

IN THE CIRCUIT COURT OF THE FIFTEENTH JUDICIAL CIRCUIT
PALM BEACH COUNTY, FLORIDA
CIVIL DIVISION

TRISTAN TATE, an individual and
ANDREW TATE, an individual,

CASE NO. 502023CA011904XXXXMB

Plaintiffs,

DIV. AI

v.

JANE DOE, an individual,
JUNE DOE, an individual, and
JOHN DOE, an individual,

Defendants.

The Defendant, JANE DOE, by and through her undersigned counsel hereby files her Answer, Affirmative Defenses, and Counterclaims, in response to Plaintiffs' Fourth Amended Complaint (the "Complaint") for damages exceeding \$5,000,000 for defamation, defamation per se, commercial defamation, false imprisonment, tortious interference of a business relationship, civil conspiracy, and intentional infliction of emotional distress, and states:

ANSWER

Introduction: Denied as to the "Introduction" in the Complaint, denied as to the allegations contained therein. This "Introduction" is an inappropriate diatribe against women alleging sexual exploitation, and against the "#METOO" movement, which has nothing to do with this case and therefore all allegations therein are denied. To the extent that the allegations in this paragraph are based on claims that Jane Doe is a "con artist," engages in "romance scams," is a "villain," or "predator," those allegations are all denied. To the extent this

introduction purports that this lawsuit was filed for any purpose other than to harass Jane Doe for her truthful testimony and engage in illegal witness intimidation and tampering those allegations are denied.¹

1. Admitted that the Plaintiffs reside in Romania but denied as to the characterization that they are “businessmen” as that term implies a status of legitimacy and lawfulness completely absent from the illegal activities of the Plaintiffs.
2. Denied that Jane Doe is a resident of Palm Beach County. Admitted that she is over 18 years of age.
3. Admitted that June Doe and John Doe are the parents of Jane Doe. Admitted that they reside in Florida.
4. Admitted.
5. Admitted that Mary Doe is over 18 years of age. Without knowledge and therefore denied as to Mary Doe’s current place of residence.
6. There is no paragraph 6. therefore, denied.
7. Admitted that the Plaintiffs have alleged damages in excess of the jurisdictional limits of this Court, but denied that the Plaintiffs have been injured or that any alleged injuries were the result of improper conduct on the part of Jane Doe and denied that the Complaint alleges a claim for negligent infliction of emotional distress.
8. Denied that this Court has personal jurisdiction over Mary Doe, admitted that the Court has personal jurisdiction over Jane Doe, John Doe, and June Doe, denied that venue is proper as

¹ See Fresh & Fit Podcast, *Tate Attorney Joe McBride & Former Fed EXPOSE “Trafficking Victims” LIES Against the Tates*, RUMBLE, (Sept. 3, 2023) <https://rumble.com/v3g3cr6-tate-attorney-joe-mcbride-and-former-fed-expose-trafficking-victims-lies-ag.html> at 1:17:00-1:21:50.

substantially all of the events relating to the causes of action did not occur in Palm Beach County, Florida but rather Bucharest, Romania.

9. Denied.

10. Denied.

11. Denied.

12. There is no paragraph 12, therefore denied.

13. Admitted that Andrew Tate and Tristan Tate are brothers residing in Romania and are major social media influencers but denied as to the characterization that they are “businessmen” or “entrepreneurs,” as those terms imply a status of legitimacy and lawfulness completely absent from the illegal activities of the Plaintiffs.

14. Without knowledge therefore, denied.

15. Without knowledge therefore, denied.

16. Without knowledge therefore, denied.

17. Without knowledge therefore, denied.

18. Without knowledge therefore, denied.

19. Without knowledge therefore, denied.

20. Without knowledge therefore, denied.

21. Without knowledge therefore, denied.

22. Without knowledge therefore, denied.

23. Without knowledge as to the means and factors of the Tate brothers’ “success” therefore, denied, and denied that the Tate brothers’ social media bans or cancellations were caused by the Romanian criminal prosecution or Jane Doe’s testimony.

24. Without knowledge therefore, denied.

25. Without knowledge as to the importance of the Tate brothers' ability to travel therefore, denied and denied that the Tate brothers' inability to travel was caused by Jane Doe instead of their own criminal conduct and denied that Jane Doe has caused the Tate brothers damages.
26. Denied.
27. Denied.
28. Without knowledge therefore, denied.
29. Without knowledge therefore, denied.
30. Without knowledge therefore, denied.
31. Without knowledge therefore, denied.
32. Without knowledge therefore, denied.
33. Without knowledge as to the Tate brothers' personal feelings therefore, denied and to the extent that this paragraph alleges Jane Doe is a "bad-faith actor," who has targeted the Tate brothers for extortion, or any other tortious or criminal reason those allegations are denied.
34. Admitted that the Tate brothers employ armed security guards but to the extent this paragraph alleges that Jane Doe could freely and quickly leave the Tate brothers' residence anytime, those allegations are denied.
35. Denied.
36. There are two paragraphs numbered 36. As to the first paragraph 36 on p. 12 of the Complaint, without knowledge therefore, denied. As to paragraph 36 located on p. 13 of the Complaint, denied.
37. Denied.
38. Denied.
39. Denied.

40. To the extent this paragraph alleges Jane Doe used “aliases” for any tortious or criminal purpose those allegations are denied. Denied that Jane Doe used the social media handles “thegardenofeden__,” or “furyfatalex__.” Admitted that the other names listed in quotes are social media handles Jane Doe has used.
41. Admitted that Jane Doe has used a social media handle with the combination of words “Furyfatale” but to the extent this paragraph alleges Jane Doe used it as an “alias” for any tortious or criminal purpose those allegations are denied. Without knowledge as to the dictionary or foreign language definition of the terms therefore denied. To the extent this paragraph alleges Jane Doe directs “fatal violent anger” at successful men those allegations are denied.
42. Denied.
43. Admitted that Jane Doe attended a “Tate Affiliated War Room” event at Tristan Tate’s invitation and spent further time with Tristan Tate at his invitation. To the extent this paragraph alleges that Tristan Tate did not know Jane Doe’s true first name when she attended this event those allegations are denied. Admitted that both Tristan Tate and Jane Doe used pseudonyms on the internet application where they first met but to the extent this paragraph alleges that Jane Doe did not tell Tristan Tate her real name before meeting him in person those allegations are denied.
44. Denied.
45. Denied.
46. Denied.
47. Denied.
48. There is no paragraph 48 therefore, denied.

49. Denied.
50. Denied.
51. Denied.
52. Denied.
53. Denied.
54. Admitted that Jane Doe sought a Temporary Injunction for Protection Against Domestic Abuse for protection from Marlin Fisher but denied that it was sought under false pretenses or because Marlin Fisher would not go to a concert with Jane Doe. To the extent this paragraph alleges that Jane Doe sought legal protection from Marlin Fisher for any reason other than valid legal reasons those allegations are denied.
55. Admitted that Marlin Fisher filed a lawsuit against Jane Doe but denied that Marlin Fisher has “permanent and irreversible” damages, or any damages, caused by Jane Doe.
56. Denied.
57. Without knowledge as to Justin Milner’s opinions and beliefs therefore denied. Admitted that Dustin Milner died by suicide. To the extent this paragraph alleges that Jane Doe caused in any way, proximately or otherwise, Dustin Milner’s death, those allegations are denied.
58. Without knowledge as to Adam Henrich’s opinions and beliefs therefore denied. To the extent this paragraph alleges that Jane Doe caused in any way, proximately or otherwise, Dustin Milner’s death, those allegations are denied. Denied that Jane Doe was the last person to see Dustin Milner before he died.
59. Without knowledge as to what Justin Milner or Adam Heinrich would testify if called to do so therefore, denied. To the extent this paragraph alleges that Jane Doe caused in any way, proximately or otherwise, Dustin Milner’s death, those allegations are denied. To the extent

this paragraph alleges that Jane Doe “psychologically manipulate[d]” Dustin Milner to “keep him guessing and provoke his anger,” those allegations are denied.

60. To the extent this paragraph alleges that Jane Doe could have legally consented to a “sexual relationship” with an adult male when she was a minor, those allegations are denied. Admitted that Tyler Hensel had sex with Jane Doe when she was a minor. To the extent this paragraph alleges Jane Doe defrauded or extorted, or attempted to defraud, extort, or commit any tortious or criminal act towards Tyler Hensel those allegations are denied.
61. Denied.
62. Without knowledge therefore, denied.
63. Denied that Jane Doe was an active OnlyFans model. Admitted that Jane Doe had an OnlyFans account. Admitted that Jane Doe had a Seeking Arrangements account which is the platform where she met Tristan Tate who also had a Seeking Arrangements account.
64. Admitted.
65. Denied that Tristan Tate met Jane Doe on “Hinge,” they met on Seeking Arrangements. Admitted that Tristan Tate invited Jane Doe to a “Tate-affiliated War Room event,” other parties and events, and that Tristan Tate invited Jane Doe to stay with him, that they spent “a good deal of time together,” and had consensual intercourse multiple times up until he departed Miami December 2021.
66. Denied that Jane Doe told Tristan Tate she came from a wealthy family. Without knowledge as to [REDACTED] impressions and opinions of Jane Doe when they first met therefore, denied. Admitted that Jane Doe expressed interest in growing her social media presence to promote her music but to the extent this paragraph alleges Jane Doe expressed interest in growing her social presence on “OnlyFans,” or “TikTok,” those allegations are denied.

Admitted that Tristan Tate invited Jane Doe to come to Romania and that they followed up with each other intermittently between December 2021 and April 2022.

67. Denied.

68. Admitted that Jane Doe was hoping to continue a romantic and sexual relationship with Tristan Tate in Romania. Admitted that Tristan Tate often acted aloof but denied that Tristan Tate did not reciprocate romantic advances. To the extent this paragraph alleges that Tristan Tate was under the impression Jane Doe came from a wealthy family or that he made efforts to “ground [Jane Doe’s] dreams about Romania in realistic expectations” those allegations are denied.

69. Admitted that Tristan Tate bought Jane Doe a flight from Palm Beach to Romania. As to Tristan Tate’s motives for doing so those allegations are denied.

70. Admitted that in April 2022 Tristan Tate picked up Jane Doe from the Bucharest Airport in a blue Rolls Royce and they went to lunch. Without knowledge as to Tristan Tate’s impression of Jane Doe when she arrived therefore denied. Denied that when Jane Doe arrived at the “Tate Brothers’ Romanian estate,” that she provided the security detail with her identification. Denied that the Tate brothers’ security allowed Jane Doe to leave whenever at any time. Admitted that Jane Doe was always in possession of her passport.

71. Denied.

72. Admitted that Jane Doe stayed at one location when she first arrived and was then relocated to another location otherwise, denied. To the extent this paragraph alleges that Jane Doe was not restricted in her movements those allegations are denied.

73. Admitted that the second location where Jane Doe stayed was not guarded by security but to the extent this paragraph alleges that Jane Doe was not restricted in her movements those allegations are denied.

74. Admitted that Jane Doe was always in possession of her phone but to the extent this paragraph alleges Jane Doe was free to speak without restriction those allegations are denied.

75. Denied.

76. Denied.

77. Denied.

78. Denied.

79. Denied.

80. Denied.

81. Admitted.

82. Denied.

83. Denied.

84. Denied.

85. Denied.

86. Denied.

87. Denied.

88. Denied.

89. Denied.

90. Denied.

91. Admitted that Sgt. Liam Doe contacted the U.S. Embassy as he was legally obligated to do but to the extent this paragraph alleges Sgt. Liam Doe acted for any reason other than his

concern for Jane Doe and under his obligations as a United States Marine those allegations are denied.

92. Denied.

93. Denied.

94. Denied.

95. Denied.

96. Denied.

97. Admitted that Jane Doe asked Sgt. Liam Doe to retract the call to the U.S. Embassy but to the extent this paragraph alleges that Jane Doe requested this retraction for any reason other than because she feared alerting the U.S. Embassy put her in more danger those allegations are denied. To the extent this paragraph alleges that Jane Doe accused Sgt. Liam Doe of orchestrating a “scheme” those allegations are denied.

98. Admitted that Jane Doe sent those messages to Mary Doe but to the extent this paragraph mischaracterizes, re-orders, and takes these messages out of context it is denied. To the extent this paragraph alleges that Jane Doe and Mary Doe were lying and did not believe they were in danger rather than very afraid and trying to stay calm and sneak away to safety those allegations are denied.

99. Denied.

100. Denied.

101. Denied.

102. Denied.

103. Denied.

104. Denied.

105. Admitted that Jane Doe sent the text message to her parents but otherwise denied.

106. Denied.

107. Without knowledge therefore denied.

108. Denied.

109. Without knowledge therefore denied.

110. Admitted that June Doe sent these messages to Jane Doe but to the extent this paragraph mischaracterizes these messages, takes them out of context, and alleges that June Doe believed Jane Doe was lying about the dangerous situation she was in those allegations are denied.

111. Denied.

112. Denied.

113. Admitted.

114. Without knowledge therefore denied.

115. Denied.

116. Denied.

117. Denied.

118. Denied.

119. Denied.

120. Admitted that Jane Doe used an Instagram handle with the words “fury fatale” but without knowledge as to Mary Doe’s social media information therefore that allegation is denied.

121. Denied.

122. Admitted that information provided by Jane Doe, Mary Doe and other persons contributed to an ongoing investigation into the Tate Brothers by Romanian authorities. Denied that the

Romanian investigation was caused by Jane Doe or Mary Doe or their statements. To the extent this paragraph alleges that the information provided to Romanian authorities was false those allegations are denied. To the extent that this paragraph alleges that the Romanian Courts found the evidence against the Tate Brothers unpersuasive those allegations are denied.

123. Denied.

124. Denied.

125. Denied.

126. Denied.

127. Without knowledge therefore denied.

128. Denied.

129. Denied.

130. Admitted that Jane Doe sent those messages to Mary Doe but to the extent this paragraph mischaracterizes, re-orders, and takes these messages out of context it is denied. To the extent this paragraph alleges that Jane Doe and Mary Doe were lying and did not believe they were in danger rather than very afraid and trying to stay calm, cooperate with Romanian authorities, and get away safely, those allegations are denied.

131. Denied.

132. Denied.

133. Denied.

134. Denied.

135. Denied.

136. Denied.

137. Denied.

138. Denied.

139. Denied.

140. Denied.

141. Without knowledge as to the damages sustained by the Tate Brothers from being imprisoned therefore denied. To the extent that this paragraph alleges that Jane Doe caused the Tate Brothers any harm or damages or is the cause of the Tate Brothers legal and reputational issues rather than their own statements and criminal conduct those allegations are denied.

142. Denied.

143. Denied.

144. Denied.

FIRST CAUSE OF ACTION

Defamation: [June Doe] and [John Doe]

145. Jane Doe hereby re-states, re-alleges, and incorporates by reference each and every response to the introduction, and paragraphs one (1) through one hundred and forty-four (144) as though fully set forth herein.

146—153. That the allegations set forth in the First Cause of Action are directed at Defendants June Doe and John Doe. As such, Jane Doe makes no response to such allegations other than to deny same.

SECOND CAUSE OF ACTION

Defamation Per Se: [June Doe] and [John Doe]

154. Jane Doe hereby re-states, re-alleges, and incorporates by reference each and every response to the introduction and paragraphs one (1) through one hundred and forty-four (144) as though fully set forth herein.

155—164. That the allegations set forth in the Second Cause of Action are directed at Defendants June Doe and John Doe. As such, Jane Doe makes no response to such allegations other than to deny same.

THIRD CAUSE OF ACTION

Commercial Defamation: [June Doe] and [John Doe]

165. Jane Doe hereby re-states, re-alleges, and incorporates by reference each and every response to the introduction and paragraphs one (1) through one hundred and forty-four (144) as though fully set forth herein.

166—171. That the allegations set forth in the Third Cause of Action are directed at Defendants June Doe and John Doe. As such, Jane Doe makes no response to such allegations other than to deny same.

FOURTH CAUSE OF ACTION

False Imprisonment: [Jane Doe] and [Mary Doe]

172. Jane Doe hereby re-states, re-alleges, and incorporates by reference each and every response to the introduction and paragraphs one (1) through one hundred and forty-four (144) as though fully set forth herein.

173. Paragraph 173 contains an inaccurate statement of Florida law and is therefore denied.

174. Denied.

175. Denied.

176. Denied.

177. Denied.

178. Denied.

179. Denied that the Tate Brothers were incarcerated in April 2022 following the raid by Romanian police. Admitted that the Tate Brothers were later incarcerated in December 2022 following months of investigation by Romanian Authorities. Denied that the Tate Brothers' incarceration was caused by Jane Doe and/or Mary Doe.

180. Admitted that the Tate Brothers remained under house arrest after being released sometime in 2023. Denied that the Tate Brothers incarceration or house arrest was caused by Jane Doe and/or Mary Doe.

181. Admitted that the Tate Brothers were confined to Bucharest after being released from house arrest. Denied that the Tate Brothers incarceration, house arrest, or other judicial control measures were caused by Jane Doe and/or Mary Doe.

182. Admitted that the Tate Brothers were confined to Bucharest after being released from house arrest. Denied that the Tate Brothers incarceration, house arrest, or other judicial control measures were caused by Jane Doe and/or Mary Doe.

183. Denied.

184. Admitted that the Tate Brothers cannot travel to the United States or the United Arab Emirates but denied that this was caused by Jane Doe and/or Mary Doe. Without knowledge as to whether traveling to these locations is needed for the Tate Brothers "work," therefore, denied.

185. Denied.

186. Denied.

187. Paragraph 187 contains a mischaracterization of what was asserted at the June 6, 2024 hearing therefore, denied.

188. Without knowledge therefore, denied.

189. Denied that Jane Doe or Mary Doe lied to Romanian authorities. Denied that the indictment is based only on Jane Doe and Mary Doe's testimony. Without knowledge as to Romanian criminal and court procedure therefore denied. Paragraph 189 also contains a misstatement of United States criminal legal procedure and is therefore denied.

190. Denied.

FIFTH CAUSE OF ACTION

Tortious Interference with a Business Relationship: [Jane Doe] and [Mary Doe]

191. Jane Doe hereby re-states, re-alleges, and incorporates by reference each and every response to the introduction and paragraphs one (1) through one hundred and forty-four (144) as though fully set forth herein.

192. Admitted that this is a statement about Florida law but to the extent this paragraph alleges Jane Doe is liable under Florida law those allegations are denied.

193. Denied.

194. Denied.

195. Denied.

196. Admitted that Jane Doe was invited by Tristan Tate to a War Room event and that Tristan Tate is involved with Hustlers University but to the extent this paragraph alleges Jane Doe tortiously interfered with any of the Tate Brothers' business relationships those allegations are denied.

197. Without knowledge therefore denied.

198. Denied.

199. Denied.

200. Denied.

201. Without knowledge as to the Tate Brothers' business agreements therefore denied. Denied that the Tate Brothers were de-platformed because of Jane Doe's statements to Romanian authorities and denied that Jane Doe's statements to Romanian authorities were false.

202. Without knowledge as to any unfulfilled agreements by the Tate Brothers therefore denied. Denied that the Tate Brothers were banned from social media because of Jane Doe's statements to Romanian authorities and denied that Jane Doe's statements to Romanian authorities were false.

203. Without knowledge therefore denied.

204. Denied.

SIXTH CAUSE OF ACTION

Civil Conspiracy: [Jane Doe] and [Mary Doe]

205. Jane Doe hereby re-states, re-alleges, and incorporates by reference each and every response to the introduction and paragraphs one (1) through one hundred and forty-four (144) as though fully set forth herein.

206. Admitted that the Tate Brothers seek to allege a claim for civil conspiracy and state the elements of a civil conspiracy claim under Florida law but to the extent this paragraph alleges Jane Doe engaged in a conspiracy or is liable under Florida law those allegations are denied.

207. Denied.

208. Denied.

209. Denied.

210. Without knowledge therefore denied.

211. Without knowledge therefore denied.

212. Denied.

213. Denied.

214. This paragraph is incorrectly numbered. As to incorrectly numbered paragraph 195 on page 64 of the Complaint the allegations are denied.

215. This paragraph is incorrectly numbered. As to incorrectly numbered paragraph 196 on page 64 of the Complaint the allegations are denied.

216. This paragraph is incorrectly numbered. As to incorrectly numbered paragraph 197 on page 65 of the Complaint the allegations are denied.

217. This paragraph is incorrectly numbered. As to incorrectly numbered paragraph 198 on page 65 of the Complaint the allegations are denied.

218. This paragraph is incorrectly numbered. As to incorrectly numbered paragraph 199 on page 65 of the Complaint the allegations are denied.

SEVENTH CAUSE OF ACTION

Intentional Infliction of Emotional Distress: [Jane Doe] and [Mary Doe]

219. This paragraph is incorrectly numbered 200 on page 65 of the Complaint. Jane Doe hereby re-states, re-alleges, and incorporates by reference each and every response to the introduction and paragraphs one (1) through one hundred and forty-four (144) as though fully set forth herein.

220. This paragraph is incorrectly numbered. As to incorrectly numbered paragraph 201 on page 66 of the Complaint, admitted that the Tate Brothers seek to allege a claim for intentional infliction of emotional distress but to the extent this paragraph alleges that they

have sufficiently pled such a claim against Jane Doe or that Jane Doe is liable to the Tate Brothers for such a claim those allegations are denied.

221. This paragraph is incorrectly numbered. As to incorrectly numbered paragraph 202 on page 66 of the Complaint, admitted that this paragraph states the elements of a claim for intentional infliction of emotional distress under Florida law but to the extent this paragraph alleges Jane Doe engaged in intentional infliction of emotional distress against the Tate Brothers or is liable for such a claim under Florida law those allegations are denied.

222. This paragraph is incorrectly numbered. As to incorrectly numbered paragraph 203 on page 66 of the Complaint, the allegations are denied.

223. This paragraph is incorrectly numbered. As to incorrectly numbered paragraph 214 on page 66 of the Complaint, admitted that Jane Doe made statements similar to those alleged in this paragraph but to the extent this paragraph mischaracterizes, re-orders, and takes these messages out of context it is denied. To the extent this paragraph alleges that Jane Doe made such statements for any reason other than to express her distress at the abuse and criminal conduct committed by the Tate Brothers those allegations are denied. To the extent this paragraph alleges Jane Doe engaged in any tortious conduct towards the Tate Brothers or that the Tate Brothers were harmed by any alleged tortious conduct by Jane Doe those allegations are denied.

224. This paragraph is incorrectly numbered. As to incorrectly numbered paragraph 215 on page 66 of the Complaint, the allegations are denied.

225. This paragraph is incorrectly numbered. As to incorrectly numbered paragraph 216 on page 66 of the Complaint, without knowledge therefore denied. To the extent this

paragraph alleges Jane Doe fabricated crimes and evidence to purposefully imprison the Tate Brothers those allegations are denied.

226. This paragraph is incorrectly numbered. As to incorrectly numbered paragraph 217 on page 67 of the Complaint, the allegations are denied.

227. This paragraph is incorrectly numbered. As to incorrectly numbered paragraph 204 on page 67 of the Complaint, the allegations are denied.

EIGHTH CAUSE OF ACTION

Defamation: [Jane Doe] and [Mary Doe]

228. This paragraph is incorrectly numbered 205. As to this incorrectly numbered paragraph 205 on page 67 of the Complaint, Jane Doe hereby re-states, re-alleges, and incorporates by reference each and every response to the introduction and paragraphs one (1) through one hundred and forty-four (144) as though fully set forth herein. Denied as to the allegations in this paragraph.

229. This paragraph is incorrectly numbered. As to incorrectly numbered paragraph 206 on page 67 of the Complaint, admitted that the paragraph states the elements of a defamation claim but to the extent this paragraph alleges Jane Doe defamed the Tate Brothers those allegations are denied.

230. This paragraph is incorrectly numbered. As to incorrectly numbered paragraph 207 on pages 67-68 of the Complaint, the allegations are denied.

231. This paragraph is incorrectly numbered. As to incorrectly numbered paragraph 208 on page 68 of the Complaint, the allegations are denied.

232. This paragraph is incorrectly numbered. As to incorrectly numbered paragraph 218 on page 68 of the Complaint, admitted that Jane Doe provided truthful testimony to Romanian

authorities about what she witnessed and experienced at the hands of the Tate Brothers which described elements of human trafficking and sexual assault. To the extent this paragraph alleges that Jane Doe's testimony was false those allegations are denied.

233. This paragraph is incorrectly numbered. As to incorrectly numbered paragraph 219 on page 68 of the Complaint, the allegations are denied.

234. This paragraph is incorrectly numbered. As to incorrectly numbered paragraph 209 on page 68 of the Complaint, admitted that Jane Doe provided truthful testimony to Romanian authorities about what she witnessed and experienced at the hands of the Tate Brothers which described elements of sexual assault. To the extent this paragraph alleges that Jane Doe's testimony was false those allegations are denied. Denied that the Tate Brothers did not engage in human trafficking, false imprisonment, or sexual assault of Jane Doe, Mary Doe, or others. As to the allegations that Jane Doe is a "serial liar, manipulator, and schemer, who predatorily exploits vulnerable, often wealthy men with good intentions for sexual, financial, and emotional profit," those allegations are denied.

235. This paragraph is incorrectly numbered. As to incorrectly numbered paragraph 210 on page 68 of the Complaint, the allegations are denied.

236. This paragraph is incorrectly numbered. As to incorrectly numbered paragraph 211 on pages 68-69 of the Complaint, the allegations are denied.

237. This paragraph is incorrectly numbered. As to incorrectly numbered paragraph 212 on page 69 of the Complaint, the allegations are denied.

NINTH CAUSE OF ACTION

Defamation Per Se: [Jane Doe] and [Mary Doe]

238. This paragraph is incorrectly numbered 213. As to this incorrectly numbered paragraph 213 on page 69 of the Complaint, Jane Doe hereby re-states, re-alleges, and incorporates by reference each and every response to the introduction and paragraphs one (1) through one hundred and forty-four (144) as though fully set forth herein.

239. This paragraph is incorrectly numbered. As to incorrectly numbered paragraph 214 on page 69 of the Complaint, admitted that the Tate Brothers seek to allege a cause of action for libel and slander per se. To the extent this paragraph sufficiently alleges such causes of action or alleges Jane Doe is libel for such causes of action those allegations are denied.

240. This paragraph is incorrectly numbered. As to incorrectly numbered paragraph 215 on page 69 of the Complaint, admitted that this paragraph states the elements under Florida law for defamation and per se defamation but to the extent this paragraph sufficiently alleges such causes of action or alleges Jane Doe is liable for such causes of action those allegations are denied.

241. This paragraph is incorrectly numbered. As to incorrectly numbered paragraph 216 on page 70 of the Complaint, the allegations are denied.

242. This paragraph is incorrectly numbered. As to incorrectly numbered paragraph 217 on page 70 of the Complaint, the allegations are denied.

243. This paragraph is incorrectly numbered. As to incorrectly numbered paragraph 218 on page 70 of the Complaint, the allegations are denied.

244. This paragraph is incorrectly numbered. As to incorrectly numbered paragraph 219 on page 71 of the Complaint, the allegations are denied.

245. This paragraph is incorrectly numbered. As to incorrectly numbered paragraph 220 on page 71 of the Complaint, the allegations are denied.

TENTH CAUSE OF ACTION

Commercial Defamation: [Jane Doe] and [Mary Doe]

246. This paragraph is incorrectly numbered 221. As to this incorrectly numbered paragraph 221 on page 71 of the Complaint, Jane Doe hereby re-states, re-alleges, and incorporates by reference each and every response to the introduction and paragraphs one (1) through one hundred and forty-four (144) as though fully set forth herein.
247. This paragraph is incorrectly numbered. As to incorrectly numbered paragraph 222 on page 71 of the Complaint, admitted that the Tate Brothers seek to bring this action against Jane Doe for damages, denied that the Tate Brothers' businesses are parties to this action, and denied that the Tate Brothers sufficiently allege a cause of action against Jane Doe. Without knowledge as to the Tate Brothers businesses and branding therefore denied.
248. This paragraph is incorrectly numbered. As to incorrectly numbered paragraph 223 on pages 71-72 of the Complaint, admitted that this paragraph states the elements of commercial defamation but to the extent this paragraph sufficiently alleges such a cause of action or alleges Jane Doe is liable for such causes of action those allegations are denied.
249. This paragraph is incorrectly numbered. As to incorrectly numbered paragraph 224 on page 72 of the Complaint, the allegations are denied.
250. This paragraph is incorrectly numbered. As to incorrectly numbered paragraph 225 on page 72 of the Complaint, the allegations are denied.
251. This paragraph is incorrectly numbered. As to incorrectly numbered paragraph 226 on page 73 of the Complaint, the allegations are denied.

RESERVATION OF RIGHTS

Admitted that the Plaintiffs seek the right to amend the Complaint upon discovering additional facts, including adding a claim for punitive damages but denied that Plaintiffs are entitled to such relief.

DEMAND FOR JURY TRIAL

This paragraph is not addressed to Jane Doe therefore Jane Doe is unable to respond to the allegations stated therein.

RELIEF SOUGHT

Admitted that the Plaintiffs seek judgment against each defendant jointly and severally but denied that they are entitled to such relief.

Admitted that the Plaintiffs seek a judgment of liability against the Defendants including damages and attorneys' fees and costs but denied that they are entitled to such relief.

DEFENSES

FIRST DEFENSE

The Complaint fails to state a claim upon which relief can be granted.

SECOND DEFENSE

Plaintiffs' damages, if any, were not caused by Jane Doe, but to the extent they may exist, are due in whole or in part to the actions of the Plaintiffs and/or third parties, such that Jane Doe has no liability or her share of liability should be reduced.

THIRD DEFENSE

Any injuries suffered or damages allegedly sustained by the Plaintiffs as a result of the Romanian criminal investigation and prosecution described in the Complaint were caused solely by the intentional acts on the part of third parties, and, therefore, are superseding intervening causes.

FOURTH DEFENSE

Any injuries suffered or damages allegedly sustained by the Plaintiffs as a result of the Romanian criminal investigation and prosecution described in the Complaint were caused solely by the unforeseeable intentional conduct, negligence, fault, or want of care on the part of third parties, and, therefore, are superseding intervening causes.

FIFTH DEFENSE

Jane Doe has no duty to control or protect against the unforeseeable acts of third parties.

SIXTH DEFENSE

The intervening actions of third parties, over which Jane Doe had no knowledge or no control, relieve Jane Doe from liability.

SEVENTH DEFENSE

Jane Doe is under no duty to control the conduct of third parties.

EIGHTH DEFENSE

The Plaintiffs have failed to plead any cognizable basis for attorney's fees under Florida law.

NINTH DEFENSE

The Plaintiffs' claims against Jane Doe are barred by the doctrines of estoppel, waiver, and laches.

TENTH DEFENSE

Jane Doe is not liable to the Plaintiffs' for defamation, defamation per se, or commercial defamation because the alleged defamatory statements made by her were true. The truthfulness of alleged defamatory statements is an absolute defense to defamation. *New York Times v. Sullivan*, 376 U.S. 254 (1964); see also *Linafelt v. Beverly Enterprises-Florida, Inc.*, 745 So. 2d 386 (Fla.1st DCA 1999); *Cape Publications, Inc. v Teakes*, 840 So. 2d 277 (Fla.5th DCA 2003).

ELEVENTH DEFENSE

Jane Doe is not liable to the Plaintiffs' for defamation, defamation per se, or commercial defamation because the alleged defamatory statements made by her did not defame the Plaintiffs,

and were substantially similar to statements made about the Plaintiffs by the Plaintiffs themselves, and by others.

TWELFTH DEFENSE

The Plaintiffs are “public figures” and the alleged defamation by Jane Doe was not made with “actual malice” as required by *New York Times v. Sullivan*, 376 U.S. 254, 279-80 (1964). Therefore, Jane Doe cannot be liable to the Plaintiffs for any of the alleged defamatory statements. Per *Sullivan* and its progeny, under the First Amendment a “public figure” must demonstrate that an alleged defamatory statement was made with “actual malice” to plead a successful defamation claim. *Curtis Pub. Co. v. Butts*, 388 U.S. 130, 163 (1967) (Warren, C.J., concurring); also see *Gertz v. Welch, Inc.*, 418 U.S. 323, 342 (1974). “Public figure status is a question of law to be determined by the court.” *Turner v. Wells*, 879 F.3d 1254, 1271 (11th Cir.2018) (quoting *Saro Corp. v. Waterman Broad. Corp.*, 595 So. 2d 87 (Fla. 2d DCA 1992)). A key criterion for determining public figure status is whether the individual, such as the Plaintiffs herein, “drew public attention to himself” and whether he “chose to put himself in the public arena.” *Turner*, 879 F.3d at 1271 (finding that a football coach was a public figure); see also *Rosanova v. Playboy Enters.*, 580 F.2d 859, 860 (5th Cir. 1978).

The Plaintiffs are clearly public figures based on their own description of their immense celebrity and influence. They have achieved professional athletic success as winners of “multiple World Titles” and “numerous European Championships.” FAC ¶ 17-18. They “found ways to parlay that fame” into greater public endeavors. FAC ¶ 29. Between the two brothers, they have starred in two different reality TV programs and Tristan Tate has engaged the public as a “successful sports commentator.” FAC ¶ 29. The Plaintiffs state they have a “massive social media presence (previously in the tens of millions of followers, putting them in the top 1% of social media personalities in the world). FAC ¶ 23. Not merely limited to the internet, their “direct interaction

with their following and the ability [to] fly to anywhere in the world at a moment's notice represents a first of its kind intersection between social media personalities and people in the real world." FAC ¶ 23. This massive following and real-world interaction is unique and "[n]othing like this had ever been seen before." FAC ¶ 23. They have a "massive following of young men worldwide" who look up to them. FAC ¶¶ 21, 26.

The actual malice standard also applies to Jane Doe's alleged defamatory statements because this case involves a "matter of public concern." This alone triggers the actual malice standard. *Della-Donna v. Gore Newspaper Company*, 489 So. 2d 72, 76-77 (Fla. 4th Dist. 1986). The Court in *Della-Donna* stated, "a public controversy has been defined as 'any topic which sizeable segments of society have different, strongly held views'". *Id.* at 76 (citing *Lerman v. Flynt Distributing Co.*, 745 F. 2d 123, 138 (2d Cir. 1984). "If the issue was being debated publicly and if it had foreseeable ramifications for non-participants, it was a public controversy." *Id.* The crises of international human trafficking, especially webcam trafficking of girls in Eastern Europe, as is implicated in the present case, is of the highest societal concern, especially considering the Plaintiffs' "tens of millions of followers" whom they influence. FAC ¶ 23 (using language like, "social media influencer", "tens of millions of followers", and "massive social media presence" to describe their online presence). To quote the Plaintiffs, "Young men represent a large constituency of their following" (FAC ¶ 25) and "young men, in particular, look to the Tate Brothers for...inspiration, and instruction..." FAC ¶ 21.

The Plaintiffs have not sufficiently alleged nor did Jane Doe act with "actual malice." *New York Times Co. v. Sullivan*, 376 U.S. 254 (1964) held that a statement is made with "actual malice" only when uttered "with knowledge that it was false or with reckless disregard of whether it was false or not." *Id.* at 279-80. To prove actual malice, there must be a "high degree of awareness of

[the communication's] probable falsity or . . . [that the speaker] in fact entertained serious doubts as to the truth of his publication." *Id.* In *St. Amant v. Thompson*, the Court added that the "actual malice" standard was a "subjective" one, and proving negligent behavior is not sufficient. 390 U.S. 727, 731 (1968) (*see also, Rosanova*, 580 F.2d at 861-62). Rather it requires proof that the defendant "entertained serious doubts" about the truth of the statement. *St. Amant*, 390 U.S. at 731. The "actual malice" standard has been extended to defamation claims by "public figures". *Curtis Pub. Co. v. Butts*, 388 U.S. at 163 (Warren, C.J., concurring); *and see Gertz v. Welch, Inc.*, 418 U.S. at 342.

THIRTEENTH DEFENSE

Jane Doe's statements to Romanian law enforcement authorities and to the Romanian Court are absolutely privileged. Under Florida law, otherwise defamatory words spoken by parties or witnesses connected with or relevant to or material to litigation "enjoy absolute privilege" and their words cannot form the basis of a defamation claim. Accordingly, all statements the Plaintiffs allege Jane Doe made in connection with Romanian judicial proceedings such as her statements to a "Romanian judge" (FAC at ¶ 125), "Romanian authorities" (FAC at ¶¶ 124, 132), "to a Romanian court and a Romanian prosecutor" (FAC at ¶ 218), and "Romanian police" (FAC at ¶ 132), are absolutely privileged and cannot be the basis of civil claims against her. *See also Levin, Middlebrooks, Mabie, Thomas, Mayes & Mitchell, P.A. v. U.S. Fire Ins. Co.*, 639 So. 2d 606, 608 (Fla. 1994) ("[A]bsolute immunity must be afforded to any act occurring during the course of a judicial proceeding, regardless of whether the act involves a defamatory statement or other tortious behavior such as the alleged misconduct at issue, so long as the act has some relation to the proceeding."); *Sussman v. Damian*, 355 So. 2d 809, 811 (Fla. 3d DCA 1977) (Statements made in the course of judicial proceedings enjoy an absolute privilege "and cannot form the basis for a defamation action so long as the statements uttered are connected with or are relevant or material

to the cause at hand or the subject of inquiry no matter how false or malicious said statements may in fact be.”); *Campbell v. LoPucki*, 345 So. 2d 860 (Fla. 1st DCA 1977) (allegation that defendant had committed murder held privileged); *Buchanan v. Miami Herald Pub. Co.*, 230 So. 2d 9, 11 (Fla. 1969). This absolute privilege bars all of the Plaintiffs’ claims.

FOURTEENTH DEFENSE

Jane Doe’s alleged defamatory statements about the Tate Brothers’ to her parents and Sgt. Liam Doe, are privileged under Florida’s Qualified Immunity Doctrine. Jane Doe did not act with express malice therefore, she cannot be liable to the Plaintiffs for any alleged injury caused by these statements. *See Nodar v. Galbreath*, 462 So. 2d 803, 809 (Fla. 1984); *Fridovich v. Fridovich*, 598 So. 2d 65, 69 (Fla. 1992); *see also Stucchio v. Tincher*, 726 So. 2d 372, 373-374 (Fla. 5th DCA 1999).

FIFTEENTH DEFENSE

Because the Plaintiffs have no actionable underlying tort against Jane Doe there can be no claim for civil conspiracy against her. *See Palm Beach Cnty. Health Care Dist. v. Profl Med. Educ., Inc.*, 13 So. 3d 1090, 1096 (Fla. 4th DCA 2009) (“Since the counts regarding the goals of the conspiracy—defamation and tortious interference—fail, so too the conspiracy count must fail. The gist of a civil action for conspiracy is not the conspiracy itself, but the civil wrong which is done pursuant to the conspiracy and which results in damage to the plaintiff. An act which does not constitute a basis for an action against one person cannot be made the basis of a civil action for conspiracy.”) (internal citations and quotations omitted); *Raimi v. Furlong*, 702 So.2d 1273, 1284 (Fla. 3rd DCA 1997); *see also SFM Holdings, Ltd. v. Banc of Am. Sec., LLC*, 764 F.3d 1327, 1338–39 (11th Cir. 2014) (“This is to say that conspiracy is not a freestanding tort, but, rather, a cause of action for civil conspiracy exists . . . only if the basis for the conspiracy is an independent wrong

or tort which would constitute a cause of action if the wrong were done by one person.”) (internal citations and quotations omitted).

SIXTEENTH DEFENSE

Jane Doe took no act in furtherance of any alleged conspiracy to defraud the Tate Brothers of money.

SEVENTEENTH DEFENSE

The conspiracy Plaintiffs allege Jane Doe participated in to defraud them of money was unsuccessful and did not harm the Plaintiffs or cause the Plaintiffs any damages.

EIGHTEENTH DEFENSE

Jane Doe did not detain nor instigate the Plaintiffs’ arrest and/or detainment, nor did she personally and actively participate in the Plaintiffs’ arrest and/or detainment, nor did Jane Doe proximately cause the Plaintiffs’ arrest and/or detainment. *Pokorny v. First Fed. Sav. & Loan Ass’n of Largo*, 382 So. 2d 678 (Fla. 1980).

NINETEENTH DEFENSE

The Plaintiffs’ arrest and/or detainment was lawful.

TWENTIETH AFFIRMATIVE DEFENSE

Jane Doe cannot be liable for Intentional Infliction of Emotional Distress because the Plaintiffs are public figures and Jane Doe did not act with actual malice. *Hustler v. Falwell*, 485 U.S. 46, 56-57 (1988).

TWENTY-FIRST DEFENSE

Jane Doe’s conduct was not outrageous.

