

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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MARY DOE,

Case No. 19 Civ. 10758

Plaintiff,

**COMPLAINT  
AND JURY DEMAND**

-against-

DARREN K. INDYKE and RICHARD D. KAHN,  
as EXECUTORS OF THE ESTATE OF JEFFREY E.  
EPSTEIN, and [REDACTED],

Defendants.

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Plaintiff Mary Doe<sup>1</sup>, by and through her attorneys, Cuti Hecker Wang LLP and Allred, Maroko & Goldberg, for her Complaint alleges as follows:

**NATURE OF THE ACTION**

1. Beginning when Plaintiff Mary Doe was sixteen years old, Jeffrey Epstein preyed upon her, manipulated her to be completely dependent on him, and repeatedly sexually assaulted her. As a result, she attempted suicide multiple times. His degradation of her was total for years.

2. [REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED].

3. [REDACTED] el. He made clear to Mary how

<sup>1</sup> Plaintiff is using the pseudonym “Mary Doe” in this Complaint in place of her real name. “Mary” is not her real first name. Plaintiff intends to file a motion to proceed under a pseudonym on the basis of her privacy because her allegations concern childhood sexual abuse.

important and powerful he was. [REDACTED]

[REDACTED]

4. Mary felt very fortunate to have met Epstein. She was amazed that such a powerful man wanted to help her, and believed that she could trust him. Because they had hours of conversation about her and her desire for an education, she understood that he could change her life and help her achieve her parents' dream of going to a top school.

5. Epstein used this power over Mary to sexually abuse her, viciously and repeatedly. Epstein, often through Defendant [REDACTED] née [REDACTED] ("[REDACTED]"), would summon Mary to his Manhattan townhouse, order her to give him massages, and then subject her to sexual acts, the severity of which increased over time.

6. In Mary's first visit to the townhouse, it was only a massage. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] Epstein gave Mary a few hundred-dollar bills.

8. Epstein manipulated and threatened Mary to ensure that she understood his total power over her life, with both offers to help and threats not to contradict him. She was 16. Mary understood that she had no choice but to follow his commands.

9. In approximately late 2004, when [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

10. [REDACTED] played an integral role in facilitating Epstein's sexual abuse of Mary. [REDACTED] arranged for Mary to come to the townhouse and frequently saw Mary going into the massage room with Epstein. Epstein openly commented to [REDACTED] about Mary performing sexual acts for him, and [REDACTED] once witnessed Epstein forcing Mary [REDACTED].

11. In late 2005, after being sexually abused by Epstein yet again, she heard Epstein shout to [REDACTED] that [REDACTED] Mary was mortified and ashamed, and in that moment suddenly saw the truth: she was not even a human being to Epstein, she was an object. As she left the townhouse feeling physically ill, Mary saw another girl around her age entering his townhouse. The penny dropped: Mary suddenly felt like Epstein's prostitute, as one of many girls he treated as sexual objects.

12. [REDACTED]. She nearly immediately left New York City, returned to her parents' home across the country and never saw Epstein again.

13. Epstein's abuse devastated Mary. [REDACTED]

[REDACTED]

[REDACTED]

She isolated herself and had to rebuild from a dark place.

14. Mary continues to feel the dramatic psychological scars from Epstein's abuse every day.

15. When Epstein was arrested in July 2019, Mary was briefly hopeful that he might finally face consequences. But his death left Mary with the desolate sense that he has evaded justice yet again.

16. Mary brings this action seeking, at last, some measure of justice for the

egregious abuse that Epstein inflicted on her when she was a child, which irreparably scarred her for life.

**PARTIES**

17. Plaintiff Mary Doe is an individual who resides in the western United States.

18. Defendants Darren K. Indyke and Richard D. Kahn are the Executors of the Estate of Jeffrey E. Epstein (the “Estate”). As Executors of the Estate, Defendants Indyke and Kahn are liable for the acts and omissions of Epstein and his agents. For purposes of 28 U.S.C. § 1332, Defendants Indyke and Kahn are deemed to be citizens of the United States [REDACTED], where Epstein was domiciled at the time of his death.

