

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

CASE NO.:

08-80069

JANE DOE NO. 1, by and through
JANE DOE's FATHER as parent and natural
guardian, and JANE DOE's FATHER, and
JANE DOE's STEPMOTHER, individually,

Plaintiffs,

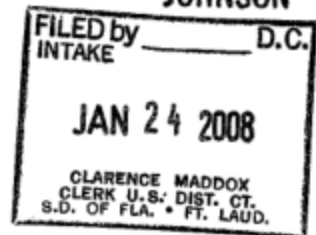
vs.

JEFFREY EPSTEIN,

Defendant.

CIV-MARRA

**MAGISTRATE JUDGE
JOHNSON**



COMPLAINT

Plaintiff, Jane Doe No. 1 ("Jane" or "Jane Doe"), by and through Jane Doe's Father as parent and natural guardian, and Jane Doe's Father and Jane Doe's Stepmother, individually, bring this Complaint against Jeffrey Epstein, as follows:

Parties, Jurisdiction and Venue

1. Jane Doe is a citizen and resident of the State of Florida. She is a minor under the age of 18 years.
2. Jane Doe's Father brings this action individually and as parent and natural guardian of Jane Doe. Jane Doe's Father is a citizen and resident of the State of Florida.
3. Jane Doe's Stepmother brings this action individually. Jane Doe's Stepmother is a citizen and resident of the State of Florida.
4. This Complaint is brought under fictitious names to protect the identity of the Minor Plaintiff because this Complaint makes sensitive allegations of sexual assault and abuse upon a

minor.

5. Defendant Jeffrey Epstein is a citizen and resident of the State of New York.

6. This is an action for damages in excess of \$50 million.

7. This Court has jurisdiction of this action and the claims set forth herein pursuant to 28 U.S.C. §1332(a), as the matter in controversy (i) exceeds \$75,000, exclusive of interest and costs; and (ii) is between citizens of different states.

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

Factual Allegations

9. At all relevant times, Defendant Jeffrey Epstein ("Epstein") was an adult male, 52 years old. Epstein is a financier and money manager with a secret clientele limited exclusively to billionaires. He is himself a man of tremendous wealth, power and influence. He maintains his principal home in New York and also owns residences in New Mexico, St. Thomas and Palm Beach, FL. The allegations herein concern Epstein's conduct while at his lavish estate in Palm Beach.

10. Upon information and belief, Epstein has a sexual preference and obsession for underage minor girls. He engaged in a plan and scheme in which he gained access to primarily economically disadvantaged minor girls in his home, sexually assaulted these girls, and then gave them money. In or about 2005, Jane Doe, then 14 years old, fell into Epstein's trap and became one of his victims.

11. Upon information and belief, Jeffrey Epstein carried out his scheme and assaulted girls in Florida, New York and on his private island, known as Little St. James, in St. Thomas.

12. An integral player in Epstein's Florida scheme was [REDACTED]

[REDACTED]

[REDACTED], [REDACTED]

[REDACTED].

15. After Epstein had completed the assault, he left the room. Jane was then able to get dressed, leave the room and go back down the stairs. She then met Ms. [REDACTED] again who brought Jane home. Jane was paid \$300 by Epstein. Ms. [REDACTED] was paid \$200 by Epstein for bringing Jane to him.

16. As a result of this encounter with Epstein, the 14-year old Jane experienced confusion, shame, humiliation, embarrassment and the assault sent her life into a downward spiral.

COUNT I
Sexual Assault

17. Plaintiff Jane Doe by and through her Father, as parent and natural guardian, repeats and realleges paragraphs 1 through 16 above.

18. Epstein tortiously assaulted Jane Doe sexually in or about 2005.

19. This sexual assault was in violation of Chapter 800 of the Florida Statutes, which recognizes as a crime the lewd and lascivious acts committed by Epstein upon Jane.

20. As a direct and proximate result of Epstein's assault on Jane, she has suffered and will continue to suffer severe and permanent traumatic injuries, including mental, psychological and emotional damages.

WHEREFORE, Plaintiff Jane Doe, by and through her Father, as parent and natural guardian, demands judgment against Defendant Jeffrey Epstein for compensatory damages, punitive damages, costs, and such other and further relief as this Court deems just and proper.

COUNT II
Intentional Infliction of Emotional Distress

21. Plaintiffs Jane Doe by and through her Father, as parent and natural guardian, Jane Doe's Father and Jane Doe's Stepmother, individually, repeat and reallege paragraphs 1 through 16 above.

22. Epstein's conduct was intentional or reckless.

23. Epstein's conduct was outrageous, going beyond all bounds of decency.

24. Epstein's conduct caused severe emotional distress not only to Jane Doe, but also to her parents, Jane Doe's Father and Jane Doe's Stepmother. Epstein knew or had reason to know that his intentional and outrageous conduct would cause emotional trauma and damage to Jane Doe's parents.

25. As a direct and proximate result of Epstein's intentional or reckless conduct, Jane Doe, Jane Does' Father and Jane Doe's Stepmother have suffered and will continue to suffer severe mental anguish and pain.

WHEREFORE, Plaintiffs Jane Doe by and through her Father, as parent and natural guardian, Jane Doe's Father and Jane Doe's Stepmother demand judgment against Defendant Jeffrey Epstein for compensatory damages, costs, punitive damages, and such other and further relief as this Court deems just and proper.

COUNT III
Loss of Parental Consortium

26. Plaintiff Jane Doe's Father repeats and realleges paragraphs 1 through 16 above.

27. Epstein's tortious conduct is the direct and proximate cause of damages to Jane Doe's Father, consisting of parental loss of comfort, companionship and society and healthcare costs

associated with the treatment of Jane.

28. Jane Doe's Father experienced and will continue to experience great mental anguish, pain and suffering from the time that Defendant's tortious conduct occurred.

WHEREFORE, Plaintiff Jane Doe's Father demands judgment for loss of consortium damages, costs and such other and further relief as this Court deems proper.

JURY TRIAL DEMAND

Plaintiffs demand a jury trial in this action.

Dated: January 24, 2008

Respectfully submitted,

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