

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

x

[REDACTED]

Case No. 19 Civ. 10788

Plaintiff,

-against-

**COMPLAINT
AND JURY DEMAND**

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

Defendants.

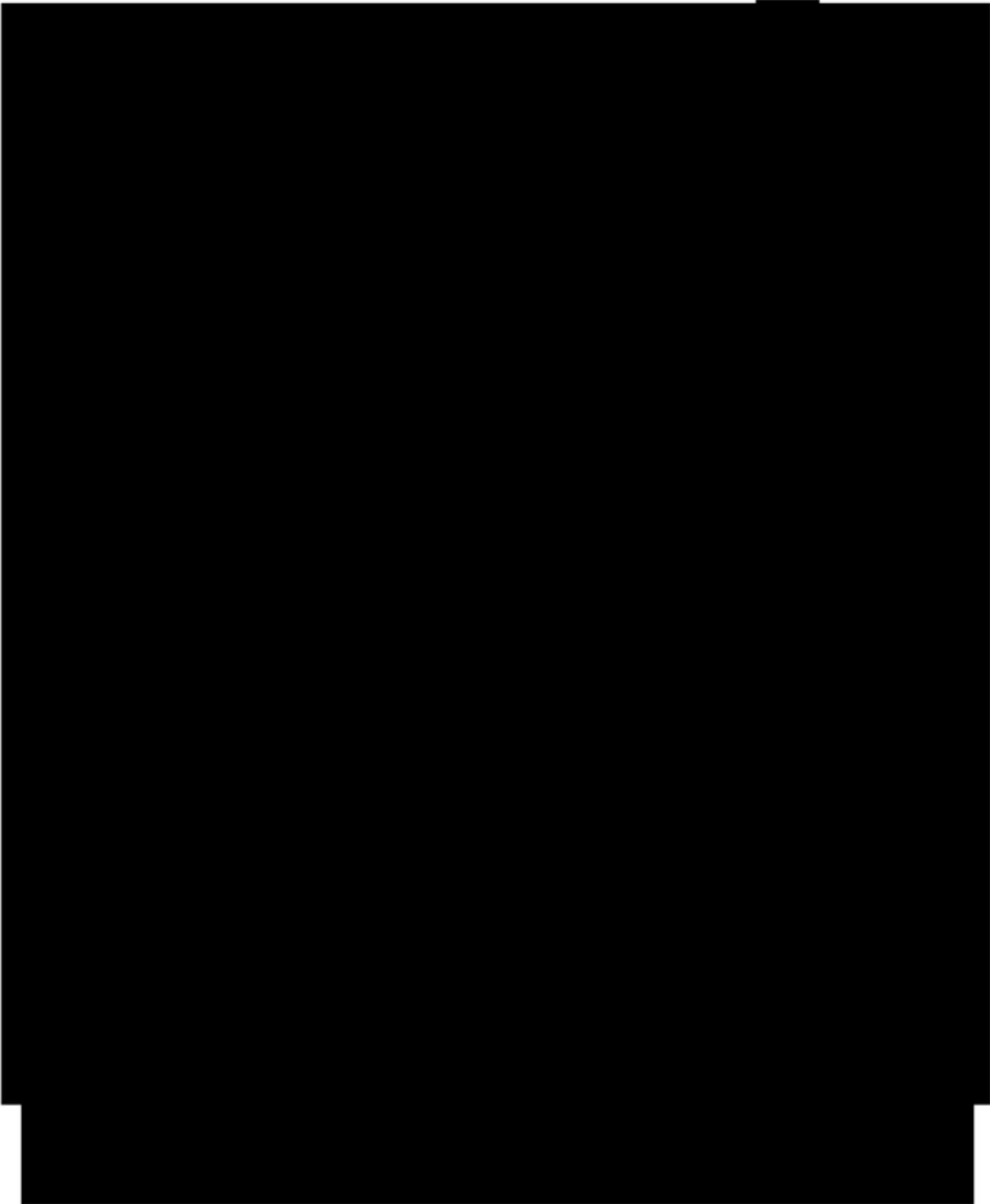
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Plaintiff [REDACTED] by and through her attorneys, Cuti Hecker Wang LLP and

Allred, Maroko & Goldberg, for her Complaint alleges as follows:

NATURE OF THE ACTION

[REDACTED]



11. [REDACTED] brings this action seeking, at last, some remedy for the egregious abuse that Epstein inflicted when she was a child.

