

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

MARVIN GERBER AND KALMA KOENIG, on
behalf of themselves and all others similarly
situated,

Plaintiffs,

v.

THE FINANCIAL TRUST COMPANY, XYZ
CORPORATION, ABC, INC., and JEFFREY E.
EPSTEIN,

Defendants.

Case No.

INITIAL COMPLAINT

ECF CASE

Marvin Gerber and Kalma Koenig (collectively “Plaintiffs”), on behalf of themselves and all others similarly situated, by their attorneys, Hach Rose Schirripa & Cheverie, LLP (“HRSC”), bring this Complaint against the Defendants, The Financial Trust Company (“TFTC”), Jeffrey E. Epstein (“Epstein”),¹ XYZ Corp., and ABC, Inc., as follows:

INTRODUCTION

1. This is an action to recover damages on behalf of Plaintiffs and members of the proposed class, defined below (the “Class”), who are Noteholders and Bondholders of Towers Financial Corporation (“TFC”) for harm suffered as a result of Defendants’ conspiring and participation in a massive Ponzi scheme perpetrated by Defendant Jeffrey Epstein, an uncharged co-conspirator of Steven Hoffenberg (“Hoffenberg”). Epstein used The Financial Trust Company, XYZ Corp., and ABC, Inc. to conceal his ill-gotten gains, obtained from his participation in a

¹ Defendant Epstein is sued herein in his individual capacity as well as in his capacity as President and Chief Executive Officer of The Financial Trust Company.