew of other females (co-guests) who would attend. For first-time attendees, May was ordered to use a "guest registration form" created by Nygard's company with entries for height, weight, and dress size-" Nygard prohibited women with a dress size or more than size 8 to be re-invited" (p. 11). Each new "co-guest" had to have their photo taken and physical beauty attributes rated as "A" = always invited, "B" = to fill out party, C = "last resort" and "D" = no invite. Ms. May realized at the first party that it was not a model talent search but instead "...parties concluded at the resort's private disco where Nygard would hand pick from those women rated 'A' a woman (or women) to participate in sexual activities with him at his personal residence," (p. 12). The computerized database maintained by Nygard's corporate IT department had listings of more than 7,500 minors and women by the mid-2000s (2020). The point of Nygard picking a victim for his alleged sexual assault from the "pamper party" guests was stage two of his victim-selection method (his organization performed stage 1 and as a practice he would enter into the party after his bartenders had been serving his guests alcohol for a period of time from which he would select one or as many as three victims).²⁷ Attendee photos and invitations were often personally reviewed and vetoed by Nygard before the parties and communicated to his staff.

Figure 2 is an organizational chart of Nygard's alleged sex trafficking and racketeering enterprise. At the head of the organization is Peter Nygard, the alleged capo trafficante who closely supervised,

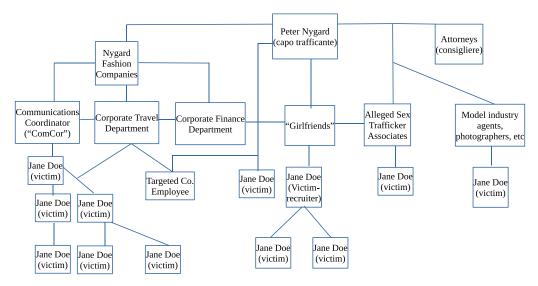


Figure 2. Organizational chart of Peter Nygard's alleged sex-trafficking enterprise in the 2000s.

directed, managed, and controlled the enterprise's finances (including approving even small payments and expense reimbursements). Compared to Epstein, Nygard's recruitment methods involved the use of multiple hired women called "girlfriends" who were often adult victims that Nygard deemed most attractive and used a combination of deceit, fraud, coercion or physical force to compel their employment to recruit others into the trafficking network (2023).

Other third parties that are alleged to have supplied victims to Nygard's alleged operation were other sex traffickers with whom Nygard would engage in "sexual swaps" where they would allegedly exchange victims as human currency to engage in forced sexual activities with Nygard and vice versa. 28 One alleged associate of Nygard's (who was sued independently by several Jane Does) appeared in a video posted to his social media embracing Nygard on a volleyball court at his Marina del Rey property and stated "I'm sorry Peter, you've shared over five-hundred girls with me and I've only shared five, but they were five good ones, but your five hundred was really good ones," and both men chuckle. Such statements seem to correspond to allegations of overlapping sex trafficking conspiracies raised in the Jane Doe lawsuits against Nygard and the apparent interest by federal prosecutors who recently filed a letter acknowledging that alleged Nygard accomplices remain under investigation. 29 To wit, modeling industry actors, such as agents and photographers, also allegedly supplied potential victims (knowingly or unknowingly) to Nygard. The federal criminal indictment against Nygard cites racketeering laws, charging that Nygard's clothing company created a facade of legitimacy that concealed, financed, and provided the logistics for Nygard's criminal sex trafficking operation.

As noted in Figure 2, the "girlfriends" (some of whom acted as underbosses) were paid from funds in the finance department and accountants were allegedly "...routinely sending tens of thousands of dollars per month in U.S. currency, without substantiation or controls, to Nygard" (2023:87–88). In instances where "girlfriends" were unable to procure new potential victims, they allegedly had to submit to Nygard's proclivities.

Sex trafficking involves the movement of people within and across national borders. As such, Nygard's corporate travel department allegedly made routine travel arrangements for victims and "girlfriends." Corporate accounts were used to pay for food, entertainment, alcohol, spa services, as well as cash Nygard would pay to "girlfriends" or leave for victims after he allegedly assaulted them. This included "in-kind" transfers such as rent, dental work, plastic surgery, child support, immigration assistance "...often thinly disguised as payroll or payments for professional contracts ... " (United States of America v. Peter J. Nygard 2020: 6). "Pamper Party" invitations were

used to groom and recruit adult and minor victims and were funded by Nygard's clothing company. A large corporate yacht and Boeing 727 jet were allegedly used to transport victims as well as drugs, liquor, and supplies for the "pamper parties," where victims would often be drugged before the alleged sexual assaults (alleged assaults also occurred while these vehicles were en route). Residences and company assets in Canada, California, New York, and the Bahamas, taking full advantage of jurisdictional variation in enforcement and age-of-consent laws, were allegedly used for parties and the scenes of possibly thousands of sexual assaults. Taken as a whole, this extensive operation clearly shows how elite sex traffickers use their extreme wealth and assets to create an organization that aims to perpetuate the central goal of acquiring an endless number of victims for the capo trafficante and illustrates the detailed and variegated nature of such a criminal operation.