19. Defendant [REDACTED] née [REDACTED] is an individual who at all relevant times resided in New York, New York. [REDACTED] was Epstein’s assistant and scheduler who, upon information and belief, played an integral role in operating Epstein’s operation of sex trafficking Mary and other underage girls. Upon information and belief, [REDACTED] is a resident of [REDACTED]  
[REDACTED]

**JURISDICTION AND VENUE**

20. This Court has subject-matter jurisdiction pursuant to 28 U.S.C. § 1332 because this case is between citizens of different states and the amount in controversy exceeds \$75,000.

21. Venue is proper in this District pursuant to 28 U.S.C. § 1391(b)(2) because a substantial part of the events or omissions giving rise to the claim occurred in this District.

22. This Court has personal jurisdiction over Defendants. As Executors of the Estate, Defendants Indyke and Kahn are subject to personal jurisdiction in this Court because Epstein was subject to personal jurisdiction at the time of his death.

23. This Court had personal jurisdiction over Epstein at the time of his death because the tortious acts giving rise to Plaintiff's claims took place in New York State.

24. This Court has personal jurisdiction over [REDACTED] because the tortious acts and omissions giving rise to Plaintiff's claims took place in New York State.

**JURY DEMAND**

25. Plaintiff hereby demands a trial by jury on all of her claims in this action.

**FACTUAL ALLEGATIONS**

26. Mary was born in [REDACTED]. [REDACTED]

[REDACTED]

27. [REDACTED]

[REDACTED]

[REDACTED]

28. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

31. [REDACTED]

36. [REDACTED]

[REDACTED]

[REDACTED]

37. In this context, Mary met Jeffrey Epstein for the first time in approximately the summer of 2004, when she was sixteen years old.

38. [REDACTED]

[REDACTED] The woman said that Epstein had connections to Victoria's Secret, and told Mary that he would be the most interesting person she would ever meet.

39. Mary made an appointment to meet Epstein at his townhouse at 9 East 71st Street in Manhattan.

40. Mary did not view it as strange or concerning to go to Epstein's home. During that time period, it was common for her [REDACTED] to run around the city, ringing the doorbells of artists and photographers to meet with them at their studios and homes. [REDACTED]

[REDACTED] In those interactions, she had found nearly all of the people she met to be nice, and found that they were not predators and understood that she was a child.

41. When Mary rang the doorbell of Epstein's townhouse, a maid answered the door, but Epstein was standing right behind her, giving the impression that he was expecting Mary. Epstein seemed larger than life to Mary.

42. Mary was impressed by the grandeur of Epstein's townhouse, the ornate furnishings, and the numerous photographs of famous people.

43. Epstein quickly touted his connections to important people. He pointed out to Mary a photo of Bill Clinton, the president who had made it possible for [REDACTED]

[REDACTED]. Epstein told her that he and President Clinton were "best friends." When Mary explained her family's story, Epstein told her that he would personally thank "Bill" on her and her family's behalf.

44. Epstein told her about himself, including about his healthy lifestyle and that he did not drink or do drugs. This put her at ease, and caused her to think, "I'm in good hands."

45. Epstein asked Mary whether she had a boyfriend. [REDACTED]

[REDACTED]

[REDACTED]

46. After they conversed, Epstein told Mary that he had a knot in his back that his masseuse had not gotten out, and asked if she would help him with it. Mary took this to be an innocent request. [REDACTED]

[REDACTED]

47. Epstein led Mary to the massage room in his townhouse. He gave her a large massage device to use on his back, and she did so. Afterwards, Epstein told her she was an excellent masseuse. He pulled two or three hundred-dollar bills out of his wallet and gave them to Mary, saying, in substance, "I was going to give it to my masseuse anyway, so you take it and pay for your car service or something."

48. Afterwards, Mary felt very fortunate to have made the connection with Epstein. She found him very impressive, and the smartest person she had ever met. She could not fathom the wealth and luxury that he had, and felt that she wanted to be like him. She assumed she would never see Epstein again, and would move on with her life.

49. To Mary's surprise, Epstein called soon afterward. He told her that he had enjoyed talking to her, that he was impressed at how smart she was for a sixteen-year-old, and that her life story was touching. Epstein asked if Mary would like to see him again.