TWENTY-SECOND DEFENSE

Jane Doe is a victim of crime, as defined under Florida law, perpetrated by the Plaintiffs therefore, Marsy’s law and the Florida constitution foreclose this lawsuit, and any claims brought

by the Plaintiffs against Jane Doe for the testimony she provided to law enforcement as a witness and victim in an ongoing investigation and prosecution of the Plaintiffs. Art. I, § 16 Fla. Const.

TWENTY-THIRD DEFENSE

This lawsuit was brought by the Plaintiffs for improper and malicious purposes namely to intimidate and harass Jane Doe, as a means of witness intimidation and witness tampering, and an attempt to illegally interfere with ongoing criminal investigations and prosecution of the Plaintiffs.

TWENTY-FOURTH DEFENSE

This lawsuit brought by Plaintiffs against Jane Doe is an abusive SLAPP lawsuit that seeks to violate Jane Doe’s Free Speech rights under the United States and Florida Constitutions. Fla. Stat. § 768.295.

COUNTERCLAIMS

Table of Contents

GENERAL AND JURISDICTIONAL ALLEGATIONS.....33

RELEVANT FACTUAL BACKGROUND.....33

THE TATE BROTHERS.....33

IN THEIR OWN WORDS: ANDREW TATE AND TRISTAN TATE’S METHODS OF EMPLOYING FRAUD AND COERCION.....36

 ANDREW TATE’S PHD Course.....44

 ANDREW TATE’S Webcam Course.....48

OTHER RELEVANT COURSES AND STATEMENTS59

THE TATE BROTHERS USE FRAUD AND COERCION TO SEXUALLY EXPLOIT WOMEN.....60

 The Trafficking Victims Protection Act61

 Human Trafficking Under Florida Law, Fl. Stat. § 787.0663

 The Tate Brothers’ methods are textbook sex trafficking strategies.....64

“The Test,” The Tate Brothers’ grooming process “lover boy” modus operandi64

Selling the Dream.....65

The Tate Brothers’ are not unique in teaching their sex trafficking methods to others68

SCAMMERS: THE TATE BROTHERS USE FRAUDELENT MEANS TO EXPLOIT MEN.....70

<u>THE TATE BROTHERS’ CRIMINAL HISTORY: A DECADE OF ACCUSATIONS AND INVESTIGATIONS</u>	73
<u>SOCIAL MEDIA BANS</u>	76
<u>THE TATE BROTHERS’ ROMANIAN SEX TRAFFICKING OPERATION</u>	78
Generally.....	79
Vivien.....	81
Abigail Tyson	86
Co-conspirator: Georgiana Naghel	88
Co-conspirator: Luana Radu.....	89
Iasmina Pencov.....	89
Counter-Defendant TRISTAN TATE.....	95
Counter-Defendant ANDREW TATE	106
<u>CONSPIRACY TO TRAFFIC AND INTIMIDATE JANE DOE</u>	110
Jane Doe.....	110
Mary Doe	119
<u>THE TATE BROTHERS’ WITNESS INTIMIDATION AND HARASSMENT OF JANE DOE</u>	159
<u>COUNTERCLAIM I: VIOLATION OF 18 U.S.C. §§ 1591(A)(1) AND 1595 OF THE TVPRA</u>	168
<u>COUNTERCLAIM II: CONSPIRACY TO VIOLATE THE TVPRA IN VIOLATION OF 18 U.S.C. §§ 1594(c) AND 1595 OF THE TVPRA</u>	170
<u>COUNTERCLAIM III: FLORIDA CIVIL REMEDY FOR CRIMINAL PRACTICES FL. STAT. §§ 772.103 AND 772.104</u>	171
<u>COUNTERCLAIM IV: CIVIL CONSPIRACY UNDER FLORIDA LAW</u>	173
<u>COUNTERCLAIM V: DEFAMATION AND DEFAMATION PER SE</u>	177
<u>COUNTERCLAIM VI: MALICIOUS PROSECUTION</u>	179
<u>COUNTERCLAIM VII: INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS</u>	180
<u>RESERVATION OF RIGHTS</u>	183
<u>PRAYER FOR RELIEF</u>	183
<u>DEMAND FOR JURY TRIAL</u>	183

JANE DOE’S COUNTERCLAIMS AGAINST ANDREW TATE AND TRISTAN TATE

Counter-Plaintiff, JANE DOE, by and through her undersigned counsel, hereby sues Counter-Defendants, ANDREW TATE and TRISTAN TATE, (hereinafter collectively referred to as “THE TATE BROTHERS”), and hereto alleges all relevant and material facts as follows:

GENERAL AND JURISDICTIONAL ALLEGATIONS

1. This is a civil action for both damages in excess of five million (\$5,000,000) dollars and for equitable relief.
2. Counter-Plaintiff, JANE DOE, is in all respects sui juris.
3. Counter-Defendant, ANDREW TATE, is a United States citizen residing in Bucharest, Romania, is over the age of eighteen (18), and is otherwise sui juris.
4. Counter-Defendant, TRISTAN TATE, is a United States citizen residing in Bucharest, Romania, is over the age of eighteen (18), and is otherwise sui juris.
5. Counter-Defendants, ANDREW TATE and TRISTAN TATE, have subjected themselves to the jurisdiction of this Court by bringing suit against JANE DOE in this Court by filing their First Complaint on July 11, 2023. Dkt. No. 3.
6. Pursuant to Fla. R. Civ. P. 1.70(a) Counter-Plaintiffs’ claims arise out of the transaction or occurrence that are the subject of Counter-Defendants’ claims. Supplemental jurisdiction exists over Counter-Plaintiff’s claims.

RELEVANT FACTUAL BACKGROUND

THE TATE BROTHERS

7. THE TATE BROTHERS are currently being prosecuted in Romania for charges related to sex trafficking and other serious sex crimes, including against minors. *See* Indictment, Dkt. 89.

8. THE TATE BROTHERS hold dual citizenship with the United Kingdom and the United States but have chosen to reside full-time in Romania since about 2015 according to their Complaint in this case.

9. THE TATE BROTHERS are also subject to a criminal investigation for alleged sex crimes committed in the United Kingdom. Related to that investigation, an extradition request by the U.K. government was granted by a Romanian court. The Romanian Court Order states that THE TATE BROTHERS will be extradited to the U.K. to face criminal charges there, after the Romanian prosecution has ended, and any sentences, if they are convicted, are served.

10. To disrupt the Romanian prosecution, and in a clear case of witness intimidation, THE TATE BROTHERS have sued JANE DOE, an American citizen, who was lured from Florida to Romania by TRISTAN TATE under the pretense of a romantic relationship. THE TATE BROTHERS' lawsuit seeks damages in excess of \$5,000,000, damages that allegedly exist merely because JANE DOE expressed her very real fears and concerns for her safety to her family and friends in private text messages and, because she cooperated with Romanian law enforcement after they raided THE TATE BROTHERS' compound. To increase the pressure on JANE DOE, THE TATE BROTHERS have also *sued her parents* because they allegedly facilitated a call to the U.S. Embassy in Romania when they, in good faith, believed their daughter—a 21-year-old young woman alone in a foreign nation—was in serious danger.

11. THE TATE BROTHERS' lawsuit is a grave abuse of process brought—not for any legitimate judicial purpose—but instead, to bully and harass JANE DOE and other victims into recanting their testimony against THE TATE BROTHERS, and the others involved in their scheme. This weaponization of the legal system is part of a pattern of intimidation used by THE TATE BROTHERS to silence detractors. And as is typical for ANDREW TATE, he has

openly and publicly bragged about using this strategy. For example, in a livestream conversation with podcaster Richard Cooper, that took place on or about January 20, 2022, ANDREW TATE described using “lawfare” to silence critics:

Andrew Tate: “I had some spare time and I decided to destroy his brand and do my absolute best to wreck his life. . . .”

Richard Cooper: “But, you know, then you went like . . . full on . . . him, . . . you got his family involved. I think you mentioned his parents name.”

Andrew Tate: “Well I certainly got his family involved. They birthed scum Richard. They will pay.”

Richard Cooper: “How did you manage to include his family in a lawsuit? Like, like, how would they be involved with him running his mouth on Twitter?”

Andrew Tate: “. . . Listen, I'm part of networks and groups. I'm part of organizations where I can drop a \$20,000 prize and say, this Twitter tag, 20 grand with ideas and information that's going to destroy his life. It took . . . that's all I did. It took three minutes. I have his name, his address, his dad's job, his sister's bra size, you name it. . . .”

Andrew Tate: “. . . It took all of three minutes to get all the information and as for litigating his parents. . . . I don't need a reason. You're gonna have to defend yourself. Regardless, that's the thing about the American legal system, you cannot ignore it. I don't care if it costs me a million dollars to take \$1,000 out of your bank. You are gonna be in court twice a month for the rest of your human years. I don't care. I will sue you for any and every reason forever. And you're gonna have to hire lawyers and turn up for ever. I will do that. I'm that guy. I'm petty. I'm petty and I've got a lot of money and a lot of time. . . .”²

12. ANDREW TATE will, in his own words, abuse the American legal system to harass and punish his enemies. And that is exactly what THE TATE BROTHERS are doing to the American witness, *and her parents*, because she cooperated with Romanian authorities in their ongoing criminal investigation. THE TATE BROTHERS are using legal process to

² PTW #57 – Andrew Tate – How to Destroy Haters, YOUTUBE (Jan. 20, 2022), <https://www.youtube.com/live/AkcC84AKVBU?feature=share>, last accessed January 28, 2025.

silence Jane Doe, a woman they attempted to recruit into their webcam sex trafficking ring. Their attempted trafficking violates of the Trafficking Victim's Protection Act and their continued harassment violates JANE DOE's First Amendment Rights. These are the textbook intimidation tactics of predators and human traffickers.

IN THEIR OWN WORDS: ANDREW TATE AND TRISTAN TATE'S METHODS OF EMPLOYING FRAUD AND COERCION.

13. THE TATE BROTHERS are self-confessed webcam pimps and pornographers who made their first million dollars from lying and deceiving women into working for them to produce webcam pornography. They then grew internet fame from bragging about these exploits: their methods of manipulating and controlling women, and teaching other men—and young boys—how to engage in this abusive behavior. This resulted in public pushback, particularly in the U.K. and in bans on social media. In their own words, they have described the start of their webcam business, their methods, and the many women—and men—they exploited in the process.

14. On Anthony Pompliano's podcast recorded in May 2021 ANDREW TATE described his entry into the webcam business as follows:

Andrew Tate: "I was like, I want money. . . . So I started trying to write down what I had. I was like, I have an apartment, I have a BMW. I can I'm in good shape, but I already use that for fighting. You know, what can I do? I can play chess. I'm just writing down the things I have and what I'm good at. And then I kind of realized I was like, I've got like, eight girlfriends, because, because I was traveling the world, and if you win, you get ring girl. It's kind of like just, she's banging the winner, right? You win a world title, you get to choose the ring girl you want. It's pretty easy, right? So I had a girlfriend in Slovakia, I had a girlfriend in France. I had a girlfriend in England. Girlfriend, all these girlfriends."

Anthony Pompliano: "Do they know about each other?"

Andrew Tate: “No, . . . but they find out pretty soon. So, um, I had all these girlfriends, so I'm like, **maybe I could open a strip club and, like, be a pimp, you know, be a gangster about it.**”

Andrew Tate: “**What can I do with these hot girls? I was like, it's just an asset, right?** . . . And then by absolute coincidence, I stumbled upon somewhere on the internet. . . . And it was one of those webcam websites, and I was like, Ah, so these girls sit here and talk to dudes for money. . . . And I thought, I'm gonna try this. So, I messaged all five of my girlfriends, told him I had a job for them, explained them what I was gonna do. I was gonna launch this company. Four of them agreed. All four flew in, sat around the same table. They're all like, Who's she? Who she? who she? I'm like, you're all my girlfriends. Two more left, and then two stayed, and that was the beginning of my little attempt at a webcam Empire and my role in it all was, I did all the tech side of stuff, which is the first thing, of course, and then also, **and I get called a pimp alot, but I and the reason I use the term is because I don't see it as a negative term.** I see it as positively inspirational and motivating person I was. I'd motivate the girls. . . .”

Anthony Pompliano: “And is it hard?”

Andrew Tate: “It's hard because women have to want to work for you. Women have to want to obey you. Okay, it's hard, and . . . This is one of the biggest misconceptions. I really want to clear this up. People in the movies and stuff, pimps are like aggressive, mean men, complete opposite. Pimps are more like James Bond. **James Bond's a pimp. He sleeps with a girl to get information. He doesn't care about her. He is absolutely a pimp. He doesn't hit her. He makes her love him. She does what he wants. He uses sex as a weapon to reward her, and then he disappears.** James Bond is absolutely and utterly a pimp. So I say pimp because everyone calls me a pimp online. . . . It's like no beautiful women wanted to work for me, and they wanted to work for me because I displayed supreme, supreme competence, and they knew they worked for me they'd make a lot of money. So whenever I was out, I'd meet a waitress and say, Well, you look, you're working 10 hours a day for pennies. You can work 10 hours a day for me, make 10 grand a month. Make 10 grand a month, 20 grand a month. And over time, I just build up this big, this big little empire of webcam girls. **At one, one point I had four locations, 75 girls working for me.**”

Anthony Pompliano: “And we say locations, like, explain what goes into a location.”

Andrew Tate: “I just rent houses.”

Andrew Tate: “. . . .So they, girls who lived in the house would have set amount of hours they want to do, and then we'd have rooms that they could book in and do X amount of hours. A girl could come and do one hour a week, or whatever. We'd have rooms they could share. And then, um, yeah, very much. Exactly like you said,

they'd go online, they do their hours, they'd have their regular customers, and get their money, and then I'd take around half of the money, around 50 takes 50%.

Anthony Pompliano: "Are there other people at the time doing this?"

Andrew Tate: "At the time, I didn't know anybody else doing it. I've now discovered in certain countries, like in Romania and the places I live now, there's a lot of boys doing this. This is big business in Colombia, Brazil. This is big and all the big models on OnlyFans and webcam, nearly all of them work for men, nearly every single I would say. Now, if you see a model and she's really big, she's working for a man.

Anthony Pompliano: "Okay, this is fascinating, because take OnlyFans, we know it's a massive business, right? It's as much of a technology business as any other business, absolutely. People want to talk about, I think people get very uncomfortable talking about some of it, just because there's this element of like sex and exploitation and whatever. Where's the line, right? And I asked you, because I think that you've seen kind of different variations of this, you know, a lot of the players, etc, is it? This is just a business, and people can do what they want to do, both as the customer side and the other and it's like a marketplace? Is it like no, there's like ethical concerns?"

Andrew Tate: "I have absolutely zero ethical concerns. I totally, I totally view it free market capitalism. And the reason is this, **if I were to shut down my all my webcam operation, I still do a little bit today, I still have four girls working for me.** If I were to shut it all down, it's kind of like if an alcoholic walks into your liquor store and you deny him vodka, does he stop being an alcoholic? An alcoholic, or does he buy it somewhere else? Like you can't stop. These guys want to spend money."

....

Anthony Pompliano: "Are there female bosses in any of these organizations?"

Andrew Tate: "**you do have, so you do usually have, like, a girl boss, which is usually the best cam girl. Okay, so you have a girl boss, but there always has to be a man at the top.** . . because women won't give their money to a woman."

Anthony Pompliano: "What do you mean?"

Andrew Tate: "If you had a woman who was in charge of a bunch of women, all the women at the bottom would look up and say, why is she not on cam? Why am I not why am I giving her my money? Whereas a man, they can go, ah, but he's the man."

Anthony Pompliano: "So No, no woman's ever run one of these organizations?"

Andrew Tate: “I don't know, maybe, but I never met one. Every man I know who's doing this was a man and the women liked, even if, the way, even if he wasn't sleeping with all the girls . . . **But, um, even, even if, even if you're not sleeping with all your girls, you're obviously sleeping with some whatever.**”

Anthony Pompliano: “But wait, hold on. You can't say that offhand comment and just keep going.”

Andrew Tate: “Like 65% of them, but,”

Anthony Pompliano: “65% of the people who worked for you,

Andrew Tate: “yeah,”

Anthony Pompliano: “you're sleeping with?”

Andrew Tate: “**they wanted to**. I mean, if a woman respects you enough to work for you, then she respects you like every it's like the old adage of the woman at the office liking her boss, right? You're her boss. **She's naked in your house**. You've made her millions and millions. You got a Lambo out front. You're the big G. What's . . . gonna . . . like? Come on.”³

15. ANDREW TATE has repeated this history of how he established his sexual exploitation operation multiple times. Examples include but are not limited to:

- In ANDREW TATE's “Webcam Course,”⁴ previously only available for purchase he said:

I wanted to buy a property in Thailand and move to Thailand. I needed 80,000. I was 10 grand short. And I thought I'd go to the casino and make 10, which was obviously, you know how that story went. So, I lost 30. So, now I need 40. And I needed it quickly. So, I was sittin' there trying to find a way to make money. How can I make money? And, what I did was, I said to Tristan, “I'm literally not leaving my room until we have a way for us to make more money.” Cuz, I can only fight so many times per year, and I needed another income. . . .

So, I got a pen and paper, and I was, I was on YouTube researching how people make money, what millionaires have, de de de de de. And, they kept

³ See *Andrew Tate is The New Alex Jones- Anthony Pompliano Podcast*, RUMBLE, available at <https://rumble.com/v1mcvg0-andrew-tate-is-the-new-alex-jones-anthony-pompliano-podcast.html>, last viewed February 3, 2025.

⁴ See *Andrew Tate Webcam Course Part 1*, RUMBLE, available at <https://rumble.com/v3h0lti-andrew-tate-webcam-course-part-1.html>, last viewed February 3, 2025.

talking about assets. And I was sittin' there thinking, "What assets do I have?" . . . And then I realized, I have about 5 girlfriends, all smokin' hot. **And females are an asset. Attractive females are absolutely an asset. . .**

So, when I realized I had all these assets, I had to find a way to monetize the assets. I knew some street pimps, I've known them for a long time. Straight street-pimpin' is a completely, in fact, no, it's not a completely different game. The psychological aspect is the same of what we're gonna do. The skill I'm gonna teach you is exactly the same. I could easily translate mine into a street business, and you could easily street-pimp with the things I'm gonna teach you. . . .

But I didn't want anyone else fuckin' my girl, that's the truth, my girls. I wanted to fuck my girls. I didn't want some other guy fuckin' my girls. What the fuck's the point in that? So, I, long story short, blah blah blah blah, discovered webcam, and went from there. Flew all five girls in at once. Sat them all down. Said, 'I've been going out with all of you. Here's the truth. Let's [word unintelligible] the business. Do you want to make money or not?' Two decided to say. Three started crying and went back on the plane cuz they're all from different places in the world. I had them from when I was fightin'. I went and fought in Slovakia and got a girlfriend. I went and fought in France, got a girlfriend. Went and fought [word unintelligible], girls around the world. So, it's all a lot of flying. So, sat them all together. "Who the fuck are all these other girls?" Okay, truth time. Bang. I'm a G. I'm fuckin' you all. I'm gonna start a business. You all are gonna live here with me. Three got back on the plane. Two decided to stay. Two weeks later, one left. So, I was left with one. To start with one is good. Those two weeks I fucked them together a few times, so that's fine. Start with one is what you want to do anyway. . . .

16. ANDREW TATE has referred to himself as a "pimp," or a person who controls and financially benefits from the commercial sexual exploitation of another person, on numerous occasions.⁵

⁵ See <https://x.com/themilkbartv/status/1828590887850648019?s=46&t=8Lpb1VgqcTT3ytW6sWKPTQ>; see also <https://rumble.com/v359lx2-the-phd-course.html>.

17. In an appearance on the “Full Send Podcast,” ANDREW TATE described making his girlfriends work fifteen to sixteen hours per day and waking them up after two hours of sleep to work more.⁶

18. TRISTAN TATE tells a similar story to ANDREW TATE about his experience in the webcam business. For example, on a podcast released on February 9, 2020, with Stefan Molyneux, titled, “#4548 The Truth About Web Cam Girls! Tristan Tate Reveals All!”

TRISTAN TATE states as follows:

Stefan Molyneux: “I was really struck by the tweet that you put out, where in you were talking about the cam girl business. . . . What is the business and what are the economics behind it?”

TRISTAN TATE: “. . . . it's essentially girls talking, flirting, stripping, sometimes performing sex acts, etc, always with themselves. It's solo stuff to guys across the internet, who are paying upwards of \$4 \$5 per minute for the pleasure of watching these women. Now, of course, this is not something that everybody is completely okay with, nor do I care if they are or want them to be. **Who I am is I am a webcam studio owner.** So, I have numerous . . . houses, apartments, mansions, filled with web cam girls who obviously broadcast on my platforms, as well as some of the more famous platforms. It's a business I've been in in five and a half for five and a half years. Alongside my brother. **I made my first million dollars in this business.**

....

I very I liken myself to a bar owner. A lot of people will come in and drink two or three drinks in a very healthy way. I guess they use it as pornography. They use it as masturbation, and they'll then log off. But you do get addicts, and you can do get people who abuse this, who really fall in love. I will not use that term cheaply, but they really do fall in love with the girls they think they're talking to. I've seen men sell their houses, sell their possessions, sell their television sets to spend more time with web cam girls, and it's very damaging.

....

Stefan Molyneux: All right, so if a man, I assume it's usually men, although I'm sure it can go the other way, but a man logs onto the website

⁶ See *FULL SEND PODCAST – With ANDREW TATE!!!*, uploaded October 25, 2022, available at https://www.youtube.com/watch?v=kJyTkLgW_KI, at 59:40 – 1:20; see also *id.* at 1:15 – 1:19:00, (Andrew Tate explicitly stated that the women in a relationship with him gave him 100% of the money they earned on webcam.).

choose a webcam model, and is it a one on one session? Is it many to one? Or how does it work in that way?

TRISTAN TATE: Well, it depends very much on the webcam in platform. . . . **Some websites work more like the ones that I specialize in. They work more like online strip clubs.** Whereas if you imagine a strip club with a girl standing in the pole on the center and crowds of men throwing dollar bills at them, it's essentially the same way. However, the crowds are much larger, so you can have up to some of my models will pick it, 3000 4000 5000 individual men sitting on their computers from across the world, throwing in little bits of money on the websites I used to call tokens that were five cents each. This guy will throw in 10 tokens. That guy will throw in 100 and as various goals are met, the girl will then take off her bra, for example, after she's made a few \$100 so the different websites work in different ways. I specialize in more the online strip club kind of ways, but anything that you can imagine is essentially happens, and virtual reality sex is now just starting, and that is the next good thing, and I can touch on that later as well.

....

So it is I understand quite, quite difficult to wrap around, because I, when I first started this business, me and my brother, the reason we didn't think of it any sooner is because we didn't imagine in any universe that something like this existed. **We stumbled on it by accident, and used the fact that we always had pretty girlfriends, we were always relatively good with women to build a big company out of them.** But I know it's mind boggling to people who haven't seen this before.

Stefan Molyneux: Oh, the economics. I mean the ethics, we can perhaps discuss a little later, but the economics are really interesting. And I remember on my show some years ago, talking to a man who had gotten so infatuated with a webcam girl he was a call into my call in show that he'd actually gone in debt to the organized crime to try and sort of fund his habit and also figure out how to fly her over and so on, like he had become so wrapped up with her that he was literally putting his kneecaps, his elbows, maybe his life itself in danger by borrowing from organized crime just to try and pursue this kind of madness, really, when you think about it, because the relationship is very artificial. It is obviously highly sexualized. The man is kind of in control. The woman's personality is not there, and it's not like she says, Hey, man, I need you to watch my kid while I go and get a root canal, or my mother's ill. And therefore, you know, I have to not be available this weekend. And like the realities of life, it's sort of like an affair. Like the realities of life don't impinge upon this sort of weird, you know, waifu anime fantasy of who the woman is.

TRISTAN TATE: Yes, and the relationship is far more artificial than you would even believe, because a lot of the conversation that's happening a girl will typically, in my setup, a girl will sell her phone number to an individual. So he'll pay up to dollars to have the girls number. Now, the entire time he's messaging that girl, it's not that girl, it's a member, it's another member of staff I have who has a pile of five or six phones, and her job is to just reply as these false personalities, as these false names, looking at getting the money. So, before the guy calls again, one of my admin staff will have a chat with the girl says, Oh, by the way, Stephanie, well, I'll use the name. Oh, by the way, Stefan was talking to you earlier today. He sent you \$200 his dog is sick, asking about his dog. Ready go. So it's so fake, more fake than people could possibly believe, because **I'm not even talking to the girl they think they're talking to, even when she's live on screen.** A lot of the time there's somebody else behind the scenes. Sometimes the models English isn't that strong, doing the typing on behalf of the model. The model is just bashing a keyboard which isn't plugged into anything. **So it's far more artificial than you got you could possibly believe. And yes, people do get themselves into debt and spend money indulging in these relationships, which, from my perspective, it just looks ridiculous.** I'm happy to run the business. It's a great business for me to run, but I would not advise anybody to partake in this in any manner.

Stefan Molyneux: Now, when you first, I guess, got the idea for the webcam was there, you know, there's this sort of law in economics that supply sometimes creates its own demand. Did it while for the business to get rolling? Or did you kind of put the bait in the water and like, 12 sharks ate up your boat?

TRISTAN TATE: Oh, I mean, the first model that we put online was a model who worked for my brother. . . . So yeah, we started with a really beautiful girl who my brother was, my brother was dating at the time, and still is with to this day. And yeah, the sharks attacked. I quit my job a few weeks later, because we saw the potential of this, and we scaled up and became very big names in this industry. When I say very big names, you probably haven't heard because I don't tell people what I do, and nobody knows that the models who work for me are working for me. I wouldn't even divulge that information right now to you, they have 50, 60,000 followers on Twitter, 100,000 followers on Instagram. They're very big girls in terms of their fame and their popularity and the money that they make. But nobody knows that I'm the guy behind the accounts, and I wouldn't ever divulge that anywhere, because that would be damaging to my business.

Stefan Molyneux: And what kind of money were you making at the peak of your webcam business?

TRISTAN TATE: When I had 75 members of staff, not all of them were webcam models. But I had 75 people on my payroll, I was making profit, almost \$3 million a year between me and my brother. Now keep in mind, yeah, profit. Keep in mind I was paying 23,000 euros a month in rents in Bucharest, where rents relatively cheap. It was a very stressful business to run. People will also think, Oh, you run web cameras. That must be great sitting in your hot tub all day with a bunch of naked women. No, because you can't put the lifestyle above the money, otherwise you're never going to make anything. So it was a very high pressure job. It ran 24 hours a day, around the clock, seven days a week, Christmas, New Year's. There were no exceptions. And I think with any business that big that makes you that kind of money, there's a lot of pressure involved in it. Nothing is that easy. And we became, as I said, very, very big in the industry. And to the people watching, and I do know this from Twitter. I do know that a lot of people doubt me, they'll think that I'm a drug dealer or I'm or whatever, seven cars, and I live in a big ass house and that kind of stuff. **This is what was my bread and butter for the last five years, five and a half years my life.** This is what I guess I do. I consider myself a professional businessman in my sphere, and it really does make the money that you know that I say it does.

19. TRISTAN TATE has also said, **“I have recruited I think . . . more girls into, I guess the adult entertainment industry than anyone else, I really have . . .”**⁷
20. THE TATE BROTHERS have also **sold courses** to men on how to recruit, groom, and manipulate women into creating pornography, further profiting from the sexual exploitation of vulnerable young women (and men).

ANDREW TATE’s PHD (stands for “Pimping Hoes Degree”) Course

21. ANDREW TATE sold a course called his “PHD Course,” with PHD standing for “Pimping Hoes Degree.”⁸ Upon information and belief, ANDREW TATE previously charged \$250 for the PHD course. In this course, ANDREW TATE teaches men his methods on attracting women who may be vulnerable to sexual exploitation, identifying vulnerable women who are predisposed to being manipulated, and then his methods of

⁷ See <https://x.com/themilkbartv/status/1682574820226269185?s=46&t=8Lpb1VgqcTT3ytW6sWKPTQ>.

⁸ See *The PHD Course*, RUMBLE, available at <https://rumble.com/v359lx2-the-phd-course.html>, last viewed Feb. 6, 2025.

psychological and emotional manipulation and conditioning the victims of these sexual exploits.

22. ANDREW TATE calls his method for identifying vulnerable women the “PHD test,” and he claims if women pass this “test,” they are worth continuing a “relationship” with.

23. In his PHD Course ANDREW TATE states:

There's no such thing as a perfect woman. **If you want a woman who's perfect for you, you must build her to be perfect for you. A woman who is understanding and kind and who respects you does not exist unless you force her to be that way.** When I say force women I don't mean in a horrible way, I mean, in a simple there's no other option. Like water always takes the easiest path through the rocks. The woman must learn that her man is fucking an Iron Mountain, and the easiest path is to obey any other kind of resistance simply doesn't work. That's how you have to be. **But some women are more moldable than others. You have, I call it blueprints. You have good blueprints and bad blueprints. So you have, I, with my skill level, can make any female who, as I say, and I say that with absolute conviction, I've never met a woman who will not do the basics of what I say, bring me coffee, turn up where I tell her to, listen to me, not talk to other men, basic things. But some are better blueprints than others. . . . So you have good blueprints and bad blueprints. Some women are more susceptible to being molded.** Some women have better values than others.

. . . .

I do agree with what the red pill books say, that if a woman's fucked lots of men, she's not as good a mold as women whose fucked less men. That's true, and the reason for that is because if a woman's fuck lots and lots and lots of guys, they don't have a stigma attached to getting a new dick. So when times get hard or you tell them to do something they don't want to do, they think, I'll just fuck someone else. Then they're more they're less loyal. They're more likely to run off and leave if they've fucked more men. If you're the second guy or first guy ever they don't want to give up on you that easy. So, if you say stop texting this dude, they're more likely to do that. . . . **So you have good blueprints and bad blueprints. . . I can tell you 100 different reasons. What makes a good blueprint, what makes a bad blueprint. I could waste loads of time, or I could just give you the fucking instant, easy to tell iron breakable test, this test, pickable test. This test tells you concrete if a woman is good quality or bad quality.**

24. In summary, ANDREW TATE'S “PHD test” involves charming women through humor and compliments, inviting them on dates, being patient, and then intentionally ignoring

women after sex. The next step in the test is to see if the woman will reach out, and if she does, he will hang out with her and give her a command, such as “buy me a coffee.” If she obeys the command and is still interested in him, then she has passed the test.

25. ANDREW TATE explains that his “PHD test” sets the standard for the relationship, he states:

[T]he relationship standard is as follows: you better be nice to me, you better fuck me when I want, you better do as your told, to get my attention, otherwise it is staying down here. You have won the game. . . . Once you have slept with her you are now in charge. . . You are finally, since the first time you messaged this girl on Instagram in the position of power. You are above her now. Because you fucked her. And if you fuck her and never talk to her again then she’s a stupid slut. And she doesn’t want that. She wants you to want her. So she wants to keep you. . . . this is the first time she wants to get you. And most men fuck that up straight away by either saying something ‘I really like you,’ ‘can I see you again,’ da da da and just being submissive to the woman’s whims straight away. And giving them attention. You can’t do that. You have to drop your attention down to absolute zero.

26. ANDREW TATE describes the coercion involved with his methods: “A quality woman . .

. they know that fucking a guy is a big deal, and they don't want to fuck you for no reason, and they don't want to be a ho. They don't want to be a number, another random number on your fucking book. They want to get relationship out of it. They want to build it into something **so a quality woman will bend her normal rules. A girl who would perhaps never buy the coffee is now prepared to do something to bend her normal rules to get your attention back post sex.**”

27. ANDREW TATE teaches men that they should cut off women who “fail,” the “PHD test.” For women that “pass” the “PHD” test, ANDREW TATE then teaches men how to use a systematic approach via emotional manipulation and abuse to create complete emotional dependance.

28. ANDREW TATE describes how he only provides emotional connection and attention if the woman he is targeting is complying with his demands, and not complaining about his

behavior. According to ANDREW TATE the moment a woman does something he does not like he completely withdraws and will even break up with her. ANDREW TATE's methods involve "rewarding," a woman who is compliant with affection, attention, and gifts. This also involves deception as ANDREW TATE says you cannot be honest or logical with a woman so instead just cheat on her in secret as long as you can get away with it, and then when she finds out just downplay and disregard her emotions and ignore her.

29. ANDREW TATE explains that by using these tactics over time his girlfriends will even tolerate him having sex with other women and they "do[n't] even cry about it anymore," as he explains:

She lets me fuck other girls because she cannot possibly leave me. She leaves me because she loves me, and I love her, and she loves me with all her heart, and she cannot imagine her world without me. If I died, she would commit suicide. I am her everything. It doesn't matter if I fuck someone else, because I'm her everything. She has nowhere else to go, because this test was implemented and she passed it, and years have passed where I haven't taken her shit, and I've kept a position of authority, and I've just become her idol in life. It's like trying to take God away from a Christian. They're like, Well, if God doesn't exist, have you ever argued a religious person? Look, and they'll, after you prove them wrong a bunch of times, 'but well, if God doesn't exist, then what's the point?' They'll eventually say, 'What's the point in being alive? What's the point in doing good? What's the point not doing bad without God?' That's how your woman has to think of you without him. What's the point in doing anything? When you get to that point, you can do what the fuck you want. I can fuck who I want cause she aint gonna leave. She ain't gonna leave. She doesn't even cry about it anymore.

30. ANDREW TATE also states in the Question and Answers follow up to the PHD video, available at <https://rumble.com/v359lx2-the-phd-course.html>, at 1:50:00-1:52:30,⁹ that at the time of filming he had been in a relationship with "Vivien" for six years and she was

⁹ See *The PHD Course*, RUMBLE, available at <https://rumble.com/v359lx2-the-phd-course.html>, last viewed Feb. 6, 2025.

“about 21 years old,” which would mean **he started a sexual relationship with her when she was about 15 years old.**

31. The Romanian prosecutors allege ANDREW TATE began trafficking Vivien into webcam pornography when she was 17 years old. *See* Exhibit A, Bucharest Tribunal Decision of August 22, 2024.

32. Under United States law, pornographic images of a 17-year-old constitutes child sexual abuse material, or child pornography. *See* 18 U.S.C. §§ 2251, 2252, 2252A. And any commercial sex act involving a minor is *per se* sex trafficking, even if force, fraud, or coercion are not present. 18 U.S.C. § 1591 (“Whoever knowingly . . . recruits, entices, harbors, transports, provides, obtains, advertises, maintains, patronizes, or solicits by any means a person . . . knowing, or . . . in reckless disregard of the fact, that means of force, threats of force, fraud, coercion . . . will be used to cause the person to engage in a commercial sex act, **or that the person has not attained the age of 18 years will be caused to engage in a commercial sex act.**”) Any purported consent of a minor is no defense—a minor cannot consent.

ANDREW TATE’s Webcam Course

33. ANDREW TATE sold an instructional course for profit that described his methods of using fraud and coercion to recruit women into doing webcam pornography for him and giving him all or most of the money. He taught men through this course how to do the same.

34. In his Webcam Course¹⁰ ANDREW TATE said the following:

You’re effectively taking girls, teaching them how to make unlimited money from home, and making sure they give it all to you. . . .

¹⁰ *See Andrew Tate Webcam Course Part 1*, RUMBLE, available at <https://rumble.com/v3h0lti-andrew-tate-webcam-course-part-1.html>, last viewed January 30, 2025.

Laptop, webcam, girl. You, typing for the girl, replying to the PMs, giving her instructions, you learning the business the hard way as well as the girl learning the business the hard way. This is gonna be the beginning of the business, you and one girl. You're gonna start with one. . . .

And I have a separate phone with all my girls' guys [customers] in that phone, and I kept control of it. And I would speak to them. And before she went online, I would tell her like any basic information. Fuckin' Max's dog died, so, he's upset, or whatever. But the rest of the time, I keep it very generic. . . .

You don't let your girl have this, because if your girl ever runs off and leaves you, which is gonna happen to some of you at least, you don't want her to have an address book of all the guys she could get money from. You want her to leave and go, 'Well, I don't know the account. I don't have the password or the account. I've never set it up before. I don't know how the banking works. I don't have any of my guys' phone numbers. I have nothing.' And that's why they don't want to leave because then they're like: 'Well he has everything. I need him. I have to stay with him. He has everything.' So, it's important. It's a very important element, that control. Because once the money starts pouring in, the girl is gonna go, 'Well what the fuck do I need this guy for?' And they will leave if you don't have every aspect under control. . . .

Next, tax. Going back to tax, [word unintelligible] we talked about the [though or fall] audit thing. **Tax is also another important element for controlling your woman. You're not gonna pay anyone in tax because you're getting paid in Bitcoin. You don't need to pay a tax to anybody. But you need to tell your girl that you're paying the tax.** Cuz girls are lazy, and girls are stupid, and girls don't understand how taxes work. So, the girl's workin' with you, and you're like, 'Oh, okay. We've made this much money. But I'm gonna pay the tax to make sure we don't get in trouble.' She'll sit there and go, 'Okay. Okay.' Now that allows you to do two things. **One, it's another control element. 'If I work with him, my tax is not a problem. If I do it alone, I have to deal with taxes. Taxes are complicated.' It's a control element. Secondly, it allows you to pay her a smaller percentage. So, I used to pay my girls 30%. So, for every \$10,000 they made, I'd give them 3 and I'd keep 7. They thought they were on 50%, and I said that the, **disparately, it was because of taxes. So, you're on 50%, but we had to pay the tax first, and then it's 50/50. . . .****

Don't think you're Mr. Casanova and try to start with 3 or 4. It's a waste of time because, one, you're not gonna understand the gender dynamics, the dynamics of having that many women. Two, you're not gonna be good at typing yet. You need 3 or 4 weeks just typing to learn how to get the most money from these dudes. And after you've learned that, then bring new girls on. If you try to type for 3 girls at once, when you don't know what you're doing, it's fuckin' stupid. So, you start this business with one girl only. One girl. **Now, we're gonna go back into street-pimpin' terminology. . . .**

The girl you start with is the most important girl. **Cuz the girl you start with is gonna be your bottom bitch. We call her the bottom bitch on the street. The bottom bitch is the girl who collects the money from all the other girls and brings you the money.** That's the girl you can really count on. And that's gonna have to be your first girl. . . .

Well, your bottom bitch is important because the dynamic of the business is always gonna be difficult to manage. It's never gonna be easy for you, as the one man, to have all these women workin' for you, **because you have to fuck the girls. This is a fuckin' super important.** You're probably sittin' there with a smile on your face right now. Look at you fuckers. You're all like, 'Yes.' **You have to fuck the girls. You cannot sit and do a purely professional business relationship with a female. It doesn't work. . . . You have to fuck the girls. You cannot do a business relationship with a female, and I'll tell you why. Women have sex with somebody. If they're not fuckin' you, they're fuckin' somebody else. Now a woman is always going to be the most loyal to the guy she's fuckin' as opposed to anyone else for any other reason.** If you have a girl work for you, and you say, 'Look. We're gonna be business partners and make money. Here's your cut. Here's my cut. We're gonna work together. Blah blah blah blah blah.' Here's a fuckin' . . . I've had dudes, I've had loads of guys try to do a contract with a girl. Tried to sit there and talk common sense with her. When's the last time talking common sense to a girl has ever worked? Ever. **If you're not fuckin' the girl, she is fuckin' someone else. And that other person she's fucking is gonna have the control over her, of her mind, as opposed to you. And if he controls her mind, and you don't control her mind, once she starts to pick it up a bit after a few weeks, a few months, whatever, and realizes how to make money on her own, is she gonna stay and keep paying you? Or is she gonna run off and pay her boyfriend for them two to go traveling in Southeast Asia, and she's gonna work as she goes. Or, is she gonna go to her boyfriend and go, 'Fuck it. You type for me.' She's gonna run off. She's going to leave.** There's no way, I've been doing, I've done this business for a long time. . . .

There's no such thing as having girls work for you who you have not fucked. It's impossible. **You have to fuck them, and they have to love you. It's essential to the business. . . .**

Women are snakes. They have to be in love with you which means you have to have sex with them. So, this why your bottom bitch is so important. Because your bottom bitch is there from the beginning, and if you ever want to grow the business, you have to be having sex with other women. And your bottom bitch has to understand that. . . .

