



Epstein Victims' Compensation Program
Detailed Summary of Victim Claim



June 26, 2020

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Subject to Federal Rule of Evidence 408 & State Law Analogues

Jane Doe 43 v. Jeffrey Epstein, Ghislaine Maxwell, [REDACTED], [REDACTED], Lesley Groff, & [REDACTED]
[REDACTED], 17-cv-00616 (S.D.N.Y.)

Claim ID: FJV4-KWCW

BOIES SCHILLER FLEXNER LLP



Fort Lauderdale, FL 33301 |



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██████████, through her attorneys at Boies Schiller Flexner LLP, submits the following claim to the Epstein Victims' Compensation Program. ██████████ requests (1) an interview with the Administrator and (2) that the Administrator consult with Professor Marci A. Hamilton in reviewing and evaluating her claim.

██████████ Abuse at the Hands of Epstein

██████████ was recruited into Jeffrey Epstein's sex-trafficking ring when she was 22 years old. ██████████ grew up in ██████████. In 2006, ██████████ moved to New York to start a new life in the fashion world after she had to drop out of university in ██████████ due to the costs. In New York, her goal was to study design at the ██████████. Two weeks after moving to New York, ██████████ met ██████████ ██████████, one of Epstein's recruiters, at a nightclub. ██████████ took notice of ██████████ vulnerabilities, and said that she knew a wealthy philanthropist who could help get ██████████ into fashion school. ██████████ agreed to meet him. She and Epstein, along with a number of other girls, went to the movies. Epstein discussed with ██████████ that he could use his wealth and influence to have ██████████ admitted to her dream school, ██████████. A few days later, ██████████ called ██████████ and told her that Epstein wanted her to travel to his private island on his plane.

██████████ accepted the offer, and got on Epstein's private plane with several other women. Epstein began having sex with another girl in front of the other passengers on the flight. At that point, ██████████ became terrified as to what would happen on the private island. When ██████████ got to the island, the sexual abuse began. ██████████ passport and phone were taken so that she could not leave. ██████████ was directed to go to Epstein's room where he sexually abused her and caused her incredible physical pain. ██████████ was required to go to the island a number of times. During those visits, ██████████ ██████████ and Ghislaine Maxwell would direct ██████████ and the other girls as to how to

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please Epstein and demanded that they be on a rotating sex schedule for Epstein every day. If █████ did not show up when she was called upon, Maxwell or █████ █████ would come and find her. █████ could not escape. She was told dozens of times to give Epstein sexual massages, and Epstein raped █████ repeatedly. Epstein also abused her by using sex toys so forcibly on █████ that she suffered incredible pain and physical injury. █████ became so scared that on one occasion she ran away from the house and tried to escape off the island by swimming, but she was stopped by Epstein's search party before she could escape, brought back to the main house, and punished by Epstein.¹

For a period of almost a year, Epstein controlled █████ life entirely, abusing her regularly both in New York and on the island. The abuse was both physical and emotional. █████ was put on a strict low-calorie diet because of Epstein's insistence that she be thinner as a prerequisite to helping her with her FIT admission. This dangerous diet caused █████ to suffer severe health issues, including pain in her kidneys. Epstein even went as far as using his assistant █████ █████ to monitor █████ weight and diet progress when he sent her back to █████ for a trip.² Epstein also sent █████ to a doctor that provided her with psychotropic medicine, which was also very damaging. Epstein even regulated how █████ styled her hair and what she wore.

In addition to controlling her emotionally, Epstein physically controlled █████. Epstein housed █████ in one of his many apartments on █████, where he also housed other girls he abused. Epstein had █████ carry a Blackberry and if she did not answer immediately he would

¹ Ex. F, Chris Dyer, *Epstein victim describes escape from 'pedophile island' by swimming through shark-infested waters*, Daily Mail Online (Sept. 16, 2019), available at <https://www.dailymail.co.uk/news/article-7469327/Epstein-victim-describes-escape-pedophile-island-swimming-shark-infested-waters.html>.

