

April 14, 2008

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDASTEVEN M. LARIMORE
CLERK U.S. DIST. CT.
S.D. OF FLA. - MIAMICASE NO.: **08-CV-80380-Hurley-Hopkins**

JANE DOE NO. 4,

Plaintiff,

vs.

JEFFREY EPSTEIN,

Defendant.

COMPLAINT

Plaintiff, Jane Doe No. 4 ("Jane" or "Jane Doe"), brings this Complaint against Jeffrey Epstein, as follows:

Parties, Jurisdiction and Venue

1. Jane Doe No. 4 is a citizen and resident of the State of Florida, and is sui juris.
2. This Complaint is brought under a fictitious name to protect the identity of the Plaintiff because this Complaint makes sensitive allegations of sexual assault and abuse upon a minor.
3. Defendant Jeffrey Epstein is a citizen and resident of the State of New York.
4. This is an action for damages in excess of \$50 million.
5. 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.
6. 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

7. 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.

8. 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 2002-2003, Jane Doe, then approximately 15 years old, fell into Epstein's trap and became one of his victims.

9. 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.

10. Epstein's scheme involved the use of young girls to recruit underage girls. Haley Robson, a Palm Beach Community College student from Loxahatchee, Florida recruited girls ostensibly to give a wealthy man a massage for monetary compensation in his Palm Beach mansion. The young girls would be contacted when Epstein was planning to be at his Palm Beach residence or soon after he had arrived there. Ms. Robson, upon information and belief, generally sought out economically disadvantaged underage girls from western Palm Beach County who would be enticed by the money being offered - generally \$200 to \$300 per "massage" session - and who were perceived as less likely to complain to authorities or have credibility if allegations of improper conduct were made. This was an important element of Epstein's plan.

11. Epstein's plan and scheme reflected a particular pattern and method. The underage victim would be brought to the kitchen entrance of Epstein's mansion, where she would be introduced to Sarah Kellen, Epstein's assistant. Ms. Kellen would then bring the girl up a flight of stairs to a bedroom that contained a massage table in addition to other furnishings. There were photographs of nude women lining the stairway hall and in the bedroom. The girl would then find herself alone in the room with Epstein, who would be wearing only a towel. He would then remove his towel and lie naked on the massage table, and direct the girl to remove her clothes. Epstein would then perform one or more lewd, lascivious and sexual acts, including masturbation and touching the girl's vagina.

12. Consistent with the foregoing plan and scheme, when Jane Doe was approximately 15 years old, she was recruited by Haley Robson to give Epstein a massage for monetary compensation. Jane was brought to Epstein's mansion in Palm Beach, to the kitchen entrance. Once there, Jane was introduced to Sarah Kellen, who led her up the flight of stairs to the room with the massage table. In this room, Jane was directed by Epstein to remove her clothes and give him a massage. Jane initially kept her panties and bra on, and complied with Epstein's instructions. Jane was paid by Epstein for this massage.

13. Jane returned on many occasions to the Palm Beach mansion to provide Epstein with massages. On those occasions, Epstein engaged in sexual contact and activity with the minor Jane, which included, among other things, directing Jane to remove all her clothes, masturbating during the massage, and digitally penetrating Jane's vagina. Jeffrey Epstein often used a vibrator on the minor Jane during the massage. This sexual abuse continued for approximately three years.

14. As a result of these encounters with Epstein, Jane experienced confusion, shame,

humiliation and embarrassment, and has suffered severe psychological and emotional injuries.

COUNT I
Sexual Assault

15. Plaintiff Jane Doe repeats and realleges paragraphs 1 through 14 above.
16. Epstein tortiously assaulted Jane Doe sexually. Epstein's acts were intentional, unlawful, offensive and harmful.
17. Epstein's plan and scheme in which he committed such acts upon Jane Doe were done willfully and maliciously.
18. 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.
19. 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 No. 4 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

20. Plaintiff Jane Doe repeats and realleges paragraphs 1 through 14 above.
21. Epstein's conduct was intentional or reckless.
22. Epstein's conduct was outrageous, going beyond all bounds of decency.
23. Epstein's conduct caused severe emotional distress to Jane Doe. Epstein knew or had reason to know that his intentional and outrageous conduct would cause emotional trauma and

damage to Jane Doe.

24. As a direct and proximate result of Epstein's intentional or reckless conduct, Jane Doe, has suffered and will continue to suffer severe mental anguish and pain.

WHEREFORE, Plaintiff Jane Doe No. 4 demands judgment against Defendant Jeffrey Epstein for compensatory damages, costs, punitive damages, and such other and further relief as this Court deems just and proper.

JURY TRIAL DEMAND

Plaintiffs demand a jury trial in this action.

Dated: April 14, 2008

Respectfully submitted,

HERMAN & MERMELSTEIN, P.A.

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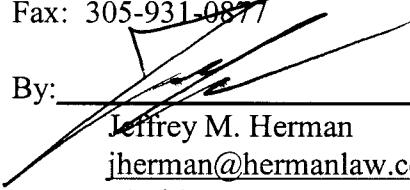
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