

1 Her testimony about this is on page 255.

2 Finally let's talk about the last count in the  
3 Indictment, that's Count Seven, the attempted sex trafficking  
4 of Jay. As she described on page 4,427, Jay was assigned to  
5 seduce the defendant and have him take a picture of her and  
6 send it to India to prove it was done. Allison told her to  
7 keep the assignment. Jay pushed back with Allison. And Jay  
8 testified on page 4,418, Allison tried to convince her that it  
9 would help her with her child sexual abuse. Jay also directly  
10 asked Allison if the defendant was part of the vow and Allison  
11 lied and said no. Finally, at one point, Allison stated to  
12 Jay, I give you permission to enjoy it in regards to the  
13 assignment.

14 Given what happened with Sylvie and Nicole, I submit  
15 it's clear that Jay was being sent to the defendant to engage  
16 in a sex act. They thought because of her collateral she  
17 could be coerced like the others. In fact, Allison admitted  
18 it that Jay that was supposed to have sex with the defendant.  
19 This is page 1,794. Lauren Salzman testified that she asked  
20 Allison if the defendant was having sex with her slaves.  
21 Allison said, just Nicole and Suzy, but we're going to start  
22 working with India and Jay. Lauren then asked, when you say  
23 working, do you mean fucking? And Allison said yes.

24 Additionally, the coercive power collateral is made  
25 clear by the fact that she decided she needed to download