So, the dynamic you pull there with your #1 girl, your bottom bitch, your first girl, is after you've been working a few weeks, whatever, whatever, after things have been going well, you say to her, 'You know what? You and me can get even

richer.’ And, she’ll say, ‘How?’ And you’ll say, ‘If me and you got some other girls . . .’ Me and you, not me. ‘If me and you got some other girls to work, then, we’d have even more money. Then what we could do, I can give you a percentage of their money. So, you can teach them, train them to be like you, and I can give you a cut of their money as well so you have more money as well. And we can buy a house and buy a car, and Crypto.’ Whatever. Sell them the dream. Sell some dream. ‘And we’ll buy this big property and fuck in the Bahamas.’ And she’ll go, ‘Oh yeah. But where are we gonna find girls from?’ ‘Well, I’m gonna find a girl, and I’m gonna bring her to you. And you’re gonna tell her how good it is to work for me and how great it is to do this webcamming thing and how smart we are with this typing system that no one else uses.’ It’s actually true that no one else really uses this typing system. The system I’ve taught you is some top-secret shit, so you should be appreciative. “And with this typing system, how easy it is to make money, and we can get this other girl to work.” And she’ll go, “Okay. Okay. . . .”

Then you’ve got to go out there and fuckin’ find another girl, sit down there, have another meeting. Blah blah blah blah blah. **Now when I say you have to find another girl, and have a meeting, it is after you’ve fucked this other girl. You cannot get a girl to work for you you haven’t fucked. . . .**

So, the recruitment process is the same as the PhD course. You message them on Instagram. The PhD course is my recruitment system. I don’t mention webcam until after I’ve had sex with the girl. If you’re on dates and you try to mention it and shit, it just doesn’t work. It puts them off. “I’d never do that. That’s disgusting. I’m not a whore. [Makes noise with mouth]” It’s just not gonna work. You continue as normal, no mention of webcam. You fuck the girl. After you’ve fucked the girl, you do the PhD test. If she passes the PhD test and she wants to be with you, then you start mentioning things like, “Yeah, but you know what you’re always busy, you’re always at work. You can come work for me. . . .”

So, as I said, you cannot try and approach girls to try to do webcam. “Hi, do you want to do webcam?” It’s bullshit. It doesn’t work. Any, no one’s gonna say yes. And any girl who does say yes is doing it, she doesn’t like you, she doesn’t know you, she doesn’t love you. She’s saying yes purely for money. . . Any girl who wants money that bad is gonna skank you and leave you when she realizes you get a big cut of it. . . .

Even if you do get a girl to say yes that way, even if you do say to a girl, “Look, let’s make some money.” She’s only in it for the money. She’s not in it to please you. And, if she’s only in it for the money, she’s gonna get pissed off with her cut. Cuz, they’re gonna Google up how much a token’s worth, how many tokens they made, and all that shit. They’re gonna get pissed off with their cut. Remember the tax things. . . .

You'll want to pay them 30% instead of 50%, it's important for your profitability. So, you don't want a girl who's in it for money. You want a girl who's in it to be with you. So, you meet a girl, you take her on dates, you fuck her or whatever, she passes the PhD test. Then, you start saying things like, "Oh, yeah, you're always working. I have to do some traveling, and you can't come. I want to bring you with me." Traveling's a great one because the thing about this business is it's mobile. If you can find a good Air Bnb with good internet, you can run it somewhere else. So, it's a good little caveat to throw in. "And you're always working. Why don't you work for me so we can spend more time together." "Work with you doing what?" "Well, I have a webcam business." "Oh, I don't want to do that." "Okay. I know you don't want to do that, but listen, come, let's have a meeting. Let's just talk about it. If you don't want to do it, you don't have to do it, fine. But let me explain it to you properly. In fact, I'll bring in one of the girls who works for me." You, the bottom bitch, the new girl, you go out for a fuckin' nice dinner. **Your bottom bitch is the one who does the selling. You don't do the selling. The girl has to hear it from a girl. And this is where your bottom bitch has to be trained.** This is why it's so important to have a good first girl. My first girl was so good it was easy. . . .

My girl would sit there and go, "Oh my god. Before this, I was a waitress, and it was shit. And now I do this, and I make so much money, and the guys all love me, and they adore me, and on my birthday they send me presents, I get so much money. Blah. Blah. Blah. It's so much fun, and we stay at home. De de de de de." Or, "We're gonna go to Thailand sooner, we'll be working in Thailand. We're gonna stay there for as long as we want. You should come with us. It's gonna be so much fun." De de de de de. Martinis. Martinis. Martinis. Bang. Threesome. Slam em both. You're bottom bitch. . . .

This girl's like, "Oh okay, well, I'll try it." Put both girls on camera together on the first day. **So, the new girl can just sit there and sit with the other girl and get drunk. Give em a bottle of vodka.** Put on the fuckin' Chaturbate, 100 tokens per shot. **The guys will send loads of money to get the girls drunk cuz guys like drunk girls. Girls are sittin' there getting drunk, havin' a great time, and you say, "This is your new job now. You don't have to go to work ever again."** That's how you recruit girls. Do not recruit girls any other way. You will fuckin', at some point in your future of webcammin', go on a date with a girl you can tell is a complete whore. And you're gonna be lazy, cuz I've done it, myself. And, I've thought, "This girl is a fuckin' slut." And just before you even bang her, you just say, "Hey look, why don't . . . have you ever tried webcam?" You just, you don't, you're busy. You want her to work. You don't care about anything else. You have enough sex at home. **It's not about sex. Now, it's about money.** And you get lazy and you [words unintelligible]. Even though she's the biggest hoe in the world, she starts coming at you with some virtue or bullshit. "I would never do that. Eh. You're a fuckin' horrible. You're disgusting." And she'll run off and fuck some other dude who she meets on the first night. Cuz these girls are that stupid because

they think it's okay to go fuck a guy they barely know, but it's wrong to show their tits for money. Cuz girls are that dumb. So, don't do that. . . .

You have to fuck the girls first. Fuck em first. So, your bottom bitch has to know you'll be out there fuckin' hoes. She has to know it. Say, "Look. We're gonna run this business together. We're gonna grow this business together. Right now, you're on camera and doin' really good. In a year from now or two years from now, I don't want you on camera. I want you typing and the other girls on camera. . . .

Let her sit there and go, "Yeah." Career, selling the dream, career progression. All the shit they do in normal jobs to keep the fuckin' person slavin' away. 'Eventually you're gonna be here. We're gonna own this. We're gonna make this much. Blah blah blah. But the only way we can do that is if we go have all these threesomes with all these girls because these girls have to work for us, and they're not gonna work if they don't love me because they're just gonna run off. So, the only way me and you, as a team, are gonna be rich people is if we go get a bunch of girls to suck my dick together. Do you agree?'

And if you do that right, she'll sit there and go, "Okay. Let's do it." This is why people, people look at my Twitter and my Instagram shit and go, "How the fuck does he have all these girls?" This is how. I've got a good bottom bitch who knows the game. I've had innumerable threesomes. But 80% of my threesomes involved my #1 girl. And then the other girl's just a swap out. Because she knows the game. I'll take her to the club. I'll just point at a girl, and she'll laugh because she knows I'm gonna try to fuck that girl. I don't even have to do anything. I'll send her to go fuck the girl. Go talk to her. Be her, go be her friend. Before you know it, they're all fuckin' dancing and shit, and I'll just walk up out of nowhere. She doesn't even know me. "So, you're both coming with me." And when my girl goes, "Hehehe, alright okay." Then the other girl's like, "Okay, let's go." It's fuckin' easy. Bottom bitch is the most important thing, so you gotta get a good one. And you're only gonna get a good one by fuckin' a lot of hoes. . . .

Truth is this, before I had this webcam business, I fucked girls. I've got a PhD, I've always been the best. But, I never really, I wasn't militant with it. I'd get a girlfriend, I'd fuck here and there, but I didn't really care. **But after I started this business and realized that the only way I could get girls to work for me is to fuck em first, I became militant. It became my job to fuck girls. I was, I was fuckin' ruthless. Every day, I'd send 20 Instagrams. Every day, I was on a date. I was fucking, 4 girls, 5 girls, a week. Because that's how I built my business. I built my business on the back of my dick. That's how I built it. That's how I got rich. . . .**

So, I became militant with the pimping. So, my bottom bitch understood it. And she understood that perfectly. So, that is the recruitment structure, and that is extremely important. I hope you understand why you have to have sex with a girl. Otherwise, she is going to leave. What you don't want to do is get a bunch of girls,

teach them how to make money from home, and then let them leave you and run off and make money for themselves. And you check their Instagrams, and they're having a great life, and they're fuckin' rich, and you have nothing. You don't want to do that. So, you have to fuck the girl. . . .

35. TRISTAN TATE sold a course called, "God Mode: the Elite Playboy Tactics of Tristan Tate,"¹¹ which offered very similar techniques and advice as Andrew Tate's PHD Course. Tristan Tate's Course also taught men how to take a woman's virginity.

36. In TRISTAN TATE'S "God Mode" Course he said the following:

Everybody who has ever met me, who has ever visited me, certainly in the last five or six years, has commented on how many beautiful girls I have. So before we get into the course material, let me tell you my credentials. **I used to run one of Europe's largest webcam studios. I had 75 women employed by me, working working for me and following every single order I gave them. But right now I no longer have my webcam studio. I just have a few models who work for me,** but I have a few girlfriends. . . .

I have six girlfriends. Six. Now I'm not talking about girls I sleep with sometimes. I'm not talking about girls who will come to see me when I'm drunk or when I'm bored. **I'm talking six relationships, women who love me, women who want families with me, women who are not leaving, women who are loyal to me.** I'm not even going to waste your time by naming how many side chicks I have come and hang at me for a week or so. . . . Now, how do I do it? My Content, my credentials, are beyond doubt, but there's methodology to my madness. That's why you bought this course. . . .

Now, if you've ever had a girlfriend, what you should do next time you do is get access to her Instagram. **I have Instagram inbox passwords to all of my girlfriends, all six of them, so I can see the messages they get.** . . .

That's the end of module one, how to meet women. If you apply all these things the way they you should meet women and be ready for the next stage, which is dating module two. Nobody covers this topic. Nobody, but I'm going to talk to you about how to have sex with virgins. . . . When you run game like me and meet the women who I meet, and roll in the circles I meet you meet beautiful virgins. Sometimes me, I'll do two or three virgins a year. Now, how do you date a virgin when you're a when you're ice cold player? There is a tactic which I'm going to share with you on how to date a virgin and how to take a girl's virginity. . . . Be their boyfriend for three months and be in a nice relationship with them. . . . You have to be their

¹¹ See *Tristan Tate – God Mode*, RUMBLE, available at <https://rumble.com/v359saw-tristan-tate-god-mode.html>, last viewed January 30, 2025.

boyfriend for an extended period of time. You then have to take a virginity on the second month anniversary, or something along those lines. And I'm going to teach you how to do it while still in a playboy lifestyle scenario. . . .

What you do with your virgin is you turn everything into a date. I need to go have a business lunch with my brother or my friends, I make sure she's there. I Uber her in. I Uber her out. If I have to go for a drive, I make sure she's with me. I go pick her up, do my drive, drop her off, go back home. If I have to go to a club. She's part of my double booking scenario. She's always with me at least three or four times a week. Irregardless of what I'm doing, I go to a lot of lunches and a lot of dinners. I eat at restaurants a lot. I take her to the restaurant. Nothing about my life has changed. **I'm not going out my way. I'm not making specific time for her. I'm not trying my best to take her on dates and show her a good time. What I'm doing is I'm adding her into my normal everyday life. Now, to me, I'm fucking my girls. I have my girlfriends, my relationships. I'm getting my sex. I'm having my drinks hanging out with my friends. Nothing has changed in my life apart from there's some quiet girl next to me half the time when I'm out and when I otherwise would be alone. But to her, in her mindset, Tristan is my boyfriend.** He took me to lunch today, and he dropped me home. He took me to the bar today, he was with his friends, and he took me with him, and then he sent me home. Tristan is my boyfriend. In her mind, we've been dating, and then one day, that day will come, when she's ready, and you'll know. You'll know, because she'll make it obvious to you. No matter what you do with virgins, don't get pushy. . . And no matter what, do not violate my golden rule with virgins. If she won't fuck you, do not let her touch you . . . 'Baby you're not ready. I understand. Let's go to sleep'. . . Nothing will make her want you more. So I've come into situations where I've been seeing these virgins for a month, two months, nothing about my life has changed. And then they'll come to me and say, Oh, maybe we can do something special this weekend. Boom, I book a hotel. We have a few drinks at the hotel bar, take upstairs. Virginity gone. **As far as she's concerned, I've been her boyfriend for three months. She's in a long term committed relationship, and all it's taken is me to order some Ubers when I'm having my free time with my friends, that is how I have added virgins to my list.** Two of the girls of my six were virgins when I met them. They're not anymore, but now they're mine. . . .

So a very good test to whether women are relationship quality or friend quality is, how are they around your friends? Now my women are all the same. **All six of my girlfriends are the ones who pass my test, and they get to be around me when I have my guy time. Now, when they're around me, what do they do? The drinks stay cold. They bring the beers over. They make us coffee, they make us tea, and they remain quiet. . . .**

That is everything you need to know about dating to be an elite playboy. But Dating isn't the end goal, which is why we have module three. I'm going to talk about relationships. . . .

So that is the key to having relationships. You have to differentiate which girls you fuck from which girls you want to stay with. . . What exactly is nice about her when I'm trying to differentiate which kind of women I want to love and which women I want to just sleep with? I usually close my eyes and I think about them as an asexual, blackened figurine. **I think of what their qualities are. I wake up in the morning. She makes me coffee. My injured shoulder is playing up, leaves her phone around unlocked. Doesn't matter. Doesn't care if I look in. Never goes out of the room to make to take a phone call, is respectful to my friends, cleans up my house, cooks my meals. If these things are adding up, then I'll usually turn it into something serious.** I'll tell her she's exclusively with me. I'll tell her the truth. I'm a busy man. I'll see her as much as I can. I'll tell her that I love her even. I'll tell her I have respect for her. I'll tell her I care about her all of it's true. **Yeah, I have other women, and a lot of them know that,** but women would rather share the king than marry the Jester. . . . **[T]he good girls are the ones who are willing to share you. This is what people don't understand, and this is what people don't teach. Like 'my wife would never tolerate me talking to other girls,' great your wife's a bitch! Let me tell you something. I know women who are so invested in my happiness that they know when they're not around, there may be another woman in my bed. I don't know if they know the true extent of it, but they love me so much that they allow me to have other women. . . . the woman who really loves you is like, 'Look, I know you have another girl, tears streaming down her face, but I really love you. Please don't leave me. Just tell me I'm different from the rest.' That's the woman who loves you.** So you have to differentiate which girls you fuck and which girls you want to love. Simple as that. **A good way of doing this is testing their loyalty.** . . . But you have to test their loyalty now. Don't even look through their phone. . . 'Hey, baby, unlock it.' Unlocks. Hands over. Don't do shit, take a selfie, give it back to her, if she'll hand you her unlocked phone. She ain't cheating. . . . **So if they won't unlock your phone and hand it to you, then that is a very good loyalty test. She's probably not girlfriend material. By all means, get her to suck your dick. Have your fun with her, but she's probably not the girl you want to be with.** . . .

Stay away from women who make arguments. So be nice. Be kind. But don't take shit if they want to start arguments. **Stop talking to them.** If you can't say something nice, don't say anything at all. **So they're arguing with you and you have no nice response to them, cut them off.** Do not invest hours in that shit. In relationships, a good way to keep your relationship fresh, and a **good way to keep your relationship happy is to make demands of women.** Women love to serve men. They really do. If a woman cooks you a meal and it's good, she's going to be happy. She can spend an hour in the kitchen, sweating, toiling. She can burn her hand if she brings you a plate and you're satisfied, she is happy, believe me, women are servile. **Good women are servile,** and a good way to keep your relationship happy is to make demands of your women. I have a ritual every morning I drink a black coffee in bed. I never make it myself. Whichever girl I wake up next to goes downstairs, makes my coffee. She knows how I like it. She brings it upstairs. I sip it now. You know, I love when you make me coffee. Your coffee is the best because

I can tell it's made with love. It's a joke, we'll laugh. It's cheesy, it's corny, but that will set the mood for the day. That will set the pace for the day. It's a one thing. Women are very servile creatures, so do not be afraid to make demands of them. So if you hang around me, or you know people who have hung around me, you'll know how it goes. I'm sitting with the boys. I'm drinking some whiskeys. 'Hey, baby, Bobby wants a refill. Hey, Iggy wants another few ice cubes. Darling, excuse me, Jonathan's beers out and you're in the house? like, I mean, get my lighter as well. Cigars out. Come on.' They love it. They really do, **if you have a good woman. So that is certainly an important part of having a relationship, make demands. Be the man. Be assertive. Be Alpha. Be dominant. . . .**

Never admit that you're wrong for doing something that you wanted to do. I'll give you an example. Another girl sucks your dick. Another girl, you fuck her, your girlfriend finds out. Two of your girlfriends, girlfriends find out, don't even say sorry. You're not sorry. One, why are you not sorry? Because you wanted to do it at the time, so you're sorry you got caught. You're not really sorry, and she knows it. You know you have to hold the line. The moment you start apologizing, you're making a concession. . . . **Never admit you're wrong. Hold the line. Say whatever it is you can but never concede and never admit mistakes, because they're not mistakes. You on your way to being an elite level playboy. I am an elite level player. I don't make mistakes. I fuck them because I want to fuck them. It isn't a mistake. No, I'm not sorry. Now this isn't an act. I mean it. I don't apologize, and I fucking mean it. I'm really not sorry. . . .**

37. In 2021, on Richard Cooper's podcast TRISTAN TATE admitted to taking the virginity of a 17-year-old girl. He said, "One of my main chicks has 200,000 Instagram followers and I took her virginity when she was seventeen. That's legal by the way here I don't know if its eighteen in your crazy country."¹²

38. On November 27, 2021, TRISTAN TATE told "dating coach," John Anthony about a woman he had sex with, saying: "**I was the second man she'd ever fucked in her whole life . . . it hurt her at every moment that I was doing it, but it felt good for me so who gives a shit.**"¹³

¹² See *PTW #50 – Tristan Tate*, at 1:08:19-1:08:26, YOUTUBE, available at https://www.youtube.com/live/qTLkbHu_LR0?si=mDpBoIYDScMLIepk, last viewed January 30, 2025.

¹³ See John Anthony Lifestyle, *Tristan Tate YouTube Live*, YOUTUBE, available at <https://www.youtube.com/live/v6LvICDUcNI?si=d5NGIIaDAUAh9k51>, last viewed Feb. 10, 2025.

39. ANDREW TATE also gave a training at one of his War Room¹⁴ events where he taught men how to isolate women from any outside influences or support to better control them. He and one of his fellow War Room members, Justin Waller, explain:

ANDREW TATE: “All the drama, she’s got to have all the dreams . . . **everything has to come from you. All of it. She should have no outside influences on any level.**”

Question from the audience: “Can you talk a bit more about that? How the restrictions and the boundaries you put on a woman, on who she can talk to, where she can go, and these kinds of things?”

ANDREW TATE: “Yeah, absolutely. So, you have to be very careful, as I’m very careful when I talk about this . . . but if you really want to sew up a chick, she’s yours and **when I say she’s yours it means she’s basically with you, and her family and your family and that’s, that’s basically it.** Alright. **If she has like a really strong social circle and she really insists on seeing them, they’re going to have a big influence over her and it is in your best interest to get her away from that social circle.** . . . You don’t want her out, whatever saying whoever. And women can’t shut the fuck up either. They will talk your business, they’ll give their side of the story only, you’re a bad guy now and ‘my husband wouldn’t do that’ even though the bitch is lying just to try and flex. **But it gets in her head so you have to try and isolate them from those things. And things we’ve talked about thus far like selling the dream, adding excitement, her never catching you slipping, all of these things tie into isolating her and taking her away from outside influences. Every outside influence is your enemy, all of them.** . . .”

ANDREW TATE: “**But in terms of isolating them from their friendships, its not actually that difficult to do** because women . . . will tell you anything you fucking want . . . next time her friends come over, when they leave just say, ‘why was Leanne looking at you like that?’ and she’ll say, ‘like what?’ and ‘I dunno she just had like an evil look on her face.’ ‘Oh well actually, last week she said this...’ Bullshit! Make it up! They’ll do it to themselves! You can say, ‘yea she just seemed a bit jealous of you when you were talking.’ Just some garbage . . . and **when we talk about selling the dream, this is how everything is all encompassing and everything comes together** because they do. . . . You say, ‘you know what, that thing I am working on, if that money comes in, I really don’t want you hanging out with Leanne. She doesn’t deserve to be hanging around with you when we make it [inaudible].’ ‘You’re exactly right, you’re right.’ **And then she buys into the narrative more, she buys into the drama deeper. The rift with Leanna is now strengthened. You understand where I am coming from?! And people will call it ‘manipulation,’ but what you’re really doing is putting the pieces on the**

¹⁴ See *Exclusive: Leaked Andrew Tate and Justin Waller War Room Discussion*, YOUTUBE, available at <https://www.youtube.com/watch?v=yCDTltg6Jk8>, last viewed January 30, 2025.

chess board in the best place for you to win. You're the one playing the fucking game."

OTHER RELEVANT COURSES AND STATEMENTS:

40. During the COVID-19 pandemic ANDREW TATE sold a course teaching men how to run women's OnlyFans accounts. In this course Andrew says, "The reason women need a man to do OnlyFans is the same reason a woman would need a man to do anything. Because they're incompetent, and they're very, very lazy, and they're stupid."¹⁵ He also quotes someone called "pimpin' Ken"¹⁶: "A ho' without instruction is headed for self-destruction".

41. In his OnlyFans course ANDREW TATE advised on controlling women's OnlyFans account, including the passwords, so they cannot leave and work on their own. He tells men to use the woman's photo and ID to verify the account on OnlyFans but do it on the man's phone, and says that if the man controls the account the woman won't leave.¹⁷

42. ANDREW TATE also helps his customers use fraudulent means to recruit women into working on OnlyFans by offering to sell a screenshot that shows OnlyFans earnings from one of ANDREW TATE's models. ANDREW TATE advises that these men should use the screenshot and represent to women they are trying to recruit that they have earned models that much money in the past, even if they have never done it before.

43. ANDREW TATE also advertised manipulating and deceiving women in order to induce them to produce pornography for his profit on his website: "My job was to meet a girl, go on a few dates, sleep with her, test if she's quality, get her to fall in love with me to where she'd

¹⁵ See *Andrew Tate Onlyfans Elite Course Part 1*, RUMBLE, available at <https://rumble.com/v3g2fbc-andrew-tate-onlyfans-elite-course-part-1.html>, last viewed Feb. 6, 2025.

¹⁶ Pimpin' Ken is a real life pimp who exploited women in street prostitution. See https://en.wikipedia.org/wiki/Pimps_Up,_Ho%27s_Down.

¹⁷ See *HU [LEAKED] Tate shares ONLYFANS Secrets*, YOUTUBE, available at <https://www.youtube.com/watch?v=y3n7HB03UK8> at 5:30 – 5:58, last viewed Feb. 6, 2025.

do anything I say and then get her on webcam so we could become rich together.” This was later deleted from the Tate Brothers’ website in February 2022.¹⁸ See Exhibit B.

44. ANDREW TATE said he liked eastern Europe, “because corruption is far more accessible.”¹⁹

45. ANDREW TATE said he moved to Romania because of the “#MeToo era... I am not a rapist, but I like the idea of being able to do what I want, I like being free. . . If she goes to the [Romanian] police and says: 'He raped me yesterday', they'll say ok, do you have evidence? Is there CCTV proof?”²⁰

46. As stated herein and in the Indictment, [REDACTED] face charges involving the equivalent of human trafficking of numerous victims, in Romania and the U.K.

THE TATE BROTHERS USE FRAUD AND COERCION TO SEXUALLY EXPLOIT WOMEN

47. THE TATE BROTHERS’ TACTICS are not novel or unique to them. They encapsulate what is known as “Romeo pimping”²¹ or, as the Romanian authorities prosecuting THE TATE BROTHERS refer to it, the “loverboy method.”²² It involves using fraud and deception to

¹⁸ See *Who is Andrew Tate? The self-proclaimed misogynist influencer*, BBC, available at <https://www.bbc.com/news/uk-64125045>.

¹⁹ See *The truth about Andrew Tate: 'His home is less Hollywood hideaway, more rundown meat factory'*, THE GUARDIAN, available at <https://www.theguardian.com/news/2023/feb/11/the-truth-about-andrew-tate-his-home-is-less-hollywood-hideaway-more-rundown-meat-factory>.

²⁰ See *Andrew Tate: Bodyguard says 'Some girls thought they'd be his next wife'*, BBC, available at <https://www.bbc.com/news/world-europe-64285341>.

²¹ See Eberhard et al, 2019, *The dark side of routine dynamics: Deceit and the work of Romeo pimps*, at 4 (We find that Romeo pimps use false talk of love and ambiguous actions to make women believe they are progressing through the role sets of friends, boyfriend / girlfriend, and boyfriend pimp / willing sex worker until they arrive at the final role set of abusive pimp / entrapped sex worker. The pimps use each new role set to introduce actions into the Romeo pimp routine that move the women through phases of the routine’s emergence that we label recruiting, grooming, and soft coercing, before ending with the pimp’s intended pattern of actions that we label hard coercing. In the end, women are trapped as sex workers, with no hope of escape and working solely for the pimp’s benefit.”).

²² See Merodio et al., 2020, (“Early in the 1970s, some American mass media represented pimps showing off on the streets with fancy clothes, expensive cars, and false promises of having a powerful life. Proudly,

induce women into performing commercial sex acts, here, webcam pornography, and to give all, or most, of the money to the man. The victim is manipulated into believing she must do this to prove her love and devotion to him. It involves, manipulation, emotional abuse, brainwashing, and coercion. And it meets the definition of sex trafficking under U.S. sex trafficking law. 18 U.S.C. § 1591 (“Whoever knowingly . . . **recruits, entices, harbors, transports, provides, obtains, advertises, maintains, patronizes, or solicits by any means a person . . . knowing, or, in reckless disregard of the fact, that means of force, or threats of force, fraud, coercion . . . will be used to cause the person to engage in a commercial sex act . . .**”).

48. One study describes this method of sex trafficking in this way: “*Romeo pimps or Finesse Pimps*; they were predators trained to get young girls to fall in love with them through psychological manipulation, violence, and abuse to lure them into sexual exploitation.” (Merodio et al., 2020,). This perfectly encapsulates the methods THE TATE BROTHERS not only publicly admitted to using, as explained above, *but taught other men to use for a fee.*

The Trafficking Victims Protection Act

49. The Trafficking Victim’s Protection Act was first passed in 2000 and later amended six times via the Trafficking Victims Protection Reauthorization Act (TVPRA). *See, e.g.,* 18 U.S.C. § 1591 (Oct. 28, 2000); 18 U.S.C. § 1591 (Dec. 19, 2003); 18 U.S.C. § 1591 (Jul. 27,

traffickers started referring themselves as *Romeo pimps* or *Finesse Pimps*; they were predators trained to get young girls to fall in love with them through psychological manipulation, violence, and abuse to lure them into sexual exploitation. In the European context, although the origin of the term *Loverboy* is unclear, Bovenkerk and Van San (2011) suggest that late in the 1990s, in the Netherlands, a rescued sex trafficked woman referred to the arrested trafficker as “her Loverboy.”)

2006); 18 U.S.C. § 1591 (Dec. 23, 2008); 18 U.S.C. § 1591 (May 29, 2015); 18 U.S.C. § 1591 (Apr. 11, 2018).

Congress passed the TVPA in 2000 to . . . specifically criminalize actions that compel another's service through nonviolent coercion. Congress recognized that many traffickers target vulnerable victims susceptible to nonviolent coercion. Specifically, Congress found that traffickers target those who are poor, unemployed, lack education, and lack economic opportunities. Congress also found that traffickers excel at isolating their victims from family, friends, religious institutions, or other sources of protection and support compounding their vulnerability.²³

50. Sex trafficking under the TVPRA is defined as using force, fraud, or coercion to cause a person to engage in commercial sex. 18 U.S.C. § 1591(a).

51. A commercial sex act is defined as “any sex act, on account of which anything of value is given to or received by any person.” 18 U.S.C. §1591(e)(3).

52. Pornography is a commercial sex act. *See, e.g., United States v. Flanders*, 752 F.3d 1317, 1330 (11th Cir. 2014) (upholding defendant's sex trafficking conviction for violating 1591(a)(1) by using fraud to induce adults to participate in pornography film); *United States v. Tollefson*, 367 F. Supp. 3d 865, 878-880 (E.D. Wis. 2019). (denying motion to dismiss Section 1591(a) claim for sex trafficking where defendant induced 13 year old to create pornography of herself over an app).

53. Coercion under the TVPRA is defined as:

threats of serious harm to or physical restraint against any person; any scheme, plan, or pattern intended to cause a person to believe that failure to perform an act would result in serious harm to or physical restraint against any person; or the abuse or threatened abuse of law or the legal process.

18 U.S.C. §1591(e)(2).

²³ Major Matthew T. Grady, *Prosecuting Human Trafficking*, Army Law., 2019, at 60, 62 (2019) (internal citations omitted); *see also* 22 U.S.C. § 7101(b)(4), (b)(5), (b)(13) (2000).

54. Serious harm under the TVPRA means, “**any harm, whether physical or nonphysical, including psychological, financial, or reputational harm, that is sufficiently serious, under all the surrounding circumstances, to compel a reasonable person of the same background and in the same circumstances to perform or to continue performing commercial sexual activity in order to avoid incurring that harm.**” 18 U.S.C. §1591(e)(5). And the use of fraud has been defined by the courts to mean, “**any act of deception or misrepresentation’ would be ‘used to cause that person to engage in a commercial sex act.’**” *United States v. Maynes*, 880 F.3d 110, 114 (4th Cir. 2018). In *Maynes*, the Fourth Circuit upheld a conviction for sex trafficking via fraud where the trafficker made false promises to provide the women with homes and incomes. *Id.*

55. The TVPRA has extraterritorial application and U.S. citizens can be prosecuted for engaging in sex trafficking abroad. *See, e.g., United States v. Baston*, 818 F.3d 651, 656-657, 667-70 (11th Cir. 2016).

Human Trafficking under Florida Law, Fl. Stat. § 787.06

56. Codified in the Florida legislature’s findings regarding human trafficking are the following:

- Victims of human trafficking are trafficked across international borders and also include United States citizens trafficked domestically within the borders of the United States;
- Many victims of human trafficking are forced to work in prostitution or the sexual entertainment industry;
- Traffickers “use various techniques to instill fear in victims and to keep them enslaved. Some traffickers keep their victims under lock and key. However, **the most frequently used practices are less obvious techniques that include isolating victims from the public and family members . . . using or threatening to use violence toward victims or their families . . . and controlling the victims’ funds by holding the money ostensibly for safekeeping.**”

57. The Florida anti-trafficking statute closely tracks the federal TVPRA. Under Florida law, “Any person who knowingly, or in reckless disregard of the facts, engages in human

trafficking, or attempts to engage in human trafficking, or benefits financially by receiving anything of value from participation in a venture that has subjected a person to human trafficking . . . using coercion for commercial sexual activity of an adult commits a felony of the first degree.” Fl. Stat. 787.06(3)(b).

58. Under Florida Law “‘Coercion’ means:

- Using or threatening to use physical force against any person;
- Restraining, isolating, or confining or threatening to restrain, isolate, or confine any person without lawful authority and against her or his will;
- Using lending or other credit methods to establish a debt by any person when labor or services are pledged as a security for the debt, if the value of the labor or services as reasonably assessed is not applied toward the liquidation of the debt, the length and nature of the labor or services are not respectively limited and defined;
- Destroying, concealing, removing, confiscating, withholding, or possessing any actual or purported passport, visa, or other immigration document, or any other actual or purported government identification document, of any person;
- **Causing or threatening to cause financial harm to any person;**
- **Enticing or luring any person by fraud or deceit.”**

Fl. Stat. 787.06(2)(a).

59. Under Florida law, “‘Commercial sexual activity’ means any violation of chapter 796 or an attempt to commit any such offense, and **includes sexually explicit performances and the production of pornography.**” Fl. Stat. 787.06(2)(b).

60. Under Florida law, “‘Financial harm’ includes extortionate extension of credit, loan sharking as defined in s. 687.071, or **employment contracts that violate the statute of frauds** as provided in s. 725.01.” Fl. Stat. 787.06(2)(c).

The Tate Brothers’ methods are textbook sex trafficking strategies.

“The Test,” The Tate Brothers’ grooming process and “lover boy” modus operandi.

61. Both ANDREW TATE and TRISTAN TATE describe above their methods for identifying the “right” kind of woman, as Andrew says, a woman with “good blueprints,” who can be

molded. Both describe women who are compliant/submissive. Andrew specifically describes testing women after sex by withdrawing completely to see if they reach out and if they do, asking them to buy him coffee. This testing is a way to identify vulnerable women who will be susceptible to the Tate Brothers methods of manipulation and coercion. Two prosecutors wrote a law review article on this exact method, they explain: “Domestic traffickers leverage those preexisting problems in targets they identify as particularly vulnerable to create a sense of dependence and, eventually, hopelessness, which they prey on to profit from their victims. . . . [T]he grooming process . . . relies on identifying vulnerabilities in prospective victims and then exploiting them.” Stephen C. Parker & Jonathan T. Skrmetti, Pimps Down: A Prosecutorial Perspective on Domestic Sex Trafficking, 43 U. Mem. L. Rev. 1013, 1017 (2013).

62. Importantly, Parker and Skrmetti clarify a common misconception: “When a person unfamiliar with the nature of sex trafficking is confronted with the bare-bones facts of a domestic sex trafficking case, a common question is ‘why didn't the girl just get up and leave?’ The short answer is that the traffickers tend not to target the kind of victims who will just get up and leave after the initial steps of the grooming process.” *Id.* at 1019. This is precisely what the Tate Brothers do, and instruct other men to do, by employing “the test:” they target women who are not likely to leave once groomed.

Selling the Dream

63. Parker and Skrmetti describe the lover-boy sex trafficker’s grooming process as,

[T]he grooming process commences with overwhelming flattery. The trafficker continuously compliments the victim, takes the victim on dates, and, within a short time, professes love for the victim. The victim, starved for a family relationship and pained by the absence of a loving father figure, rapidly develops feelings of love, trust, and dependence towards the trafficker.

After placing himself in a strong position to influence her by lowering his victim's defenses, the trafficker then begins the grooming process in earnest. He quickly

isolates the girl from her family and friends by monopolizing all of her time. He might move her into his home or the hotel room where he resides. **Many traffickers take their victims on trips out of town early on in the relationship to further isolate them and reinforce their dependence.** Traffickers almost always limit a victim's access to her family and social network, either by taking away phones and computer access or by **closely monitoring a victim's communications to create a chilling effect.**

....

The only value the trafficker sees in his victim—and the only value he wants her to see in herself—is her ability to make money for the trafficker through prostitution. The trafficker also tries to become the victim's exclusive source of drugs, cigarettes, food, and shelter. These steps can further intensify the victim's dependence. Traffickers pursue this agenda at an aggressive pace, and typically it only takes a few weeks for the victim to be isolated, dependent on, and in love with the trafficker.

Traffickers **also exploit victims through promises of a bright future together. Traffickers will talk about buying a house, having a family, and living off the proceeds of what they describe as a short stint of prostitution by the victim.** The trafficker promises all the things the victim lacked as a child and yearns for as a teenager.

Stephen C. Parker & Jonathan T. Skrmetti, Pimps Down: A Prosecutorial Perspective on Domestic Sex Trafficking, 43 U. Mem. L. Rev. 1013, 1025–26 (2013) (emphasis added).

64. THE TATE BROTHERS both lie to women about having romantic feelings when they are really using these women for sexual exploitation and profit. As ANDREW TATE has said repeatedly, “women are assets.” ANDREW TATE describes using flattery and charm in the beginning with women and then once he has sex with them exerting significant control. If the woman stays, he continues to employ manipulative tactics such as providing love and affection when she complies with his wishes and punishing her when she does not. **ANDREW TATE has also explained how he isolates women and removes their support network so he can exert greater influence and control.**

65. Counter-Defendant ANDREW TATE describes how he “sells the dream” to his victims:

- “Whatever. Sell them the dream. Sell some dream. ‘And we’ll buy this big property and fuck in the Bahamas.’” *See Andrew Tate Webcam Course Part 1*, RUMBLE, available at <https://rumble.com/v3h0lti-andrew-tate-webcam-course-part-1.html>, last viewed January 30, 2025.
- “All the drama, **she’s got to have all the dreams . . . everything has to come from you**. All of it. She should have no outside influences on any level.”
- “But it gets in her head so you have to try and isolate them from those things. **And things we’ve talked about thus far like selling the dream, adding excitement, her never catching you slipping, all of these things tie into isolating her and taking her away from outside influences**. Every outside influence is your enemy, all of them . . .”

66. These methods openly described by ANDREW TATE follow precisely the modus operandi described above by prosecutors Parker and Skrmetti known as the “lover boy” modus operandi, which is a common tactic used by predators to effectuate sex trafficking.

67. ANDREW TATE regularly admits to misleading in a fraudulent manner and outright lying to women about the initial terms of the webcam arrangement. ANDREW TATE misleads victims by stating they will get 50% of the proceeds but he really only gives them 30% and tells her he is paying taxes on the earnings when in reality, TATE pays no taxes and is misappropriating the funds. TATE also explains that he controls the webcam accounts, including the login information and passwords and controls the money. Andrew also describes taking all the earnings from some of the women who believe they are in romantic relationships with him. These methods also meet the definition of coercion under Florida law, Fl. Stat. 787.06(2)(a), and fraud and/or coercion under federal law. 18 U.S.C. § 1591.

68. After this initial phase of grooming, THE TATE BROTHERS describe how they manipulate victims into tolerating their sexual relationships with multiple other women. ANDREW TATE even describes in eerily similar terms as Parker and Skrmetti, how he manipulates his “bottom bitch,” and how the “bottom,” collects the money from the other women.

69. The scheme effectuated by the Counter-Defendants, according to Parker and Skmetti:

The trafficker then lets his victim realize that the trafficker has done this before and that this is his career. He lets her know there are other girls, but they are just the “hoes;” this victim is special because he loves her. He then introduces her to his “stable”—the collection of victims in his employ—and the “pimp subculture.” The subculture structures the group through use of terms that characterize it as a family structure. The stable is called the “family,” or “folks,” implying a loving group. The pimp is usually referred to as “Daddy.” The other girls in the stable are sometimes referred to “wife in-laws.”

Stephen C. Parker & Jonathan T. Skrmetti, Pimps Down: A Prosecutorial Perspective on Domestic Sex Trafficking, 43 U. Mem. L. Rev. 1013, 1027–28 (2013).

70. The sordid role of the “bottom”:

Another role from the subculture is the substitute mother for the family structure, called the “bottom,” or “bottom bitch,” in the industry. The bottom will supervise the other victims, and sometimes the bottom will engage in violent or manipulative conduct that leaves her liable for prosecution as a sex trafficker. However, traffickers frequently use the status of “bottom” to manipulate the victims by playing them against each other in a competition for affection. A trafficker may demote and promote various girls as part of a punishment and reward system to keep them psychologically dependent on the trafficker.

Stephen C. Parker & Jonathan T. Skrmetti, Pimps Down: A Prosecutorial Perspective on Domestic Sex Trafficking, 43 U. Mem. L. Rev. 1013, 1028 (2013).

71. THE TATE BROTHERS also brag about having dozens of women tattoo their names on their bodies, with some tattoos even saying “Tate owned,” or “Tate property.”²⁴ Tattooing or “branding,” is a common practice employed by sex traffickers to signal to the victim, and the world, that the victim is the traffickers’ “property.”²⁵ See Romanian Indictment, Dkt. 89 at pp. 29, 40, 42, 100, 111, 118, 120, 194, 214, 219, 226, 230, 249, 250.

The Tate Brothers’ are not unique in teaching their sex trafficking methods to others

²⁴ Collective Shout, “Tate property”: Andrew Tate brands victims with tattoos, YOUTUBE, available at <https://youtu.be/Myxcp4kjj8o?si=qZYUNGNguwvQyqJh>.

²⁵ See e.g. the National Association of Pediatric Nurse Practitioners identifies tattooing and/or branding as a common indicator of sex trafficking, available at <https://www.napnappartners.org/tattoos-human-trafficking-victims>; see also Rambhatla R, Jamgochian M, Ricco C, Shah R, Ghani H, Silence C, Rao B, Kourosh AS. Identification of skin signs in human-trafficking survivors. *Int J Womens Dermatol*. 2021 Oct 2;7(5Part B):677-682. doi: 10.1016/j.ijwd.2021.09.011. PMID: 35028364; PMCID: PMC8714580.

72. Parker and Skrmetti also explain that sex traffickers are aware of exactly how they are exploiting their victims' vulnerabilities and, like the Tate Brothers, are often open about this.