50. Mary found it unbelievable that Epstein, such a smart and powerful man, was impressed by her. She was thrilled at the successful track her life appeared to be taking. She believed that if she stuck by Epstein she would be in good hands.

51. When Mary went to Epstein's townhouse a second time, Epstein discussed his connections with Victoria's Secret, and said he would put in a good word for Mary.

52. When Mary conversed with Epstein, she felt like she was in the presence of someone who was powerful and perfect. She saw that he had the ability to reach down from his powerful position and influence the people directly involved with Mary's daily life and her future prosperity.

53. Epstein made a point of calling massive celebrities – such as an Oscar-winning actress and a world-famous supermodel – on a speakerphone in Mary's presence to show her the tremendous influence he had. Those two famous women did pick up the phone and talk to Epstein when he called them. They plainly also thought he was impressive and important.

54. Mary told Epstein about her parents being upset that she was pursuing modeling, and explained that it was their dream for Mary to attend a prestigious college. Epstein told Mary that he was on the board of directors of Harvard University. He promised her that, if she did well on her SATs, he would write her a letter of recommendation for Harvard, which he said would carry significant weight in the admissions decision.

55. Mary strongly desired for her parents to be proud of her. Accordingly, Epstein's assurance that he could help her get into Harvard was deeply meaningful to her.

56. Epstein brought Mary back to the massage room. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

57. Afterwards, Epstein again gave Mary \$200 in cash, and she left.

58. The third time Mary went to Epstein's townhouse, [REDACTED]

[REDACTED]

[REDACTED]

60. Afterwards, Epstein gave her \$300 and left.

61. Epstein's pattern of abuse continued. [REDACTED]

[REDACTED]

[REDACTED]. Each time, Epstein would give her two or three hundred-dollar bills.

62. Epstein acted as if he were [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

64. Afterwards, Epstein told her how amazing she was, and gave her \$200 or \$300.

65. As time went on, and Mary's relationship with her parents remained distant due to their objection to her career choice, Epstein became the only adult presence in her life. Epstein began calling Mary constantly, whether she was in New York or traveling. He told

her that he loved her. [REDACTED] and, as a child, she perceived Epstein's daily check-up calls as giving her emotional support that she did not otherwise have.

66. Epstein told Mary about the island he owned in the Virgin Islands, and made repeated attempts to fly her to the Virgin Islands to meet people he assured her were very influential and would help with her future. Epstein told Mary that she should be willing to give other people massages as well.

67. Epstein invited Mary to stay in his home in Paris, and arranged for her to attend a concert accompanied by a world-famous supermodel.

68. Epstein had manipulated Mary into believing that Epstein's thoughts were focused on her career and her future.

69. At the same time, Epstein made sure Mary understood his power over her. If she was ever late to meet him, he would tell her that nobody messes with his time, and that she could lose everything. When Mary told Epstein she needed to leave for [REDACTED], he often demanded that she stay, telling her things like, "[REDACTED] you can miss that appointment."

70. Epstein continued to train Mary to be submissive to him and to submit to his orders.

71. Any time Mary failed to do exactly what Epstein commanded of her, Epstein threatened her and verbally berated her. On one occasion, when Mary failed to show up precisely when Epstein had asked her to, he reacted with anger, telling her, in substance, "How dare you? I could make you disappear. I could destroy you. I own this city."

72. Mary believed that was true, that Epstein could make her disappear. She felt he had total control to help her dreams come true, or to make her disappear.

73. Epstein's threats terrified Mary. She made sure to stay in line and not to disobey him.

74. When Mary talked back, Epstein would belittle her and scrutinize her appearance. At one point, Epstein critiqued Mary's body, telling her that her legs were "too big." Epstein went so far as to send Mary to a plastic surgeon, who declined to perform any procedures on her.

75. [REDACTED]

[REDACTED]

[REDACTED]

78. Mary saw Epstein numerous times from the summer of 2004 until the end of 2005. These meetings were often arranged by calls from Epstein himself.

79. On numerous other occasions, Defendant [REDACTED] née [REDACTED] called Mary and scheduled appointments between Mary and Epstein.