PARTIES

12. Plaintiff [REDACTED] is an individual who resides in [REDACTED]

13. 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 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 Virgin Islands, where Epstein was domiciled at the time of his death.

JURISDICTION AND VENUE

14. 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.

15. 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.

16. 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.

17. This Court had both specific and general personal jurisdiction over Epstein at the time of his death.

18. Epstein resided in New York State a substantial portion of the time during the time period at issue in this lawsuit, and through the time of his death.

19. Epstein resided in the Metropolitan Correctional Center in New York County at the time of his death.

20. Epstein conducted substantial business operations in New York.

21. Epstein owned and/or controlled numerous companies with principal places of business in New York.

22. Epstein owned substantial real property assets in New York, including the townhouse located at 9 East 71st Street in Manhattan, which is valued at \$55 million or more.

23. New York was the epicenter of Epstein's criminal sex-trafficking enterprise. For years, Epstein and his agents took actions in New York in order to arrange for minor girls to be trafficked to his homes throughout the country in order to perform sexual acts for him. Epstein's trafficking and abuse of ██████████ was part of that New York-based criminal enterprise.

24. From his Manhattan townhouse, Epstein directed a vast network of agents in recruiting minor girls to be brought to him for his sexual use.

25. Epstein sexually abused many minor girls, including ██████████ in his Manhattan townhouse.

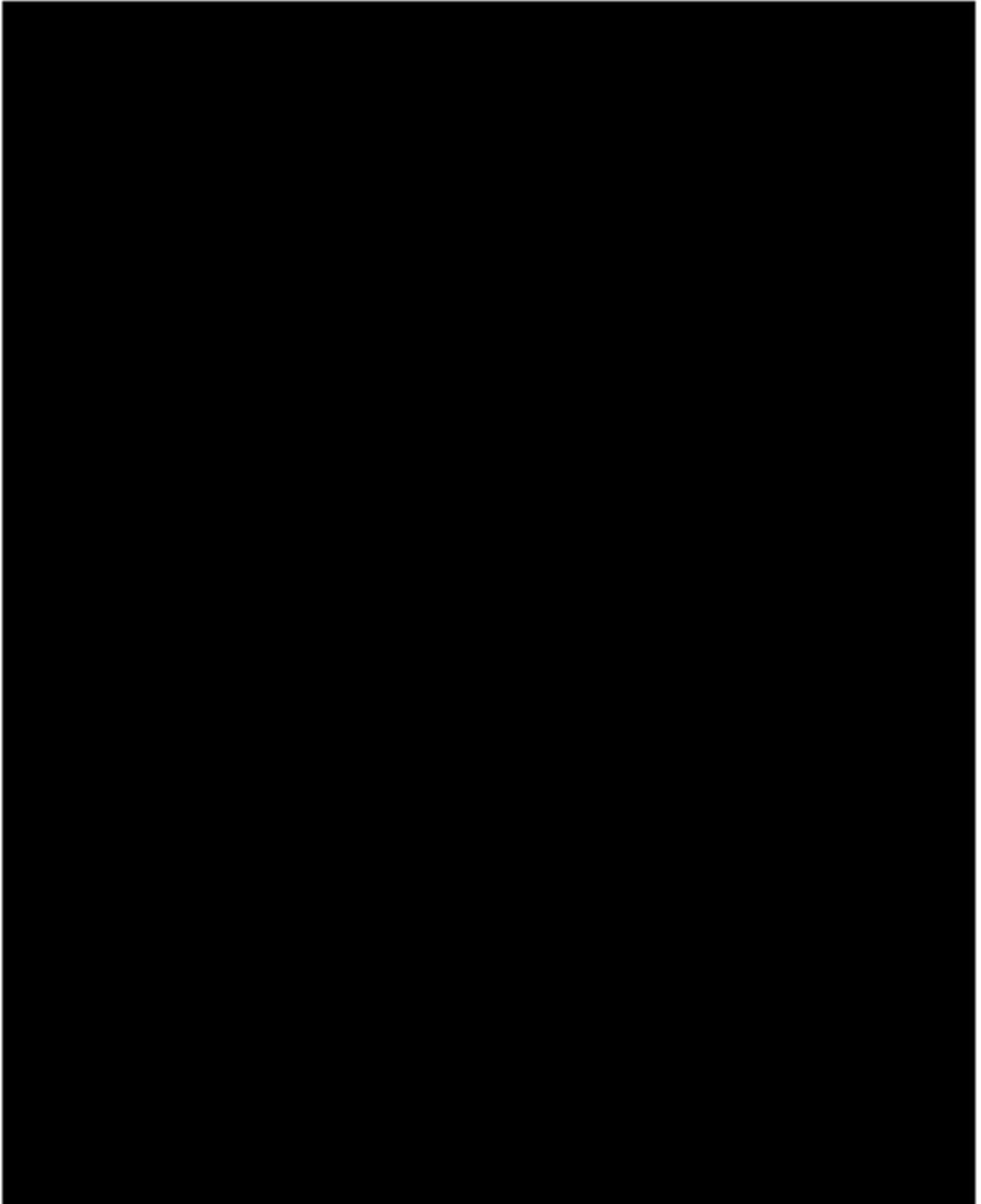
26. On many occasions, Epstein and his agents made phone calls from New York to schedule appointments for minor girls to come to Epstein's residences outside of New York in order to perform commercial sexual acts for Epstein.