² Comp. Ex. A, Email to █████ █████ re: FIT website (Feb. 6, 2007).

come and find her. One day she was out walking in New York and did not answer Epstein. Within minutes Epstein's driver pulled up beside her. Epstein then demanded she get in the car, took her back to his mansion, and made it very clear that she should not disobey him.

Beyond his own abuse of [REDACTED], Epstein also forced her to have sex with other people against her will. One day, Epstein summoned [REDACTED] to his New York mansion. When she arrived, [REDACTED] [REDACTED] was waiting for her. [REDACTED] led [REDACTED] to the upstairs bedroom where Epstein forced [REDACTED] to perform sexual acts with his lawyer and friend, Alan Dershowitz, and [REDACTED]. [REDACTED] was severely traumatized by the experience.

During this entire period, Epstein and Maxwell manipulated [REDACTED] into enduring the abuse by repeatedly making false representations that they were helping her with her admission to [REDACTED] which included reviewing her application and essay and claiming that they had made contacts with board members on her behalf. Epstein also made clear to [REDACTED] that if she did not obey him in every way then he would make sure she never got into [REDACTED] or any other school, and would be in danger. Epstein and Maxwell reminded [REDACTED] constantly of their power and influence, and [REDACTED] was terrified that if she did not comply with their demands that she would not get into [REDACTED] and that they would destroy her career.

Eventually, [REDACTED] escaped Epstein and flew to [REDACTED]. But [REDACTED] continued to be incredibly scared of Epstein. At one point, she was followed in Europe by individuals who she believes were hired by Epstein to scare her after she made her first report of the abuse to law enforcement. [REDACTED] has cooperated with the government as part of its investigation into Epstein and his co-conspirators.

Ultimately, █████ came forward in 2016 and filed a lawsuit against Epstein in 2017.³ Since then, she has been in hiding and has moved several times. Epstein had demonstrated that he could find █████ and even emailed another █████ victim in an attempt to locate █████ after she came forward.⁴ Reliving her trauma and fear of Epstein also caused her to attempt suicide while her case was pending. █████ was so terrified of Epstein that she ultimately settled her case for a nominal amount to ensure her own safety. But the government later discovered that Epstein attempted to sabotage █████ case by paying off fact witnesses prior to their scheduled depositions when her case was pending. Specifically, witnesses who had been cooperating with █████ counsel during discovery suddenly stopped doing so around the same time that Epstein made two payments for \$250,000 and \$100,000 to one of his long-time friends and one of his employees.⁵ Therefore, the subpar settlement was not the product of fair circumstances and was corrupted by Epstein's witness tampering, and █████ could file a motion to vacate that settlement agreement. *See Interspace Inc. v. Morris*, 650 F. Supp. 107, 110 (S.D.N.Y. 1986) (settlement agreements will be set aside if there is "cause sufficient to invalidate a contract, such as fraud, collusion, mistake or accident").

Damages

Epstein broke █████ in many ways with his abuse and she should be compensated for that terrible harm. While with Epstein, she suffered from severe anxiety and depression. █████ also suffered physically from the extreme dieting Epstein forced her to undergo which resulted in

³ Amended Complaint, *Jane Doe 43 v. Jeffrey Epstein, Ghislaine Maxwell, █████, █████, █████, █████, & █████*, 17-cv-00616 (S.D.N.Y.)

⁴ Ex. G, Email from Jeffrey Epstein to █████ (Jan. 13, 2017); *see also* Ex. 51, Jane Doe 43 Am. Compl. at ¶¶ 41, 43, 48-49

⁵ Comp. Ex. 48, Epstein Bail Hearing at 9, 69-71 (July 15, 2019); Order & Remand at 5-6, 17-18 (July 18, 2019). Note that numbered exhibits refer to exhibits attached to █████ submission providing an overview of Jeffrey Epstein's sex-trafficking operation.

kidney problems. After cutting ties with Epstein and fleeing to London, ██████ began seeing media reports on Epstein and his plea deal with Alexander Acosta. Those reports triggered her, and drove her to attempt suicide in August of 2008. She ended up in a coma for four weeks. Further, coming forward has been extremely traumatic.⁶ While litigating her civil case against Epstein in 2018, ██████ again attempted suicide due to her fear of Epstein and what he might do to her.