Discussion and conclusion

Elite sex trafficking, as defined in this paper, occurs when a wealthy person incrementally constructs a deviant organization around the processes, financing, and logistics of sexual grooming on a large scale over a long period. These organizational goals map well to organized deviance, wherein several or more people conspire to engage in the deviant activity. As the criminal costs of sex trafficking have increased along with public attention, victim pursuit of their rights, and prosecutions, elite sex traffickers are under increasing scrutiny as they are less able to conceal and hide behind their wealth and power to sustain their criminal operations.

In this paper, I compared the sex trafficking enterprises of Jeffrey Epstein and Peter Nygard. Both alleged conspiracies involved high-net-worth men who resided in tax havens (the U.S. Virgin Islands in the case of Epstein, the Bahamas in the case of Nygard) where they could easily influence governments to ignore their deviant activity through massive campaign contributions, philanthropy, and other sources of influence. These residences not only provided tax advantages to the capo trafficante but also allowed them to construct isolated domiciles where they could entrap victims and commit sexual assaults and other abuse. In terms of the Sexual Grooming Model, such residences enable the capo trafficante to access victims as they have been isolated from capable guardians. Underbosses such as Ghislaine Maxwell may recruit and later supervise the recruitment of others to bring new victims into the operation. In the case of Nygard, some of this labor fell on house managers who were allegedly tasked with highly specified recruitment techniques and intense demands to "fill out" parties. In addition, staff who worked as "ComCor" (communications coordinators) at Nygard's company were allegedly paid from company assets to act as professional recruiters for his trafficking activities. Victims were also converted into recruiters - in the case of Epstein, certain minors would "age out" and no longer be of value to him except as recruiters. He would exploit their precarious economic circumstances and incentivize them to continue recruiting victims from their social networks.

Exclusive and sophisticated measures, such as the use of large commercial aircraft converted into private planes, where sexual assaults also occurred, were another similarity (Nygard purchased an identical Boeing 727 in 2004 after Epstein purchased his in 2001). The alleged use of violent restraint and drugs to overcome victim resistance appears more consistently in alleged Nygard victim accounts. In contrast, Epstein's victims often cited fear and psychological manipulation after he isolated them (e.g., a secluded desert-ranch residence in New Mexico, his island in the USVI, or one of his large properties in New York, Palm Beach, or Paris). Nygard's organization, for anyone traveling with him, is alleged to have confiscated and held passports. At the same time, in one known case, a 15-year-old who allegedly wouldn't comply with Epstein and the commands of others had her passport confiscated - a known tactic used by sex traffickers to enslave victims (U.S. Department of Justice 2011). In the event of threatened disclosure, both Nygard and Epstein allegedly used bribery, intimidation, and coercion on victims as well as access to the media to persuade news outlets not to run stories.

The most significant distinction between Nygard and Epstein's alleged enterprises is likely the racketeering allegation made against Nygard. Nygard's fashion and garment business could disguise financial transfers as employment and business expenses. In contrast, Epstein, with his reliance on large regulated banks, triggered numerous compliance efforts by banks such as Bear Stearns and JP Morgan. However, Epstein's close relationship with elite bankers (and role as a "rainmaker") seems to have allowed him, for a time, to overcome any resistance by compliance officers at some of the banks where he did business. His explanations for large cash withdrawals (his need to pay cash for jet fuel in various countries) and structuring of transactions (often cash withdrawals by his attorneys) to not set off any money-laundering flags seem to lack credibility. Emails between Epstein and the leader of JP Morgan, Jes Staley, appear to show coded language suggesting that Epstein may have been trafficking girls and women to the banker - a curious take on the idea of client-banker relationships (in a 2025 U.K. tribunal hearing, the banker admitted to engaging in sexual activities with a member of Epstein's staff). Likewise, it is alleged in the class action lawsuit that Nygard forced a victim to engage in sexual activity to influence business deals as well as with very high-ranking officials in the Bahamian government (the federal indictment of Nygard alleges that Nygard trafficked victims to "Nygard's personal friends and business associates"). Another distinction is that Jeffrey Epstein is often alleged to have been a "spy" or "modern James Bond" who was running a sexual blackmail scheme for himself, the United States, Israel, or some other country. In contrast, Nygard has not been similarly accused (though there are concrete claims about Nygard trafficking a victim to the Prime Minister of the Bahamas in the 2020 class action complaint). Epstein, after his conviction in Florida in 2008, wound up on multiple sex offender registries. After the passage of International Megan's Law in 2016, consequently, like all other offenders, he had his passport book and card revoked by the U.S. State Department (Hill and Volscho 2024) – this would seem inconsistent with the idea of a state-supported intelligence agent. Likewise, when Epstein's underboss, Ghislaine Maxwell, was arrested in New Hampshire, federal agents discovered that she had her cell phone wrapped in tin foil - a rather amateurish and peculiar protocol for someone allegedly involved in a sophisticated intelligence operation. Nygard has been described as a "flamboyant" attention-seeker, which has likely tempered such accusations.