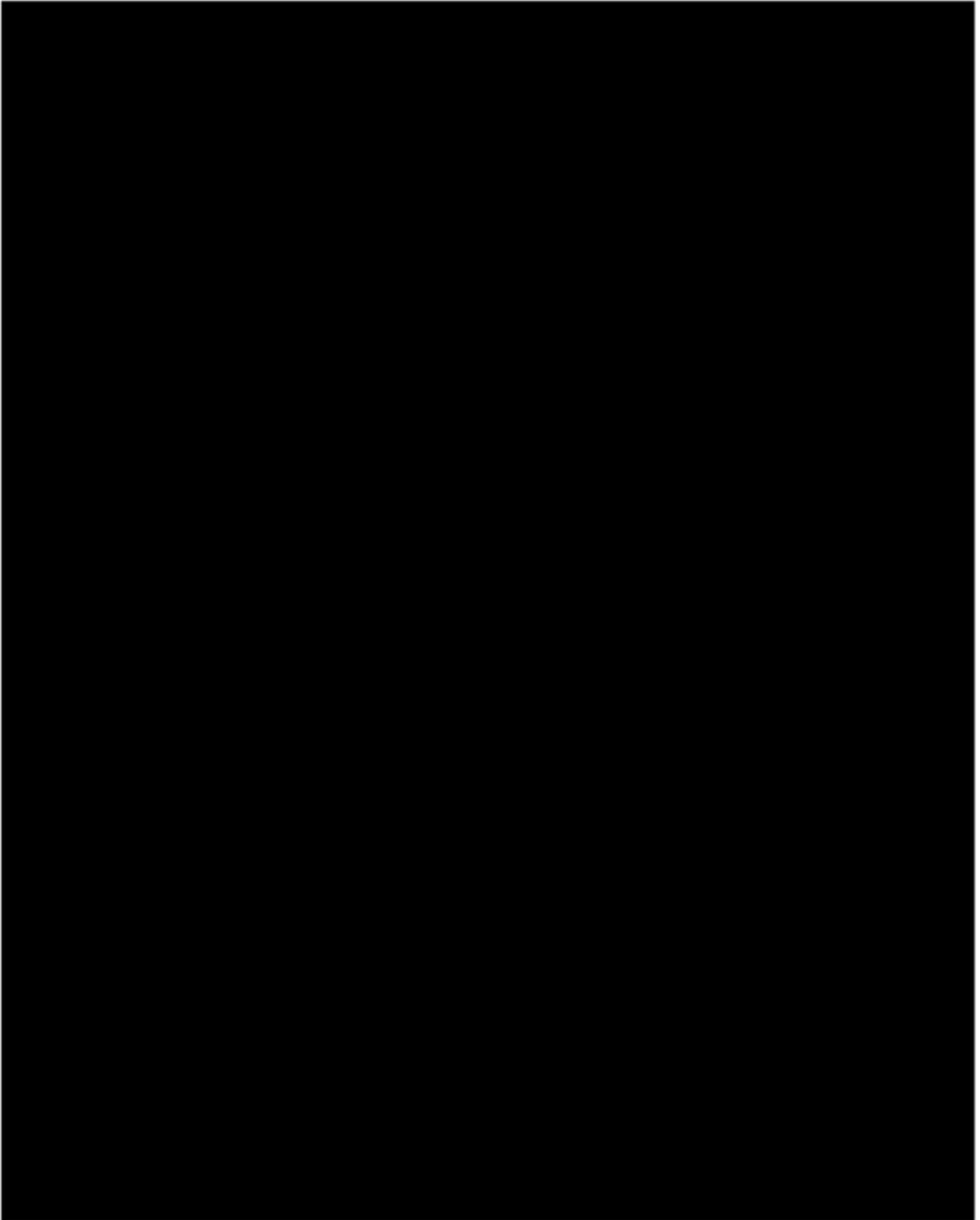
27. Upon information and belief, Epstein and/or his agents were present in New York when they took various actions to facilitate the trafficking of ██████████ for the purpose of performing sexual acts for Epstein.