██████ damages are not solely attributable to Epstein. Many of Epstein's co-conspirators were complicit in and aided her trafficking and abuse, including Ghislaine Maxwell, ██████ ██████, and ██████ ██████. Further, ██████ was forced to perform sex acts with Alan Dershowitz and ██████ ██████, an experience that she will never be able to forget.

Supporting Evidence and Corroboration

██████ has documentary evidence to support her claim, including the following:

- Emails with ██████ ██████ about FIT.⁷
- Emails from ██████ ██████ regarding travel arrangements and itineraries.⁸
- Flight Logs showing ██████ traveling to and from the U.S. Virgin Islands with Epstein on his private plane.⁹
- Photographs taken while ██████ was on Epstein's island, which include photographs of Epstein and Maxwell.¹⁰

Additionally, shortly after Jeffrey Epstein died in prison, ██████ stood up in open court before the Honorable Richard Berman to tell her story and to discuss Epstein's escape from punishment. ██████ told the court:

For a very long time Jeffrey Epstein gamed the system at every level, and when he realized he couldn't do that any longer, he showed the world what a depraved and cowardly human being he is by taking his own life. But we, the victims, are still

⁶ ██████ ██████ Psychological Records.

⁷ Comp. Ex. A, Email to ██████ ██████ re: FIT website (Feb. 6, 2007).

⁸ Comp. Ex. B, Emails from ██████ ██████ re travel arrangements and itinerary.

⁹ Ex. 30, ██████ ██████ Flight Log at D.R. 00085.

¹⁰ Comp. Ex. C, Photographs from Epstein's Island.

here, prepared to tell the truth, and we all know he did not act alone. We are survivors, and the pursuit of justice should not abate.¹¹

█ has also bravely shared her story with the media to raise awareness about Epstein's sex-trafficking scheme. She provided the Telegraph with an interview in September 2019.¹² She was also interviewed on the BBC in December 2019,¹³ and she and other survivors were interviewed by Glamour magazine. In that interview, █ discussed bringing Epstein's co-conspirators to justice:

Ghislaine [Maxwell] is still walking the streets. Jean-Luc [Brunel] is still walking the streets. It's not good enough just to be heard. There are some people who need to be stopped. Because if they're not stopped, they will move to Brazil, France, South Africa, and perpetrate there. Because if they're not [stopped], they're going to continue to hurt more and more girls. So that's what needs to change. These people need to be behind bars, where they can't hurt anybody else.¹⁴

Finally, █ was interviewed for and appeared on Netflix's documentary miniseries entitled *Jeffrey Epstein: Filthy Rich*, which aired on May 27, 2020.

Conclusion

█ mental health has been deeply impacted by the abuse she suffered at the hands of Epstein, Maxwell, and their associates. She was brave enough to come forward, but was severely

¹¹ Comp. Ex. 49, Epstein Final Hearing at 57 (Aug. 27, 2019).

¹² Ex. D, Harriet Alexander, *Prosecutors must probe Jeffrey Epstein's trafficking network, says British victim █ in first interview*, The Telegraph (Sept. 13, 2019), available at <https://www.telegraph.co.uk/news/2019/09/13/prosecutors-must-probe-jeffrey-epsteins-trafficking-network/>.

¹³ *The Prince and the Epstein Scandal*, BBC Panorama interview of Virginia Giuffre (Dec. 2, 2019), video available at <https://www.bbc.co.uk/iplayer/episode/m000cd4h/panorama-the-prince-and-the-epstein-scandal>.

¹⁴ Ex. E, Mattie Kahn, *'This Is Not Our Shame': Five Survivors of Jeffrey Epstein's Abuse on Trauma, Justice, and Sisterhood*, Glamour (Dec. 10, 2019), available at <https://www.glamour.com/story/jeffrey-epstein-survivors-roundtable>.



punished by Epstein for doing so, and his interference in her case caused her to get less than she deserves. She deserves to be made whole, and she is hopeful that this program can help her heal.

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