The organizational contribution of this paper may allow researchers insight into how a wealthy person can create a deviant organization with a division of labor that achieves the goals of the SGM and operates with high efficiency and can deflect against accountability, disclosure, and prosecution. While offenders are often viewed in psychological terms, there are sociological and organizational perspectives that will aid in profiling multi-actor sexual abuse and trafficking conspiracies.

Notes

- 1. In contrast, two sizable and regulated banks who did business with Epstein, J.P. Morgan and Deutsche Bank, have settled lawsuits by victims accusing them of willingly thwarting compliance efforts on his behalf while Nygard has been accused of ignoring corporate financial formalities in the operation of his company to facilitate his trafficking operation (see 2020, 2022).
- 2. Lanning (2010) noted that child molesters often blackmail their *victims* with compromising photos especially if the victim tries to disclose the abuse or trafficking. After Epstein spent several years unsuccessfully trying to establish a financial relationship with the billionaire Bill Gates, he is alleged to have subtly informed Mr. Gates that he knew the software tycoon to have had an extra-marital affair with a Russian bridge player in her early twenties, according to a report in *The Wall Street Journal* (Safdar and Glazer 2023).
- 3. Inklings of suspicion in Palm Beach about Epstein began in late 2004 after Epstein's late house manager, Alfredo Rodriquez, mistakenly called the police on a suspicious car in the driveway the car actually belonged to a teenager who came to pick up an envelope of money from Epstein (Brown 2021). Shortly after this incident, Epstein inquired about making a substantial donation to the police department. Following ethical practices and to avoid a conflict of interest, Palm Beach police Chief Reiter returned a recent \$90,000 donation from Epstein while the local investigation was in progress and shortly before criminal charges were levied against him.
- 4. The police chief wrote to the prosecutor, "I know that you agree that it is our shared responsibility to seek justice and to serve the public interest by discharging our duties with fairness and accountability. I must renew my prior



observation to you that I continue to find your office's treatment of these cases highly unusual. It is regrettable that I am forced to communicate in this manner but my most recent telephone calls to you and those of the lead detective to your assigned attorneys have been unanswered and messages remain unreturned," (Letter from Chief Michael Reiter to State Attorney Barry Krischer, May 1, 2006).