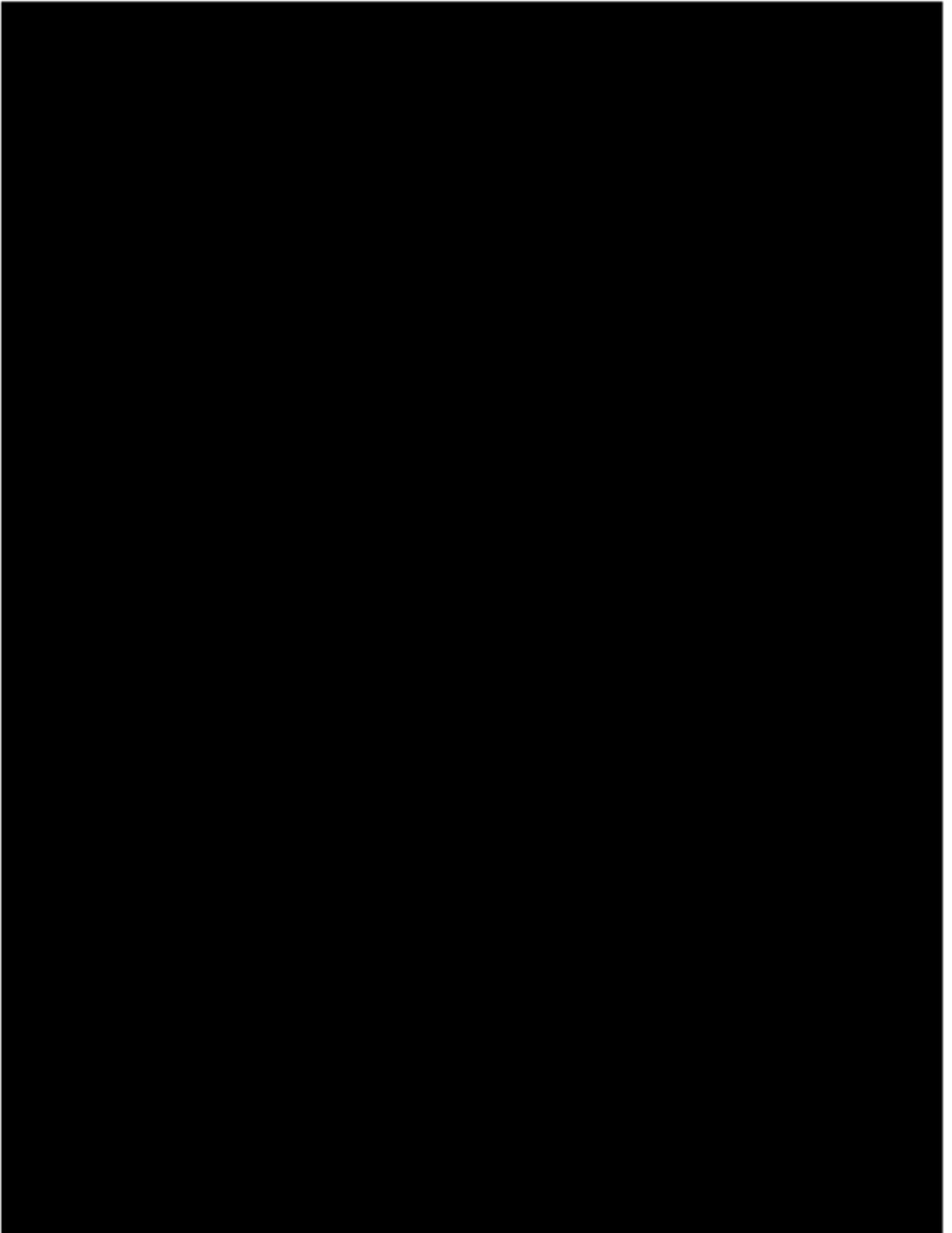
JURY DEMAND

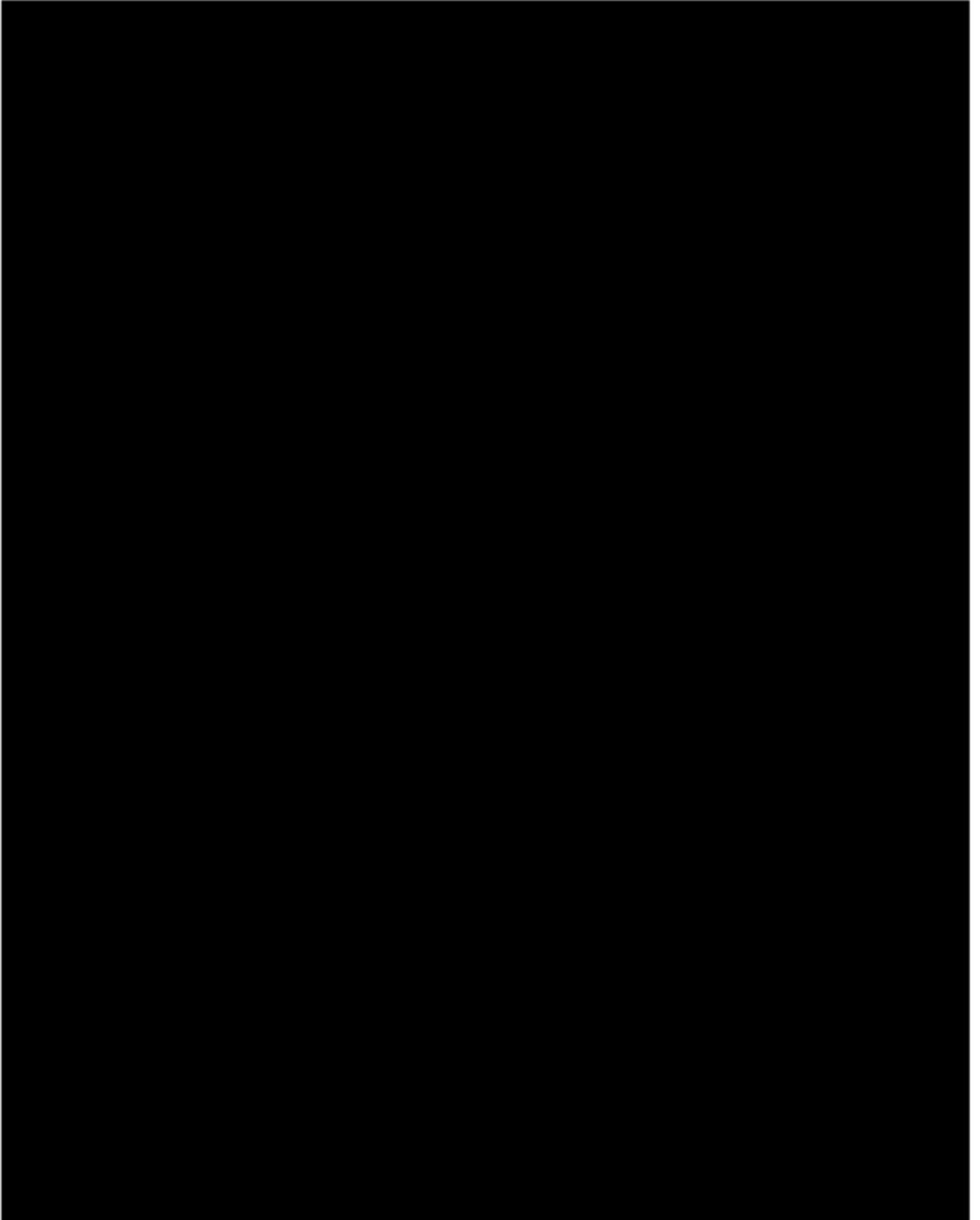
28. Plaintiff hereby demands a trial by jury on all of her claims in this action.