80. Mary first met [REDACTED] in approximately early 2005, when Mary was approximately sixteen years old.

81. Upon information and belief, [REDACTED] knew that Epstein engaged in numerous sexual acts with Mary when Mary was a minor.

82. When [REDACTED] called Mary to arrange meetings between Mary and Epstein, [REDACTED] referred to them as "massage" appointments. Upon information and belief, [REDACTED] knew that Epstein would engage in sexual acts with Mary, a minor, at some or all of these "massage" appointments at the time [REDACTED] arranged those meetings.

83. While Mary was travelling, [REDACTED] wired money to her in order to facilitate further encounters between Mary and Epstein.

84. Upon information and belief, [REDACTED] was an integral part of Epstein's child sex trafficking operation.

85. Upon information and belief, [REDACTED] engaged in a long pattern of actions aimed at recruiting underage girls for Epstein to use for sexual purposes, and to facilitate sexual encounters between underage girls and Epstein.

86. Upon information and belief, [REDACTED] kept a Rolodex that included numerous underage girls for Epstein to use for sexual purposes.

87. Upon information and belief, [REDACTED] warned numerous underage girls who had been sexually abused by Epstein not to talk to the police, causing them to feel intimidated and frightened.

88. [REDACTED] was often present in the townhouse when Mary came there. Mary frequently observed [REDACTED] at Epstein's side, and [REDACTED] often observed Mary going in and out of the massage room.

89. On one occasion, Epstein violently forced Mary [REDACTED] [REDACTED]. [REDACTED] walked into the area and witnessed the sexual act, then quickly walked away. Minutes later, Mary heard [REDACTED] [REDACTED]. Mary was incredibly embarrassed and thought, "That's not me. I don't want to be presented this way."

90. On another occasion, in Mary's presence, Epstein instructed [REDACTED]  
[REDACTED]  
[REDACTED]

[REDACTED]

[REDACTED]

91. One day in approximately late 2004, when Mary was sixteen years old, Epstein raped her. [REDACTED]

93. Afterwards, Epstein gave Mary \$200. He led her out of the townhouse assuring her, as he had many other times, that she was on the right path under his guidance. Epstein told Mary that he loved her, and said “don’t f\*\*\* it up.”

94. Throughout 2005, Epstein continued to exercise tremendous control over Mary’s life.

95. In the spring of 2005, when Mary was seventeen years old, Epstein arranged for Mary to stay in an apartment of his on the [REDACTED], close to his townhouse.

96. One day around Thanksgiving 2005, when Mary was seventeen years old, Mary again went to Epstein’s townhouse for the final time. As he had so many times before, Epstein sexually assaulted her, then gave her a few hundred dollars. [REDACTED]

[REDACTED]

[REDACTED]

97. As Mary walked out of the townhouse and onto to the street, she saw another young girl walk by her and go into the townhouse.

98. At that moment, Mary's world shattered. Epstein had made himself the center of her young existence, masking himself as a parental substitute and mentor who had her best interests in mind. She realized that Epstein was paying her for sexual acts, and that she was just one of many young girls Epstein had in rotation for his use as sexual objects. She felt that she was no longer a human being.

99. Mary effectively had a nervous breakdown. She was humiliated, angry, and suicidal. She felt immense desolation. She found herself crying inconsolably, shaking, and hyperventilating.

100. [REDACTED]  
[REDACTED]

101. Mary was desperate to escape the circumstances Epstein had her living in, but she needed Epstein's permission to leave New York. She asked Epstein to let her visit her parents [REDACTED]. Epstein agreed to let Mary go, but only if she returned immediately after. Epstein made sure to have his close associate purchase a round-trip ticket for Mary. But, once Mary left New York, she never went back, even though she had significant jobs lined up [REDACTED]  
[REDACTED]

102. Epstein and his agents continued to contact Mary, but she refused to go back. Near the end of 2005, Epstein tracked down the home phone number for Mary's parents and called. Mary's mother answered the phone, told Epstein that he should go out with women his own age, and told her she was going to call the police. At the same time, Mary remained

extremely frightened of all of Epstein's power and threats, and would never have let her parents call the police.