Pimps and madams have long appreciated the vulnerabilities described above and have, as a community of criminals, developed a definite strategy to exploit them. The traditional American pimp subculture promoted a collaborative refinement of exploitive techniques, producing methods the traffickers do not hesitate to describe:

'I would look for girls who needed sh-- who would do whatever to come out of the messed up homes and escape from their f--ed-up parents. I pulled these girls. Women who had been abused by some sucker and wanted better treatment and nice things.'

'Girls who ran away from home or were put out by their parents. Ladies who were pretty but were on welfare, dropouts, you know you can smell desperation. If she is hungry, she will go.'

....

'Any player can tell when a girl has the look of desperation that you know she needs attention or love. It's something you start to have a sixth sense about....'

Not every domestic sex trafficker has ties to the pimp subculture, but many of the defendants the authors have prosecuted for domestic sex trafficking emerged from that subculture and embraced its values and techniques.

Id. at 1023–24 (2013).

73. THE TATE BROTHERS have demonstrated they identify with the pimp subculture, particularly ANDREW TATE, who has described himself as a pimp, uses the term, “bottom bitch,” refers to street prostitution, and quotes “pimpin Ken” in his courses. Tristan Tate recently referenced “pimpin Ken,” in an interview with Candace Owens.²⁶ This is all part of a long tradition of sex traffickers teaching the next generation of traffickers how to exploit and control their victims, and the Tate Brothers are doing the same by teaching their male followers

²⁶ See *Tristan Tate x Candace Owens FULL INTERVIEW*, RUMBLE, at 49.39-50:10, available at <https://rumble.com/v5bafxp-tristan-tate-x-candace-owens-full-interview.html>, last viewed on January 31, 2025 ;see also <https://x.com/themilkbartv/status/1878984567509717483?s=46&t=8Lpb1VgqcTT3ytW6sWKPTQ>, last viewed January 31, 2025.

their methods. Parker and Skrmetti acknowledge this tradition and identify “pimpin Ken” specifically, as part of this sex trafficking history. They explain,

These techniques are not discovered anew by each trafficker; the pimping subculture has ensured that the methods described above have been passed down from one trafficker to another for many years. One of the few available surveys of domestic traffickers reports that 60% of pimps interviewed had family members involved in prostitution. Others learn the trade in prison from fellow inmates. Moreover, there are books,²⁷ videos, and websites available on the market to teach aspiring pimps how to recruit and maintain control of the victims.

Id. at 1029. The Tate Brothers themselves offered such heinous content for purchase.

SCAMMERS: THE TATE BROTHERS USE FRAUDELENT MEANS TO EXPLOIT MEN

74. THE TATE BROTHERS also prey on vulnerable men and their entire webcam business was based on manipulating and scamming men to pay women they believed they were in love with when they were really texting with THE TATE BROTHERS or their staff.

75. For example, TRISTAN TATE told Stefan Moluneux on his podcast:

TRISTAN TATE: I very I liken myself to a bar owner. A lot of people will come in and drink two or three drinks in a very healthy way. I guess they use it as pornography. They use it as masturbation, and they'll then log off. But you do get addicts, and you do get people who abuse this, who really fall in love. **I will not use that term cheaply, but they really do fall in love with the girls they think they're talking to. I've seen men sell their houses, sell their possessions, sell their television sets to spend more time with web cam girls, and it's very damaging. . . .**

TRISTAN TATE: . . . Yes, and the relationship is far more artificial than you would even believe, because a lot of the conversation that's happening a girl will typically, in my setup, **a girl will sell her phone number to an individual. So he'll pay up to [unintelligible] dollars to have the girls whatsapp number. Now, the entire time he's messaging that girl, it's not that girl, it's a member. It's another member of staff I have who has a**

²⁷ Parker and Skrmetti cite, “See, e.g., PIMPIN' KEN, supra note 104; ICEBERG SLIM, PIMP: THE STORY OF MY LIFE (2011)” at footnote 115 to support that books are written by sex traffickers to teach the next generation of sex traffickers. Additionally, at footnote 104 which supports sex traffickers use of a “bottom bitch,” Parker and Skrmetti cite, PIMPIN' KEN, PIMPOLOGY: THE 48 LAWS OF THE GAME 65-66 (2007).

pile of five or six phones, and her job is to just reply as these false personalities, as these false names, looking at getting the money. . . .

TRISTAN TATE: . . . The young men don't, and they are the guys I see doing very desperate things. Talk about selling their television sets, spending their grandmother's inheritance on you know, when their grandmother dies on my webcam levels, and I did once, warn a man not to do it. I called him myself and told him who I was and the type of business I was running, and told him not to spend his money and that, I really regret doing that I should have taken his money.

Stefan Molyneux: Wait, wait, hang on, that's one could say that that was like a geyser-like, eruption of conscience, like, why would you regret that? I mean, that seems like a fairly decent thing to do.

TRISTAN TATE: Well, I was new to the business. I was new to the industry, and I didn't quite understand the mindset of my customer. I didn't understand how, I guess, messed up these people were not because of people like me or because webcam girls are on offer. This is the result, them going on webcam sites, is the result of them being so messed up, many of these guys. So, he essentially, his grandmother had died, and they were waiting to sell this house in England where the grandkids were going to inherit about 20,000 pounds each from the sale of this house. And he promised it all to one webcam model of mine. She no longer works for me, but she was not very attractive, but she had a great enough personality. This guy was really in love with her, so she had purchased this guy's phone number. So I called him. I didn't tell the model, **Hey, look, look, bro. Her name is not Chloe, one. She doesn't live in England, two. She was in Bucharest, like, it's all, it's all the big scam. My name is Tristan. This is the business I run.** And he seemed, I guess, relatively embarrassed and humble, and he thanked me. And I never saw the guy again, until about eight weeks later, I hired a new model from Lithuania from my studio, and this guy pops up, is when his picture came up in the office. I mean, we have six iMacs in a row where I can see everything these guys are saying and doing. I almost like my my heart sank to my stomach. So this guy was talking to my Lithuanian model about how he had been tricked by this English girl, and how he had figured her out and realized she was tricking him and didn't give her the money she was trying to scam him out of his grandmother's inheritance. And I looked at my management team I said take this guy for everything he's got. That is the last straw. I'm never doing anything like that again. He just could not stay away and like he would vent, essentially the terms I put him in when I was saying about alcoholics abusing a bar, he was an alcoholic abusing my bar, and I stopped him from going into my bar, and he just went down the street and started drinking somewhere else, but it was a bar that I owned, luckily enough. But that's when I realized that you can't feel sorry for these people, and it's not something that I have done, although I'm the face of it

to a lot of people, and I'm very easy to point a finger at and say, This is your fault. Belle Delphine selling her bathwater Tristan. This is because of you. It's nothing to do with me. It's to do with the internet, the digitalization of sex. **I am simply providing a service that targets these people who have been created by this process, my customers.**

76. In another example, ANDREW TATE said on the Full Send Podcast:

ANDREW TATE: So I'm trying to teach these women, and the women kept fucking it up. So I said to said to him, it's like, you know what? Fuck it. I'm taking over. So what I did is I unplugged their keyboards and plugged a new one in for me behind the screen. So the chicks would sit there and hit a keyboard that wasn't plugged in (inaudible). Eventually, some staff I trained would do all the talking. **The girls were just pure, just famoosers, just laughing and doing this (mimics typing on a keyboard) with titties out, and they were talking to fucking ice cold hustlers! We were taking their money, all of it, they, they come and say, what kind of, all of it! We were fucking milking them dry.**

ANDREW TATE: Women ain't got a clue how to famoose a dude. They don't have because they are used to riding on their looks. They don't have any of the intellect. They have no game, nothing. . . . **You got a man with game and give him a female's body, a female avatar, you will fuck a guy up. I had these guys selling their houses, life savings, loans, all of it to me! Give me it all.** So like, and it's basic shit, right?

Podcast host: You ever feel bad or no?

ANDREW TATE: Fuck no! I don't give a solitary fuck. I don't give a fuck.

ANDREW TATE: If you, if you run an alcohol store If you run an alcohol store, and most of the people you sell to enjoy alcohol, but a couple of the people you sell to are alcoholics. Do you feel bad? No. Right? So if you come and you enjoyed it and spoke to the girls, spent what you could afford to spend cool if you turned up, you're an idiot and got a loan out. Is that my problem? No. **So I'm famoosing these dudes, right?** So the guy would be like, 'what kind of what kind of guys do you like?' And if he was a young man I would say like, 'I can't believe I'm talking to some young guy, all these old creeps are on here. Oh my god, you're so handsome. Why are you even here?' If he was an old guy, I would say, 'oh my god, I'm finally glad to talk to you. All these young creeps keep coming talking to me. I want a guy who serious is ready to settle down. I know older men will settle down.' **Sell the dream, sell the dream. Sell the dream. We got to the point where we had these guys falling in love with my models. Serious money. And they were convinced they were going to meet the chick. This is almost where I kind of felt bad, because they're like, 'Can we meet? I've sent you \$200,000 can we meet? Can we meet? Can we meet?'**

Podcast host: What was the most that one person sent to a model? Total?

ANDREW TATE: A million.

Podcast host: Wow, wow.

ANDREW TATE: About a mil, in about a year.

Podcast host: I know you don't feel bad at all.

ANDREW TATE: Why the fuck would I feel bad?

77. ANDREW TATE describes his method of lying to and coercing women into doing webcam for him, and giving him most or all of the money, as “**selling the dream.**” In parallel, he describes lying to and manipulating the men paying for access to the webcam models as “**selling the dream.**” ANDREW TATE is a liar and a scammer. He lies and manipulates women into sexual slavery and lies and manipulates men into handing over massive amounts of money they cannot afford under completely fraudulent circumstances.

THE TATE BROTHERS' CRIMINAL HISTORY: A DECADE OF ACCUSATIONS AND INVESTIGATIONS

78. THE TATE BROTHERS have been accused of physical and sexual abuse since at least 2014.²⁸ On January 1, 2014, TRISTAN TATE was arrested in the U.K. for assault and battery causing bodily harm against a woman.²⁹ The police were called because after “returning from a New Year's Eve party, an argument broke between [the female victim] and defendant [TRISTAN TATE] who hit her. He was released on parole and was ordered not to communicate . . . with [the victim] . . . and was also banned from the county of Leicestershire.” *Id.*

²⁸ See *Controversial influencer Andrew Tate will be extradited to the U.K., after Romania trial*, NPR, available at <https://www.npr.org/2024/03/12/1238086900/andrew-tate-arrested-romania-to-extradite-uk> (“We filed complaints with the authorities for rape and physical abuse in 2014 and 2015 alongside witness testimony and damning documentary evidence. The CPS [Crown Prosecution Service] then decided not to take the matter any further,” their website says. “It's our one remaining routes to hold him accountable.”).

²⁹ See Romanian Indictment, Dkt. 89 at p. 7.

79. Three women in the U.K. separately reported ANDREW TATE to U.K. authorities for rape and physical abuse in 2014 and 2015.³⁰ The U.K. prosecutors declined to prosecute in 2019 and the women are now suing civilly.³¹ The civil suit “claim(s) Tate choked them until blood vessels burst in their eyes, beat them with a belt, raped them numerous times and coercively controlled them.”³²

80. One of the British victims described the abuse she experienced to the BBC:

Anna (not her real name) told [the BBC] she went out with Andrew Tate in Luton in 2013. After a few dates, she says she went back to his house.

‘He started kissing me... and he just looked up at the ceiling and said, ‘I’m just debating whether I should rape you or not. Out of the blue he just grabbed me by the throat, smashed me to the back of the bed, strangling me extremely hard.’

Anna says he then raped her.

She says after the attack, Mr Tate sent her disturbing text messages and voice notes about rape and sexual violence.

‘Am I a bad person? Because the more you didn’t like it, the more I enjoyed it,’ he said in a voice note.

In a text he wrote: ‘I love raping you.’

Anna says he also tried to pass the strangulation episode off as a joke: ‘Are you seriously so offended I strangled you a little bit?’

When the BBC asked him about the messages, Mr Tate declined to comment.

In 2014, Anna told Bedfordshire Police about the alleged attack. Two other women made similar allegations, and the investigation was taken over by Hertfordshire Police.

³⁰ See Romanian Indictment, Dkt. 89 at pp. 7-8.

³¹ See *Andrew Tate served with UK civil proceedings papers at Romania home*, THE GUARDIAN, available at <https://www.theguardian.com/news/article/2024/may/08/andrew-tate-served-with-uk-civil-proceedings-papers-at-romania-home>.

³² See *Andrew Tate to be sued by four women over rape and choking allegations*, McCue Jury & Partners, available at <https://www.mccue-law.com/andrew-tate-to-be-sued-by-four-women-over-rape-and-choking-allegations/>.

81. The UK is now criminally investigating THE TATE BROTHERS on completely separate allegations of rape and human trafficking that occurred 2012-2015,³³ and the Romanian court approved an extradition request from the U.K. government.³⁴ After the Romanian prosecution is completed and the Tate brothers are either acquitted or convicted and complete their sentences, they will be extradited to the U.K. to face criminal charges there.

82. It has been reported repeatedly that ANDREW TATE, “rose to fame after he was removed from the British version of the reality TV show *Big Brother* in 2016, following the release of a video that appeared to show him attacking a woman. He claims the video³⁵ was edited and amounts to ‘a total lie to make me look bad.’”³⁶

83. The video released in 2016 showed ANDREW TATE **beating a woman with a belt. He claimed his removal from the reality TV show was a “conspiracy,”** and claimed he and the woman in the video were just having fun.³⁷

84. In Romania, **allegations of abuse were made against THE TATE BROTHERS and their associates beginning in 2021 – before either Jane or Mary Doe ever arrived in Romania.** On October 29, 2021, one of the named victims in the first Romanian Indictment of THE TATE BROTHERS (filed June 2023) made a complaint to the Romanian police alleging she had been physically assaulted by THE TATE BROTHERS’ co-conspirator Georgiana Naghel at one of THE TATE BROTHERS’ residences and that someone had hacked her social media accounts and published pornographic photos and videos of her without her consent. *See* Indictment, Dkt. 89 at pp. 332-34.

³³ See <https://www.nytimes.com/article/andrew-tate-arrests-explained.html>.

³⁴ See <https://www.bbc.com/news/uk-68547871>.

³⁵ See <https://www.mirror.co.uk/tv/tv-news/big-brothers-andrew-tate-claims-8194524>.

³⁶ See <https://www.npr.org/2024/03/12/1238086900/andrew-tate-arrested-romania-to-extradite-uk>.

³⁷ See <https://www.mirror.co.uk/tv/tv-news/big-brothers-andrew-tate-claims-8194524>.

85. On March 30, 2021, the Romanian police authorities were informed that during November 2020 a minor “was recruited by the “loverboy” method by the defendant [TRISTAN TATE] for the purpose of exploitation by inducing her to practice prostitution.” On April 7, 2021, the complaint was registered with DIICOT, Romania’s organized crime unit currently prosecuting the Tate Brothers for human trafficking. This is **one year prior** to the April 2022 raid, involving Jane Doe. See Indictment, Dkt. 89 at pp. 334-35.

86. Additional women have come forward with similar experiences of abuse.³⁸ The BBC reported being aware of five U.K. women who have alleged being strangled by ANDREW TATE during sex and they spoke to a U.K. woman who recently came forward with her experience of being raped and strangled by TRISTAN TATE.³⁹

87. Additionally, THE TATE BROTHERS are facing civil penalties in the United Kingdom for tax evasion and money laundering.⁴⁰ On December 18, 2024 a London court ruled that the police in Britain can seize close to 2.5 million pounds from THE TATE BROTHERS’ U.K. bank counts for unpaid taxes on more than 21 million pounds in business revenue. According to the NY Times, ANDREW TATE “used his online platform to **brag about evading tax and to coach others on how to do so**. Those videos were used against him in court as evidence. ‘When I lived in England, I refused to pay tax,’ Mr. Tate said in one video quoted from in the ruling. In another, he incorrectly advised that setting up an online business in the United Arab Emirates would mean not having to pay tax.”

³⁸ See <https://www.bbc.com/news/articles/cwyje823er4o>.

³⁹ See <https://www.bbc.com/news/articles/cwyje823er4o> (“A few days after arriving in Romania, Daisy says she broke up with Tristan Tate, but she claims it did not stop him trying to have sex with her. ‘I told him, ‘no’ 10 to 15 times that I didn’t want to.’ He put his hands around her throat and raped her, she says. Daisy has not reported her allegation to police. The BBC has spoken to one of her friends who says that after Daisy returned to the UK she was upset and told him that Tristan Tate had been forceful with her sexually.”).

⁴⁰ See <https://abcnews.go.com/Business/wireStory/court-rules-uk-police-seize-millions-andrew-tate-116896843>.

88. Upon information and belief, a Romania investigation into “two individuals of British nationality” by Romania’s anti-fraud agency, was an investigation into the Tate Brothers. This investigation concluded that these individuals failed to pay approximately 28.8 million lei, or about \$6 million dollars, in income taxes.⁴¹

SOCIAL MEDIA BANS

89. The BBC⁴², NBC⁴³, NPR⁴⁴, and the New York Times⁴⁵ all reported on ANDREW TATE’s bans from social media in August 2022. All these news outlets reported, as did the social media platforms themselves, that he was banned for making misogynistic remarks. There was no mention of any accusations by Jane Doe or any other woman or an arrest or prosecution in Romania. In fact, it was not widely known that he was under criminal investigation in Romania until THE TATE BROTHERS December 2022 arrest—well after Jane Doe provided statements to DIICOT, and well after he was banned from social media.

90. THE TATE BROTHERS gained immense fame from being intentionally controversial on social media, particularly by being brutally honest about their views on women,⁴⁶ bragging about their ability to attract and control them, and successfully exploiting them for millions of dollars via their webcam business.⁴⁷ For example, The Medium reported, “The Tate brothers

⁴¹ See <http://www.antifrauda.ro/index.php?articol=367>.

⁴² See <https://www.bbc.com/news/technology-62602913>.

⁴³ See <https://www.nbcnews.com/pop-culture/viral/andrew-tate-facebook-instagram-ban-meta-rcna43998>.

⁴⁴ See <https://www.npr.org/2022/08/20/1118624860/andrew-tate-facebook-instagram-banned>.

⁴⁵ See <https://www.nytimes.com/2022/08/24/technology/andrew-tate-banned-tiktok-instagram.html>.

⁴⁶ See <https://www.nbcnews.com/pop-culture/viral/andrew-tate-facebook-instagram-ban-meta-rcna43998>

(“He’s continued to go viral in large part due to his extreme statements: comparing women to property, graphically describing how he would assault a woman for accusing him of cheating, and claiming that men would rather date 18- and 19-year-olds over women in their mid-20s because the former have had sex with fewer men. His views have been widely reposted on TikTok and Instagram Reels.”).

⁴⁷ See <https://www.theguardian.com/news/2023/feb/11/the-truth-about-andrew-tate-his-home-is-less-hollywood-hideaway-more-rundown-meat-factory> (“Undermining the protestations of his vast global fanbase (Tate fans took to the streets in Athens to protest his innocence) and doing little to help Tate’s defence are the bizarrely self-incriminating social media lectures that he has made over the years. Possibly useful when trying to burnish his gangster credentials for a credulous online audience, but less so when faced with a real-world Romanian prosecutor trying to prove you are involved in organized crime. When Tate first arrived in Romania six years ago, aged 30, he

recognize the algorithms that govern online platforms. They understand the importance of shock value, controversy, and emotional triggers. Their content, often laced with provocative opinions on masculinity, wealth, and success, is designed to provoke reactions and ignite debate. This engagement, even negative, fuels the algorithm, pushing their content to wider audiences and generating buzz.”⁴⁸

91. The publication goes on to explain, “Controversy is a double-edged sword. While it attracts attention and fuels engagement, it can also draw negative publicity and lead to platform bans. THE TATE BROTHERS have faced accusations of misogyny, promoting violence, and spreading harmful stereotypes. While they deny these claims, their willingness to court controversy keeps them in the spotlight, constantly generating headlines and keeping their audience engaged.”

92. THE TATE BROTHERS knew their statements would offend and excite people and they made the statements anyway for fame and riches. But like cowards, THE TATE BROTHERS will not accept the consequences of their words and instead try to blame “the Matrix,” and Jane Doe, for the fall-out of intentionally promoting discord, and exploitation of women, and for being criminally prosecuted, at least in part, due to their own incriminating statements.

93. THE TATE BROTHERS know they were banned on social media due to backlash from their offensive content and not based on Jane Doe’s cooperation with the Romanian authorities. Yet they falsely represented to the Court that the social media bans were due to Jane Doe’s

was asked why he chose to relocate. ‘I like eastern Europe as a whole,’ he said, ‘because corruption is far more accessible.’ In the UK, he mused, only those of high status get away with crimes, implying that Romania was open to all. Pushing through the gears, he then complained about how rape allegations in the UK were pursued a little too vigorously for his tastes – perhaps a reference to his own experience. ‘In western legal systems,’ he said, ‘whether England, America, or any of them, if a girl says something she needs zero proof . . . and they will come and arrest you. It’s insanity and I thought, I can’t live under this system any more, so I had to move somewhere with common-sense rules.’”

⁴⁸ See <https://medium.com/@linkezd/the-algorithm-chemists-how-the-tate-brothers-mastered-the-art-of-viral-marketing-96e3d092831f>.

testimony. THE TATE BROTHERS also know that they have admitted to essentially the same actions and activity that Jane Doe described in her testimony to Romanian authorities. THE TATE BROTHERS know her testimony was truthful, yet they have repeatedly, publicly, claimed she made false accusations.

THE TATE BROTHERS' ROMANIAN SEX TRAFFICKING OPERATION

Generally

94. THE TATE BROTHERS' methods for sex trafficking are largely in the public domain as they bragged about them and sold courses on them as outlined in section I above.

95. THE TATE BROTHERS work together in a common enterprise to sex traffic women—using force, fraud, and coercion—into performing in webcam pornography for their profit.

96. Counter-Defendants recruit women under the auspices of a romantic relationship and promises of love and security. They control their victims by preying on their vulnerabilities, breaking down their barriers, manipulating them, isolating them from friends and support networks, demanding control over most aspects of their lives including where they live, controlling the webcam accounts and passwords, controlling all the money from the accounts, and through intimidation and threats, and sometimes using force or threats of force.

97. THE TATE BROTHERS use women under their control to recruit new women into their trafficking operation. They do this by having the women under their control vouch for the THE TATE BROTHERS, and their success, and giving the impression they can be trusted. They also use women as enforcers and to create an environment of social pressure and competition, playing off their victims' insecurities, jealousy, and ultimately their desire for love and security.

98. THE TATE BROTHERS bring their victims into their world, often moving them into one of the homes they own or renting a place for them so they can control their housing, they surround them with other women under their control, and cut off or minimize outside influences to increase their dependence on the respective Tate Brother. THE TATE BROTHERS' M.O. is to systematically break down the women's barriers and boundaries to gradually push them to comply with more and more extreme demands.

99. For example, THE TATE BROTHERS will increasingly demand more sexually from a woman even when the woman expresses discomfort or even explicitly says she does not want to participate. THE TATE BROTHERS may initially seem understanding of this but will continue to ask or pressure for the particular sex act. Eventually, THE TATE BROTHERS will either create a conflict, or during a conflict that arises, THE TATE BROTHERS will demand the woman give into the sexual demands the women previously rejected as a way to "make up" for the alleged misbehavior. When the victim then complies, this has the effect of increasing her insecurities, and decreasing her self-esteem, which increases her vulnerability. This also causes the woman to feel more invested in the relationship making it harder to draw boundaries or maintain boundaries and THE TATE BROTHERS know this. In short, each time the woman gives in to one of these demands it makes it harder and harder to resist THE TATE BROTHERS' future demands or to leave. THE TATE BROTHERS are calculated and intentional when they carry out these manipulation tactics.

100. One consistent demand both TATE BROTHERS make is: that a woman they are grooming engage in group sex. They will ask or demand that she have a threesome with him (TRISTAN TATE or ANDREW TATE), and one of the women that have been with him for years – a "bottom," or an enforcer. Once she gives in, this further enmeshes her in their circle,

it also creates jealousy and competition among the women which THE TATE BROTHERS can manipulate to their benefit. This also further desensitizes and demoralizes the woman with the ultimate goal of moving her to perform sexually on webcam for THE TATE BROTHERS' profit.

101. The Romanian prosecutors gathered the below witness testimony from various victims regarding this:

[VICTIM NAME REDACTED]: 'Also, I mention that, at one point, Tristan asked me to have sex in a group, namely Vivien and [VICTIM NAME REDACTED]. Although I wasn't comfortable with this situation, I had no choice; it was somehow a duty. Whenever I refused to do something he asked, he reminded me that he would tell my parents. So, out of fear that my parents would find out, I always accepted any of his demands'

[VICTIM NAME REDACTED]: 'Throughout the relationship I had with Andrew, he proposed several times that we have group sex'

[VICTIM NAME REDACTED]: 'In Dubai, I was somewhat forced to sleep in the same bed with Tristan and Abigail. I specify that it happened once that we had sex in 3. I never enjoyed this'

[VICTIM NAME REDACTED]: 'Tristan asked me several times to have sex with him and Abigail, which did happen'

[VICTIM NAME REDACTED]: 'Throughout this relationship, Tristan proposed that we have group sex, which I accepted. This happened 4 times with different people, one of the girls I know was named [VICTIM NAME REDACTED].'

[VICTIM NAME REDACTED]: 'During the period I lived in Romania, in the evening, after work, it often happened that Andrew and Tristan would have sex with several girls at once, each with those who worked for him. I also participated in group sex acts with Tristan and other girls or were physically violent with them during sexual acts.'

[VICTIM NAME REDACTED]: 'Tristan had certain sexual fetishes based on violence, in the sense that he would slap me and choke me, telling me that this is how he makes me 'become a woman'

[VICTIM NAME REDACTED]: 'Also, I specify that when we had sex, Andrew was often aggressive with me, in the sense that he beat me with a belt, choked me,

it happened that once he choked me until I fainted, circumstance in which he woke me up by slapping me in the face.’

[VICTIM NAME REDACTED]: ‘Also, the bruise he left on my leg after hitting me in the kitchen was the size of a melon.’”

See Exhibit A, Romanian Court Decision at p. 65.

Vivien

102. On information and belief, Vivien (an alias, not her legal name), was the first victim of THE TATE BROTHERS’ webcam human trafficking ring, **and she was first trafficked as a minor**. Upon information and belief, Vivien is the woman in the video ANDREW TATE was violently beating with a belt that circulated and reportedly was the reason he was removed from the U.K. reality show “Big Brother.”⁴⁹

103. ANDREW TATE has stated publicly that he started a relationship with Vivien when she was a minor.⁵⁰

104. The Romanian Government is currently investigating ANDREW TATE for “trafficking of minors’ . . . in relation to the victim [upon information and belief the woman ANDREW TATE refers to as “Vivien”] consisting in that, starting from 2014 and until December 2021, [ANDREW TATE], taking advantage of both the victim's obvious state of vulnerability (minor - 17 years old, lack of life experience, lack of family support), as well as by misleading about the intention to establish a love/marriage/cohabitation relationship and the existence of real feelings of love, but the falsity of the feelings of love results from the fact that [ANDREW TATE], in the same time interval, recruited several victims through the same

⁴⁹ See <https://www.bbc.com/news/newsbeat-36524693>.

⁵⁰ See *The PHD Course*, RUMBLE, available at <https://rumble.com/v359lx2-the-phd-course.html>, at 1:50:00-1:52:30, (Andrew stated that at the time of filming he had been in a relationship with “Vivien” for six years and she was “about 21 years old,” which would mean **he started a sexual relationship with her when she was about 15 years old**).

method - "loverboy", recruited [Vivien] whom, after gaining her trust and causing her to fall in love with him, through coercion (emotional blackmail), he sexually exploited her by determining her to pornographic manifestations for the production and dissemination of pornographic materials, respectively to practice videochat activities on the MyFreeCams and OnlyFans videochat platforms for his material benefit, obtaining patrimonial benefits totaling 1,529,305.12 US dollars. Also, during the period of sexual exploitation, [TRISTAN TATE] repeatedly transported the victim [Vivien] from the territory of Great Britain to Romania and provided her with accommodation in several locations both on the territory of Great Britain and on the territory of Romania (at his domicile in Voluntari, in a house in Tunari and in an apartment in the Pipera area), as well as all the logistics necessary for carrying out the videochat activity. *See* Exhibit A, Romanian Court Decision at p. 17.

105. **If these allegations about ANDREW TATE and TRISTAN TATE regarding even this one victim are true, they have committed human trafficking and likely violated statutes prohibiting the creation and distribution of child pornography.** Force, fraud, or coercion are not required under the TVPRA when the victim is a minor. *See* 18 U.S.C. 1591. Causing a minor to engage in a commercial sex act constitutes human trafficking under U.S. federal law. *Id.* **These allegations alone, vindicate Jane Doe.**

106. Text exchanges between ANDREW TATE and TRISTAN TATE show that they control the webcam money and lie to the women about what percentage they are giving them from their webcam earnings. For example, below is an exchange between Andrew and Tristan from October 2019:

TRISTAN TATE: Gotta send big another grand

ANDREW TATE: Shoot her.

TRISTAN TATE: She said you said she gets 40% and she needs the money for something ?

TRISTAN TATE: Viv*

TRISTAN TATE: Just say yes I'll send

ANDREW TATE: **Pay her 30%**

ANDREW TATE: **And say it's 40**

TRISTAN TATE: I sent her 30%

ANDREW TATE: Work out genuine 30% and pay that and fdb⁵¹

ANDREW TATE: She's saying no you paid 10%

ANDREW TATE: Talk to her

TRISTAN TATE: She's coming back at me with math

TRISTAN TATE: Bro. I paid her 30

ANDREW TATE: Blame exchange rates

ANDREW TATE: How much of her money came in

ANDREW TATE: **Pay 30 legit and say it's 40 and blame exchange rates**

ANDREW TATE: You admitted the crime

TRISTAN TATE: This was the third time she had chased me

ANDREW TATE: What can I say then

TRISTAN TATE: Yep. You told her a %

TRISTAN TATE: **My girls don't know a %**

ANDREW TATE: **I told you before she gets 30**

ANDREW TATE: **And think it's 40**

⁵¹ FDB stands for “fuck dat bitch.” See Andrew Tate’s PHD How to Get Girls, available at <https://rumble.com/v55sbyu-andrew-tate-phd-how-to-get-girls.html>, last viewed February 2, 2025.

TRISTAN TATE: You told her it's 40 I guess

ANDREW TATE: Shouldn't have admitted it without at least asking me

ANDREW TATE: She's a cunt. Now she will always want 40

ANDREW TATE: She's a whore

....

TRISTAN TATE: **Rule 1 is don't give %**

TRISTAN TATE: So before you accuse me of fucking up

TRISTAN TATE: **I don't give numbers**

TRISTAN TATE: **Or admit token amounts**

ANDREW TATE: Cool.

TRISTAN TATE: **Abi is STILL in the dark**

....

TRISTAN TATE: **Blame me if you like**

TRISTAN TATE: **But we need to not pay 40 in the future**

TRISTAN TATE: **Cam needs to be profitable**

See Exhibit C.

107. A similar conversation occurred two months later in December 2019:

TRISTAN TATE: Also Viv is asking me about wages

TRISTAN TATE: Say ask you?

ANDREW TATE: **No. Work out what we owe her at 30%**

ANDREW TATE: **And say you'll send**

ANDREW TATE: Tell me how much

See Exhibit D.

108. The callousness with which THE TATE BROTHERS view these women, and evidence that their claims of love are false, can be demonstrated in the below conversation where ANDREW TATE casually mentions Vivien had a miscarriage, of presumably his child, and his reaction was to express relief that they have other income and are not fully reliant on webcam because she was not able to work. He then called her a moron for being distraught. TRISTAN TATE was more concerned about their pet dogs than Vivien. The below conversation occurred December 2019:

TRISTAN TATE: Gotta pay Viv and abi

ANDREW TATE: How much each?

TRISTAN TATE: Gotta log into mfc and check

TRISTAN TATE: Not much it was Dubai vacation time

ANDREW TATE: **Viv lost baby but she had a mental breakdown went Kosice. Moron.**

ANDREW TATE: **Thank god cam isnt the staple**

TRISTAN TATE: So she's in Kosice right now?

ANDREW TATE: No

TRISTAN TATE: **Which dogs did she take**

ANDREW TATE: **She's bleeding a lot she's going in a few dats**

TRISTAN TATE: Abis coming to England to meet me

ANDREW TATE: Days

TRISTAN TATE: Make her take g and Loka

ANDREW TATE: Dogs go to dog hotel

ANDREW TATE: Sorted

Abigail Tyson

109. Abigail Tyson, referred to as “Abi,” is a long-time victim of TRISTAN TATE and the mother of at least one of his children. Upon information and belief, TRISTAN TATE uses Abi to help him groom and manipulate other victims, for example by engaging in threesomes. Regarding her the Romanian authorities allege,

From October 2016 to May 2022, the named [TRISTAN TATE], by deceiving about his intention to establish a love/marriage/cohabitation relationship and the existence of real feelings of love (the falsehood of these love feelings is evident from the fact that the named [TRISTAN TATE], in the same time period, was trying to recruit multiple victims in parallel using the same "loverboy" method), recruited the named TYSON Abigail whom, after gaining her trust and causing her to fall in love with him, through moral coercion (emotional blackmail), he sexually exploited by inducing her to engage in pornographic acts for the production and distribution of pornographic materials, specifically to practice videochat activities on the specialized platform MyFreeCams for his material benefit. The named [TRISTAN TATE], obtained a total sum of 876,800.4 American dollars from the victim's practice of this activity. Additionally, during the period of sexual exploitation, the named [TRISTAN TATE], provided the victim TYSON Abigail with transportation from Great Britain to Romania, shelter in several locations in Ilfov County (Voluntari city and Pipera area) and all the necessary logistics for carrying out the videochat activity.

See Exhibit A, Romanian Court Decision at pp. 91-92.

110. Text messages from 2019 show that TRISTAN TATE controlled all the money from what Abigail earned on webcam and she was not even aware of what percentage she was receiving. See above. Furthermore, Abigail’s webcam earnings were TRISTAN TATE’S *main income* at the time. See below messages from November 2019:

ANDREW TATE: You ready?

TRISTAN TATE: No I'm going to Abis house. She's super sick

....

TRISTAN TATE: Alone in the house. Thinking of going hospital.

TRISTAN TATE: It's bush league but I gtg

ANDREW TATE: Whatttttt

ANDREW TATE: Bro.

TRISTAN TATE: Yeah

TRISTAN TATE: Type whatever

TRISTAN TATE: **She's my main Income.** Vivs gone you two have been in Istanbul (I know it was shit) **and last night I was with Adriana**

ANDREW TATE: Wait there

ANDREW TATE: 2min

TRISTAN TATE: She's super sick. If she goes hospital alone she will resent me. Going to her house

ANDREW TATE: Can't you take her out

ANDREW TATE: Gotta wait for bmw anyway

TRISTAN TATE: No. She's actually sick

See Exhibit DD.

Co-conspirator: Georgiana Naghel

111. Georgiana works for THE TATE BROTHERS and assists them with exploiting and abusing their victims. Upon information and belief, Georgiana acts as an assistant to ANDREW TATE but takes direction from both THE TATE BROTHERS when managing the victims and their webcam activities. Georgiana acts as an enforcer for THE TATE BROTHERS and carries out THE TATE BROTHERS' instructions. She assists them by lying to their victims, and assists with manipulating the victims, at times uses physical force against the victims, or threatens physical force, and uses other intimidation and exploitive tactics to coerce compliance from

these victims. The purpose is to exploit the victims to promote and perform webcam pornography for THE TATE BROTHERS and their co-conspirators for profit.

112. Georgiana Naghel is a co-defendant with THE TATE BROTHERS in the Romanian criminal case and in the first indictment, filed June 15, 2023, was charged with setting up an organized criminal group, trafficking in humans, illegal access to a computer system, alteration of the integrity of computer data, and assault or other violence. *See* Romanian Indictment, Dkt. 89 at p. 2.

113. Georgiana is also a co-conspirator with THE TATE BROTHERS in a second investigation on charges of establishing an organized criminal group and **complicity to human trafficking in continuous form with regard to 22 victims**. Exhibit A, Romanian Order p. 16.

Co-conspirator: Luana Radu

114. Luana Radu is an enforcer for THE TATE BROTHERS and a former police officer. TRISTAN TATE had sexual intercourse with Luana, and they developed a relationship to improve each other's social media accounts; eventually TRISTAN TATE employed her to manage the activities of their victims. Upon information and belief, Luana was in charge of managing, under TRISTAN TATE's direction, the webcam platforms and social media platforms of THE TATE BROTHERS' victims.

115. Luana together with Georgiana Naghel would carry out THE TATE BROTHERS' instructions, assist them by lying to their victims, manipulate their victims, threaten the victims, and use other exploitive and intimidation tactics, such as her status as a former police officer.

116. Luana Radu is a co-defendant with THE TATE BROTHERS in the Romanian criminal case and in the first indictment, filed June 15, 2023, was charged with setting up an

organized criminal group and trafficking in humans. *See* Romanian Indictment, Dkt. 89 at p. 3.

117. Luana is also a co-conspirator with THE TATE BROTHERS in a second investigation on charges of complicity to human trafficking in continuous form with regard to 3 victims. Exhibit A, Romanian Order p. 16.

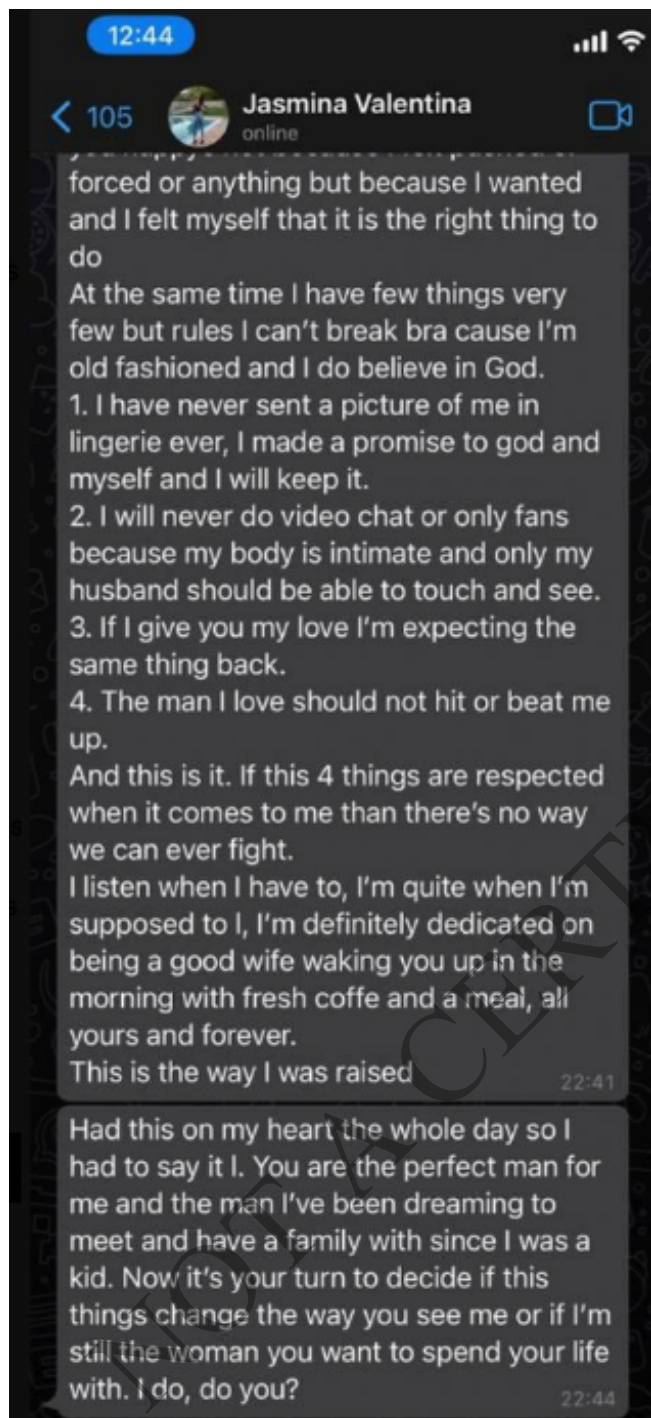
Iasmina Pencov

118. Iasmina Pencov is victim of ANDREW TATE who is so deeply under ANDREW TATE's control that she assists him in grooming and manipulating other women for him to sexually exploit. She does this even though she continuously expresses that she is jealous and hurt by ANDREW TATE's relationships with other women. ANDREW TATE has promised a family with Iasmina and she desperately wants to have a child with ANDREW TATE.

