

PalmBeachDailyNews.com
THE BEACH FRONT

site web Web Search powered by YAHOO! SEARCH Learn more about RSS Mobile Access
HOME NEWS SOCIETY BUSINESS ARTS FASHION OBITUARIES OPINION LIFESTYLES SHINY SHOTS

Start or Renew Your Subscription
Palm Beach Daily News
Friday, July 11, 2008
ADVERTISE
CONTACT US

- REAL ESTATE
- MARKETPLACE
- CLASSIFIEDS
- AUTOMOTIVE
- ADVERTISE



NEWS

Religion | Archives

Palm Beacher Jeffrey Epstein faces new lawsuit alleging sexual battery

Click-2-Listen

By David Rogers

Sunday, July 13, 2008

Another lawsuit has been filed against Palm Beacher Jeffrey Epstein.

The complaint, filed Thursday in Palm Beach County Circuit Court, charges Epstein with sexual battery and conspiracy. It alleges that Epstein and two assistants solicited the plaintiff, called Jane Doe II, from June or July 2004 through February 2005 to provide massages, which led to sexual activity. The plaintiff, represented by West Palm Beach lawyer Isidro Garcia, is seeking a jury trial. The complaint does not list a specific amount for damages.

Months ago, two other women filed federal suits against Epstein alleging that he sexually assaulted them when they were teens. A third woman filed suit in state court.

On June 30, Epstein, 55, was sentenced to 18 months in the Palm Beach County Jail after pleading guilty to soliciting underage girls for prostitution.

The arrest followed an 11-month investigation by Palm Beach police into allegations that Epstein gave five underage girls money for massages and sometimes sex at his home.

After he serves his term, Epstein will be under house arrest for 12 months.

Refinance \$300,000 for Only \$965/Month
\$300,000 Mortgage for only \$965/month. Save \$1,000's - No obligation.
www.HomeCourtHelp.com

See Today's Mortgage Rates
Calculate Your New Mortgage Payment. See Rates- No Credit Check Req.
www.LendMyBills.com

Refinance and Save \$1,000's
\$150,000 Mortgage for \$483/month. Compare up to 4 free quotes.
www.pactmortgage.com

No Time for School? Graduate Online
Get a Degree in as Few as 2 Yrs- Graduate Faster with Online Classes.
www.CB1099/SA.com

Ads by Yahoo!

By using this service you accept the terms of our Visitor Agreement.
Copyright 2007 Palm Beach Daily News. All rights reserved.
The Palm Beach Daily News
Privacy Policy | About this site | Write to us

ADAPTABLE



Featured Vehicles

Dream Car find it at PalmBeachDailyNews.com
Luxury Cars find them at PalmBeachDailyNews.com
Luxury Car find it at PalmBeachDailyNews.com
View All Featured Vehicles

Report Selection Criteria

Case ID: 502008CA020614XXXMB
Docket Start Date:
Docket Ending Date:

Case Description

Case ID: 502008CA020614XXXMB
Case Caption: JANE DOE II V JEFFREY EPSTEIN
Division: AF - LEWIS
Filing Date: Thursday , July 10th, 2008
Court: CA - CIRCUIT CIVIL
Location: MB - MAIN BRANCH
Jury: Y-Jury
Type: OC - OTHER CIRCUIT
Status: PE - PENDING

Related Cases

No related cases were found.

Case Event Schedule

No case events were found.

Case Parties

Seq #	Assoc	Expn Date	Type	ID	Name	Aliases:	
1			PLAINTIFF	[REDACTED]	JANE DOE II	Aliases:	none
2	1		ATTORNEY	0437883	GARCIA , ESQ, ISIDRO MANUEL	Aliases:	none
3			DEFENDANT	@1430497	EPSTEIN, JEFFREY	Aliases:	none
4			DEFENDANT	[REDACTED]	[REDACTED]	Aliases:	none

http://courtcon.co.palm-beach.fl.us/pls/jiwp/ck_public_qry_doct.cp_dktrpt_docket_report?... 7/11/2008

SDNY_GM_00328629

5		JUDGE	AF	LEWIS, JUDGE DIANA	Aliases: none

Docket Entries

Docket Number	Docket Type	Book and Page No.	Attached To:
	00000 - ADDITIONAL COMMENTS		
Filing Date:	10-JUL-2008		
Filing Party:			
Disposition Amount:			
Docket Text:	OWES \$65.00		
	800FF - CAFF		
Filing Date:	10-JUL-2008		
Filing Party:	JANE DOE II,		
Disposition Amount:			
Docket Text:	none.		
	PE - PENDING		
Filing Date:	10-JUL-2008		
Filing Party:			
Disposition Amount:			
Docket Text:	none.		
	RCPT - RECEIPT FOR PAYMENT		
Filing Date:	10-JUL-2008		
Filing Party:	JANE DOE II,		
Disposition Amount:			
Docket Text:	A Payment of -\$256.00 was made on receipt CAMB227404.		
1	CMP - COMPLAINT		
Filing Date:	10-JUL-2008		
Filing Party:	JANE DOE II,		
Disposition Amount:			
Docket Text:	none.		
2	CCS - CIVIL COVER SHEET		

http://courtcon.co.palm-beach.fl.us/pls/jiwp/ck_public_qry_doct.ep_dktrpt_docket_report?... 7/11/2008