103. [REDACTED]

[REDACTED]

105. The sexual abuse that Epstein inflicted on Mary left permanent psychological scars. She remains plagued with self-doubt, insecurity, and despair. She often has difficulty sleeping. She has struggled to build healthy relationships, as she finds it nearly impossible to separate memories of Epstein's manipulation and abuse from new relationships she tries to develop.

106. When Epstein was arrested in July 2019, Mary was briefly hopeful that he might face justice, but the worldwide publicity that he subsequently received only deepened her despair. Epstein's death left Mary with the desolate sense that he has managed to evade justice yet again. She desperately wants some measure of justice for herself and all of Epstein's other underage victims.

107. This action is timely because it falls within New York CPLR 214-g and is brought during the one-year time period set forth in that section. The claims brought herein allege intentional and negligent acts and/or omissions for physical, psychological, and other

injury suffered as a result of conduct that would constitute sexual offenses as defined in Article 130 of the New York Penal Law, and such acts and/or omissions were committed against Mary when she was less than eighteen years of age.

**FIRST CAUSE OF ACTION  
(Battery)**

108. Plaintiff hereby incorporates each of the foregoing paragraphs as if fully set forth herein.

109. In committing the acts described above, Epstein intentionally subjected Mary to bodily contact that was offensive in nature.

110. ██████ is liable for aiding and abetting Epstein's actions.

111. Upon information and belief, ██████ knowingly provided substantial assistance to Epstein in Epstein's tortious actions against Mary.

112. Upon information and belief, ██████ was aware at the time that she was playing a role in overall illegal and/or tortious activity by Epstein.

113. As a result of Epstein's and ██████ actions, Mary suffered damages in an amount to be determined at trial.

**SECOND CAUSE OF ACTION  
(Assault)**

114. Plaintiff hereby incorporates each of the foregoing paragraphs as if fully set forth herein.

115. In committing the acts described above, Epstein engaged in physical conduct that placed Mary in imminent apprehension that he would harm her.

116. ██████ is liable for aiding and abetting Epstein's actions.

117. Upon information and belief, ██████ knowingly provided substantial assistance to Epstein in Epstein's tortious actions against Mary.

118. Upon information and belief, [REDACTED] was aware at the time that she was playing a role in overall illegal and/or tortious activity by Epstein.

119. As a result of Epstein's and [REDACTED] actions, Mary suffered damages in an amount to be determined at trial.

**THIRD CAUSE OF ACTION  
(Intentional Infliction of Emotional Distress)**

120. Plaintiff hereby incorporates each of the foregoing paragraphs as if fully set forth herein.

121. In committing the acts described above, Epstein and [REDACTED] engaged in extreme and outrageous conduct.

122. In doing so, Epstein and [REDACTED] acted with the intent to cause, and/or disregard of a substantial likelihood of causing Mary to suffer severe emotional distress.

123. As a direct result of Epstein and [REDACTED] actions, Mary suffered severe emotional distress.

124. [REDACTED] is likewise liable for aiding and abetting Epstein's actions.

125. Upon information and belief, [REDACTED] knowingly provided substantial assistance to Epstein in Epstein's tortious actions against Mary.

126. Upon information and belief, [REDACTED] was aware at the time that she was playing a role in overall illegal and/or tortious activity by Epstein.

127. As a result of Epstein's and [REDACTED] actions, Mary suffered damages in an amount to be determined at trial.

WHEREFORE, Plaintiff respectfully requests that judgment be entered against Defendants as follows:

- a. Awarding compensatory damages for all physical injuries, emotional distress, psychological harm, anxiety, humiliation, physical and emotional pain and suffering, family and social disruption, and other harm, in an amount to be determined at trial;
- b. Awarding punitive damages in an amount to be determined at trial;
- c. Awarding attorneys' fees and costs pursuant to any applicable statute or law;
- d. Awarding pre- and post-judgment interest on all such damages, fees and/or costs;
- e. Attaching all of Defendants' real property and other assets located in the State of New York pursuant to New York CPLR 6201 *et seq.* and Federal Rule of Civil Procedure 64; and
- f. Awarding such other and further relief as this Court may deem just and proper.

Dated: New York, New York  
November 20, 2019

CUTI HECKER WANG LLP

By:           /s/ Mariann Meier Wang            
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