119. ANDREW TATE has bragged about his grooming of Iasmina on his War Room app in a channel titled "War Room- PhD" referring to ANDREW TATE's PHD or "pimpin hoes degree" program.⁵² He used screenshots from his conversations with Iasmina to instruct men on his methods of grooming.

120. Most disturbing of all, when Iasmina started her relationship with ANDREW TATE, she told him she had never sent a picture of herself in lingerie, and she would never do webcam or OnlyFans because it was against her values and her faith. **ANDREW TATE took pride in breaking her down.** Iasmina eventually began posting nude and pornographic photos and videos to OnlyFans for ANDREW TATE and TRISTAN TATE's profit.

⁵² *See* <https://www.rollingstone.com/culture/culture-features/andrew-tate-coerced-women-sex-work-leaked-texts-1234794138/>.



121. ANDREW TATE explains his process of grooming Iasmina as follows,

I'm gona [SIC] add a layer of separation.
Will use Geo [Georgiana] as the BB [bottom bitch] and pretend I don't care either way so she can't attack me for "tricking" her.

Another element

Since she moved
She's been fed. But nothing else.
She's broke
And she can't leave the house
Man. I almost sound evil . . .

So now I know she's broke. And I know what I believe the objections to be.
My plan is to use G as bottom bitch and convince her I don't give a shit if she cams,
but the only way she will ever have serious money is if she does.

Stage one
What's the chance of you leaving before I come back
She said 0
Giving her no negotiating room
It's comply or goodbye
If there's no goodbye... there is only comply.
If she woulda said something else I would have abandoned cam mission and did
more ground work on her. . . .

Let her start to panic a little.
Remember. She asked me for money now. That's scary for her
Make her qualify herself as not a gold digger then come in with 'We're going
to be traveling the world together. I'm working from my phone. We're a team
you're gona listen to me and work from your phone too.' . . .
And because cam has been soft floated before
I'd go for a hard close
If outright refuses
Don't reply. Fdb [fuck dat bitch].

122. ANDREW TATE then explains how he exerts control over her:

The girl who moved lost her support networks at home, cemented her move.
Talking about staying forever cant't wait for me to come back etc etc. So had to
tighten the screw, So I said somebody in her old town told me she worked in a sex
club. **I literally totally made this up from the sky. Started calling her a liar and
threatening to kick her out. But the real goal is for her to agree to never go
anywhere without me. Not even her home town. I need her working. Not
visiting friends back in her home town.**⁵³

⁵³See <https://x.com/crayonmurders/status/1682879715332493312?s=46&t=8Lpb1VgqcTT3ytW6sWKPTQ>; see also <https://www.rollingstone.com/culture/culture-features/andrew-tate-coerced-women-sex-work-leaked-texts-1234794138/>.

123. The Romanian prosecution files contain hundreds of text messages between Luana Rado, Georgiana Naghel and Iasmina Pencov, where Luana and Georgiana threaten Iasmina, (including threatening violence), to work more on OnlyFans and to promote on TikTok.

124. For example, *see* Indictment, Dkt. 89 at pp. 74-77 :

RADU LUANA: Make sure you don't forget the pictures
I don't want to hear an explanation
Stupid

IASMINA PENCOV: I won't forget

NAGHEL GEORGIANA: You have to make 10 videos today
**Iasmina, punch yourself in the mouth till I get there,
then I'll give you 10 more, you hopeless lazy bitch**
I'll snap you when I get there

IASMINA PENCOV: What did I do?

NAGHEL GEORGIANA: You have one hour and 10 minutes to fuck off

IASMINA PENCOV: But what have I done?

NAGHEL GEORGIANA: I'd rather say what you did yesterday only one hour
Start the timer because I just left from Comarnic
You didn't fucking go live

IASMINA PENCOV: If it's live I'll catch up. I'm in now and
I'm not out till tomorrow night

RADU LUANA: No shit, I really want to see

IASMINA PENCOV: I swear

RADU LUANA: And you haven't replied to my msg since yesterday
And you were awake

NAGHEL GEORGIANA: When the fuck are you catching up, you fucking head
banger, next year ?
You and those who fuck around will disappear this week

IASMINA PENCOV: Today. I'm trying my best to get into the weekly and make
money too

NAGHEL GEORGIANA: **I will personally kick you out**

RADU LUANA: **"Ignore my msg again and see what happens.**

I thought I'd leave you alone to be sane. But when I leave you alone, you're just fucking with me.

Just so you know, I send tt and andrew a daily list of what I'm doing.

Let's see what you send them

....
NAGHEL GEORGIANA: **Iasmina, tonight don't leave the live until you make MINIMUM 400, I mean MINIMUM**

....
RADU LUANA: Yesterday's money

3\$

Give me something 'cause I'm getting mad

At the end of the month Andrew will scold tt [Tristan Tate]

Tt will scold me and I will scold you

That's how it's gonna be

....
NAGHEL GEORGIANA: Iasmina you are 20% down, you have 4 days since you last posted

....
NAGHEL GEORGIANA: **Iasmina, I'm about to get in the car and come to take your teeth out. I swear you're not getting out alive.**

IASMINA, YOU COMPLAIN THAT YOU WORK HARD WHEN YOU HAVE TO FUCKING STAY LIVE FOR 6 HOURS A DAY PLUS LET'S SAY AN HOUR TO DO YOUR TIKTOK AND THAT YOU FEEL TIRED, BUT YOU'RE NOT TIRED WATCHING TV SHOWS? OUT OF 24 FUCKING HOURS A DAY YOU SHOULD WORK 7 AND YOU DON'T EVEN WORK THOSE FUCKING HOURS FOR FUCK'S SAKE **I'M GETTING MAD AND I HAVE A BAD FEELING THAT INSTEAD OF BREAST SURGERY YOU WILL GO TO THE MORGUE DIRECTLY**

I'm tired of people complaining about you, I've come to ignore you because I'm sick of talking to people without any common sense and respect, lazy and stupid people, corona was made for you to get the hell out of this planet as you live in vain

IF ANDREW CHECKS TO SEE IF YOU POSTED TIKTOKS YOU WON'T EVEN HAVE TIME TO PACK YOUR BAG I GUARANTEE YOU, YOU'LL FLY OFF THE BALCONY DIRECTLY

125. Iasmina was and is completely devoted to ANDREW TATE. While Mary Doe was in Romania to be with ANDREW TATE, Iasmina told ANDREW TATE, **"My love for you is**

so strong and big, I couldn't ever betray or let you go even if I'd find out you're a serial killer.” Exhibit F.

126. She even acknowledged: “**If I’d knew all this stuff back then I wouldn't have come. I did like you a lot but loving needs time. And from the outside, without knowing all the details it look like I am just a girl working with onlyfans for you and I’m used.**”

Id.

Counter-Defendant TRISTAN TATE

127. TRISTAN TATE’s victims and alleged crimes are numerous and sprawling. Currently he is indicted in Romania under charges of setting up an organized criminal group, human trafficking in continuous form with regard to three named victims one of which is Jane Doe, and incitement to assault or other violence against one of his victims. *See* Indictment, Dkt. 89 at p. 2.

128. TRISTAN TATE is also being investigated and was placed under judicial control on charges of establishing an organized criminal group, **human trafficking in continuous form regarding 28 victims**, influencing statements regarding one of these victims, and money laundering in continuous form.

129. **TRISTAN TATE’s text messages show that in 2020 he had sex with a 16-year-old child**, and even when he confirmed her age, he continued the relationship. Romanian police were informed on March 30, 2021, that TRISTAN TATE was attempting to recruit this minor victim into sexual exploitation via webcam pornography. He is still under investigation for attempting to traffic this child. *See e.g.* Exhibit A, Romanian Court Order at pp. 15, 27, 33. TRISTAN TATE’s text messages with the minor victim demonstrate that he was employing his usual modus operandi to groom this child:

TRISTAN TATE: **You will sleep at my house tonight?**
[VICTIM T.S.]: only if you want me to
[VICTIM T.S.]: but I need to know cause I can only leave at 6
TRISTAN TATE: Let me make a plan
TRISTAN TATE: **Yes you can stay but it was my plan to meet some girls tonight**
TRISTAN TATE: **Some girls who I will hire to work for me, at my new videochat studio**
[VICTIM T.S.]: ok no problem
TRISTAN TATE: **So be nice to them ok?:)**
[VICTIM T.S.]: ok
[VICTIM T.S.]: I can do that for you
[VICTIM T.S.]: you*
TRISTAN TATE: **Good girl**
TRISTAN TATE: **And if they want to sleep with us?**
[VICTIM T.S.]: **I can just sleep somewhere else**
TRISTAN TATE: You're crazy
[VICTIM T.S.]: I know
TRISTAN TATE: **You'll never share me with another girl? Even for 1 night?**
.....
[VICTIM T.S.]: **if I share you with someone thats not a relationship for me**
TRISTAN TATE: I understand
.....
TRISTAN TATE: **I want a relationship with you**
TRISTAN TATE: **But some couples have threesomes and bring another girl I think its normal**
TRISTAN TATE: But if you are not into it? Okay we will not
[VICTIM T.S.]: Thank you my love
[VICTIM T.S.]: thank you for respecting me
TRISTAN TATE: **But we can do anal sex tonight? :)**
TRISTAN TATE: Me and you only
[VICTIM T.S.]: yup we can do that
TRISTAN TATE: **You did before?**
[VICTIM T.S.]: **nope**
[VICTIM T.S.]: **never**
TRISTAN TATE: **Good but you will do it for me**
TRISTAN TATE: [heart emoji]
TRISTAN TATE: **I love that**
[VICTIM T.S.]: **yes I will do anything for you**
[VICTIM T.S.]: **all my life**
TRISTAN TATE: **Good girl**
TRISTAN TATE: **You make me happy**
.....

TRISTAN TATE: **Send me a photo of your ID**
TRISTAN TATE: **Or... tell me how old you are**
[VICTIM T.S.]: **I am fucking 16**
TRISTAN TATE: **So why did you lie?**
[VICTIM T.S.]: **Because I wanted to have you. I was afraid of telling the truth**
TRISTAN TATE: **You know in Romania the legal age for sex is 15 right?**
TRISTAN TATE: **I wouldn't have been so scared**
TRISTAN TATE: **Maybe I wouldn't have had you**
TRISTAN TATE: **But you could have been honest**
[VICTIM T.S.]: I know that
[VICTIM T.S.]: **But I'm still underage**
[VICTIM T.S.]: **In two months I'm 17 so it's still not okay**
TRISTAN TATE: **Underage for what?**
TRISTAN TATE: **Porn yes but we didn't make porn**
[VICTIM T.S.]: **I am sure of the fact you wouldn't be with a girl that is not even 18**
[VICTIM T.S.]: I am really sorry cause I kept that from you
TRISTAN TATE: So what do we do now?
[VICTIM T.S.]: I want to be with you. I don't know about you anymore. That's why I was hiding my age. The only reason. I was afraid to lose you
....
TRISTAN TATE: But still. You lied to me
[VICTIM T.S.]: I feel really bad about it. I always felt
[VICTIM T.S.]: I am very sorry
[VICTIM T.S.]: It was the only thing I kept from you.
TRISTAN TATE: What else's did you lie about
....
TRISTAN TATE: So you didn't lie about something else?
....
TRISTAN TATE: How can I trust you
....
[VICTIM T.S.]: **I want you to trust me again. What can I do for that?**
TRISTAN TATE: **A few things**
[VICTIM T.S.]: Ok! Tell me
TRISTAN TATE: **You want to be with me forever?**
[VICTIM T.S.]: Yes. I promised that to you
TRISTAN TATE: We will talk in person
TRISTAN TATE: **But I need to punish you**
TRISTAN TATE: Also you must show me your I.D. to see your age
[VICTIM T.S.]: I will bring it to you so you can see it and trust me
TRISTAN TATE: **I still need to punish you**
[VICTIM T.S.]: **I will come to you on Tuesday so we can talk**

TRISTAN TATE: **For the next 10 times we have sex, its only in your ass**
[VICTIM T.S.]: Ok
[VICTIM T.S.]: I deserve it
TRISTAN TATE: You never had anal sex before me right?
[VICTIM T.S.]: Never.
TRISTAN TATE: Before we do it, you must prepare properly for it. So it is more comfortable
okay?
TRISTAN TATE: **Its what porn girls and videochat girls do, to make it easier**
[VICTIM T.S.]: Ok
TRISTAN TATE: Google how to prepare for anal sex, and buy the things that you need okay? So it feels more comfortable for us both.
TRISTAN TATE: Next time I see you, I want you to be ready

....

TRISTAN TATE: **I'm mad at you**
[VICTIM T.S.]: I know
[VICTIM T.S.]: I mad at myself too. I always was
[VICTIM T.S.]: I am*
[VICTIM T.S.]: I am sorry Tristan
TRISTAN TATE: Hmm
[VICTIM T.S.]: **Believe me**
TRISTAN TATE: **We will see**
TRISTAN TATE: **If you do EVERYTHING I ask?**
TRISTAN TATE: **I'll keep you and trust you again with time**
[VICTIM T.S.]: I always do that
[VICTIM T.S.]: I have nothing to hide from you anymore
[VICTIM T.S.]: It was a mistake
TRISTAN TATE: **First we will see next week**
TRISTAN TATE: **If you obey me**
TRISTAN TATE: **About anal sex**
[VICTIM T.S.]: I will
[VICTIM T.S.]: I ordered the stuff
TRISTAN TATE: **Good girl**

See Exhibit G.

130. TRISTAN TATE is also under investigation for trafficking a young woman **who was only 18 at the time and still in high school.** TRISTAN TATE had a sexual relationship with her and ultimately, he groomed her and began exploiting her on webcam. This victim shared being previously exploited (at 16 years old) and TRISTAN TATE's immediate response

was to groom and lure her to participate in webcam for him. Text messages from march of 2020 demonstrate this:

[VICTIM NAME REDACTED]: So, this is my story
2 years ago i met that man, 40 years old, at my bikini competition. He was personal trainer.
Before him i had my first boyfriend, same age as me.
After i met this 40 years old man my life changed. He showed to me this part of life. Videochatting.
His ex wife was doing that so he wanted to do that too.
He made me an account on mfc and i was working from home, because i moved with him.
After we broke up he took me all the money i had done.
And 4 weeks ago i heard about a studio in cluj and because i wanted to do money but not being a prostitute again i go there..
That man who is owner of the studio made me an account on chaturbate.
I was going 2 time per week because i have school and i can t more.. at first [sic] he was ok with that and he understood me but after he said to me that i can t do anymore because he need from me to be there everyday. So my accoun [sic] on chaturbate was banned.

....

TRISTAN TATE: Look
TRISTAN TATE: I don t like doing things for one night. I want to keep you.
TRISTAN TATE: Abi and vivien are some of the best mfc girls in the WORLD. They are from a time I used to own a studio.
TRISTAN TATE: My studio was the best because my methods were the best.
TRISTAN TATE: **So after high school move to Bucharest, I will use my models to make you popular on mfc... you can fuck only me, and make good money.**
TRISTAN TATE: No more stupid things. Understand?
Tristan Tate: Because you're a good girl. But you made stupid choices, I would take care of you here in Bucharest
[VICTIM NAME REDACTED]: I dont know why but i believe you. I felt like you guys don t use me for fun. I didn't feel used.
[VICTIM NAME REDACTED]: And yes, everyone makes mistakes or everyone has a messy life until they found that balance and safety
TRISTAN TATE: **You can believe me because I don t need something from you**
TRISTAN TATE: **Yes I have videochat models. But I don t NEED the money.**
TRISTAN TATE: I am not some poor manfrom Cluj.
TRISTAN TATE: And because when I talk you know Im a serious man.
[VICTIM NAME REDACTED]: Anyway i m a little bit confused and i cannot believe how it is happening to me.

[VICTIM NAME REDACTED]: Ves, that s what i m trying to say
TRISTAN TATE: But **[VICTIM NAME REDACTED]** **I have one rule.**
TRISTAN TATE: **And you must follow my one rule.**
TRISTAN TATE: **If you cannot? Okay don t come.**
[VICTIM NAME REDACTED]: Ok
TRISTAN TATE: **But Ill tell you it just once**
[VICTIM NAME REDACTED]: **what s the rule?**
[VICTIM NAME REDACTED]: **I will.. cuz i m not happy with this life that i have.. and i want to make things happen right. Because, how u was saying to me.. not everything happens with a reason.. you make things happen**
TRISTAN TATE: **My rule is simple**
TRISTAN TATE: **You re mine**
TRISTAN TATE: **You don t talk to other men**
TRISTAN TATE: **Fuck them, date them, nothing**
TRISTAN TATE: **Who will you meet better than me?**
TRISTAN TATE: **Nobody**
TRISTAN TATE: **But if you still want the attention of these losers.... then you cannot be mine**

....
TRISTAN TATE: **Good girl**
TRISTAN TATE: **So you re mine now**
[VICTIM NAME REDACTED]: **I m all yours**
[VICTIM NAME REDACTED]: **And Abi s**
[VICTIM NAME REDACTED]: **Hehe**
TRISTAN TATE: **Good girl**

....
TRISTAN TATE: **I want to see you**
[VICTIM NAME REDACTED]: **Yeah, tomorrow i will change my number**
[VICTIM NAME REDACTED]: **Because i want to live my past life back**
TRISTAN TATE: **Good**
[VICTIM NAME REDACTED]: **And like that nobody will bother me**
Tristan Tate: **Good**
[VICTIM NAME REDACTED]: **I really wanna make a change**
TRISTAN TATE: **I can help**
TRISTAN TATE: **Ill be the change you need**
[VICTIM NAME REDACTED]: **Yeah, i can feel that:)**
TRISTAN TATE: **And I don t need anything from you**
TRISTAN TATE: **I just want things**
TRISTAN TATE: **Your obedience and your loyalty**
TRISTAN TATE: **And your body**
TRISTAN TATE: **I don't NEED anything. So you're safe with me.**

See Exhibit H.

131. TRISTAN TATE is also under investigation for grooming Ukrainian refugees into his webcam pornography operation. *See* Exhibit A, Romanian Court Order at pp. 15, 62. For example, the Romanian authorities proffered audio messages from Tristan Tate to support these allegations:

TRISTAN TATE: "I need a plane ticket for a girl from Ukraine / possibly to work, otherwise I wouldn't bother"

TRISTAN TATE: "You know how it is in this business... if someone wants to do it for a month or two, it's not worth it... So two of them say they want to stay in Romania, they want to live in Bucharest... so I'm going to work with these two, I'm going to put them in my agency, but the others who say 'I want to stay here 2 months, 3 months... after which I might go to Italy or Spain'... that's not worth it..."

TRISTAN TATE: "They'll leave for Italy or Spain and they'll find another job... and that means they'll waste my time..." "And to help them? Haven't you seen my Instagram reels... I've been by car 4 times, 5 times almost to the border with Ukraine to bring clothes and shoes and candy and food for all the refugees... and I paid for all the hotels in Galati for many months, so that everyone, all families can stay there, I help them enough, **I don't need to put them all on OnlyFans... I'll put some... but not all...**"

See Exhibit A, Romanian Court Order, p. 62 (emphasis added).

132. Regarding one of these victim, K.Y., TRISTAN TATE was in complete control over her OnlyFans accounts and she had to ask TRISTAN TATE for money whenever she needed anything. She even shared with TRISTAN TATE that she had been misled and exploited on OnlyFans previously. Like his other victims, she was in love with TRISTAN TATE and believed she was in a romantic relationship with him, and he was only having her do OnlyFans to help her support herself financially. Text messages from November and December of 2022, demonstrate this:

133. K.Y. bought a winter coat because it was cold and that was all the money she had. *See* Exhibit I. She had to ask TRISTAN TATE for money from *her* OnlyFans account to

get by. She was also living in one of [REDACTED] properties with other women under his control, including Iasmina and Beatrice.

TRISTAN TATE: Today go to the Bitcoin ATM in banasea mall

TRISTAN TATE: I can only get you money this way for now

TRISTAN TATE: What is the plan for christmas

[Victim K.Y.]: You know that we have Christmas on the 7th of January, not on the 25th of December, but I really want to visit them

TRISTAN TATE: **You're not visiting Ukraine**

TRISTAN TATE: **You're a refugee and the winter war will get bad**

....

[Victim K.Y.]: **You know my sad time when I had an OF and how I was deceived. At the moment, this is my only source of income, at least I need to understand how things are going there. I know Bettys account is run by the same translator as mine. And she knows how her account is working. And I don't know anything, not how much I earn, not what my name is, nothing**

[Victim K.Y.]: **I need to understand how much I should expect per month, because I also have bills that I have to pay**

[Victim K.Y.]: **And if this is not enough for me, then I should look for another source of income in Romania. Not tik tok**

[Victim K.Y.]: **I need to understand how much I expect to live a month**

[Victim K.Y.]: **Understand me please**

....

TRISTAN TATE: **So you know I am not like these Ukrainian idiots right?**

[Victim K.Y.]: **Of course I understand this, my earnings for you are nothing, it makes no sense for you to do this**

TRISTAN TATE: **Yes just to keep you and give you some money to use**

TRISTAN TATE: :)

[Victim K.Y.]: **I mean that you are a busy man and the last thing you want to think about is: How does Lisa live and buy her own food, pay her bills in Romania.**

Therefore, it is unpleasant for me to constantly disturb you with my questions

See Exhibit J.

134. ANDREW TATE and TRISTAN TATE employ retaliation against their victims when they do not make enough money, or they push back, or when they leave. THE TATE BROTHERS punish their victims if they do not comply with their demands and try to damage their reputations particularly in a public way so that other women under their control see the consequences for resistance. This helps them control their victims.

135. Below is one example from August 2020, of TRISTAN TATE instructing a woman under his control to retaliate against a victim who left his control:

TRISTAN TATE: You still in [VICTIM NAME REDACTED] Instagram?
Naomi: Im logged out now. But I grew the Instagram
Naomi: Why?
TRISTAN TATE: **Wanted you to destroy it but its okay**
TRISTAN TATE: Don t matter
Naomi: Why? I can do. I changed passwords
Naomi: Shes not in the account
TRISTAN TATE: **Ruin it all**
TRISTAN TATE: **Delete all photos**
TRISTAN TATE: **Lose all followers**
TRISTAN TATE: **Burn it down**
TRISTAN TATE: **Please**
TRISTAN TATE: If you have time
TRISTAN TATE: **Post porn. Get banned**
Naomi: Cool I feel like burning stuff down
TRISTAN TATE: **Porn adverts with escort rates.**
TRISTAN TATE: **It will get banned**
TRISTAN TATE: **Escorting 100% illegal**
TRISTAN TATE: **Use photos ofher**
TRISTAN TATE: **No problem**
TRISTAN TATE: **We have loads of naked pics of her**
Naomi: What has she gone and done
TRISTAN TATE: Shes gone forever
TRISTAN TATE: So is [VICTIM NAME REDACTED]
Naomi: **Yes so post all the explicit content on the story and feed? Or just story s**
TRISTAN TATE: **Both**
TRISTAN TATE: **ASAP**
TRISTAN TATE: **Want the account banned**
TRISTAN TATE: **So she can never steal it**

See Exhibit K.

136. A victim in the first Romanian prosecution reported a similar experience of retaliation and harassment. She described having her laptop stolen, her social media sites being hacked and pornographic images being posted under these accounts without her consent. See Indictment, Dkt. 89 at pp. 332-334. TRISTAN TATE, Georgiana Naghel, and Luana Radu had a WhatsApp group titled “PIMPS” where the three discussed running their webcam operation,

TRISTAN TATE gave instruction and the two women gave updates. *See* indictment, Dkt. 89 pp. 44-69. In October 2021, the three discussed retaliation against one of the women they victimized in the “PIMPS” groupchat:

LUANA RADU: [VICTIM NAME REDACTED] just wrote to me / that she won't work for us / one second ago

GEORGIANA NAGHEL: t?

TATE TRISTAN: Yes, I'm kicking her out. / there's no rational solution with whores / kick them out HARD, and if they come back, they come back

GEORGIANA NAGHEL: I want my money back / or I'll cut her tits off

TATE TRISTAN: kick her out, take her things and take them to your house

LUANA RADU: yes / I don't want to leave

TATE TRISTAN: Keep all her stuff for now. Her boobs cost me 1,500 euros, Valentin worked them cheap for me

LUANA RADU: without talking to her

TATE TRISTAN: we can do that with her account

LUANA RADU: she owes us 4,000 euros

TATE TRISTAN: listen / know / how to / solve this / at least

TATE TRISTAN: NOTHING YOU SAY will help

TATE TRISTAN: the move now is as follows

GEORGIANA NAGHEL: ok

TATE TRISTAN: go both of you, kick her out of the house / hit her if you have to, I don't care / don't let her take her things

LUANA RADU: thanks

LUANA RADU: Ok

TATE TRISTAN: when you kick her out, keep her stuff in Georgiana's car / so Jasmina can't give it to her if she comes back later / throw her out of the house with nothing / Georgiana, you've seen me do this 10 times / go and do it now. Both

GEORGIANA NAGHEL: we deal with

TATE TRISTAN: are you on your way?

LUANA RADU: now I'm getting ready

GEORGIANA NAGHEL: yep

TATE TRISTAN: good / wait / maybe my kicking out worked / don't hit her yet / wait in the car

GEORGIANA NAGHEL: I'm here, I'm waiting for elly, we're going to make good cop, bad cop

LUANA RADU: Hi. Can you please get the money from [VICTIM NAME REDACTED]?

LUANA RADU: Only fans

GEORGIANA NAGHEL: yo / take the money right away / she's a whore and she'll take over the account

TATE TRISTAN: Ellie, I'm not at the laptop / request payment

....
LUANA RADU: An hour ago the police came here, at the door. I didn't let them in the house / me and G threw her stuff in the lake / but after talking to them, they understood who she was
TATE TRISTAN: Haha! You girls are the best /change all her social media accounts to return to [VICTIM NAME REDACTED]

....
TATE TRISTAN: well, we win / [VICTIM NAME REDACTED] is next
LUANA RADU: it's good that I was there /because Georgiana wanted to kill her, if she was sure /wanted to kill her / when I was kicking her out, I kept saying "beat her without leaving any marks, please" /and G said "without leaving any marks. Don't worry" /outside and I asked / and she was in her pajamas G: "can I give her a jacket?" /and G replied: "if you give her a jacket, I'll beat you too" /I didn't want to risk it

.....
LUANA RADU: she was very angry
LUANA RADU: I gave her pants and jacket after G calmed down a bit
TATE TRISTAN: I love you girls [heart emoji]

See Indictment, Dkt. 89 at pp. 47-52.

137. In text messages between TRISTAN TATE and the victim, [REDACTED] repeatedly calls the victim a whore and ungrateful. He accuses her of “scamming” him because she wants to leave after he paid for her breast surgery. He tells her the surgery cost 5000 euro when in messages with Luana and Georgiana he says he got the surgery for cheap, at 1500 euro. He tells her that since she is on his wifi network he can read every text message she sends and every Instagram message she receives. Despite repeatedly accusing her of cheating and being a prostitute, he repeatedly demands that she move into his home so he can trust her more. He tells her that Georgiana and Luana will keep her clothes until she pays them what she “owes” them. See Exhibit L.

138. The International Consortium of Investigative Journalists (ICIJ) uncovered⁵⁴ that TRISTAN TATE has been receiving payments from MFCXY Inc., the company that hosts

⁵⁴ Matei Rosca, Daniel Mihailescu, *Adult webcam platform paid \$2.6m into controversial influencer Tristan Tate's bank account, leaked documents show*, INTERNATIONAL CONSORTIUM OF INVESTIGATIVE JOURNALISTS, available at

MyFreeCams (MFC), a U.S.-based website⁵⁵ and one of the world's most popular webcam sites. ANDREW TATE has publicly admitted to using this website and recommended it to men via his webcam courses. This investigation by ICIJ also obtained documents showing that TRISTAN TATE received payments from "other adult content platforms such as OnlyFans." The ICIJ obtained documents which "include a statement for TRISTAN TATE's Paxum Bank account covering 2017 to 2024. It shows about \$2.6 million in payments "for services provided"" from these pornography websites.⁵⁶ This evidence shows that Tristan Tate was the account holder and controlling payment for webcam models for at least the period of 2017 to 2024.

Counter-Defendant ANDREW TATE

139. ANDREW TATE is the leader of the sex trafficking operation he runs with his brother Tristan and other co-conspirators. He was indicted in Romania on charges of setting up an organized criminal group, human trafficking in continuous form with regard to four named victims, and two material acts of rape against one of these victims. *See* Indictment, Dkt. 89 at pp. 1-2.

140. He is also being investigated and was placed under house arrest on charges of establishing an organized criminal group, **trafficking of minors, human trafficking in continuous form regarding 6 victims, sexual act with a minor in continuous form,**

<https://www.icij.org/inside-icij/2024/05/adult-webcam-platform-paid-2-6m-into-controversial-influencer-tristan-tates-bank-account-leaked-documents-show/>.

⁵⁵ See https://wiki.myfreecams.com/wiki/Terms_and_Conditions (" . . . the parties agree that the Website will be deemed to be based in the State of Florida, United States of America.")

⁵⁶ Matei Rosca, Daniel Mihailescu, *Adult webcam platform paid \$2.6m into controversial influencer Tristan Tate's bank account, leaked documents show*, INTERNATIONAL CONSORTIUM OF INVESTIGATIVE JOURNALISTS, available at <https://www.icij.org/inside-icij/2024/05/adult-webcam-platform-paid-2-6m-into-controversial-influencer-tristan-tates-bank-account-leaked-documents-show/>.

influencing statements in continuous form, and money laundering in continuous form. *See* Exhibit A, Romanian Order at pp. 15.

141. Regarding the influencing statements charge, Romanian authorities allege:

On [Sept. 28, 2023] and [Sept. 29, 2023], ANDREW TATE tried to determine [VICTIM NAME REDACTED] and [VICTIM NAME REDACTED] **through acts with an obvious intimidating effect (posting on [Sept. 28, 2023], on the social network X (former Twitter) a false conversation denigrating the injured person [VICTIM NAME REDACTED], and on [Sept. 29, 2023] falsely warning the witness [VICTIM NAME REDACTED] about the fact that DIICOT is conducting a criminal investigation against him), not to make statements or to make false statements in this case;**

142. and:

From December 2023 to January 2024, ANDREW TATE tried to determine the injured person [VICTIM NAME REDACTED] **through acts of corruption (offering her the amount of 5000 euros of which he actually remitted the amount of 2500 euros), not to make statements or to make false statements in this case;**

See Exhibit A, Romanian Order at pp. 19-20.

143. Furthermore, **there is an ongoing investigation into ANDREW TATE for influencing statements regarding his threats and harassment of Jane Doe and Mary Doe:**

[I]nfluencing statements, provided by art. 272 para. 1 Criminal Code, for which the extension of criminal prosecution was ordered by ordinance dated February 22, 2023, consisting of: during the period of incarceration, respectively **December 29, 2022 – February 2023, the defendant Andrew Tate**, being aided by the witness [VICTIM NAME REDACTED], through other persons including a person known as LUKE, **tried to determine the injured persons [VICTIM NAME REDACTED] and [VICTIM NAME REDACTED], through coercion and other acts with an obviously intimidating character (notifications through commercial companies from the USA) committed against them and against members of their families, to withdraw their statements given in the present case and to give false statements in the present case, with the aim of avoiding bringing the defendants to criminal liability.**

See Exhibit A, Romanian Order at pp. 15.

144. ANDREW TATE engages in ruthless manipulation and deception to groom and coerce his victims for the purpose of sexual exploitation and ultimately for profit. As discussed above, ANDREW TATE began grooming, and even trafficking, Vivien as a minor. *See* PHD Program, Q&A session, available at <https://rumble.com/v359lx2-the-phd-course.html>, at 1:50:00-1:52:30 (ANDREW TATE stated that at the time of filming he had been in a relationship with “Vivien” for six years and she was “about 21 years old,” which would mean **he started a sexual relationship with her when she was about 15 years old.**).

145. One of the named victims, C.B., in the first Romanian Indictment, filed June 2023, testified to being abused by ANDREW TATE for years. C.B. described how she was groomed and manipulated by ANDREW TATE and ultimately exploited via webcam by him. She alleges:

146. C.B. was first approached by ANDREW TATE in 2016 and he was very persistent in his pursuit of her which she found very flattering. She explains that ANDREW TATE was profusive with praise in the beginning and expressed very strong feelings for her which made her feel very special. She was not close to her family which ANDREW TATE knew and she had little to no support network. She lived in England and ANDREW TATE lived in Romania at the time. He kept asking her to move to Romania so they could spend more time together and she could work on webcam to support herself while in Romania so they could be together. At first, she refused and expressed that she did not want to do webcam. Eventually ANDREW TATE convinced her to move to Romania and work on webcam for him. When she realized that Vivien was often around ANDREW TATE, she asked ██████████ about her, and he said she was just a woman that worked for him.

147. Eventually C.B. fell deeper and deeper in love with ANDREW TATE but he kept asking for more and more. He was constantly asking her to prove her love and devotion to him. He asked her to get a tattoo with his name on it to prove her devotion. She complied and got a tattoo of his name on her neck.

148. As the relationship went on ANDREW TATE demanded C.B. make more on webcam and constantly demanded she do more to prove herself to him.

149. ANDREW TATE began to refer to himself as “King,” and even called himself “god.” He demanded that the victim obey him in all things. The more the victim resisted the more violent ANDREW TATE became.

150. According to C.B., ANDREW TATE was always violent in their sexual relations and as time went on, he became increasingly more violent. She believed ANDREW TATE started to take out his frustration on her in violent ways during their sexual interactions.

151. In one incident C.B. described, ANDREW TATE was particularly violent. **During sex, ANDREW TATE began hitting the victim on the side of her head with one hand and choking the victim with the other hand. He was choking her so violently that she felt she was on the verge of death. All the blood vessels burst in one of her eyes from the strangulation and her eye was injured and her vision blurred for a long time. ANDREW TATE also squeezed her breast so hard during this incident that it resulted in injury to her breast implant.**

152. C.B. described that when ANDREW TATE was trying to get her to work for him on webcam he was not trying to motivate her with the idea of money but rather the relationship, and that she needed to be loyal and submissive to him for the relationship to progress.

153. ANDREW TATE told C.B. that he loved her and wanted to have a baby with her. He told her she just needed to work on a webcam for a short time and then they would have a baby.

154. C.B. described the manipulation and abuse as: "**[A]n ongoing psychological warfare and my self-respect was at an all-time low.**"

155. When she tried to confront him about his abusive behavior, he was dismissive. She once showed him an article that described parents reporting abuse of their daughter at the hands of a man and he was arrested. **In response ANDREW TATE told her that any woman, or any parents, who tried to report him to the police would fail. He once said if he ever went to jail it would be because of how he conducted his business and words to the effect of "not because of some bitch turning him in to the police."**

CONSPIRACY TO TRAFFIC AND INTIMIDATE JANE DOE

Jane Doe

156. Jane Doe met TRISTAN TATE around November of 2021. They met on an online platform where TRISTAN TATE used the alias Vladimir. On this platform you must set a geographic location in order to be recommended people to meet. Upon information and belief, TRISTAN TATE set his location to Miami which is how he was connected to Jane Doe, whose location was set nearby, in or around Palm Beach. Both TRISTAN TATE and Jane Doe exchanged real names in their first conversation on WhatsApp.

157. Jane Doe was only 20 years old when she met TRISTAN TATE. A fact she shared on the first day of chatting with him via Whatsapp.

158. On information and belief, TRISTAN TATE went on the platform where he met Jane Doe and set his location to Miami so he could find potential victims to lure into his webcam sex trafficking operation while he was in Miami for a War Room event.

159. TRISTAN TATE claimed to be single when talking with Jane Doe even though he was pretending to be in a long-time relationship with Abigail Tyson and pretending to date other women he was exploiting on webcam. TRISTAN TATE was very charming, complimentary, and romantic in his conversations with Jane Doe and told her she seemed to be everything he was looking for. He complimented her music, they discussed books, chess, traveling, and culture. They seemed to connect on a deep level and TRISTAN TATE told Jane Doe she was special.

160. He told her was holding a business conference in Miami and asked her to attend with him as their first date. Before even meeting her told her, “[i]f we hit it off you do realise you’ll be coming to Europe often right?” He also pretended to be interested in a committed relationship saying, “[f]or me a two week fling is no more or less fulfilling than a one night stand. If there’s no prospect [o]f a future I don’t waste my time with it.”

161. TRISTAN TATE and Jane Doe messaged every day for almost two weeks and then TRISTAN TATE arrived in Miami from Romania. They met up at the hotel bar of the hotel TRISTAN TATE was staying at the first night he arrived. TRISTAN TATE sent an uber to pick Jane Doe up and bring her to the bar. Because she was under 21 she told TRISTAN TATE she may not be able to get into the bar. He asked to her to come anyway.

162. They had a fun time together and had consensual sex. While together, Jane Doe shared that her ex-boyfriend had committed suicide. This was very painful for Jane Doe and she was sharing how extremely sad she was about it. She thought this was an intimate moment but the next morning when they went downstairs ANDREW TATE was in the lobby. TRISTAN TATE introduced her to ANDREW TATE and he brought up her ex-boyfriend’s suicide and

said something like, “were you that terrible?” and laughed. Jane Doe was really shaken and confused by this and left.

163. She continued to message with TRISTAN TATE, and they met up a few more times while TRISTAN TATE was in town for about two weeks. One night TRISTAN TATE told her he was going to a club with a bunch of people, mostly men, for ANDREW TATE’s birthday and he asked her to come and bring a female friend. When Jane Doe and her friend, who was also not yet 21 years old arrived at the club, they could not get in. TRISTAN TATE sent his friend Justin Waller to come get them into the club which he did.

164. When Jane Doe got into the club with TRISTAN TATE, instead of the group being mostly men like he described, his group consisted of mostly women who were barely talking to each other.

165. Upon information and belief, TRISTAN TATE was employing his “double booking” strategy in an attempt to start meeting and grooming as many women as possible.

166. Later that night TRISTAN TATE asked, “can we talk?” And asked her about her ex-boyfriend who had died by suicide. Then he told her that someone he dated had also died. He said they had dated for five years and she was killed by being hit with a car. It was a very emotional conversation and Jane doe cried. She felt a very strong emotional connection to TRISTAN TATE through this experience and it was a stronger emotional connection than she had felt with anyone in a very long time.

167. After the War Room events began, TRISTAN TATE invited Jane Doe to meet up with him there. She attended some events and met other women at the event, including a woman ANDREW TATE was dating named Natasha. Throughout the WarRoom event

TRISTAN TATE brought her to a lot of nice restaurants and she spent almost every night with him until he left.

168. While Jane Doe was staying with TRISTAN TATE he asked her to bring him coffee in the mornings which she did.

169. TRISTAN TATE was very forceful with Jane Doe and told Jane Doe he liked how submissive she was. As her feelings for TRISTAN TATE grew, she tried to be submissive to please him.

170. One night while they were having sex TRISTAN TATE put his hand around her throat. She was shocked because he did not ask for permission, but she thought it was just playful at first. But then he began to squeeze so hard all the blood rushed to her face. She put both hands on his wrist and tried to say stop but he was squeezing her throat so hard she could not open her mouth to say anything. She couldn't get him off and then he squeezed even harder. She went unconscious. When she woke back up, she felt something running down her leg and realized he had continued having sex with her while unconscious and had ejaculated inside of her. She was very upset and confused but TRISTAN TATE was so calm and nonchalant that she did not know what to think. At the time she blamed herself. Jane Doe was very shaken and confused by this experience. She ended up having bruises on her neck from where TRISTAN TATE strangled her. Later when Jane Doe brought it up, Tristan acknowledged she went unconscious saying in a Whats app message, "I remember when you passed out."

171. After this, TRISTAN TATE told her he had feelings for her and wanted her to come visit him in Europe. Later he told her he loved her and wanted her to move there with him. While in Florida, TRISTAN TATE also brought up OnlyFans saying, "Also I'm putting my management team in charge of your onlyfans. I'll get you 100k a month." TRISTAN TATE

was open about wanting to “manage” her on OnlyFans when she came to Romania because he knew that Jane Doe had an OnlyFans account. However, although Jane Doe had an OnlyFans account, she was not very active and had only posted a few photos. She had never posted any photos or videos of herself engaged in sexual activity. And she was hesitant and nervous about doing more on OnlyFans. Which she expressed to TRISTAN TATE.

172. After TRISTAN TATE left Florida, they continued to message and call each other. TRISTAN TATE would sometimes be very distant, short and cold in their messages and other times they would connect well again. When she asked him what he wanted he would say he was serious. He also asked her to come to Romania.

TRISTAN TATE: Exhausted as always, but glad to be back in romania

[JANE DOE]: that's good..

[JANE DOE]: hope everything's well on your end.