SDNY_GM_00328630

EFTA_00201382

EFTA01308058

Filing Date:	10-JUL-2008
Filing Party:	JANE DOE II,
Disposition Amount:	
Docket Text:	<i>none.</i>
3	SMIS - SUMMONS ISSUED
Filing Date:	10-JUL-2008
Filing Party:	EPSTEIN, JEFFREY
Disposition Amount:	
Docket Text:	SM-08-119679
4	SMIS - SUMMONS ISSUED
Filing Date:	10-JUL-2008
Filing Party:	[REDACTED]
Disposition Amount:	
Docket Text:	[REDACTED]
	RCPT - RECEIPT FOR PAYMENT
Filing Date:	11-JUL-2008
Filing Party:	JANE DOE II,
Disposition Amount:	
Docket Text:	A Payment of -\$65.00 was made on receipt CAMB227523.



Clerk & Comptroller
Palm Beach County

SHARON R. BOCK
Clerk & Comptroller
Palm Beach County

EXECUTIVE OFFICES: 301 North Olive Ave, West Palm Beach, FL 33401. (561) 355-2996

http://courtcon.co.palm-beach.fl.us/pls/jiwp/ck_public_qry_main.cp_header?title_phrase=... 7/11/2008

SDNY_GM_00328632

EFTA_00201384

EFTA01308060

- ▶ [Search Home](#)
- ▶ [New Search](#)
- ▶ [Report Selection](#)
- ▶ [Case Description](#)
- ▶ [Related Cases](#)
- ▶ [Event Schedule](#)
- ▶ [Case Parties](#)
- ▶ [Docket Entries](#)

(c) Copyright 1998 Affiliated Computer Systems, Inc. ACS and the ACS logo are registered trademarks. CourtConnect is a trademark of ACS. This contains trade secrets and is subject to a confidentiality agreement. The unauthorized possession, use, reproduction, distribution, display, or disclosure of this material or the information contained herein is prohibited. All rights reserved. User Accepts/Agrees to Disclaimer. Not for official use.

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,

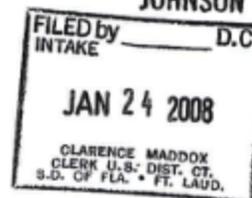
vs.

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

HERMAN & MERMELSTEIN, P. A.

www.hermanlaw.com

- 1 -

SDNY_GM_00328634

EFTA_00201386

EFTA01308062

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], a Palm Beach

removed his towel, and laid down naked on the massage table. He demanded that Jane remove her clothes. In shock, fear and trepidation, Jane complied, removing her clothes except for her underwear. Epstein then sexually assaulted Jane.

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 [REDACTED] again who brought Jane home. Jane was paid \$300 by Epstein. [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,

HERMAN & MERMELSTEIN, P.A.
Attorneys for Plaintiffs
18205 Biscayne Blvd.
Suite 2218
Miami, Florida 33160
Tel: 305-931-2200
Fax: 305-931-0877

By: _____

Jeffrey M. Herman
jherman@hermanlaw.com
Florida Bar No. 521647
Stuart S. Mermelstein
smermelstein@hermanlaw.com
Florida Bar No. 947245
Adam D. Horowitz
Florida Bar No. 376980
ahorowitz@hermanlaw.com

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

CASE NO.:

JANE DOE NO. 2,

Plaintiff,

vs.

JEFFREY EPSTEIN,

Defendant.

COMPLAINT

Plaintiff, Jane Doe No. 2 (“Jane” or “Jane Doe”), brings this Complaint against Jeffrey Epstein, as follows:

Parties, Jurisdiction and Venue

1. Jane Doe No. 2 is a citizen and resident of the Commonwealth of Virginia, 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

HERMAN & MERMELSTEIN, P. A.

www.hermanlaw.com

- 1 -

SDNY_GM_00328640

EFTA_00201392

EFTA01308068

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 2004-2005, Jane Doe, then approximately 16 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. (Upon information and belief, the young girl who brought Jane Doe to Epstein was herself a minor victim of Epstein, and will therefore not be named in this Complaint). Under Epstein's plan, underage girls were recruited ostensibly to give a wealthy man a massage for monetary compensation in his Palm Beach mansion. The recruiter would be contacted when Epstein was planning to be at his Palm Beach residence or soon after he had arrived there. Epstein or someone on his behalf would direct the recruiter to bring one or more underage girls to the residence. The recruiter, 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. Upon arrival at Epstein's mansion, the underage victim would be introduced to [REDACTED] Epstein's assistant, who gathered the girl's personal information, including her name and telephone number. [REDACTED] 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, Jane Doe was recruited to give Epstein a massage for monetary compensation. Jane was brought to Epstein's mansion in Palm Beach. Once at the mansion, Jane was introduced to [REDACTED], who led her up the flight of stairs to the room with the massage table. In this room, Epstein told Jane to take off her clothes and give him a massage. Jane kept her panties and bra on and complied with Epstein's instructions. Epstein wore only a towel around his waste. After a short period of time, Epstein removed the towel and rolled over exposing his penis. Epstein began to masturbate and he sexually assaulted Jane.