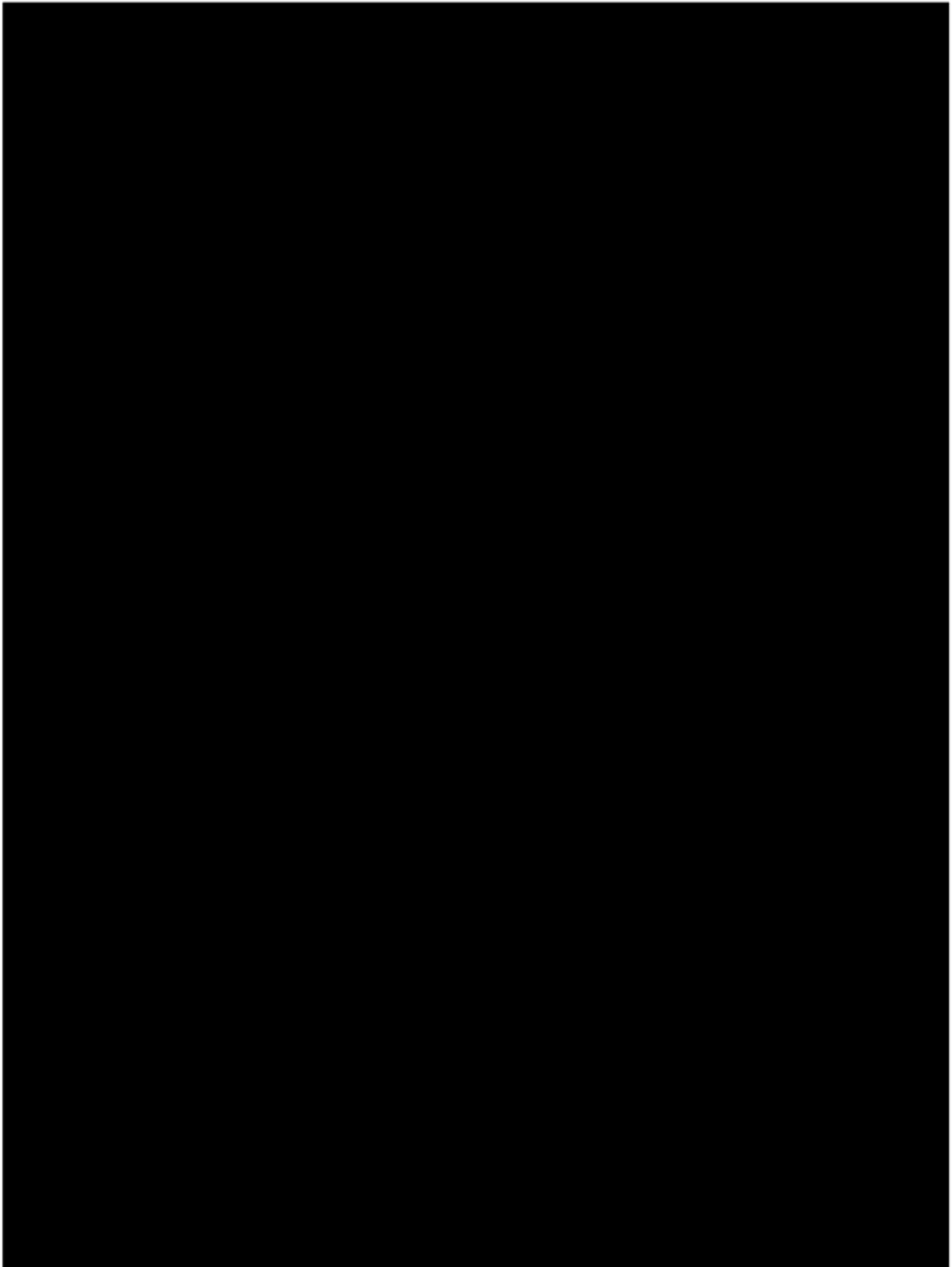
FACTUAL ALLEGATIONS

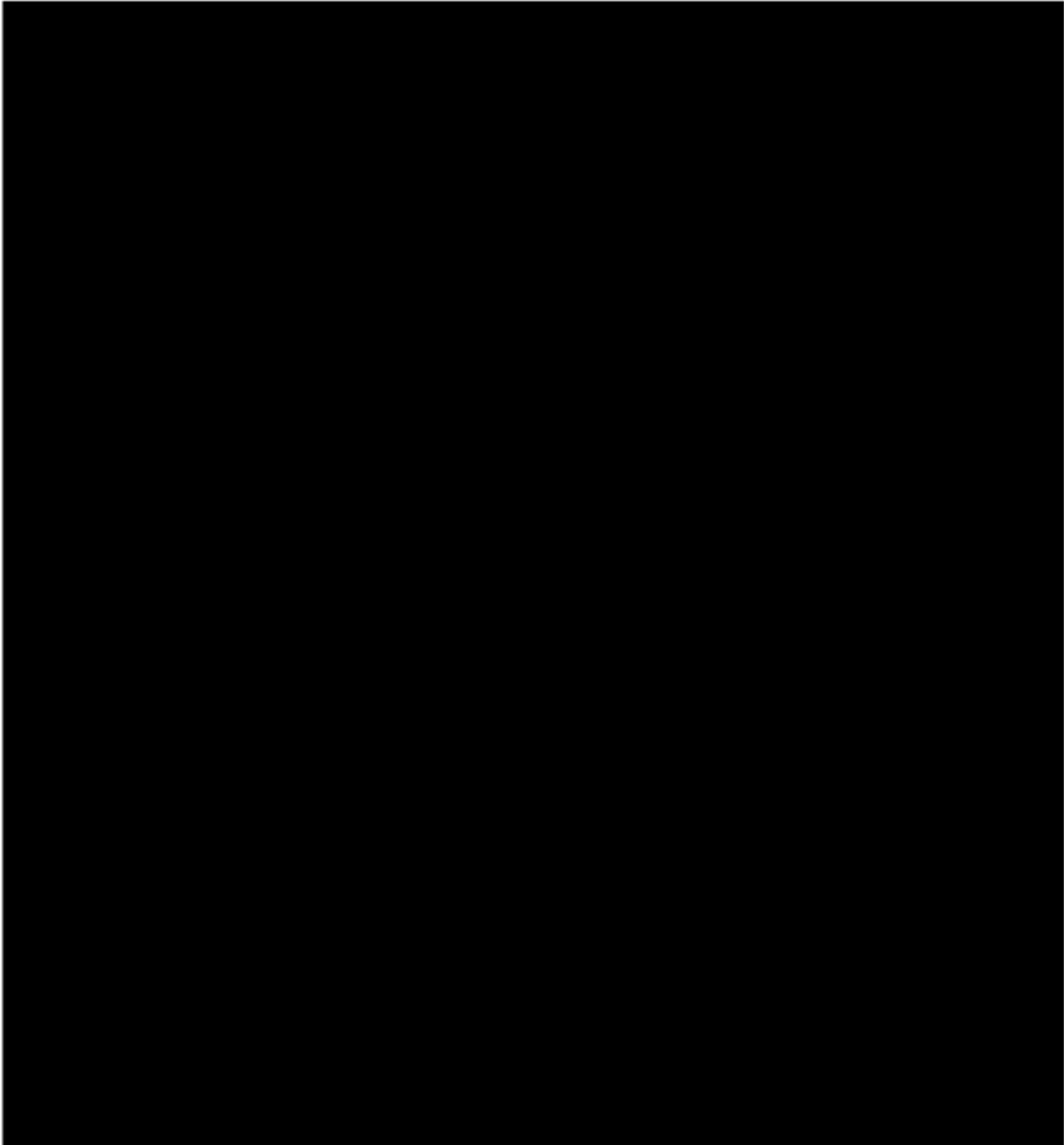












69. This action is timely under New York law because it falls within New York CPLR 214-g and is brought during the one-year time period set forth in that section. The claims brought herein allege intentional and negligent acts and/or omissions for physical, psychological, and other injury suffered as 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 [REDACTED] when she was less than eighteen years of age.

70. Epstein's conduct constitutes "childhood sexual abuse" within the meaning of New Mexico Stat. § 37-1-30 and "abuse" within the meaning of Florida Stat. § 95.11(7).

**FIRST CAUSE OF ACTION
(Battery)**

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

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

73. Epstein intentionally touched Plaintiff in a rude, insolent, or angry manner.

74. As a result of Epstein's actions, Plaintiff suffered damages in an amount to be determined at trial.

**SECOND CAUSE OF ACTION
(Assault)**

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

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

77. As a result of Epstein's actions, Plaintiff suffered damages in an amount to be determined at trial.

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

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

79. In committing the acts described above, Epstein engaged in extreme and outrageous conduct.

80. In doing so, Epstein acted with the intent to cause and/or disregard of a substantial likelihood of causing Plaintiff to suffer severe emotional distress.

81. As a direct result of Epstein's actions, Plaintiff suffered severe emotional distress.

82. As a result of Epstein's actions, Plaintiff 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 21, 2019

CUTI HECKER WANG LLP

By: /s/ Mariann Meier Wang
Mariann Meier Wang
Daniel Mullkoff



ALLRED, MAROKO & GOLDBERG
Gloria Allred



Attorneys for Plaintiff