TRISTAN TATE: Im doing okay baby

[JANE DOE]: that's really good to hear x

[JANE DOE]: image omitted

[JANE DOE]: !

[JANE DOE]: i miss hearing your history lessons and stories.

TRISTAN TATE: **Then come**

[JANE DOE]: okay when? how expensive are tix?

TRISTAN TATE: **Everything is cheap for me**

[JANE DOE]: **oh i wasn't expecting you to get the tickets. that's very courteous**

[JANE DOE]: **if you could let me know whatever dates work best for you, at your convenience, i can send over my info and anything you need. i'll make sure to take care of my own carry ons as well. i appreciate the gesture x**

See Exhibit M. TRISTAN TATE ended up purchasing Jane Doe a business class ticket to Romania.

TRISTAN TATE: **Tell me which flights to book**

....

[JANE DOE]: **i found this one!**

[JANE DOE]: **i can pay you for business class and checked bags**

[JANE DOE]: **i'm so excited**

TRISTAN TATE: **Will sort it today**

....

TRISTAN TATE: **When you get here you're going to live in a big house I have about 2 minutes walk from my house**

TRISTAN TATE: **with 2 of andrews girifriends**

[JANE DOE]: okay! will they be okay with that?

[JANE DOE]: and i'm sorry things are so stressful right now :(

[JANE DOE]: do the girls speak english too?

TRISTAN TATE: Yes all of them

[JANE DOE]: oh okay that's good

[[JANE DOE]: i'm a bit nervous because i haven't met them before and ive never really done anything like this. sorry

TRISTAN TATE: Don't be :)

[JANE DOE]: okay i'll try

See Exhibit N.

[JANE DOE]: hi.. when you have the chance, i was just wondering if there were any more info about the girls i'd be moving in with? i'm honestly feeling a bit scared and nervous. i just haven't met them before, don't know what they look like, or anything really.

i'm excited too but mostly nervous now! sorry

TRISTAN TATE: You'll be at my house most of the time, and my house is a 60 second walk from the other house you can see it from the window.

TRISTAN TATE: They are very nice polite girls, they make a lot of money on onlyfans and tiktok and will be able to help you.

See Exhibit O.

173. After buying Jane Doe's plane ticket and right before she arrived TRISTAN TATE told her she must "never ever talk about me ever to anybody." He said, "[i]n life, but especially in Romania, never ever talk about me ever to anybody." Then he said, "[r]eminds me, should I cover the rules now or when you land?"

174. TRISTAN TATE told her there are three rules she must obey. 1. No body hair at all, 2. She must teach him music, piano and guitar, and 3. **"the most important. Don't talk to anybody ever who I didn't introduce you to. Romania is my world. No external friends."**

When she asked for clarity, he said that he will introduce her to a lot of amazing people but

that she cannot use tinder or Instagram or try to meet any “normal” people in Romania on her own.

175. When Jane Doe arrived, TRISTAN TATE picked her up from the airport in a Blue Rolls Royce.

176. TRISTAN TATE talked about managing Jane Doe on OnlyFans the first day she arrived. She told him that her previous OnlyFans account had been for her photography and she had never done explicit sexual content. She said she might be willing to try strip teasing but she was nervous. TRISTAN TATE told her she could make a decent living doing pornography on OnlyFans and he would set up a meeting with “the manager,” meaning Georgiana Naghel. Jane Doe reiterated that she had not yet agreed to doing OnlyFans and TRISTAN TATE said what he says to all the women he grooms: that he doesn’t care whether she does it or not because he is already rich.

TRISTAN TATE: You could make a decent amount doing that kind of stuff

TRISTAN TATE: A good living at least

TRISTAN TATE: I'll set up a meeting with the manager?

TRISTAN TATE: She's female

[JANE DOE]: okay:)

[JANE DOE]: but i'm not set on doing that.

just a meeting to learn more about everything right?

TRISTAN TATE: Sure, like I said to you in the car. You can clearly see I have no reason to care 1% if anybody works for my company. I'm already rich.

[JANE DOE]: not doubting that. just nervous

TRISTAN TATE: Don't be :)

See Exhibit EE.

177. But this is all part of THE TATE BROTHERS M.O. They bring up OnlyFans and then say they are just offering it as a way to help the girl make money and that they don’t really care one way or the other. But as ANDREW TATE explains to the men he coaches, saying they don’t care is just a manipulation so the women cannot accuse them of pressuring them into it,

even though they will do exactly that in other ways. TRISTAN TATE repeatedly brings up OnlyFans because he brought Jane Doe to Romania for the purpose of exploiting her on OnlyFans/webcam.

178. Jane Doe was only in Romania about a week because from the instant she arrived she felt the entire experience was not normal. When TRISTAN TATE first picked her up he made a joke about kidnapping her that made her uncomfortable. She stayed at a couple different locations but ended up staying at the same house as Mary Doe, where Iasmina and Beatrice were also living. The atmosphere in that house was very hostile. Mary Doe and Iasmina were very clearly not getting along, and Iasmina and Beatrice were talking badly about Mary Doe. And Mary Doe seemed visibly upset all the time. Iasmina and Beatrice tried to keep Jane Doe away from Mary Doe which raised her suspicions. So, she decided she would find an opportunity to speak with her alone. Meanwhile she was told she could not leave the house alone.

179. Before arriving in Romania, she and TRISTAN TATE talked about spending time together and seeing the sights but instead, he was rarely available. This made her realize that he did not ask her to come to Romania because he had feelings for her, missed her, and wanted to spend time with her. She became concerned she was lured to Romania on false pretenses.

180. She eventually told TRISTAN TATE that she did not want to do OnlyFans and he seemed to accept this.

181. Although every woman in the house where she was staying was supposedly in a relationship with either ANDREW TATE or TRISTAN TATE, including herself, the women hardly saw THE TATE BROTHERS. While Jane Doe was in Romania, THE TATE BROTHERS mostly stayed somewhere else or left town completely. She observed that all the

women except Mary Doe, were working on OnlyFans and appeared to be working very long hours, often in the middle of the night until early in the morning. They appeared mal-nourished and unhappy. Iasmina said a lot of things that made Jane Doe feel uncomfortable. At one point, Iasmina told Jane Doe that she knew things about THE TATE BROTHERS that if she ever told anyone about, she would end up dead. Jane Doe told TRISTAN TATE about this comment and he just shrugged it off.

[JANE DOE]: i don't want to cause any drama or issues by sharing the things that happened

TRISTAN TATE: Just tell me

[JANE DOE]: just hearing all the drama and details of the relationships and one girl in the house that has a lot of drama with another one.

[JANE DOE]: **and that there's things she knows that if she said about you guys, she would end up dead.**

[JANE DOE]: You deleted this message.

TRISTAN TATE: Stop deleting messages

TRISTAN TATE: Tell me! :) lol

TRISTAN TATE: Not going to kill anybody

[JANE DOE]: i don't know if that's my place to continue into the detail of their conversations- but it's the one that says she's the top girl and knows her place with andrew

TRISTAN TATE: **Tell em things**

TRISTAN TATE: **Me**

TRISTAN TATE: **It's comedy for me**

See Exhibit FF.

182. When she was finally able to talk with Mary Doe alone, Mary Doe told her that she had done some work on TikTok with the other women but had not been paid. This, along with the other signs she had been observing, made Jane Doe suspect that trafficking was occurring.

Mary Doe

183. Meanwhile, around January 2022, ANDREW TATE messaged Mary Doe, then 20 years old, on Instagram after she liked one of his posts. Mary Doe was drawn to ANDREW TATE because he claimed to have traditional values and to love God, like Mary Doe. They

started messaging every day. In their messages Mary Doe told ANDREW TATE how she was working hard to support herself but struggling, and also sending money back home to her brother in Moldova when she could.

184. ANDREW TATE came to London around February 2022, and they met in person. As part of Andrew's grooming modus operandi, he quickly escalated the seriousness of the relationship saying right before he arrived: "You need to understand once you're my girl you will have to be my girl forever. A woman never leaves her man. I will be the last man in your life." And, "What if we fall in love and I kidnap you back to Bucharest."

185. On their first date, Mary Doe felt they had a lot in common: hard lives growing up, traditional values, and they were both athletes. ANDREW TATE was very charming and sweet. He expressed that he wanted to settle down which was very appealing to Mary Doe who wanted marriage and a family.

186. Mary Doe fell in love with ANDREW TATE and believed they were in an exclusive relationship. ANDREW TATE told her he loved her and wanted to marry her and have a family with her. He also lied and told her that he used to run a webcam business when he was young but that he was done with that now. The truth was he was still exploiting women on webcam, including on the website OnlyFans (also referred to as "OF").

Mary Doe: I'm sad

ANDREW TATE: I know. Because your heart is mine. But we will be together soon

Mary Doe: What about your heart?

Mary Doe: Is it mine?

ANDREW TATE: I can trust you?

Mary Doe: Yes

ANDREW TATE: We will see

....

ANDREW TATE: No boys

Mary Doe: No

ANDREW TATE: Good girl
Mary Doe: What about you
Mary Doe: Any girls around?
ANDREW TATE: I don't need girls

See Exhibit P.

187. ANDREW TATE came to the U.K. another time and spent time with Mary Doe and said Mary Doe should move in with him. Mary Doe took this as a joke at the time.

Mary Doe: So you're leaving??
Mary Doe: You're not even going to say bye?
ANDREW TATE: I will
ANDREW TATE: You should be coming with me
Mary Doe: Well you didn't ask me
ANDREW TATE: I said many times you should be living in romania you ignored my comment
Mary Doe: Okay I'm coming with you
ANDREW TATE: That's my girl. Give me a few hours to make a serious plan.
Mary Doe: Baby
Mary Doe: But can I trust you?
ANDREW TATE: Yes. You can.
ANDREW TATE: You'll move back to romania with me. I'm just planning when I'm going there.

....

Mary Doe: But we only saw each other once
Mary Doe: I want to see
ANDREW TATE: That's why you'll come with me
ANDREW TATE: Follow your heart
Mary Doe: I mean if I can't come with you now I want to [see] you before you leave
ANDREW TATE: If you knew my job you'd understand my life a little more
ANDREW TATE: If I have to leave I can trust you here? You'll wait for me?
Mary Doe: So tell me more so I can understand
Mary Doe: You know already
ANDREW TATE: I will tell you.
ANDREW TATE: **When I know you would die without me**
ANDREW TATE: **And that we are forever**

....

Mary Doe: **To be honest i never felt like this with anyone, I was thinking if I'm naive to think like that maybe I am but it's true**
ANDREW TATE: It's not naive. It's real.
Mary Doe: But how did you feel?
Mary Doe: Was it special for you too?

ANDREW TATE: I feel like I can trust you with anything But my life is very complicated
ANDREW TATE: I don't want to scare you
ANDREW TATE: So time will tell. I hope so.
ANDREW TATE: I always wanted a woman who was my partner in everything
Mary Doe: You can trust me
Mary Doe: But I you said you came here for me and in 3 days we saw each other only once
Mary Doe: This makes me sad because I really wanted to see you
Andrew Tate: I did come for you
Andrew Tate: But I have problems to fix everywhere. I have things I can't ignore.
Mary Doe: I know
Mary Doe: But I wanted you only for me
ANDREW TATE: **My heart is only for you**
ANDREW TATE: But I have to keep business moving
ANDREW TATE: It would be easier if I could explain
Mary Doe: So explain baby
...
ANDREW TATE: Not now
....
Mary Doe: I just watched some of your YouTube videos
Mary Doe: I think it was a mistake not to watch before and just listen to you telling me all the stuff and believe in it
Mary Doe: So I don't mean anything to you? I'm I just another girl you had sex with? I'm stupid for sleeping with you so soon in the first place but for some reason I thought it meant something more
Mary Doe: And you're playing with me
Mary Doe: Why?
Mary Doe: Is this fun for you?
Mary Doe: I'm don't understand honestly
ANDREW TATE: Hello
ANDREW TATE: I don't know what you watched
ANDREW TATE: **I'm 0% playing with you**
....
Mary Doe: Are you talking about babies with all the girls? Do you already have kids?
Mary Doe: Why making me fall in love for you? Why ? To hurt me?
Mary Doe: This is not fun
Mary Doe: At least not for me...I can't believe I fall for it
ANDREW TATE: **This is show business.**
ANDREW TATE: **It's not real**
Mary Doe: Ohh yeah pimps and hoes degree
██████████ are not listening to me
ANDREW TATE: And if you're not gona listen then I can't trust you with anything important
ANDREW TATE: YouTube isn't important
Mary Doe: You're not talking to me

Mary Doe: I feel really bad and I don't know what to believe
ANDREW TATE: I am in a fucking meeting
ANDREW TATE: I don't even know what videos you've see
ANDREW TATE: It's YOUTUBE
ANDREW TATE: It's not important
ANDREW TATE: There's tons on YouTube about me
Mary Doe: Don't speak like this to me, I said nothing wrong
Mary Doe: I'm just confused
ANDREW TATE: You're pissing me off
ANDREW TATE: **I've told you YouTube is show business.**
ANDREW TATE: Have I done anything wrong to you? No.
Mary Doe: Okay then
Mary Doe: **Can you be honest with me?**
Mary Doe: **Are you going to be with other girls too?**
Mary Doe: **Because this is not how a happy family looks like in my eyes**
....
ANDREW TATE: You're not a stupid girl and you probably can guess how I
ANDREW TATE: **I have to hide what I really do**
Mary Doe: **Web cam?**
ANDREW TATE: **For a long time I did this with a company of girls who worked on video chat. The company was fake.**
ANDREW TATE: **Yes**
ANDREW TATE: **But it was how I cleaned my illegal money**
ANDREW TATE: **After this.**
ANDREW TATE: **Men started getting jealous and asking me how they can start webcam companies. They could never do this because they're losers**
██████████ they liked the idea
ANDREW TATE: **So I started making men pay me to "teach" them**
ANDREW TATE: **That's what those videos are about are for**
ANDREW TATE: **It's all a cover**
ANDREW TATE: Do you understand
Mary Doe: Yes
ANDREW TATE: **Now it goes deeper**
ANDREW TATE: **Some of those girls who worked for me**
ANDREW TATE: **I used to do other things. Move monev. Or illegal things. Papers etc.**
ANDREW TATE: **I will never do this with you**
ANDREW TATE: **But I need those girls for some work sometimes. Money things.**
ANDREW TATE: **When I was saying earlier I need a woman who I don't hide things from. This is what I mean**
ANDREW TATE: **If you meet those girls I want you to be super cool with them. Friendly. You're on my team to help me**
ANDREW TATE: **You don't need details about any of this what I need you to do is just trust me and do as I say**
ANDREW TATE: **And I will always take care of you**

ANDREW TATE: Nothing bad will happen

ANDREW TATE: But you have to be on my side

Mary Doe: **Tell me more about the "illegal money " what do you mean by that?**

ANDREW TATE: **I don't want to say here**

ANDREW TATE: I wanted you to spend the summer with me in romania. Helping me with everything

ANDREW TATE: In lots of different ways

Mary Doe: **I'm not gonna do Web cam**

ANDREW TATE: **I do NOT want that**

ANDREW TATE: And I will never ask

ANDREW TATE: So don't worry about that

....

ANDREW TATE: **In london there's a lot of drugs and money here. I have to do meetings you know this.**

ANDREW TATE: **I want to tell you everything but only when I know stupid girls or YouTube can never get between us**

....

ANDREW TATE: I don't have space in my life for a woman who's going to fight with me

ANDREW TATE: I need you to be good

Mary Doe: I don't want to fight with you

Mary Doe: I felt hurt

ANDREW TATE: **I'm not going to hurt you**

....

ANDREW TATE: **Do you love me**

Mary Doe: **Don't do this**

Mary Doe: **Don't play with me**

ANDREW TATE: **Tell me**

ANDREW TATE: **I want to know**

Mary Doe: **Maybe**

ANDREW TATE: **I felt an instant connection with you**

ANDREW TATE: **I felt like we are meant to be**

ANDREW TATE: But it's risky for me to involve you in things if you're not serious about us

Mary Doe: I thought so too

ANDREW TATE: **I need to know if you love me**

Mary Doe: **I do**

ANDREW TATE: **I love you too.**

ANDREW TATE: **You saw it in my eyes**

ANDREW TATE: **I wish you didn't have a job here and could just travel with me**

Mary Doe: So what are we going to do now?

ANDREW TATE: I wanted you to go to romania for a week and live with two girls there and report back to me. Theyre nice girls

ANDREW TATE: Would be fun break for you

ANDREW TATE: And I can trust you

Mary Doe: What exactly to you want to find out?
ANDREW TATE: I want you to be their friend and talk to them
ANDREW TATE: That's it
ANDREW TATE: If they say anything about me. Tell me. If they don't, fine.
ANDREW TATE: Easy
Mary Doe: **What is their relationship with you?**
ANDREW TATE: **They want me but don't have me. I won't sleep with them unless me and you do it together. They're not girlfriends. They do some work for me only**
Mary Doe: **Me and you do it together? What do you mean?**
Mary Doe: **I'm not into girls**
Mary Doe: **And I will never share my man**
ANDREW TATE: You're not understanding what I'm saying
ANDREW TATE: **When can you go to Romania**
....
ANDREW TATE: **Are you excited to live with me?**
Mary Doe: Yes baby
Mary Doe: **But I don't want to have sex with girls**
ANDREW TATE: **Dont worry about that**
Mary Doe: what do you mean?
Mary Doe: **I want only with you.**
....
ANDREW TATE: What things
ANDREW TATE: Do you wanna talk about
ANDREW TATE: youre trying to give me rules
ANDREW TATE: ?
Mary Doe: I'm not trying to give you rules
[REDACTED] then tell me
Mary Doe: **I'm not going to have sex with girls.**
ANDREW TATE: Cool
ANDREW TATE: Anything else
ANDREW TATE: ?
Mary Doe: **And also I don't want you to have sex with anyone else**
ANDREW TATE: **After you prove yourself**
Mary Doe: Prove myself?
Mary Doe: Is this a joke for you?
ANDREW TATE: You're acting strange
Mary Doe: What do you mean to prove myself
ANDREW TATE: I want a real girlfriend not a game
ANDREW TATE: **I'm making a family with my next woman**
....
ANDREW TATE: **Whos wife is this**
Mary Doe: Yours!
...
ANDREW TATE: **Forever**
Mary Doe: Forever
....

ANDREW TATE: **Tell me you belong to me forever**
Mary Doe: video omitted
Mary Doe: Russian songs
Mary Doe: I belong to you forever baby
ANDREW TATE: **The last man youll ever have in your life. So youll need**
ANDREW TATE: take care of me
Mary Doe: I will
....
Mary Doe: No tattoos baby
Mary Doe: I hate tattoos
Mary Doe: It's cool on people
Mary Doe: But not on me
ANDREW TATE: **If i told you to put my name in a tat**
ANDREW TATE: **you'd do it**
ANDREW TATE: So you better hope i dont want that
ANDREW TATE: and i dont
ANDREW TATE: yet
Mary Doe: So you don't care what I want
ANDREW TATE: **You want what i want**
Mary Doe: Good that you don't want me to get a tattoo then
ANDREW TATE: yet
ANDREW TATE: it would be important to me
ANDREW TATE: and i need to see you deserve it first

See Exhibit P.

188. Later, Mary Doe realized ANDREW TATE was friends with someone with whom she had a previous relationship. Mary Doe told ANDREW TATE about this as soon as she found out, but ANDREW TATE reacted with jealousy and used this as an excuse to say he no longer trusted Mary Doe and demanded she come to Romania.

ANDREW TATE: And I need to know youre serious
ANDREW TATE: **Marriage serious**
Mary Doe: Yes. I'm serious
ANDREW TATE: Ok.

....
ANDREW TATE: **If we are meant to be we will fix this. But it's your time to be a woman and really show me I can trust you.**

Mary Doe: Okay baby

....
ANDREW TATE: **I am so angry at you I need you here to show me you're mine**
Mary Doe: I want to be with you too baby

....

Mary Doe: We can't change what happened baby
ANDREW TATE: You think it doesn't matter and it's nothing
ANDREW TATE: **You should feel regret**
Mary Doe: I do
Mary Doe: I told you
ANDREW TATE: **If you move for me I will know you're serious and it will be ok**
Mary Doe: I wish I could go back and change it
....
Mary Doe: **I love you**
ANDREW TATE: **I love you too**
....
Mary Doe: **I hope you're serious about us and You're not good to play with me**
ANDREW TATE: **Im more serious than you'd believe**
Mary Doe: **I don't want you to be with other girls**
ANDREW TATE: **I want you to show me you're sorry for what you did**
ANDREW TATE: **Worry about that**
ANDREW TATE: **nothing else**
ANDREW TATE: **If you don't want me with girls you need to get here, fast**

See Exhibit P.

189. ANDREW TATE began ramping up his grooming of Mary Doe, demanding she prove herself and demonstrate obedience and subservience.

ANDREW TATE: **im going to beat yo**
....
Mary Doe: You know I want to be with you
ANDREW TATE: **belt**
ANDREW TATE: **on your ass**
ANDREW TATE: **hard**
Mary Doe: But gentle
ANDREW TATE: **Slave**
ANDREW TATE: **wheres my dinner**
Mary Doe: Babe
Mary Doe: **Don't speak like this please**
Mary Doe: You know I want to make you dinner just wait for me to get there?
ANDREW TATE: **slave**
Mary Doe: Please
ANDREW TATE: Ble
ANDREW TATE: **BELT**
Mary Doe: **You want me to be your slave or your wife?**
ANDREW TATE: **You're going to do whatever I say**
ANDREW TATE: **Which is the same**

ANDREW TATE: **If i chose a woman as my wife she loves me enough to let me call her anything i fucking want**

ANDREW TATE: **I WILL DECIDE if thats slave**

ANDREW TATE: she doenst give me rules.

ANDREW TATE: Im a man.

ANDREW TATE: I dont listen to females complain

ANDREW TATE: **Just trust me and shut up**

ANDREW TATE: Dont annoy me again today

ANDREW TATE: it doesnt matter if i call you slave it matters to me if I COULD if i wanted to

ANDREW TATE: without you being an idiot

ANDREW TATE: theres enough idiot women if I am happy to accept that I have 10,000 choices

Mary Doe: I'm trying to do this right way I understand you don't know how I am But I'm not from west or some Romania bitch. I was raised with values and I'm trying to keep it like that even though the world/ my work place is so toxic. So I know you are trying to make some things sure and if I will treat you right And you kept saying you want me to prove myself well I'm moving with you. Let me get there first and see

ANDREW TATE: Ok. Lets see

Mary Doe: You need to have some faith

ANDREW TATE: My lifes been too hard for faith

Mary Doe: I can't "prove" myself if you don't let me

ANDREW TATE: **You need to accept youre mine forever no matter what I do. And if you want me to act nicer you will convince me with ninceness**

....

Mary Doe: What are you specifically upset about?

ANDREW TATE: That the girl i loved has been fucked by a guy i know

Mary Doe: I understand why you are not happy I will try think about how I can't help to fix this

But I really want to see you when I come to London

ANDREW TATE: **Tell me how you can fix it I want to know this also**

Mary Doe: **I gave my self to you. I accepted to move with you in Romania. I don't know what else I can do at the moment to make you feel better about what**

happened. If I could change the past I would but I can't. I want to be with you and I want us to work but I can't do this by myself

ANDREW TATE: **If you move to romania i know that will help me**

ANDREW TATE: until that happens I just feel decieved. I know it was before me

██████████ i feel like ive been cheated on

ANDREW TATE: I cant explain it

Mary Doe: I understand. We will fix this. I love you!

ANDREW TATE: I hope you do

....

ANDREW TATE: **im going to beat you**

ANDREW TATE: **badly**

ANDREW TATE: **once**

ANDREW TATE: **to feel better**

See Exhibit P.

190. ANDREW TATE began saying increasingly threatening and frightening things:

ANDREW TATE: Dude did a whole video on me

ANDREW TATE: Trying to work out if im on steroids or not

ANDREW TATE: and said if im not

ANDREW TATE: **my blood work is the same as a serial killer, and ill be completely insane**

ANDREW TATE: he said he couldnt tell

ANDREW TATE: because looks like im not

ANDREW TATE: but my results are insane

ANDREW TATE: and i would be a freak

....

ANDREW TATE: **My test is triple this guy who's on steroids**

ANDREW TATE: **Also it makes me insane but I control it with my mind best I can**

ANDREW TATE: I have some strange blood

....

ANDREW TATE: **Im so smart**

ANDREW TATE: **I've stayed out of jail**

ANDREW TATE: But 90% of murders in jail

ANDREW TATE: Have my T levels

ANDREW TATE: Im like a built murderer with a crazy strong brain

ANDREW TATE: That saved me

ANDREW TATE: It's a really good combo I'm actually very happy about it

ANDREW TATE: **But I know in the wrong circumstances I could snap**

Mary Doe: Baby I just got my sim back

Mary Doe: **This is a bit scary**

....

Mary Doe: What about your test

Mary Doe: So you are dangerous?

Mary Doe: If you get mad

ANDREW TATE: You gona piss me offl

Mary Doe: I hope not

Mary Doe: But what if we will have kids

Mary Doe: And they will piss you off

ANDREW TATE: Im a G

ANDREW TATE: **dont doubt me**

ANDREW TATE: **just behave**

See Exhibit P.

191. And ANDREW TATE continued to lie about his intentions and feelings for Mary Doe. He continued to promise a traditional and exclusive relationship.

Mary Doe: I told you I'm traditional
Mary Doe: **I don't want to share you with anyone else**
Mary Doe: I want you to be mine
Mary Doe: Only
ANDREW TATE: **Then be mine only**
Mary Doe: I am
ANDREW TATE: **Then youll be here soon**
ANDREW TATE: **and everything will be perfect**

See Exhibit P.

192. Mary Doe expressed fears and concerns about moving to Romania and ANDREW TATE's commitment to her. ANDREW TATE told her he was serious about marriage and a future together but Mary Doe needed to prove she was serious by quitting her job and moving permanently to Romania. After repeated pressure and manipulation, ANDREW TATE convinced Mary Doe to move to Romania to be with him.

193. ANDREW TATE had one of the women working for him buy a plane ticket to Romania for Mary Doe with her information. Then when Mary Doe was on her way to the airport, ANDREW TATE told her that he was not in Romania but had to go to Dubai for work. He told Mary Doe to stay with his assistant Georgiana until he came back.

194. Georgiana picked Mary Doe up from the airport and told her that she would be staying with some women who were working for Georgiana. Mary Doe thought this was very strange and felt very uncomfortable.

195. When she got to the house there were several women living there and they showed her to a room they said would be Mary Doe's room. This made Mary Doe very concerned because she was supposed to be in Romania to visit ANDREW TATE. When she asked what the women did for work, they said TikTok at first but later admitted they were also working on OnlyFans.

196. When Mary Doe asked ANDREW TATE why she was staying with women doing OnlyFans he lied and said he had nothing to do with the business and that it was Georgiana's company. Later he said it was Tristan's company.

197. Once in Romania, ANDREW TATE became harsher and started restricting Mary Doe's movements:

Mary Doe: How are you?

ANDREW TATE: **Yes only go city with someone else not by yourself**

ANDREW TATE: I'm still working

ANDREW TATE: Trying to get home as fast as possible

ANDREW TATE: **Girls don't go out alone when they're married**

Mary Doe: Why would I go alone baby

ANDREW TATE: You wouldn't. That's what I mean

Mary Doe: In a city I have never been before also

Mary Doe: **I'm not married yet**

██████████ are

ANDREW TATE: **You don't go out alone**

....

Mary Doe: Tomorrow we might go in to the botanical garden with the the Ukrainian girls

ANDREW TATE: Who is we

Mary Doe: It's women's day also

ANDREW TATE: Who's we

Mary Doe: Like me and them

Mary Doe: The 2 girls

ANDREW TATE: **No you need Betty or jasmine or geo to go**

ANDREW TATE: I don't trust those Ukrainians

ANDREW TATE: **You're not going anywhere**

ANDREW TATE: **Without one of those 3**

....

ANDREW TATE: I'm here

ANDREW TATE: Wake up

ANDREW TATE: **Don't ever call me that many times again**

ANDREW TATE: Literally never do that again.

ANDREW TATE: You called a bunch of times when my phone was in another room.

And now people say your name and will begin stalking your instagram to see where I am.

Because you're an idiot and can't just fucking wait for replies

ANDREW TATE: **DO NOT post any stories of the dogs.**

DO NOT post any stories of the house.

DO NOT posts any stories with the girls in the house

Let everyone think you're in London. Not romania.

Until I find out who's watching you now.

ANDREW TATE: You never listen to a word I fucking say

Mary Doe: Ok.

Mary Doe: I thought something had happened to you, I was worried Am An idiot because of this?

Okay

Mary Doe: Where are you?

Mary Doe: Baby

ANDREW TATE: You can not call me that many times

ANDREW TATE: **Your name flashed 10 times in a room full of gangsters**

ANDREW TATE: Now I have new problems

ANDREW TATE: You kept calling me when my phone was in room with them

ANDREW TATE: I don't trust those guys now they're gona be looking for you.

Mary Doe: I was worried, I didn't hear fion you for like 5 hours

ANDREW TATE: IM WORKING

do you think I make millions of dollars? Working in Starbucks?

Mary Doe: I know but let me know in advance that you will not be able to speak so I will not be worried

ANDREW TATE: If I'm not online. Wait.

ANDREW TATE: Don't call over and over

Mary Doe: And what if something is happening? I don't know that

ANDREW TATE: If I'm in trouble you can't save me

ANDREW TATE: My problems are too big

ANDREW TATE: **But bad people now know your name**

ANDREW TATE: **If my business goes bad with them you're a kidnap risk**

See Exhibit P.

198. Then ANDREW TATE began grooming Mary Doe to make sexual content with other women even though she repeatedly stated that she did not want to do OnlyFans or sexual content and did not want to do sexual things with other women:

ANDREW TATE: **Kiss the girls and send me videos.**

Do something hot and fun

I'm bored and alone in my plane

Mary Doe: Everyone is sleeping still

And I can't do that baby, I'm not like that

ANDREW TATE: "Andrew said he wants a video of my pussy in your face"

ANDREW TATE: Go wake them up

Mary Doe: Lol

Mary Doe: You're crazy

Mary Doe: No you didn't

ANDREW TATE: [strong arm emoji]

Mary Doe: Wait a minute

Mary Doe: **I'm not going to do that**

Mary Doe: Like with all the girls?

ANDREW TATE: Bet and Jasmine

ANDREW TATE: Don't be boring

Mary Doe: Are you serious?

Mary Doe: It's not that I'm being boring

But it's something to ask me only and to ask all the girls

Mary Doe: Why do you want to see the girls?

ANDREW TATE: **I want to see YOU obey me.**

It's not about them.

It's about knowing my girl does anything I say.

ANDREW TATE: **So I know you don't want too. That's why it means something when you do**

ANDREW TATE: So obey your man. We're together forever it's just a fucking picture

Mary Doe: **Okay.**

I will do it.

I want to make you happy

ANDREW TATE: You're starting to understand

ANDREW TATE: **A woman who always obey everything I say, especially things she'd never normally do, is a woman who is really loyal to her man**

ANDREW TATE: I want the best woman on earth

...

Mary Doe: **You know I'm Loyal to you
And yes I don't do this normally but I want to make you happy and I hope you will see how important you are to me!**

ANDREW TATE: That's exactly what it shows me

ANDREW TATE: Plus it's sexy

ANDREW TATE: **I can't explain how much I love it when you just obey me without question**

ANDREW TATE: **It's hot**

.....

ANDREW TATE: Good job baby

Mary Doe: Thank you

Mary Doe: Okay?

ANDREW TATE: Of course

ANDREW TATE: Now I really miss you

ANDREW TATE: **You should try obeying me more often**

ANDREW TATE: **ALWAYS LISTEN**

Mary Doe: I miss you to baby

Mary Doe: So much

Mary Doe: And if I don't? -

ANDREW TATE: **You will because that's how you get my attention and love**

ANDREW TATE: **And punishment comes from love**

.....

ANDREW TATE: Those pictures made me super miss you
ANDREW TATE: You should have kissed her
Mary Doe: Maybe I will surprise you
ANDREW TATE: I would like that
ANDREW TATE: The day you send me a video having sex with her at random
ANDREW TATE: Wifey!

. . . .
ANDREW TATE: **You can trust me 10000% in every way**
ANDREW TATE: **I'm gone trust you with my work**
ANDREW TATE: **Which is literally crime**
ANDREW TATE: Don't worry
Mary Doe: It's not about trusting you, it's about The fact that I will not feel comfortable
ANDREW TATE: You're my wife for life.
Which means you're going to be my source of fun
ANDREW TATE: No one else
Mary Doe: And G is filming
ANDREW TATE: I wanna see you do as I say it's hot
Mary Doe: Yeah but you are asking me to do it with girls that work for you or for G so
what how I am more special to you?
Mary Doe: Baby
Mary Doe: I want to hear your answer
Mary Doe: To see*
ANDREW TATE: Of course you're special to me
Mary Doe: I'm waiting for your answer
This will make me decide
ANDREW TATE: Obey me. It makes me miss you like crazy

. . . .
Mary Doe: you lucky I love you @
ANDREW TATE: **As a woman should.**
Love me and obey me and do everything I want and be my fantasy
ANDREW TATE: **And my fantasy is a woman who obeys every single word**
No matter what.
It's hot

. . . .
Mary Doe: Baby I'm not going to fuck with the girls though only with you
. . . .
ANDREW TATE: It's difficult for me to explain
ANDREW TATE: **How much you doing things you'd never normally do only to**
please me makes me happy
It shows me you respect me and shows me you'll always try to make me happy
But it's more than that it shows me I can get everything I need from only you

. . . .
Mary Doe: Baby why did Georgiana asked me if to make a fake TikTok account?
Mary Doe: Like I don't want to work for her
. . . .

Mary Doe: Yesterday she come here, she asked me If I want to go in the live with Betty again and I said I could but I said that only for support it's not like I like this this thing And then she asked me if I have another phone with me and that she can make me a fake account for TikTok and i said I have one but just for calls, and she said she has phone with a

good camera

And I was like hmmm, wired

Mary Doe: I didn't really told her anything, I wanted to speak with you about it

Mary Doe: I don't like guys talking to me and stuff

ANDREW TATE: **Well instead of going live with Betty go live alone and keep all the money.**

I know you don't like guys talking to you.

Truth is sometimes ill be very busy working myself so it's good if you have something to do

and I also think you'll make a lot of money.

I won't let you have any real job where men see you for real no way.

On a screen I don't care.

TikTok is better than a nightclub where dudes try for real

Mary Doe: I was not talking to guys in the club, and I was bitch with them

ANDREW TATE: Doesn't matter

ANDREW TATE: They tried

ANDREW TATE: **I don't care how good the locks on my car is**

ANDREW TATE: **I don't let people try and break in**

ANDREW TATE: You'll never have a job like this again

Mary Doe: **I'm not a car baby**

ANDREW TATE: **You're property owned by me**

ANDREW TATE: Stop talking back and annoying me

ANDREW TATE: You will never be around men for real ever again

ANDREW TATE: **Never out alone**

ANDREW TATE: **Ever again**

ANDREW TATE: **With me or people I know**

ANDREW TATE: **Only**

ANDREW TATE: Always

ANDREW TATE: Forever

Mary Doe: You know I'm yours baby

ANDREW TATE: If you wanna make a lot of money do TikTok.

If not I'll give you money. But sometimes I have huge work problems and am busy

It's good if you made 10,000 a month for yourself also when I am busy. Why not.

But it's your decision

Mary Doe: I can, I also can find different activities to do and different ways of making money

....

ANDREW TATE: **I want you to give your soul and body to me and exist to make me happy**

Mary Doe: I did that already

Mary Doe: I'm yours
ANDREW TATE: I want you to get a vibrator and cum with them.
All of you cumming together on the bed.
Obey me. It makes me obsessed with you.
Mary Doe: Are you going to involve the girls all the time?
ANDREW TATE: No way
ANDREW TATE: We will always be alone.
Sometimes we use them so you can impress me
Mary Doe: I want to wait to come for you
ANDREW TATE: I want you to have sex with those girls I want to have all your firsts
ANDREW TATE: Do as I say. Give it to me like a good girl
Mary Doe: Baby I need more time to get used to this
ANDREW TATE: Trust me baby
Mary Doe: I do ,
I just need more time
Mary Doe: I don't even know how to use a vibrator
Mary Doe: I never used one
Mary Doe: I don't to be embarassed
Mary Doe: I don't want to be*
ANDREW TATE: Even better
ANDREW TATE: You'll love it
Mary Doe: Baby. . .
ANDREW TATE: It's easy

See Exhibit P.

199. When Mary Doe asked questions about ANDREW TATE's business or where she will be living or their future he refused to answer and told her she was nagging him and causing stress.

200. ANDREW TATE then began grooming Mary Doe to engage in threesomes:

ANDREW TATE: **We will definitely have threesomes one day**

Mary Doe: Will see

Mary Doe: I'm not attracted to her

ANDREW TATE: **You do as I say. If I want to fuck a girl she has to fuck both of us. Not me alone. We're a team.**

ANDREW TATE: **Not her**

ANDREW TATE: **Anyone I say.**

....

ANDREW TATE: I want to see you do it

ANDREW TATE: I want you to fuck with a lot of girls. I don't care about me

Mary Doe: I'm not bi

Mary Doe: I mean I never tried to do it with a girl, but I guess it's like with a guy, I can't just "fuck"

Mary Doe: If I don't feel something

See Exhibit P.

201. ANDREW TATE sent many messages telling Mary Doe he wants her to have sex with other women. He even started a group chat with Mary Doe and two other women under his control called, "**Obey the King,**" where he instructed the girls to take sexual pictures together to send to him. And then the grooming process moved toward webcam and ANDREW TATE revealing that he was involved in the webcam business after all.

ANDREW TATE: We need to talk

Mary Doe: Sure

ANDREW TATE: I'm serious

ANDREW TATE: Can I trust you

Mary Doe: Okay babe

Mary Doe: About what

ANDREW TATE: Yes or no

Mary Doe: Yes we can talk

Mary Doe: What happened

ANDREW TATE: **No can I trust you**

ANDREW TATE: **I have a 3 stage plan**

Mary Doe: **You know you can**

Andrew Tate: **And if you're my wife I want you part of it**

Mary Doe: I did trust you

ANDREW TATE: You need to listen and think carefully and understand what I'm going to say

ANDREW TATE: **The plan is I want to get this house for free.**

ANDREW TATE: For us. I'll show you.

ANDREW TATE: <https://www.imobiliare.rolin chirieri-case-vile,&ucuresti/pipera./casa-de-inchiriat-6-camere-X6ME1-1012#modal-galerie-mare>

ANDREW TATE: Here's how we do it

ANDREW TATE: 1) you start working with Georgiana and work very hard. So the other girls try and catch you.

You'll make a lot of money and you can keep it all. Be rich.

But it's important the girls see you working so they work hard

Andrew Tate: 2) both of those girls are obsessed with you Georgiana just called me. They like you alot.

So me and you are going to fuck then together. We're going to have threesomes and fuck them and make them love you as their girlfriend.

Fuck them as a team.