13. After Epstein had completed the assault, Jane was then able to get dressed, leave the room and go back down the stairs. Jane was paid \$200 by Epstein. The young girl who recruited Jane was paid \$100 by Epstein for bringing Jane to him.

14. As a result of this encounter 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. 2 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.

HERMAN & MERMELSTEIN, P. A.

www.hermanlaw.com

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. 2 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.

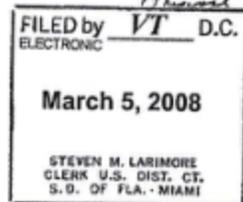
Dated: February __, 2008

Respectfully submitted,

HERMAN & MERMELSTEIN, P.A.
Attorneys for Plaintiffs
18205 Biscayne Blvd.
Suite 2218
Miami, Florida 33160
Tel: 305-931-2200
Fax: 305-931-0877

By: _____

Jeffrey M. Herman
jherman@hermanlaw.com
Florida Bar No. 521647
Stuart S. Mermelstein
smermelstein@hermanlaw.com
Florida Bar No. 947245
Adam D. Horowitz
Florida Bar No. 376980
ahorowitz@hermanlaw.com



UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

CASE NO.:

08-CV-80232-Marra-Johnson

JANE DOE NO. 3,

Plaintiff,

vs.

JEFFREY EPSTEIN,

Defendant.

COMPLAINT

Plaintiff, Jane Doe No.3 ("Jane" or "Jane Doe"), brings this Complaint against Jeffrey Epstein, as follows:

Parties, Jurisdiction and Venue

1. Jane Doe 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 her when she was 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.

HERMAN & MERMELSTEIN, P. A.

www.hermanlaw.com

- 1 -

1 of 6

SDNY_GM_00328645

EFTA_00201397

EFTA01308073

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 2004-2005, Jane Doe, then 16 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. An integral player in Epstein's Florida scheme was [REDACTED], a Palm Beach [REDACTED]. She recruited girls ostensibly to give a wealthy man a massage for monetary compensation in his Palm Beach mansion. Under Epstein's plan, [REDACTED] would be contacted when Epstein was planning to be at his Palm Beach residence or soon after he had arrived there. Epstein or someone on his behalf directed [REDACTED] to bring one or more underage girls to the residence. [REDACTED] upon information and belief, generally sought out economically disadvantaged underage girls from [REDACTED] and surrounding areas 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. Upon arrival at Epstein's mansion, the victim would be brought to the kitchen. She would then be led up a flight of stairs to a bedroom that contained a massage table in addition to other furnishings. Once the girl was alone in this room, Epstein would enter wearing only a towel to cover his private area. He then would lay down on the massage table and perform one or more lewd, lascivious and sexual acts, including masturbation and touching the girl sexually.

12. Consistent with the foregoing plan and scheme, [REDACTED] recruited Jane Doe to give Epstein a massage for monetary compensation. [REDACTED] brought Jane to Epstein's mansion in Palm Beach. Jane was led up the flight of stairs to the room with the massage table. She was alone in the room when Epstein arrived wearing a towel to cover his private parts. He laid down on the massage table, and sexually assaulted Jane Doe during the massage. In addition, Jeffrey Epstein masturbated during the massage.

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

14. As a result of this encounter with Epstein, the 16-year old Jane experienced trauma, shock, confusion, shame, humiliation and embarrassment.

COUNT I
Sexual Assault

15. Plaintiff Jane Doe repeats and realleges paragraphs 1 through 14 above.

16. Epstein tortiously assaulted Jane Doe sexually in or about 2004-2005. Epstein's acts were intentional, unlawful, offensive and harmful.

HERMAN & MERMELSTEIN, P. A.

www.hermanlaw.com

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, 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. Plaintiffs 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 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: March 4, 2008

Respectfully submitted,

HERMAN & MERMELSTEIN, P.A.
Attorneys for Plaintiffs
18205 Biscayne Blvd.
Suite 2218
Miami, Florida 33160
Tel: 305-931-2200
Fax: 305-931-0877

By: 

Jeffrey M. Herman
jherman@hermanlaw.com
Florida Bar No. 521647
Stuart S. Mermelstein
smermelstein@hermanlaw.com
Florida Bar No. 947245
Adam D. Horowitz
Florida Bar No. 376980
ahorowitz@hermanlaw.com

HERMAN & MERMELSTEIN, P. A.

- 5 -

www.hermanlaw.com

SDNY_GM_00328649

EFTA_00201401

EFTA01308077