- 5. Epstein's jail sentence itself was considered weak unlike most sex offenders, he was quickly out on work release, had an exclusive private wing of the county jail, received numerous visitors (including unindicted co-conspirators), and was overseen by sheriff's deputies he paid for himself and for which he set ground rules.
- 6. Acosta resigned from Trump's cabinet shortly after Epstein's 2019 arrest.
- According to her attorney, Arthur Aidala, in a statement made outside the federal appeals court attended by this
 author on March 13, 2024, Ms. Maxwell intends to take her case to the Supreme Court to petition for her
 conviction to be vacated.
- 8. Personal communication with victims' attorney Brad Edwards, February 23, 2023.
- 9. Personal communication with Harold Levin, June 15, 2021. Levin noted that he met with Epstein at Wexner's behest before Wexner hired Epstein. Levin, who had studied advanced calculus and PhD-level economics classes, did not think much of Epstein. "I met him at his office, he allegedly had a great strategy for currency or currency transactions. I am pretty good at that stuff. . . I sat for an hour in his office, asked him a few questions. Walked out of the office, called Wexner and I said 'Stay away from the guy, I think he's a fraud." Levin later learned that Epstein was spreading rumors that he stole from Wexner (and also levied the accusation against one of Wexner's attorneys) in a bid to get his job and control Wexner's fortune.
- 10. Personal communication with Michael Gross, December 23, 2023. Gross pointed out that practices like Brunel's were common in the modeling industry, but in Brunel's case and a few others, it "escalated to massive criminality." See also Gross (1995).
- 11. The item had a relatively high score but did not achieve the critical cutoff level of 0.78 but had a score on the I-CVI index of 0.67.
- 12. Prior to Epstein's 2019 arrest, the author visited the sidewalk outside of his Upper East Side residence and tallied 13 surveillance cameras on the front exterior of the property facing the sidewalk and a unit built into a large window shade on the first floor.
- 13. Personal communication with Michael Gross, December 27, 2023. Gross pointed out that practices like Brunel's were common in the modeling industry, but in Brunel's and a few other cases it "escalated to massive criminality." See also Gross (1995).
- 14. Personal communication with Steven Hoffenberg, April 14, 2019.
- 15. This woman was identified as a "sex slave" who some victims believe Epstein purchased from her parents in Eastern Europe. A significant number of victims and the government regard this woman as a victim herself.
- 16. In a 2007 Anti-Money Laundering Report produced by Epstein's bank, Bear Stearns, the compliance department noted, "Epstein had apparently wire transferred via Western Union \$1,000 to one or more of the females referenced in various news stories and the Probable Cause Affidavit as a 'Christmas Bonus,'" (Bear Stearns AML Report, doc 267–2 ex 197, USVI vs. JP Morgan).
- 17. According to Nygard's arrest affidavit, after learning of an FBI investigation in 2016, he directed and paid one of his victims to falsely claim that one of his minor-victims was an adult under U.S. law when she traveled with him (Court of Queen's Bench between The Attorney General of Canada on behalf of The United States of America and Peter Nygard 2020).
- 18. Remarkably, one of the 1991 complainants requested, as part of their settlement, that Nygard dismantle the bedroom office suite in his Toronto office. This bedroom suite (concealed by a sliding mirror door with keypad entry and exit and no handles on the door) was a focal point at his 2023 Toronto jury trial, where several victims testified that he had sexually assaulted them there. In the confidential 1991 settlement, Nygard agreed to monetary restitution, but would not agree to dismantle the bedroom suite. At his 2023 trial, under an intense cross-examination by Crown prosecutor Neville Golwalla concerning victim testimony about being trapped in the suite, Nygard stated, "...the other toilet you could *escape* from" and then swiftly corrected his statement, adding "... or you could leave from ..."
- 19. Personal communication with civil victim's attorney Greg Gutzler, February 7, 2024.
- 20. This "ruse" may be recognizable because Nygard's "Nygard Slims" store and his fashion companies going back to the 1960s exclusively targeted working-age women in their 30s and older. Thus, there is little surprise that the smallest sized pants in the store did not fit the 14-year-old Jane Doe.
- 21. During the 2 to 3 days, she was says she was held by Nygard, historical police records show her parents had filed a missing person's report.
- 22. Reviewer I noted that the European Online Grooming Project has offered warning signs to the public so that they may recognize when they are the target of online sexual grooming. https://europeanonlinegroomingproject.com/home.aspx. One of the authors of the SGM has coauthored a book (Jeglic and Calkins 2018) on how parents can protect their children from grooming.
- 23. Footage from a personal videographer who used to work for Nygard shows Nygard and one his friends at a table discussing his anti-aging treatment with a group of African-American and Bahamian women. Nygard and the



- friend discuss buying eggs from the women, with Nygard remarking that the "best eggs" come from females aged
- 24. During cross-examination at his 2023 criminal trial in Toronto, Nygard agreed with the prosecutor concerning fashion designs and stated, "You always get inspiration from other people's design, yeah."
- 25. In nonpublic letters between the two men seen by the author, in late 1980 Hefner wrote to Nygard that although he could still attend parties at his mansion, he wanted to distance himself from Nygard due to his business considerations (likely in response to Nygard's arrest in Canada for raping an 18-year-old in 1980). Hefner's rebuke was possibly motivated by the fact that he was applying for gaming licenses around this time and his company was publicly traded (Nygard's company, on the other hand, was privately held). In a deferential manner, Nygard wrote back to Hefner that he was disappointed but respected his decision and hoped he could one day be back in Hefner's good graces.
- 26. Personal communication with Jane Doe, familiar with the Nygard family, December 17, 2023. These men tended to be affluent plastic surgeons, dentists, real estate developers, accountants, or professionals who worked in the
- 27. According to the class action lawsuit, Nygard's bartenders would obey signals to put "happy juice" or Rohypnol into a drink prior to serving it to a potential victim he had fixated on.
- 28. According to the class action suit, Nygard would allegedly force "girlfriends" to accompany him to "swinger's clubs" in New York City and then force them to find other couples to "swap" partners with.
- 29. According to a letter filed by the U.S. Attorney's Office in a civil case against an alleged Nygard co-conspirator, "In addition to the pending charges against Nygard, the USAO-SDNY's investigation into Nygard's co-conspirators is ongoing" (2020).

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Notes on contributor

Thomas Volscho is an associate professor of sociology at the College of Staten Island. His work focuses on the political economy of income distribution, racism in reproductive healthcare, political sociology, corruption, and elite deviance. He has also worked as a reporter for the investigative unit of ABC News in New York and has written for *The Daily Beast*, People, and other outlets.

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