ANDREW TATE: Part 3 I will tell you in person
Mary Doe: And what does this have to do with the house?
ANDREW TATE: Because they earn a lot of money and they will buy it through Georgianas company with some of their wages
Mary Doe: So the house it's for Me and or the girls?
ANDREW TATE: It's actually for me
ANDREW TATE: But that means us. As you're my wife forever. Don't fuck up
Mary Doe: Me and you I meant
[REDACTED] keep all your money
ANDREW TATE: They buy the house.
I can trust you with this?
Mary Doe: I came here to be your girlfriend
Mary Doe: Not their girl friend
ANDREW TATE: You came to be my wife as do as I fucking say
Mary Doe: And you told me I don't have to any of this thing
ANDREW TATE: You will be my girlfriend
ANDREW TATE: I didn't say that
Mary Doe: I specifically told you that
ANDREW TATE: You wouldn't
Mary Doe: Why on earth would you want your "wife " to this
ANDREW TATE: Ok forget it
ANDREW TATE: You're useless you don't understand anything
Mary Doe: Explain to me
ANDREW TATE: I'm talking about millions of euros and you're complaining about sucking a tit
ANDREW TATE: MY WIFE HELPS ME
ANDREW TATE: With everything
ANDREW TATE: What if I need something actually hard or dangerous? This is fucking easy
ANDREW TATE: What's the problem?
Mary Doe: I like hard and dangerous
ANDREW TATE: Let's see if you can handle this first
Mary Doe: This is easy, that's why I didn't do it till now? I get offered in London money all the time for things like this I could've been a milioner by now if I was into it, but I don't like To sell my body
ANDREW TATE: You're not selling your body
Mary Doe: You promised me. . .
ANDREW TATE: You don't understand
ANDREW TATE: Forget it
ANDREW TATE: You're just talking shit
ANDREW TATE: You're not replying mature
ANDREW TATE: Forget everything I said.
ANDREW TATE: Useless
ANDREW TATE: I nearly didn't msg you but I thought no let's give her a chance
ANDREW TATE: You replied like a moron I should have known
ANDREW TATE: Forget it. If I need a girl I can totally trust I'll use someone else

Mary Doe: You will use someone else?
Mary Doe: So you just wanted to use me?
ANDREW TATE: You're literally a fucking idiot
ANDREW TATE: I'm going to type to you one more rime
ANDREW TATE: If you don't understand
ANDREW TATE: I give up
ANDREW TATE: Is your brain on?
ANDREW TATE: You just totally ignored everything I said and jumped to stupid conclusions
Mary Doe: Yes
ANDREW TATE: You are my woman yes or no
Mary Doe: Yes
ANDREW TATE: You understand my life is not normal
I'm not a normal man I don't have normal money
Everything I do is exceptional.
I need a mafia wife someone who obeys every word.
Do you understand this yes or no
Mary Doe: I understand
ANDREW TATE: So if I say we have to move drugs and risk jail.
Or carry diamonds to Dubai.
Or fuck some girls together so they obey us.
You will always help me.
I will not do these things without you or behind your back.
We always work as a team if we are together.
Yes or no
Mary Doe: Yes
ANDREW TATE: Ok good
ANDREW TATE: Talk more in person
ANDREW TATE: I don't need a woman who isn't on my team
ANDREW TATE: I need someone who helps me
Mary Doe: When
ANDREW TATE: Weds
Mary Doe: You are in London??
ANDREW TATE: Now yes
ANDREW TATE: But leaving in one hour
Mary Doe: Leaving where
ANDREW TATE: Munich
ANDREW TATE: Weds buch
Mary Doe: **When you said work with Georgiana did you mean TikTok or only fans too**
ANDREW TATE: **TikTok ONLY**
Mary Doe: And after that you will ask me to do onlyfans too?
I heard stories about Alexandra
Didn't sound good
ANDREW TATE: I don't care about that whore
ANDREW TATE: **I will not tell you to do OF**

ANDREW TATE: Never

Mary Doe: And does this mean I will stay in this house for more than 2 weeks?

ANDREW TATE: **You can do TikTok and we fuck some girls together and you help me with other business**

ANDREW TATE: **OF is if YOU want to do it.**

I will never ask you.

....

Mary Doe: **Even if I will want (I will not) I don't want you to be agreeing to this even, why would you want other guy's to see me naked? I'm supposed to be yours, no?**

....

Mary Doe: Answer please

ANDREW TATE: **You will do whatever I decide**

My life changes everyday with 1000 problems and you will do whatever is best for me and to help me.

....

ANDREW TATE: I have massive problems in my life at the moment

Mary Doe: And you can't tell me about it?

ANDREW TATE: **No because I can't trust you yet because you don't listen to me**

Mary Doe: I do, but you need to think about my feelings too

I'm trying to make you happy and to do please you

But you are used be surrounded by bitches

I'm not a bitch or hoe , I'm really sensitive and I need you to be more gentle with me

To give me more time to do some things. ..

Mary Doe: I can't understand if you don't speak with me at this point I just feel hurt

ANDREW TATE: You don't need to be hurt you need to obey me

ANDREW TATE: We talk later

Mary Doe: **I can't do this, I can't be working this TikTok thing and be with you like this, I feel like shit**

I'm too emotional for this

I want to cry

....

Mary Doe: **So I heard you are kind of in charge of the business with the girls**

Mary Doe: **Of and TikTok**

ANDREW TATE: **Tristan and G are**

ANDREW TATE: **But I am in charge of them**

....

Mary Doe: So we are not going to speak?

ANDREW TATE: Lolol

ANDREW TATE: !

ANDREW TATE: **We spoke a little. I need you on my team do what G says.**

ANDREW TATE: We will talk more later

Mary Doe: Is this how our relationship is going to be? Or it's now like this

....

ANDREW TATE: **Youre literally with a mafia boss and you think the answer is to nag**

ANDREW TATE: You dont understand the world

ANDREW TATE: **Google mafia wife and learn how you should act**

ANDREW TATE: **there are men with guns protecting my house because people want to kill me**

ANDREW TATE: and my woman complains about bettys shoes

....

ANDREW TATE: A real woman never leaves her man

ANDREW TATE: **I want you to read mafia wives**

....

ANDREW TATE: **Are you doing the hours geo said**

ANDREW TATE: Wives, submit yourselves unto your own husbands, as unto the Lord" (Ephesians 5:22 KJV);

ANDREW TATE: **Obey your man like he is god**

ANDREW TATE: Read this bible verse

Mary Doe: Yeah I stayed like 7 h today

....

ANDREW TATE: Georgiana is super happy with you

ANDREW TATE: hard worker

Mary Doe: I stayed almost 8 hours no break!

ANDREW TATE: Youre going to be rich

202. And ANDREW TATE increased his controlling behavior:

Mary Doe: Babe I have a problem

Mary Doe: I'm stuck

Mary Doe: At the mall

Mary Doe: Can't find a Uber

Mary Doe: Everyone is cancelling

Mary Doe: image omitted

....

ANDREW TATE: Call me if someone's trying to kill you

ANDREW TATE: **Why are you at the mall alone???**

Mary Doe: Because I need to come alone

Mary Doe: If i stay here longer It might as well happen

Mary Doe: Never mind

Mary Doe: I'm the Uber

Mary Doe: In the Uber *

ANDREW TATE: ????

ANDREW TATE: **You didn't tell me**

ANDREW TATE: **And went mall alone**

....

ANDREW TATE: **You do NOT**
ANDREW TATE: **Go out alone**
ANDREW TATE: **Without telling me**
ANDREW TATE: Mall. Super market
ANDREW TATE: **ANYWHERE**
ANDREW TATE: **EVER AGAIN**
ANDREW TATE: **I've told you this about going alone**
ANDREW TATE: **This is your final fucking warning**
ANDREW TATE: **I can't believe you went**

....
ANDREW TATE: You never go out alone again
ANDREW TATE: Understand?
Mary Doe: So you don't trust me?
Mary Doe: Okay
ANDREW TATE: Never again ok?
ANDREW TATE: If you have no one to go with tell me
Mary Doe: Okay baby

See Exhibit P.

203. Despite Mary Doe's numerous protests ANDREW TATE insisted she have group sex. ANDREW TATE told her she needed to do it even though she did not want to, and this is how she can prove her love and devotion to him. She told him she would need to drink to get through it and the other women brought alcohol for her which she drank.

204. As a result of ANDREW TATE's coercion and manipulation, Mary Doe engaged in group sex under the influence of alcohol. Immediately afterwards, she became very distressed and locked herself in the bathroom and began sobbing. She told ANDREW TATE how hurt and upset she was by the experience. Yet he insisted she comply with a threesome on another occasion.

205. Mary Doe would often become distressed and confused and try to talk to the other women about what was going on. For example, she tried to talk to Beatrice Anghel, called Betty, and Iasmina Pencov. But what Mary Doe did not know—because they lied about it—was that Betty and Iasmina were both in romantic/sexual relationships with ANDREW TATE.

See e.g. Exhibit Q. Both Betty and Iasmina would report what Mary Doe said to Andrew and he would instruct them on how to respond and they would follow these instructions. E.g. Exhibit R.

206. The other women under ANDREW TATE's control facilitated and at times assisted his grooming and manipulation of Mary Doe.

207. For example, **ANDREW TATE texts with Betty at same time period:**

ANDREW TATE: I I have to see [Mary Doe] tonight. Tomorrow wake up early me and you go somewhere

....

Beatrice Anghel: I think I was wrong. What I wanted to tell you is that on my birthday I want to be with the people I love, especially you, my king. And me and smurf wanted to go to Paris, but not alone. I want you to fuck me everywhere

ANDREW TATE: and you should never want to go anywhere without me

....

Beatrice Anghel: I know I was stupid, my king must hit me with his belt and obey him I know you are still mad at me, but I had a good night on tiktok and Im happy

ANDREW TATE: How good

Beatrice Anghel: I made some money

...

Beatrice Anghel: So far I have made \$823 but by 12pm tonight I want to make \$1300/1500

ANDREW TATE: Yes that's very good

Beatrice Anghel: Love you

....

ANDREW TATE: I love you too

Beatrice Anghel: IM live now baby

Beatrice Anghel: I finish another day good on tiktok

Beatrice Anghel: in 2 days, I did 1764\$

Beatrice Anghel: Im happy

ANDREW TATE: Im very proud of you

Beatrice Anghel: You are my motivation

Beatrice Anghel: You work hard and sleep a little and when I feel like sleeping Im thinking about how long youve been working

ANDREW TATE: I love you.

ANDREW TATE: ?

Beatrice Anghel: I love you more baby

See Exhibit S.

Beatrice Anghel: **[Mary Doe] its [sic] crazy and stupid**

ANDREW TATE: Why

Beatrice Anghel: **She came to my room and made me look into her eyes. And she asked me when**

you were in the club, something happened between you and Andrew, and I said no

ANDREW TATE: lolololol

ANDREW TATE: idiot

Beatrice Anghel: **And she said she knew I had no feelings for you, but she thought we might have “done” something together**

Beatrice Anghel: I told her that I came home that night and left in the morning for work

Beatrice Anghel: and tell me where do you get the marks on the ass

Beatrice Anghel: from the clips for onlyfans

ANDREW TATE: What?

ANDREW TATE: **Oh she ask you?**

Beatrice Anghel: **Yes**

Beatrice Anghel: Because she thought you did them to me

Beatrice Anghel: She said she saw the difference between me and Jasmine, that I was nice to her

and Jasmine was bad, but she thought maybe you fucked me that night

ANDREW TATE: **Shes a loser**

See Exhibit T.

ANDREW TATE: Old lady ;)

Beatrice Anghel: But your number 1 bitch

ANDREW TATE: And my love

See Exhibit U.

Beatrice Anghel: **[Mary Doe] asked me where we were**

ANDREW TATE: **Tell her to stop asking you questions**

ANDREW TATE: **Say “don’t question me Andrew is the boss and I only obey”**

....

Anghel Beatrice: **I told her that too and [Mary Doe] said, Please tell me. I promise I wont tell him.**

ANDREW TATE: **Ignore her**

See Exhibit V.

Beatrice Anghel: and then I go get a dress for tonight

██████████ baby

Beatrice Anghel: Its okay if I go with [Mary Doe]?

ANDREW TATE: Yes

Beatrice Anghel: she bought me this

ANDREW TATE: **She loves you**

ANDREW TATE: ;)

See Exhibit W.

ANDREW TATE: You look amazing tonight. But Im very angry.

Beatrice Anghel: Why

ANDREW TATE: Not your fault. I love you

Beatrice Anghel: I love you too

ANDREW TATE: Are you on your period?

ANDREW TATE: If not Ill fuck you and antila.. Come here.

Beatrice Anghel: No

ANDREW TATE: When party is over. Come with her

Beatrice Anghel: Ok

....

ANDREW TATE: You were amazing yesterday, love you baby

ANDREW TATE: baby

ANDREW TATE: I have a mission for you

ANDREW TATE: come over if you can, if not we talk here

Beatrice Anghel: I think I understand better if you write to me

ANDREW TATE: Everyone in the house hates jasmine

ANDREW TATE: Yes?

Beatrice Anghel: Yes

ANDREW TATE: Ok

ANDREW TATE: Then you have a very important job

ANDREW TATE: You are queen of that house

ANDREW TATE: You have to stop the drama

Beatrice Anghel:: Like what? 4/1 1/2022 8:48:04 AM(UTC+0)

ANDREW TATE: Go tell jasmine you are her friend and don't worry and bla bla

ANDREW TATE: Or she will go crazy alone with people picking on her

Beatrice Anghel: I dont care about her

Beatrice Anghel: She did ugly things about me.

ANDREW TATE: What did she do

Beatrice Anghel: Ok I will try

See Exhibit X.

ANDREW TATE texts with Iasmina during the same time period

208. In January 2022, before Mary Doe arrived in Romania, ANDREW TATE asked Iasmina to go to church and “pray for him.” Iasmina said she would and that, “God knows you are a good man. You may have sinned but he will protect you no matter what.” She also said, “I’m praying right now. You do have a plan B right?” And, “There are a few places you can go

and popo (referring to the police) can't do anything to you." See Exhibit Y. She then professed her undying love for him:

In case you still have doubts about my love for you, I thought I will try and describe it in a few words. I know you are having lots of problems and you are in bad moods but I want you to talk about your problems instead of pushing me away or not tell me to not "bother me" so here it comes. **I love you enough to fight for you, compromise for you, and sacrifice myself for you if needed be.** Enough to miss you incredibly much when we are apart and you are so far away, no matter what length of time it is for and regardless of the long distance. Enough to believe in our relationship, to stand by it trough [sic] the worst of times. Enough to have faith in our strength as a couple, and to never give up on us. Enough to spend the rest of my life with you, be there for you when you need or want me, and **never ever want to leave you, or lo live without you** I love you this much.

See Exhibit Z.

209. Two days later ANDREW TATE had this conversation with Iasmina:

IASMINA PENCOV: Don't ever play with me. If you ever leave me because you get bored of me I'll be left with no

IASMINA PENCOV: Nothing

ANDREW TATE: Why do you think I would leave you

ANDREW TATE: If you always obey like a good wife

ANDREW TATE: Why would I leave

IASMINA PENCOV: I can obey and do everything right but we are apart from each other a lot.

What if you see a girl you like more

ANDREW TATE: Why do you think you'd be left with nothing

IASMINA PENCOV: Because you are my everything. I left everything for you. I have nothing

left in Norway, or anywhere else

ANDREW TATE: As it should be

ANDREW TATE: When you love a man

IASMINA PENCOV: It's strange. I've always been independent, had no boss to decide for me.

made my own decisions. Now it's exactly the opposite

See Exhibit AA.

210. Then later, in February 2022, at the same time he was planning a trip to visit Mary Doe in London, and while visiting Mary Doe in London, ANDREW TATE repeatedly calls

Iasmina his wife. See Exhibit BB. ANDREW TATE's professions of love and commitment to Iasmina continue all while Mary Doe is in Romania up until the raid. All while deceiving Mary Doe into believing *she* is in an exclusive relationship with ANDREW TATE.

211. ANDREW TATE uses the same language with Iasmina and Mary Doe simultaneously, sometimes even the exact same wording. At one point he repeats an entire story word for word so that it appears he copy and pasted the same story to the two women. This demonstrates how the professions of love and romantic feelings by ANDREW TATE are fraudulent and a means only of controlling and exploiting these women—with the ultimate goal of monetary gain.

212. In these conversations ANDREW TATE repeatedly tasks Iasmina with spying on the other women and reporting back, including spying and reporting on Jane Doe and Mary Doe.

ANDREW TATE: Show me your face

....

ANDREW TATE: **Whos wife is this**

IASMINA PENCOV: Emory Andrew Tate's II

....

ANDREW TATE: As you should

ANDREW TATE: **Good wife**

IASMINA PENCOV: You do love me I see

ANDREW TATE: **With all of my heart**

IASMINA PENCOV: It's so hard to believe

ANDREW TATE: Why

PENCOV IASMNA: Because it's such a beautiful feeling

ANDREW TATE: But I do want my video tomorrow.

....

IASMINA PENCOV: Feeling loved like this

IASMINA PENCOV: I have never been loved this much before. Not this real

ANDREW TATE: **You're my wife forever**

ANDREW TATE: I can't wait to be home with you

IASMINA PENCOV: "I told my cousin just now on FaceTime that "he is the one" She said "I

love seeing you like this. Marry him sis" Me: "he doesn't do marriage stuff" haha"

IASMINA PENCOV: I can't wait to feel you close to me neither

ANDREW TATE: TOMORRW VIDEO

IASMINA PENCOV: Yes

IASMINA PENCOV: But we will have to do a small ceremony even if we don't get married. I

promised my grandma she will see me in a white dress before she goes away

ANDREW TATE: Ok baby

ANDREW TATE: If you behave

....

ANDREW TATE: Wife

IASMINA PENCOV: Husband

....

ANDREW TATE: Nah this is suspicious

ANDREW TATE: You're going to see grandma

ANDREW TATE: So why not stay with her

ANDREW TATE: It doesn't make sense why you wanna stay alone

IASMINA PENCOV: What do you want me to do? You can't go and work in the same apartment with her

PENCOVIASMINA: I*

ANDREW TATE: You will work when there?

ANDREW TATE: Ok I want you to go with someone

ANDREW TATE: And they can stay house also

ANDREW TATE: I love you

ANDREW TATE: You're my everything

ANDREW TATE: I can't sleep if you're alone

IASMINA PENCOV: Yes of course. I can't go and miss 4 days of not being live on tt. That's

loosing lots of money

ANDREW TATE: Ok. Who are you taking

IASMINA PENCOV: What are my options?

ANDREW TATE: **If you cheated on me I'd kill you**

....

ANDREW TATE: Ok. You can go

ANDREW TATE: **But I want your location the whole time**

ANDREW TATE: **And msgs all day everyday**

ANDREW TATE: **Understand me?**

ANDREW TATE: I don't need more problems

IASMINA PENCOV: Now Betty said she's coming

ANDREW TATE: Good

IASMINA PENCOV: Wait a sec 11102/2022 13:43:43(UTC+2)

IASMINA PENCOV: Really now, I'm going to see my grandma and spend time with her. This is weird. I can't take Betty with me everywhere.

IASMINA PENCOV: Don't you think it's odd to go and visit family I haven't seen in years. And for real do you think my grandma will feel comfortable? I get your reasons to want someone with me in the apartment but the rest can't happen. I'm just going to spend time with my grandma ffs I even shortened my trip and I'm gonna stay for 3 days instead of a week. That's because you don't feel comfortable and I'm trying to figure out something but this...

IASMINA PENCOV: I'm still waiting for you to answer

ANDREW TATE: She will stay in apartment

ANDREW TATE: you wont be with her and grandma at same time

ANDREW TATE: she will just sit and wait in apartment

ANDREW TATE: is that a problem?

IASMINA PENCOV: No that's not a problem at all

IASMINA PENCOV: She said she's gonna have lo come with me wherever

ANDREW TATE: No dont worry about tyhat [sic]

ANDREW TATE: **just she will stay in apartment**

ANDREW TATE: **so you work together**

ANDREW TATE: And you're safer this way

....

ANDREW TATE: **These are the BEST pics youve ever made**

ANDREW TATE: **Im proud of you**

ANDREW TATE: **for only fans?**

IASMINA PENCOV: Yes

....

ANDREW TATE : Trying to work out if im on steroids or not

ANDREW TATE: **my blood work is the same as a serial killer, and ill be completely insane**

ANDREW TATE: and said if im not

ANDREW Tate : Dude did a whole video on me

ANDREW TATE: but my results are insane

ANDREW TATE: and i would be a freak

ANDREW TATE: because looks like im not

ANDREW TATE: he said he couldnt tell

ANDREW TATE: I have some strange blood

ANDREW TATE: **Also it makes me insane but I control it with my mind best I can**

ANDREW TATE: **My test is triple this guy who's on steroids**

ANDREW TATE: **I've stayed out of jail**

ANDREW TATE: **Im so smart**

ANDREW TATE: It's a really good combo I'm actually very happy about it

ANDREW TATE: Im like a built murderer with a crazy strong brain

ANDREW TATE : Have my T levels

ANDREW TATE: But 90% of murders in jail

ANDREW TATE: That saved me

I know in the wrong circumstances I could snap

IASMINA PENCOV: Lool. I love it.

IASMINA PENCOV: You know because it has happened. But who cares. You're not a loser and not being a loser comes with it's bad sides too

ANDREW TATE: Correct

....

ANDREW TATE: I love you

IASMINA PENCOV: I love you too

....

ANDREW TATE: I might have another girl coming to the house for a week

ANDREW TATE: You need to famoose her like you did with tash

IASMINA PENCOV: Hq or here?

ANDREW TATE: Your house

IASMINA PENCOV: Alright when

IASMINA PENCOV: And I want to see a picture of her

....

IASMINA PENCOV: **Because, it still is hard knowing about all this girlfriends of yours. Obviously she doesn't know about me and when she'll find out she'll go nuts jealous. It will be hard knowing another girl is seeing you and chilling with you and hugging you. I may not show it not to brag or complain but I'm raised knowing a man is only gonna be with one woman showing love and affection only to his one woman. Over 9 months have passed now since I first met you and every day I love you more but at the same time it also hurts more even tho I also learned more about us.**

IASMINA PENCOV: You do understand what I mean. We come from two different worlds and mindsets but we met in the middle of it all. During this 9 months I learned more and more about your life. And I also started loving you more and more by each day passing. **My love for you is so strong and big, I couldn't ever betray or let you go even if I'd find out you're a serial killer.** I met you and a week later I moved here to be with you. I didn't have a motive really. I had a good life before too. I just went with what my heart was saying. I was scared, I didn't know anyone well enough. I could have gotten here and bad things could have happened: Something told me tho that it's the right choice and I either risk or regret later. **If I'd knew all this stuff back then I wouldn't have come. I did like you a lot but loving needs time. And from the outside, without knowing all the details it look like I am just a girl working with onlyfans for you and I'm used.** As I said, things are different because I do know the details and this was my choice to work so our relationship will work.

ANDREW TATE: If you could see inside my head and heart you'd be happy. Trust me
IASMINA PENCOV: **I do trust you, that's why I'm still here instead of running away like these other cowards. I've seen so many girls coming and going since I came.**
Lame. If you love someone you fight every battle to stay, not to find a solution to run away faster
ANDREW TATE: **Let them come and go**
ANDREW TATE: **That's why I believe in us**
ANDREW TATE: **Our loves been tested**
ANDREW TATE: **Without the test it wouldn't be as beautiful**
IASMINA PENCOV: **There's beauty to be found even in the darkest places**
ANDREW TATE: Yes baby

....
See Exhibit GG.

213. ANDREW TATE asked Iasmina to talk to another woman he was dating, Natasha, and to spy on her and report back. Iasmina complied:

ANDREW TATE: Ok. Update
IASMINA PENCOV: She just talked about you and her and how you've gone together places and how nice it is when you take her with you. How much she loves when you spend time with her and how you do things for her to show that you love her. That you want her to move in with you full time summer after the cannon run and spend more time together as a couple
ANDREW TATE: **She's testing you**
ANDREW TATE: **To see if you get mad**
ANDREW TATE: **What did you say**
ANDREW TATE: **This is why I love you. You're too smart for tricks. And that's why we are real**
ANDREW TATE: **She's running her mouth. You're reporting to me.**
ANDREW TATE: **She's a fucking child**
ANDREW TATE: **You're a real woman**
IASMINA PENCOV: **I laughed and I said I'm happy for the two of you and I hope she's gonna make the right decisions not letting you down and that I love hearing stories about the two of you**
ANDREW TATE: **Gangster**
ANDREW TATE: **Mafia wife**

....
ANDREW TATE: **This is why it's important you and I work together and just control them all**

ANDREW TATE: I can tell she likes you tho
ANDREW TATE: You could easily make her love you

....

ANDREW TATE: Not letting tash annoy you
ANDREW TATE: **Reporting to me**
ANDREW TATE: **A good spy**
ANDREW TATE: **Same with this idiot girl today**

....

ANDREW TATE: Update me on the girl⁵⁷
IASMINA PENCOV: Honest or friendly opinion? 0210312022 14:06:36(UTC+2)
ANDREW TATE: Honest
IASMINA PENCOV: She's not your average. Her personality is weird but I'll give her a few
More days
ANDREW TATE: Weird why
ANDREW TATE: I've barely spoke to her
IASMINA PENCOV: her body language is telling a lot. Like she's not real. Like she's trying to
hard
IASMINA PENCOV: I have a feeling about her
ANDREW TATE: Tell me
ANDREW TATE: What your feeling is
ANDREW TATE: I trust you that's why I ask

....

ANDREW TATE: I love you you
ANDREW TATE: I want pics today
IASMINA PENCOV: I'm with her. I'll update you when I'm alone

....

IASMINA PENCOV: **And, she did ask me if there has been something between me and you**
ANDREW TATE: **Fuck her**
ANDREW TATE: **Just say yes long ago**
IASMINA PENCOV: **I told her that we tried something but it wasn't serious and it didn't work because we were too different**
ANDREW TATE: Cool

....

IASMINA PENCOV: **,She keeps asking me about us, Should I just tell her that I'm talking to someone else?**
ANDREW TATE: **Fuck no**
ANDREW TATE: **You should say**

⁵⁷ Upon information and belief, "the girl," in this exchange refers to Mary Doe.

ANDREW TATE: **Men like Andrew are rich strong young There's no man like him Don't try to control him just be nice and don't Worry.**

....

IASMINA PENCOV: May I ask something?

ANDREW TATE: Yes

IASMINA PENCOV: What do you want to do with [VICTIM NAME REDACTED] if not work? **She's in Bucharest and she's not working.**

ANDREW TATE: **She will**

IASMINA PENCOV: Hmm

IASMINA PENCOV: You've been talking to her long and she's still not working

ANDREW TATE: You don't. Trust me?

IASMINA PENCOV: I trust you, I'm just losing patience with these girls

ANDREW TATE: They never last long

IASMINA PENCOV: But I am

....

ANDREW TATE: **I love you so much jasmine**

ANDREW TATE: You have a pure heart

....

IASMINA PENCOV: **So I was showing [Mary Doe] something on my phone and that moment you sent the message**

IASMINA PENCOV: **To both of us**

IASMINA PENCOV: **I barely calmed her down**

ANDREW TATE: Great

IASMINA PENCOV: She went insane

....

IASMINA PENCOV: **Thanks. Also. Explain to your girlfriend⁵⁸ that she cannot go out alone**

please. She's planting ideas in the other girls heads too

ANDREW TATE: What's she saying

IASMINA PENCOV: The Ukrainian girls want to go and exchange their money and I said

I'll help them- I know very few exchange places do it. She said she'll look for one and I said it's

okay I will do it. And I found the bank and she was like, "oh but we can go alone to the city

center and do it"

....

⁵⁸ On information and belief this refers to Mary Doe.

ANDREW TATE: Have you told that new bitch⁵⁹ that you make a lot of money?
ANDREW TATE: Ask her to take pics with you
IASMINA PENCOV: Yes
IASMINA PENCOV: Like me and her in pictures?
ANDREW TATE: Yes
IASMINA PENCOV: What kind of pictures? 09103/2022 I 7:03:20(UTC+2)
ANDREW TATE: Anything OF [OnlyFans]
IASMINA PENCOV: I'm underwear? She won't do it
ANDREW TATE: See
IASMINA PENCOV: G talked to her today and she will go live with Bety tonight to try it

....

ANDREW TATE: **Do my pic today no excuses with Betty, I wann see is [Mary Doe] joins in or not so do it and make sure she knows you're doing it**

ANDREW TATE: Invite her
ANDREW TATE: See what she does
IASMINA PENCOV: Oh I'm in 100%! It's her that's gonna go insane when she sees the msg
IASMINA PENCOV: Mmmm maybe
ANDREW TATE: My perfect little whore

....

IASMINA PENCOV: **What is the next step with her?**
IASMINA PENCOV: **Tell her "next time you'll have a 3some with the girls"**
IASMINA PENCOV: **What did u tell her? I can see her face changing and shaking a lot**

ANDREW TATE: Fuck her leave it with me

....

IASMINA PENCOV: We're supposed to be a team when it comes to the girls

ANDREW TATE: Yes true

ANDREW TATE: **I'm telling her**

ANDREW TATE: **To cum with you**

ANDREW TATE: **She said she's too shy⁶⁰**

ANDREW TATE: **She's panicking now**

ANDREW TATE: I find it funny tbh

ANDREW TATE: I just love watching you

ANDREW TATE: I want you in all of it

....

IASMINA PENCOV: I will be in all of it

IASMINA PENCOV: Anything for my man

⁵⁹ On information and belief this refers to Mary Doe.

⁶⁰ ANDREW TATE was having this conversation at the same time he was pressuring Mary Doe to take sexual pictures as described above. ¶¶ 198-201.

ANDREW TATE: That's my girl
IASMINA PENCOV: We're the power team
ANDREW TATE: forever

....
IASMINA PENCOV: I want to fuck all the girls
ANDREW TATE: That's my girl
ANDREW TATE: This is what I've always wanted from you
ANDREW TATE: For you to be horny and really want it
IASMINA PENCOV: Betty done [MARY DOE] must happen these days [VICTIM
NAME REDACT] ish done Tash soon

....
IASMINA PENCOV: **She saw the message and said absolutely not lol**
 say you don't want to disobey me and will do it with Betty only
ANDREW TATE: **That'll annoy her**
IASMINA PENCOV: She was like "yes sure, just the two of you"
ANDREW TATE: Good do it
ANDREW TATE: I wanna see
IASMINA PENCOV: She was ironic
IASMINA PENCOV: She said it in a way that no way we're gonna do it
ANDREW TATE: That's why you will

....
ANDREW TATE: Waiting for the video. Send in the group
IASMINA PENCOV: Yeah well, convince her
ANDREW TATE: **No. Do it with Betty and send the video in group teach her a lesson**
IASMINA PENCOV: **"He's asking for too much"**
ANDREW TATE: [crying laughing emoji]
IASMINA PENCOV: Fireeeee
IASMINA PENCOV: Hahahahah
IASMINA PENCOV: I think I might start loving these games

....
IASMINA PENCOV: Me and B are gonna do it but we won't send it in that group
ANDREW TATE: **Yes. Do it. She needs to learn**
IASMINA PENCOV: Betty is getting ready now. I already am

....
IASMINA PENCOV: You're home today or tomorrow?
ANDREW TATE: **Don't tell [Mary Doe]**
ANDREW TATE: **Or whatever her name is**
ANDREW TATE: Tomorrow or Tuesday

....

ANDREW TATE: **I was gona take you to lunch**

ANDREW TATE: **but G said youre not working**

ANDREW TATE: **so now i cant**

PENCOV IASMINA: Got it

ANDREW TATE: your fault

PENCOV IASMINA: If you say so...

ANDREW TATE: **who elses fault is it cunt**

ANDREW TATE: **that you didnt work**

ANDREW TATE: so I cant take you out?

ANDREW TATE: is it MY fault your lazy?

....

ANDREW TATE: **Who's fault is it**

....

IASMINA PENCOV: Technically mine but I did not do anything because I'm lazy.

ANDREW TATE: why then

PENCOV IASMINA: **I was tired and sick because I had too many thoughts and I couldn't fall asleep even tho I was exhausted and I fell sick the whole evening. It's ok. I got my sleep and I will go back to work. Don't worry**

ANDREW TATE: What thoughts

PENCOV IASMINA: Don't worry I'm okay. I'm getting ready now to get more work done

ANDREW TATE: Tell me something nice

PENCOV IASMINA: I love you more than you think

ANDREW TATE: I love you too

....

IASMINA PENCOV: **Get [Mary Doe] mad she will go home lol jk**

ANDREW TATE: Hahahah

IASMINA PENCOV: Good plan

IASMINA PENCOV: I'll smoke my cigarette and go home. **Your gf is in a bad mood again**

ANDREW TATE: **So?**

ANDREW TATE: **Who gives a fuck**

IASMINA PENCOV: I do? We live in the same house

ANDREW TATE: Listen

ANDREW TATE: **You have bigger problems**

ANDREW TATE: **And you're not obeying me**

ANDREW TATE: **Don't talk about her I don't care about her I care about you**

....

ANDREW TATE: Something weird has happened with tash and now she's going police. Me and you need a very serious talk about this

ANDREW TATE: Tomorrow. Alone

ANDREW TATE: : I want you to go home tonight. I'm gona stay with Betty and [Mary Doe]. I won't fuck them im not in the mood. I'm doing it so I can see you alone tomorrow and we need a serious talk. Then I might have to go to London.

....

ANDREW TATE: Also. Tristan's new girl⁶¹ you're doing a very good job with her

ANDREW TATE: Tristan wants you to take her back and stay there

ANDREW TATE: I'll deal with Betty and [Mary Doe] tomorrow we need to be alone and fix this

ANDREW TATE: Because I'm in real trouble

ANDREW TATE: Can I count on you?

ANDREW TATE: Take Tristan's girl home now

IASMINA PENCOV: Alright I can see you're worried and I won't ask about it today. I just want

you to know that **I would never do something to get you in trouble and I'd go as far as someone can possibly go to fix whatever this is**

PENCOVIASMINA: Always

ANDREW TATE: Something crazy is happening I don't understand it

See Exhibit GG.

214. When Jane Doe arrived in Romania, she could see that Mary Doe was unhappy. Once they were able to talk together Mary Doe shared what she had been going through and how she felt deceived by ANDREW TATE. Because Tristan did not hide that he wanted to manage Jane Doe on OnlyFans and that ANDREW TATE was dating multiple women, ■■■■■ knew that ANDREW TATE was lying to Mary Doe. The women exchanged information and both Jane Doe and Mary Doe became very concerned. Jane Doe was very disturbed by how ANDREW TATE was treating Mary Doe. And Mary Doe realized that ANDREW TATE was lying to her and sleeping with many other women. Both women realized that all the women associated with THE TATE BROTHERS were working on webcam, and that the women in the

⁶¹ On information and belief this refers to Jane Doe.

house were collaborating with THE TATE BROTHERS, to groom and manipulate them. This was extremely upsetting and frightening to ██████████ and Mary Doe so they decided to escape.

215. Because THE TATE BROTHERS always talked about how connected they were to dangerous people, Jane Doe and Mary Doe felt the safest way to escape was not to confront THE TATE BROTHERS but instead, to pretend like everything was fine and sneak out at night while everyone was sleeping. Jane Doe bought plane tickets for the two girls to go to London. They started documenting evidence so they could report the criminal activity they had witnessed to authorities once they had escaped to London.

216. Jane Doe shared her fears and concerns with her parents and her friend Sgt. Liam Doe. In response, they were worried she would not be able to escape safely and felt they had a duty to report what was happening to the United States Embassy in Romania for Jane Doe's safety. Additionally, Sgt. Martelly had a duty as a United States Marine to report what he believed—due to his training—was suspected sex trafficking activity.

217. Jane Doe was most worried for Mary Doe. Mary Doe was in extreme distress and traumatized by what she experienced in Romania at the hands of ANDREW TATE. Jane Doe wanted to help get her out of that situation. She was outraged by what THE TATE BROTHERS had done to Mary Doe and the other woman ANDREW TATE was exploiting that she had befriended in Miami.

218. Jane Doe tried to stop her parents and Sgt. Martelly from making a report because she believed it would endanger her and Mary Doe. She wanted to sneak out quietly to safety and then she could report what she witnessed to authorities. But the report to the Embassy was made and the Romanian police were notified by the Embassy.

219. At the time this report was made, April 2022, the Romanian authorities had already received at least two reports about THE TATE BROTHERS, including a report that TRISTAN TATE had attempted to sex traffic a minor child. As a result, there was already an open criminal investigation into THE TATE BROTHERS. Upon information and belief, the Romanian authorities decided to raid THE TATE BROTHERS compound after receiving the report of an American in trouble because they were already investigating THE TATE BROTHERS for criminal activity.

220. On or around April 11, 2022, the Romanian police raided THE TATE BROTHERS compound and rescued Jane Doe and Mary Doe. At this time, Jane Doe had been in Romania approximately one week and Mary Doe had been there approximately one month.

221. Jane Doe cooperated with Romanian authorities during the raid and allowed them to take a copy of her phone. She gave a statement describing what she observed, as well as her fears and impressions. She gave truthful testimony. The Romanian authorities asked her to stay in Romania and cooperate further with their investigation which she agreed to do. She provided a recorded statement, underwent a psychological evaluation and IQ test, and she provided sworn testimony in Court before a Romanian judge. Jane Doe did not speak Romanian and all of this had to be conducted through an interpreter which was a grueling process. This was an intensely invasive and frightening experience.

222. Afterwards, Jane Doe and Mary Doe were not sure where to go because they were very afraid THE TATE BROTHERS would try to find them and hurt them. The Romanian authorities arranged for them to stay in a safe house in France. After leaving France Jane Doe intentionally posted on social media some photos of her in France to obfuscate her true whereabouts. Jane Doe has been in hiding ever since the April 2022 raid. She lives in constant

fear that THE TATE BROTHERS or one of their associates or followers will try to find her and harm, or kill her.

THE TATE BROTHERS' WITNESS INTIMIDATION AND HARASSMENT OF JANE DOE

223. When THE TATE BROTHERS were arrested and held in preventative custody in December 2022, they began a campaign to harass and intimidate Jane Doe and Mary Doe into recanting their testimony to Romanian authorities.

224. To protect their sex trafficking conspiracy THE TATE BROTHERS have engaged in an organized and systematic witness intimidation campaign. They have used their money and influence to hire private investigators and internet sleuths to dig into Jane Doe's personal life and invade her privacy. They then used their army of online followers to rapidly spread hateful lies and her private information online to be seen by thousands. They launched a frivolous lawsuit against her to discredit her, intimidate her, ruin her reputation, and humiliate and embarrass her. They then used their fame and influence to engage powerful media personalities such as Candace Owens to join their smear campaign and make Jane Doe feel powerless.

225. Jane Doe is a young, 23-year-old woman who was only 20 years old when this all began. She has little resources and virtually no support network. THE TATE BROTHERS know this. She did not speak out in the media but instead cooperated with a criminal investigation, which she had a duty to do, and went in to hiding. Yet THE TATE BROTHERS have launched a public relations and smear campaign against her. In January 2023, the Tate Brothers sent a legal demand letter threatening to sue her and her parents for 30 million dollars if she did not recant her testimony to Romanian authorities in writing. Exhibit CC, In addition

to filing this baseless lawsuit against her and *her parents* for 5 million dollars, THE TATE BROTHERS orchestrated two other baseless lawsuits against her, and a lawsuit against her pro-bono attorney. This is witness intimidation. Below is only a sampling of the many acts of intimidation, threats, and harassment THE TATE BROTHERS have inflicted against Jane Doe. See also Exhibit HH.

226. Recorded prison calls in Romania captured conversations documenting ANDREW TATE instructing his cousin and other associates to create videos smearing Jane Doe and Mary Doe. In these calls ANDREW TATE said, “Keep going! Good job. Over and over again, different ones ... we need the girls to cry, to be frustrated, angry.”⁶² Around the same time highly salacious, humiliating, and defamatory videos about Jane and Mary Doe began circulating online and were shared and viewed thousands of times.

227. THE TATE BROTHERS hired investigators to harass and question everyone Jane Doe ever dated or had a sexual relationship with. These investigators told some of the men that Jane Doe had made allegations against them—which was a lie—in order to get them to talk about Jane Doe. THE TATE BROTHERS had people go to Jane Doe’s parents’ house and take pictures of their home to harass and intimidate them.

228. Upon information and belief, THE TATE BROTHERS paid a British man Sulemain Ahmed to interview Marlin Fisher (in Florida) who sexually abused Jane Doe when she was 17. Fisher made a copy of Jane Doe’s cell phone without her permission and shared this private information with Ahmed who shared it with THE TATE BROTHERS. Ahmed then posted

⁶²See https://www.yahoo.com/entertainment/andrew-tate-built-empire-bullsh-173212463.html?guccounter=1&guce_referrer=aHR0cHM6Ly9zdGF0aWNzLnRlYW1zLmNkbi5vZmZpY2UubmV0Lw&guce_referrer_sig=AQAAAH7DWP9fMNmyC99B-qPyl2D1TQop-Hcqtpe8kqOseSkr-10CrOI4QdVT-oDN8m9TiYizWfZi_cr1Kfa5GqE2durplcA4Ok2x6ZwIYNsEyHRZq2oCgWBSRYOX8bjGygtYKgbIGXEsqNvhGnx5cW-Zv0u7EJKRso5uTaKuaPCTkOcR.

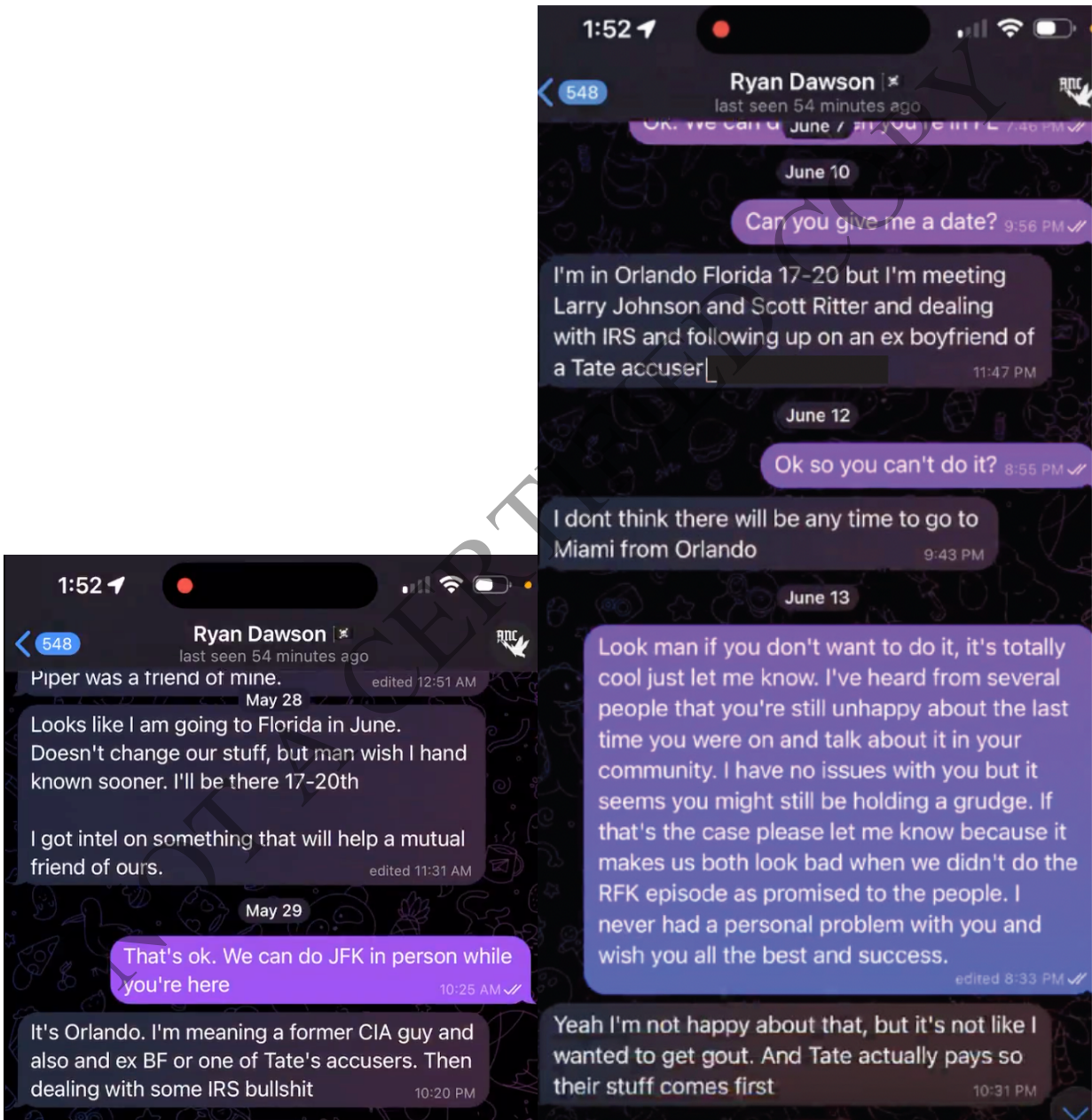
much of this private information online without Jane Doe's consent, as well as defamatory and harassing information, at the direction of THE TATE BROTHERS.

229. THE TATE BROTHERS have spread the heinous and hurtful lie that Jane Doe was responsible for the death of Dustin Milner who died by suicide. This man was in his mid-30s when he was in a relationship with 18-year-old Jane Doe, and he had a history of mental health issues. Yet, THE TATE BROTHERS had private investigators interview his family members and dig up these painful memories. And they shared this terrible lie, that Jane Doe was responsible for his death, intentionally to hurt Jane Doe because Jane Doe had confided in TRISTAN TATE how painful his death was for her and how much she cared about him.

230. On Dec. 20, 2024, ANDREW TATE claimed that Jane Doe accused six other men of the exact same crime of human trafficking as THE TATE BROTHERS and when asked if any of the men were charged ANDREW TATE said, "one of the men killed himself during the trial." This is a complete lie and ANDREW TATE knows it. He knows that Jane Doe never accused Dustin Milner of human trafficking or any other crime, that he was never arrested or charged with any crime related to Jane Doe, and that he did not kill himself in the midst of any trial. ANDREW TATE said this defamatory statement to discredit Jane Doe, hurt her reputation in the worst way, and to cause her as much pain and humiliation as possible. *See* <https://x.com/marionawfal/status/1869853090054320374?s=46> at 0:53:00-0:55:00.

231. Sulemain Ahmed shared an illegal recording of Jane Doe in complete distress telling Fisher about Milner's death when she first found out. She was crying and hysterical and in utter pain. This was a private communication that Fisher and Ahmed shared without her consent and upon information and belief, they shared this at the direction of THE TATE BROTHERS to hurt and humiliate Jane Doe.

232. THE TATE BROTHERS paid a man named Ryan Dawson to fly from South Korea to Florida to further “investigate” Jane Doe. Upon information and belief, the defamatory and harassing posts Ryan Dawson has made on X, formerly Twitter, about Jane Doe are done at the direction and for the benefit of the Tate Brothers. *See* below screenshots:



233. ANDREW TATE is good friends with George Farmer, husband of Candace Owens. Candace Owens did an entire episode of her show smearing Jane Doe and Mary Doe, claiming

to have done a “deep dive” into the victims when all she did was repeat the most salacious and outrageous lies from the civil complaint in this case. Including repeating the hateful lie that Jane Doe was responsible for Dustin Milner’s suicide. And perhaps most disturbing, Candace repeated the lie that Jane Doe previously “falsely accused,” a man referred to in the complaint as “Jailed John⁶³,” who was convicted of molesting two minors, one of which was Jane Doe. Candace beeped out Jailed John’s real name from the broadcast but kept in Jane Doe’s legal name—a child sexual abuse victim and victim in the Romanian prosecution—which she said over 100 times.

234. Upon information and belief, she did this at the direction of THE TATE BROTHERS and/or her husband George Farmer on behalf of THE TATE BROTHERS.

235. Candace Owens collaborated with the defamation, harassment, and witness intimidation of Jane Doe despite knowing that ANDREW TATE was a pimp and publicly stating that fact.⁶⁴

236. THE TATE BROTHERS filed criminal complaints in Romania against Jane Doe and Mary Doe alleging that they had given false testimony and misled Romanian authorities. These allegations were dismissed, and THE TATE BROTHERS appealed and lost on appeal.⁶⁵ See Exhibit II.

237. Upon information and belief, THE TATE BROTHERS have instructed and encouraged their online followers to make and share harassing posts about Jane Doe online. As a result, these harassing and often defamatory posts of Jane Doe have been shared hundreds,

⁶³ Jailed John was an over 50 year old yoga instructor for Jane Doe and other high school students. This is how he met Jane Doe and how knew she was a minor, Jane Doe did not lie about her age, nor did they meet online. Furthermore, Jane Doe did not report him to the police, her parents hired a private investigator who documented the abuse on camera and provided it to the police. All of this is available in the criminal court documents yet the Tate Brothers and their attorneys intentionally misrepresented the facts regarding Jailed John to the court. Exhibit KK.

⁶⁴ See <https://x.com/TheMilkBarTV/status/1826810085198496114>.

⁶⁵ See <https://www.clujust.ro/sentinta-plangerea-penala-a-fratilor-tate-impotriva-a-doua-femei-ramane-clasata/>.

and in some cases thousands, of times. As a result, she has received a deluge of online harassment, calls for her to be imprisoned or harmed, threats to her and her family, and even death threats. *See* Exhibit JJ.

238. THE TATE BROTHERS' lawyer, Joseph McBride, at THE TATE BROTHERS instruction, has made many public statements defaming and harassing Jane Doe. Mr. McBride even claimed Jane Doe has been falsely accusing and exploiting men for 10 years which meant he was making the ludicrous and grossly despicable claim that she had been exploiting grown men since she was 12 years old. Mr. McBride even publicly stated that if she recanted her statement "all of this goes away."⁶⁶

239. Mr. McBride even doxxed Jane Doe by posting google drive links to court documents on X (formerly Twitter), which included unredacted confidential Romanian case file documents that contained Jane Doe's full name, her parents' home address, her date of birth, and passport number.

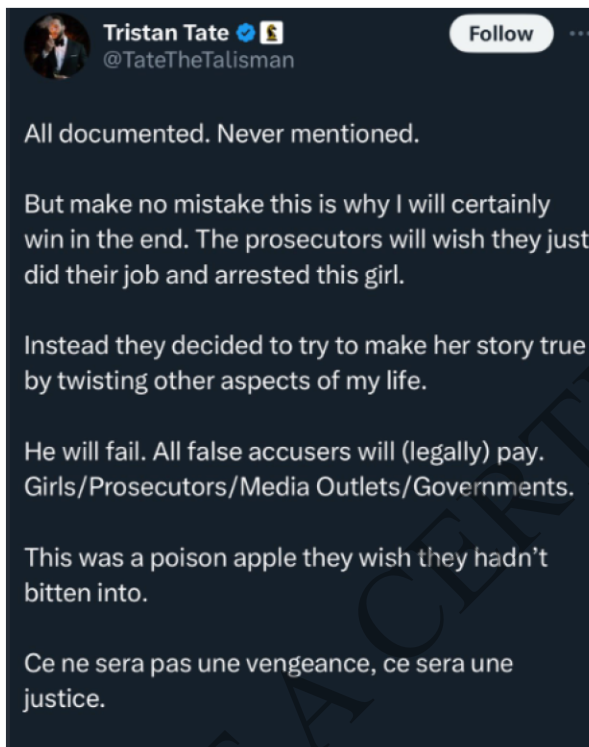
240. THE TATE BROTHERS have directed their lawyers to file a frivolous lawsuit on behalf of Iasmina Pencov and Beatrice Anghel, who are under THE TATE BROTHERS control, against Jane Doe and her parents to increase the pressure on her to recant her testimony. That lawsuit contains substantially the same allegations as the lawsuit THE TATE BROTHERS filed on their own behalf.

241. THE TATE BROTHERS lawyers have even **convinced** Marlin Fisher to sue Jane Doe and her lawyer, causing Mr. Fisher to admit in public documents that he committed statutory rape. Upon information and belief, they did this to increase the pressure on Jane Doe

⁶⁶ See Fresh & Fit Podcast, *Tate Attorney Joe McBride & Former Fed EXPOSE "Trafficking Victims" LIES Against the Tates*, RUMBLE, (Sept. 3, 2023) <https://rumble.com/v3g3cr6-tate-attorney-joe-mcbride-and-former-fed-expose-trafficking-victims-lies-ag.html> at 1:17:00-1:21:50.

and to intimidate her counsel into no longer representing her. THE TATE BROTHERS know that Jane Doe cannot afford to pay for her defense and that her lawyer is defending her pro bono. Speaking of Fisher, Joseph McBride said, “we got him to a point where he was competent enough to go public with his case and sue them in court.”⁶⁷

242. THE TATE BROTHERS have made numerous threatening posts towards Jane Doe on social media and repeatedly made threats that Jane Doe will go to prison.



⁶⁷ See <https://x.com/ShaykhSulaiman/status/1858972899593589154>

243. THE TATE BROTHERS have sought to overwhelm Jane Doe with harassment, court cases, invaded her privacy, defamed her, threatened criminal prosecution in the U.S., and attempted to criminally prosecute her in Romania. THE TATE BROTHERS have even attacked her family by including her parents in two lawsuits they know have no merit.

244. Despite the fact that Jane Doe's statements are consistent with THE TATE BROTHERS own statements about their activity, they have filed this lawsuit against Jane Doe. She is not even the first woman to make similar allegations about THE TATE BROTHERS, such allegations go back to at least 2014, before THE TATE BROTHERS fled the U.K. sometime around 2016, pending a criminal investigation into ANDREW TATE for sex crimes.⁶⁸

245. Moreover, her statements are corroborated and consistent with the statements of multiple victims, in investigations by the UK and Romanian authorities. Furthermore, THE TATE BROTHERS were removed from social media *prior* to the Romanian investigation being public (prior to December 2023 arrest) because of *their own offensive statements* about women. Despite this, THE TATE BROTHERS claimed in their lawsuit that the social media bans were caused by Jane Doe's testimony and the Romanian prosecution when they knew this was false. THE TATE BROTHERS have sued her to punish her for providing testimony against them and to intimidate and harass her into recanting her testimony or refusing to further cooperate with the Romanian authorities.

246. THE TATE BROTHERS have employed the methods ANDREW TATE bragged about employing against someone who merely challenged him online. ANDREW TATE publicly stated that he will engage in such harassment against dissenters and that is exactly

⁶⁸ See <https://x.com/themilkbartv/status/1884639330137935966?s=46&t=8Lpb1VgqcTT3ytW6sWKPTQ>.

what he is doing. *See* PTW #57 – Andrew Tate – How to Destroy Haters, YOUTUBE (Jan. 20, 2022), <https://www.youtube.com/live/AkcC84AKVBU?feature=share> (“I don't need a reason. You're gonna have to defend yourself. Regardless, that's the thing about the American legal system, you cannot ignore it. I don't care if it costs me a million dollars to take \$1,000 out of your bank. You are gonna be in court twice a month for the rest of your human years. I don't care. I will sue you for any and every reason forever. And you're gonna have to hire lawyers and turn up for ever. I will do that. I'm that guy. I'm petty. I'm petty and I've got a lot of money and a lot of time.”).

247. Jane Doe was only in Romania for six days. But because she did the right thing, because she cooperated with a criminal investigation, THE TATE BROTHERS have sought to destroy her life.

COUNTERCLAIM I:
VIOLATION OF 18 U.S.C. §§ 1591(A)(1) AND 1595 OF THE TRAFFICKING VICTIMS PROTECTION REAUTHORIZATION ACT (TVPRA)
(against Tristan Tate and Andrew Tate)

248. JANE DOE realleges and incorporates by reference all prior paragraphs as if fully incorporated here.

249. TRISTAN TATE and ANDREW TATE knowingly used the instrumentalities and channels of interstate and foreign commerce to facilitate violations of 18 U.S.C. § 1591(a)(1), occurring within the territorial jurisdiction of the United States and Florida.

250. TRISTAN TATE and ANDREW TATE's conduct was in or affecting interstate and/or foreign commerce for purposes of the TVPRA.

251. TRISTAN TATE and ANDREW TATE are United States citizens. Under 18 U.S.C. §1596, the United States has “extra-territorial jurisdiction over any offense (or any attempt or

conspiracy to commit an offense) under section . . . 1591 . . . if an alleged offender is a national of the United States.”

252. TRISTAN TATE and ANDREW TATE established a venture to groom, recruit, entice and ultimately defraud and coerce women into performing commercial webcam pornography for their profit.

253. TRISTAN TATE, as part of a fraudulent scheme and under coercive circumstances, including the pretext of a romantic relationship, recruited, enticed, and transported JANE DOE from Florida to Romania for the purposes of causing her to engage in commercial sex acts, via webcam pornography, for his and ANDREW TATE’s profit.

254. TRISTAN TATE’s use of coercion and fraud to groom JANE DOE to further his sex trafficking scheme includes but is not limited to:

- a) Grooming JANE DOE by employing his publicly proclaimed techniques such as identifying her as young and vulnerable, playing on her vulnerabilities and using deception to create an emotional connection. For example, TRISTAN TATE pretended to relate to JANE DOE’s pain and suffering at losing someone she cared about via suicide. The manipulative nature of this is evident by the fact he told ANDREW TATE about this very personal story immediately, likely over text while still in person with JANE DOE. This is evident because ANDREW TATE mocked her about the suicide the next morning. Then TRISTAN TATE raised the issue again at a later date to prey on this vulnerability.
 - Further evidence that TRISTAN TATE used his pattern and practice of grooming and manipulation includes inviting her to a club in an apparent “double booking,” scenario where he ignored her most of the night but then insisted, she sleep with him at the end of the night. He then used his massive size and strength during a sexual encounter by choking her until she went unconscious and proceeding to have sex with her unconscious body. Upon information and belief, this was a tactic by TRISTAN TATE to instill fear in JANE DOE, to form a trauma bond with her, to make her aware of his physical strength, and that he was willing to use it under the cover of sex play.
 - Additional evidence that TRISTAN TATE was employing his grooming methods and testing for Jane Doe’s vulnerability and susceptibility to coercion is that TRISTAN TATE employed the PHD “test” of telling JANE DOE to bring him coffee and do other small tasks for him.

- b) Isolating and controlling JANE DOE by transporting her from Florida to Romania, far away from anyone she knows, and having her stay in various homes or residences that he owned and/or controlled. Using the influence of his celebrity status to promise her a fortune if she worked on OnlyFans while he managed her account. Representing that he was only offering to manage her on OnlyFans as a favor and to help her support herself financially in Romania while she was pursuing her romantic relationship with him, when in reality, he had no interest in JANE DOE, romantic or otherwise, outside of recruiting her into his webcam sex trafficking operation.
- c) Using other women under his and ANDREW TATE's control to lie to and manipulate JANE DOE;
- d) Employing physical and sexual violence against her as described above;
- e) Exerting undue influence and control over JANE DOE by telling her she could not leave the place where she was living without being escorted by one of the women under he or ANDREW TATE's control;
- f) Using intimidation and scare tactics such as saying he knows very dangerous people and is connected to Romanian government; and
- g) Instructing the other women under his and ANDREW TATE's control to monitor JANE DOE and report back to THE TATE BROTHERS causing JANE DOE to feel she was under constant surveillance.

255. ANDREW TATE and TRISTAN TATE's conduct has caused JANE DOE "serious harm," including, without limitation, physical, psychological, emotional, and reputational harm.

256. Because ANDREW TATE and TRISTAN TATE knowingly recruited, enticed, harbored, and transported JANE DOE for the purpose of causing her to engage in commercial sex acts, through the use of fraud, and/or coercion, in violation of 18 U.S.C. § 1591(a) JANE DOE is entitled to civil recovery under 18 U.S.C. 1595(a).

COUNTERCLAIM II:
CONSPIRACY TO VIOLATE THE TVPRA IN VIOLATION OF 18 U.S.C. §§ 1594(c)
AND 1595
(against Tristan Tate and Andrew Tate)

257. JANE DOE realleges and incorporates by reference all prior paragraphs as if fully incorporated here.

258. TRISTAN TATE and ANDREW TATE knowingly used the instrumentalities and channels of interstate and foreign commerce to facilitate violations of and conspire to violate 18 U.S.C. § 1591(a)(1), occurring within the territorial jurisdiction of the United States and Florida.

259. TRISTAN TATE and ANDREW TATE's conduct was in or affecting interstate or foreign commerce for purposes of the TVPRA.

260. ANDREW TATE and TRISTAN TATE are United States citizens. Under 18 U.S.C. §1596, the United States has "extra-territorial jurisdiction over any offense (or any attempt or conspiracy to commit an offense) under section . . . 1591 . . . if an alleged offender is a national of the United States"

261. As part of ANDREW TATE and TRISTAN TATE's sex trafficking venture they conspired to violate 18 U.S.C. § 1591(a) namely, to knowingly recruit, entice, harbor, and transport JANE DOE for the purpose of causing her to engage in commercial sex acts, through the use of fraud, and/or coercion. They took such acts in furtherance of this scheme including but not limited to:

- TRISTAN TATE fraudulently claimed romantic interest in JANE DOE and purposefully groomed and lied to JANE DOE about only seeking a personal relationship with her when his primary intention was to coerce her to engage in webcam pornography for his and ANDREW TATE's benefit;
- TRISTAN TATE enticed JANE DOE to move to Romania and live with him under fraudulent circumstances in furtherance of the conspiracy to sex traffic her;
- Using funds shared by both ANDREW TATE and TRISTAN TATE, TRISTAN TATE paid for JANE DOE's flight to Romania in furtherance of the conspiracy to sex traffic her;
- ANDREW TATE and TRISTAN TATE harbored JANE DOE in a property they jointly own and/or control in Romania in furtherance of the conspiracy to sex traffic her;
- TRISTAN TATE and ANDREW TATE employed coercion via a scheme, plan, and/or pattern intended to cause JANE DOE to believe that failure to perform an act requested by THE TATE BROTHERS would result in serious harm to or physical restraint against JANE DOE, her family, and/or Mary Doe;

- TRISTAN TATE and ANDREW TATE have both threatened to and abused the law and legal process to force JANE DOE to retract and/or recant her testimony to Romanian authorities, prevent her from cooperating with any other governmental authorities, to cease cooperation with prosecutions against them, and to scare any other potential victims or witnesses from providing truthful testimony against them in order to protect and further their sex trafficking venture. These include attempts to criminal prosecute her in Romania and repeated threats to criminally prosecute her in the United States.

262. ANDREW TATE and TRISTAN TATE have committed unlawful acts including, but not limited to, violations of 18 U.S.C. 1591(a) and 18 U.S.C. 1594(c) via their conspiracy to sex traffic JANE DOE, and for recruiting, enticing, harboring, and transporting her for this purpose.

263. ANDREW TATE and TRISTAN TATE's conduct has caused JANE DOE "serious harm," including, without limitation physical, psychological, emotional, and reputational harm.

264. Because TRISTAN TATE and ANDREW TATE knowingly recruited, enticed, harbored, and transported JANE DOE for the purpose of causing her to engage in commercial sex acts, through the use of fraud, and/or coercion, in violation of 18 U.S.C. § 1591(a), and conspired to do these acts in violation of 18 U.S.C. 1594(c), JANE DOE is entitled to civil recovery under 18 U.S.C. 1595(a).

COUNTERCLAIM III:
FLORIDA CIVIL REMEDY FOR CRIMINAL PRACTICES FL. STAT. §§ 772.103 AND
772.104
(against Tristan Tate and Andrew Tate)

265. JANE DOE realleges and incorporates by reference all prior paragraphs as if fully incorporated here.

266. TRISTAN TATE and ANDREW TATE, with criminal intent, conspired to and endeavored to receive proceeds from the sex trafficking of JANE DOE, as described in Counterclaim I-III, directly or indirectly, from a pattern of criminal activity.

267. TRISTAN TATE and ANDREW TATE, with criminal intent, conspired to and endeavored to collect a debt from JANE DOE that was created through deception with a false offer of free housing in, and transportation to, Romania. Through this illegal enterprise, ANDREW TATE and TRISTAN TATE conspired to and endeavored to collect this debt by coercing JANE DOE to engage in sex trafficking via webcam pornography.

268. TRISTAN TATE and ANDREW TATE, with criminal intent, conspired to and endeavored to, through a pattern of criminal sex trafficking, through fraud and coercion, and through a conspiracy to collect a false debt from JANE DOE, conspired to and endeavored to acquire or maintain, directly or indirectly, control of the enterprise.

269. TRISTAN TATE and ANDREW TATE acted with criminal intent to establish and/or operate an enterprise to sex traffic JANE DOE via webcam pornography by coercing her to engage in webcam pornography and controlling all of the proceeds and profits from that enterprise.

270. As a direct and proximate cause of the foregoing, JANE DOE was injured by TRISTAN TATE and ANDREW TATE's actions and has suffered psychological, emotional, and physical injuries, emotional distress, mental anguish, pain and suffering and the loss of enjoyment of life.

COUNTERCLAIM IV:
CIVIL CONSPIRACY UNDER FLORIDA LAW
(against Tristan Tate and Andrew Tate)

271. JANE DOE realleges and incorporates by reference all prior paragraphs as if fully incorporated here.

272. ANDREW TATE and TRISTAN TATE entered into an agreement to violate 18 U.S.C. § 1591(a) namely, to knowingly recruit, entice, harbor, and transport JANE DOE for the purpose of causing her to engage in commercial sex acts, through the use of fraud, and/or coercion. They also entered into an agreement to violate Fl. Stat. 787.06(3)(b) by knowingly, or in reckless disregard of the facts, engaging in human trafficking and/or attempting to engage in the human trafficking of JANE DOE using coercion for commercial sexual activity. They took such acts in furtherance of this scheme including but not limited to:

- TRISTAN TATE fraudulently claimed romantic interest in JANE DOE and purposefully groomed and lied to JANE DOE about only seeking a personal relationship with her when his primary intention was to induce her to engage in webcam pornography for his and ANDREW TATE's benefit;
- TRISTAN TATE enticed JANE DOE to move to Romania and live with him under fraudulent circumstances in furtherance of the conspiracy to sex traffic her;
- Using funds shared by both ANDREW TATE and TRISTAN TATE, TRISTAN TATE paid for JANE DOE's flight to Romania in furtherance of the conspiracy to sex traffic her;
- TRISTAN TATE and ANDREW TATE harbored JANE DOE in a property they jointly own and/or control in Romania in furtherance of the conspiracy to sex traffic her;
- ANDREW TATE and TRISTAN TATE employed coercion via a scheme, plan, and/or pattern intended to cause Jane Doe to believe that failure to perform an act requested by THE TATE BROTHERS would result in serious harm to or physical restraint against JANE DOE, her family, and/or Mary Doe;
- TRISTAN TATE and ANDREW TATE have both threatened to and abused the law and legal process to force JANE DOE to retract and/or recant her testimony to Romanian authorities, prevent her from cooperating with any other governmental authorities, to cease cooperation with prosecutions against them, and to scare any other potential victims or witnesses from providing truthful testimony against them in order to protect and further their sex trafficking venture.
- TRISTAN TATE and ANDREW TATE made threats of legal complaint and attempted to legally prosecute JANE DOE in Romania which was rejected by the Romanian courts. TRISTAN TATE and ANDREW TATE then threatened to sue Jane Doe and her parents for a collective 30 million dollars if she did not retract her statements to Romanian authorities.

- TRISTAN TATE isolated JANE DOE from the public and restricted her freedom of movement by telling her she could not leave the house or go anywhere without supervision.
- TRISTAN TATE restrained her speech and communication with others telling her she could not speak about ANDREW TATE with the other women in the house where she was residing. Upon information and belief, [REDACTED] restrained JANE DOE's speech and communication with others, either directly or indirectly by preventing her from speaking with Mary Doe alone, without supervision, and by asking Iasmina Pencov and Beatrice Anghel to spy on her and listen in on her communications.
- TRISTAN TATE and ANDREW TATE exploited JANE DOE's victimization by sexual abuse by making public that JANE DOE was a victim of child sexual abuse (when she was fifteen (15) years old) at the hands of her Yoga instructor—a man who was well into his fifties at the time. This man was entrusted with the care of children and was ultimately convicted of molesting JANE DOE, *and another child*. Furthermore, public records show she did not first report the abuse, a private investigator captured evidence of the abuse on camera. TRISTAN TATE and ANDREW TATE made this private information public, and made false representations regarding the facts of that abuse, in an attempt to coerce JANE DOE to retract her statements or cease cooperation with Romanian law enforcement to protect and further their sex trafficking venture.

273. ANDREW TATE and TRISTAN TATE have committed unlawful acts including, but not limited to, violations of 18 U.S.C. 1591(a) and 18 U.S.C. 1594(c) via their conspiracy to sex traffic JANE DOE, and for recruiting, enticing, harboring, and transporting her for this purpose.

274. These unlawful acts have caused JANE DOE severe harm in the form of emotional, physical, psychological, emotional, and reputational harm. JANE DOE was terrified and in fear for her life, and for the life of Mary Doe, during her time in Romania with THE TATE BROTHERS because of THE TATE BROTHERS' words and actions done in furtherance of their conspiracy.

275. ANDREW TATE and TRISTAN TATE's treatment of her via their sex trafficking scheme has caused JANE DOE severe psychological and emotional damage. The weaponization of the law and the legal process to threaten and harass JANE DOE has caused severe and agonizing damage to her. JANE DOE lives in constant fear and in a state of

hypervigilance because of the actions of THE TATE BROTHERS. THE TATE BROTHERS' actions have damaged JANE DOE's ability to find meaningful employment or advance her education or career. THE TATE BROTHERS' actions have caused irreparable harm to her reputation, her music career, and have caused severe anxiety and stress.

276. TRISTAN TATE and ANDREW TATE have also conspired to defame JANE DOE, and in fact defamed her, as described in Counterclaim V, and this has caused her severe harm as described in Counterclaim V, incorporated by reference here.

277. TRISTAN TATE and ANDREW TATE have also conspired to extort Jane Doe, as prohibited by Fl. Stat. § 836.05, by threatening to sue her and her parents for ten million dollars each, for a total of 30 million dollars via written communication. This communication maliciously accused Jane Doe of defamation and lying to Romanian authorities with the intent to compel Jane Doe to recant her statement to Romanian authorities. This communication indicated that if she recanted her statement, she could avoid this threat of lawsuit. *See* Exhibit CC.

278. TRISTAN TATE and ANDREW TATE have also conspired to maliciously prosecute JANE DOE, as described in Counterclaim VI, and this has caused her severe harm as described in Counterclaim VI, incorporated by reference here.

279. TRISTAN TATE and ANDREW TATE have also conspired to engage in witness tampering under Fl. Stat. § 914.22 by knowingly attempting to and using intimidation, threats, and misleading conduct with the intent to cause JANE DOE to withhold testimony from the Romanian investigation and any other jurisdictions' criminal investigation and/or proceeding, and/or to evade legal process summoning her to appear as a witness in the Romanian proceedings or to be absent from such proceedings if summoned, and/or to hinder, delay, or

prevent JANE DOE from communicating with law enforcement or a judge of information regarding THE TATE BROTHERS' crimes, and/or to cause or induce her to testify untruthfully in the Romanian ongoing investigations and proceedings.

280. TRISTAN TATE and ANDREW TATE have also conspired to engage in witness harassment under Fl. Stat. § 914.23, by intentionally harassing JANE DOE in an attempt to hinder, delay, prevent, and/or dissuade JANE DOE from:

- attending or testifying in the Romanian or any other criminal proceeding regarding THE TATE BROTHERS or cooperating in an official investigation of THE TATE BROTHERS; and/or
- Reporting to a law enforcement officer or judge the commission or possible commission of an offense by THE TATE BROTHERS; and/or
- Seeking the arrest of THE TATE BROTHERS or any other person in connection with a criminal offense; and/or
- Causing a criminal prosecution of THE TATE BROTHERS and/or assisting in such a prosecution or proceeding.

281. As a direct and proximate cause of the foregoing, JANE DOE was injured by ANDREW TATE and TRISTAN TATE's actions and has suffered psychological, emotional, and physical injuries, emotional distress, mental anguish, pain and suffering and the loss of enjoyment of life.

COUNTERCLAIM V:
DEFAMATION AND DEFAMATION PER SE
(against Tristan Tate and Andrew Tate)

282. JANE DOE realleges and incorporates by reference all prior paragraphs as if fully incorporated here.

283. JANE DOE is a private person and is non-public.

284. Both ANDREW TATE and TRISTAN TATE have defamed JANE DOE on numerous occasions; by publicly disseminating defamatory statements that JANE DOE falsely

accused them of human trafficking, including countless and continuing statements that DOE lied to the Romanian authorities.

285. These statements are false, THE TATE BROTHERS know they are false, and Counter-Defendants knew they were false every time they repeated them. Although such is not required for purposes of these claims, both ANDREW TATE and TRISTAN TATE acted with actual malice when making and repeating these false statements about JANE DOE.

286. These statements, namely saying they JANE DOE falsely accused THE TATE BROTHERS of human trafficking and lied to Romanian authorities, are highly defamatory, constitute outrageous conduct, and have severely harmed JANE DOE's reputation.

287. JANE DOE has been severely harmed by THE TATE BROTHERS' defamatory statements which have caused her actual damages in loss of reputation, and loss of job and career opportunities. JANE DOE is an artist and musician, which THE TATE BROTHERS know, and these defamatory accusations by THE TATE BROTHERS have made it impossible for her to publicly perform, share her music online, or with the world. As a result of this defamation, her social media profiles and even her music profiles have been swarmed by supporters and fans of THE TATE BROTHERS repeating the defamation, saying hateful things, making threats, and otherwise harassing her. Her music career is permanently damaged as her image has been severely tarnished by THE TATE BROTHERS defamatory statements.

288. Due to the aforementioned allegations, JANE DOE also lives in constant extreme fear and in hiding and has been in a state of hypervigilance since this harassment and defamation campaign began. She fears that due to THE TATE BROTHERS' defamation—which they have intentionally used to provoke outrage by their devoted fan base—that one of THE TATE BROTHERS fans would harm or kill her if they knew where she was. THE TATE

BROTHERS fans have made such death threats and have posted online that they are looking for her because she “falsely accused” THE TATE BROTHERS. THE TATE BROTHERS are aware of the death threats and harassment JANE DOE has experienced as a result of their defamation and have continued to repeat these defamatory statements with this knowledge. THE TATE BROTHERS have intentionally and with actual malice defamed JANE DOE and encouraged their followers to harass her.

289. As a direct and proximate cause of the foregoing, JANE DOE was injured by TRISTAN TATE and ANDREW TATE’s actions and has suffered psychological, emotional, and physical injuries, emotional distress, mental anguish, pain and suffering and the loss of enjoyment of life.

COUNTERCLAIM VI:
MALICIOUS PROSECUTION
(against Tristan Tate and Andrew Tate)

290. JANE DOE realleges and incorporates by reference all prior paragraphs as if fully incorporated here.

291. TRISTAN TATE and ANDREW TATE filed a criminal complaint in Romania against JANE DOE alleging she provided false testimony and misled the Romanian prosecutors. They filed this criminal complaint knowing that it was a false complaint. The prosecutor refused to prosecute based on their complaint, so THE TATE BROTHERS sought judicial enforcement. The Romanian court rejected THE TATE BROTHERS’ allegations against JANE DOE as unfounded. THE TATE BROTHERS appealed. The Romanian appeals court affirmed the lower court decision finding THE TATE BROTHERS criminal complaint against JANE DOE was unfounded.

292. TRISTAN TATE and ANDREW TATE knew that JANE DOE's testimony was truthful and yet they filed the criminal complaint anyway. Even after the court and appeals court in Romania found this criminal case unfounded, they have proceeded/continued with this civil claim in Florida on the same basis – that JANE DOE provided false testimony to Romanian authorities.

293. There was no probable cause for TRISTAN TATE and ANDREW TATE to initiate or continue pushing for criminal prosecution of JANE DOE because they know her testimony was truthful. TRISTAN TATE and ANDREW TATE know they sexually exploit women as they have publicly bragged about it. Yet, they attempted to prosecute a young woman for giving truthful testimony describing the very behavior they have previously touted with pride. Accordingly, TRISTAN TATE and ANDREW TATE acted with malice in attempting to prosecute JANE DOE.

294. As a direct and proximate cause of the foregoing, JANE DOE was injured by TRISTAN TATE and ANDREW TATE's actions and has suffered damages including but not limited to reputational harm, fear of prosecution, psychological, emotional, and physical injuries, emotional distress, mental anguish, pain and suffering and the loss of enjoyment of life.

COUNTERCLAIM VII:
INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS
(against Tristan Tate and Andrew Tate)

295. JANE DOE realleges and incorporates by reference all prior paragraphs as if fully incorporated here.

296. TRISTAN TATE and ANDREW TATE have recklessly and intentionally violated the TVPRA, by recruiting, enticing, harboring, and transporting JANE DOE for the purpose of causing her to engage in commercial sex acts, through the use of fraud, and/or coercion, in violation of 18 U.S.C. § 1591(a), and conspired to do these acts in violation of 18 U.S.C. 1594(c), which was extreme and outrageous conduct that caused JANE DOE severe emotional distress as explained above.

297. ANDREW TATE and TRISTAN TATE intentionally publicized that JANE DOE was a victim of child sexual abuse (when she was fifteen (15) years old) at the hands of her Yoga instructor—a man who was well into his fifties at the time. This man was entrusted with the care of children and was ultimately convicted of molesting JANE DOE, *and another child*.

298. As a victim of child sexual abuse this information was protected by Florida law, to remain confidential, and the documents are redacted to preserve the privacy of the child victims including JANE DOE. THE TATE BROTHERS know this because they quickly redacted the predator's name after filing and referred to him with the alias "Jailed John" in their filings. But in violation of JANE DOE's privacy, THE TATE BROTHERS made this information public by their own statements and through their associates on social media. This is outrageous conduct. Even worse, THE TATE BROTHERS claimed the Yoga Instructor *was the victim* of JANE DOE—the fifteen-year-old child. THE TATE BROTHERS spread false information that JANE DOE lied about her age to the Yoga instructor and that she falsely accused him. They did this to hurt JANE DOE, damage her reputation, undermine her credibility as a witness, and to make it appear that JANE DOE has a pattern of falsely accusing men, which is not true. **Public arrest records show**, JANE DOE did not even make the report regarding the Yoga instructor. Instead, concerned for their daughter, JANE DOE's parents hired a private

investigator to investigate the nature of their relationship which they began to suspect was not appropriate. The private investigator captured **photographic evidence** of the Yoga instructor molesting JANE DOE and provided it to the police. In their investigation the police discovered another minor victim who sexually abused by the Yoga instructor. The Yoga instructor was ultimately convicted of sexually abusing JANE DOE and the other minor child.

299. ANDREW TATE and TRISTAN TATE intentionally made public that JANE DOE was a victim of child sexual abuse to cause her severe emotional distress. ANDREW TATE and TRISTAN TATE intentionally spread the lie that JANE DOE falsely accused the Yoga instructor despite public records that show she did not accuse him but instead **he was caught red-handed and on camera**. They did this to increase JANE DOE's pain and suffering. This is heinous, extreme, and outrageous conduct done with actual malice.

300. Upon information and belief, ANDREW TATE and/or TRISTAN TATE asked Candace Owens, either directly or indirectly, to spread these heinous lies to intensify the hurt and harm to JANE DOE and undermine her credibility as a witness against them in the Romanian criminal prosecution.

301. Upon information and belief, ANDREW TATE and/or TRISTAN TATE asked Sulemain Ahmed, either directly or indirectly, to spread these heinous lies to intensify the hurt and harm to JANE DOE and undermine her credibility as a witness against them in the Romanian criminal prosecution.

302. ANDREW TATE and TRISTAN TATE have recklessly and intentionally violated JANE DOE's privacy by working with Marlin Fisher, who committed statutory rape against JANE DOE and illegally copied her cell phone and stole other private information. THE TATE BROTHERS disseminated this private information of JANE DOE's, including sensitive

information regarding her childhood sexual abuse, to third parties, such as Sulemain Ahmed, and online.

303. ANDREW TATE and TRISTAN TATE's intentional and/or reckless conduct was outrageous and would be regarded as odious and utterly intolerable in a civilized community.

304. As a direct and proximate result of [REDACTED]'s intentional and/or reckless conduct JANE DOE suffered severe emotional distress.

305. JANE DOE demands judgment against ANDREW TATE and TRISTAN TATE and for compensatory damages, costs and such other further relief as this Court deems proper.

RESERVATION OF RIGHTS

306. JANE DOE reserves the right to amend this pleading for counterclaims upon discovering additional facts, including adding claims, parties, and defenses as appropriate.

PRAYER FOR RELIEF

307. JANE DOE respectfully requests that the Court enter judgment in her favor, against ANDREW TATE and TRISTAN TATE, jointly and severally, as follows:

- That the Court award JANE DOE punitive (or treble damages as to Count III under FL. Stat. § 772.104), compensatory, consequential, general, and nominal damages in an amount to be determined at trial;
- That the Court enter an order prohibiting THE TATE BROTHERS from contacting, harassing, or defaming JANE DOE;
- That the Court award to Plaintiff the costs and disbursements of the action, along with reasonable attorneys' fees, costs, and expenses;
- That the Court award pre- and post-judgment interest at the maximum legal rate;
- Other judicial and equitable relief as the Court may deem just and proper; and
- That the Court retain jurisdiction of this matter to ensure all forms of relief it deems appropriate.

DEMAND FOR JURY TRIAL

308. Jane Doe demands a trial by jury of all so triable issues, pursuant to Fla. R. Civ. P. 1.430

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on February 10, 2025, the foregoing was filed via Florida Court's E-Portal filing system and was efiled upon:

Thomas Maniotis
Equity Legal, PLLC
5201 Blue Lagoon Dr., Flr. 8
Miami, FL 33126
321-313-8642
tamaniots@equitylegal.net

Joseph D. McBride
The McBride Law Firm, PLLC
99 Park Avenue, 6th Flr.
New York, NY 10016
917-757-9537
jmcbride@mcbritelawnyc.com

Attorneys for Plaintiffs

Respectfully Submitted,

By: /s/ Danielle Bianculli Pinter
Danielle Bianculli Pinter
[FBN 120441]
National Center on Sexual
Exploitation
1201 F. St., NW, Suite 200
Washington, DC 20004
dpinter@ncoselaw.org
Telephone: 202-393-7245

Jennifer Safstrom
[FBN 1019759]
First Amendment Clinic
Vanderbilt Law School
131 21st Ave South
Nashville, TN 37203
Telephone: 615-322-4964
jennifer.safstrom@vanderbilt.edu

Attorneys for Defendants