

IN THE CIRCUIT COURT OF THE 15th
JUDICIAL CIRCUIT IN AND FOR PALM
BEACH COUNTY, FLORIDA

CIVIL DIVISION

CASE NO.: _____

L.M.,

Plaintiff,

vs.

① JEFFREY EPSTEIN,

Defendant.

58 2008 CA 0 28051 XXXXNB

ON

AD

COMPLAINT

Plaintiff, L.M., by and through her undersigned counsel, sues the Defendant Jeffrey Epstein, and alleges:

1. This is an action in an amount in excess of \$15,000.00, exclusive of interest and costs and is within the jurisdictional limits of this Court.
2. This Complaint is brought under a fictitious name in order to protect the identity of the Plaintiff, L.M., because this Complaint makes allegations of sexual assault and child abuse of a then minor.
3. At all times material to this cause of action, the Plaintiff, L.M. (hereinafter referred to as "Plaintiff"), was a resident of Palm Beach County, Florida.
4. At all times material to this cause of action, the Defendant, Jeffrey Epstein, had a residence located at 358 El Brillo Way, West Palm Beach, Palm Beach County, Florida.

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PALM BEACH COUNTY
CIVIL DIVISION

5. Defendant, Jeffrey Epstein, is currently a citizen of the State of Florida, as he currently resides in West Palm Beach, Florida at the Palm Beach County Jail and has the intention to remain in Florida. This is substantiated by the residence that he maintains at 358 El Brillo Way, West Palm Beach, Florida where he spends the majority of his time, and intentions to remain at that address permanently are further evidenced by his statements to the Court during his State Plea colloquy on June 30, 2008, case number 06CF009454AMB, taken before the Honorable Judge Dale Pucillo, wherein he indicated that after his release from Palm Beach County Jail he intends to reside permanently at his home at 358 El Brillo Way, West Palm Beach, Florida, and he plans to work in West Palm Beach, Florida as well.

6. At all times material to this cause of action, the Defendant, Jeffrey Epstein, was an adult male born in 1953.

7. At all times material, the Defendant, Jeffrey Epstein, owed a duty unto Plaintiff to treat her in a non-negligent manner and to not commit intentional or tortious or illegal acts against her.

8. All of the allegations within this Complaint occurred in West Palm Beach, Florida.

FACTUAL ALLEGATIONS

9. Upon information and belief, the Defendant, Jeffrey Epstein, has demonstrated a sexual preference and obsession for minor girls.

10. The Defendant, Jeffrey Epstein, developed a plan, scheme, and criminal enterprise that included an elaborate system wherein the then minor Plaintiff was brought to the Defendant,

Jeffrey Epstein's residence by the Defendant's employees, recruiters, and assistants. When the assistants and employees left the then minor Plaintiff and other minor girls alone in a room at the Defendant's mansion, the Defendant, Jeffrey Epstein, himself would appear, remove his clothing, and direct the then minor Plaintiff to remove her clothing. He would then perform one or more lewd, lascivious, and sexual acts, including, but not limited to, masturbation, touching of the then minor Plaintiff's sexual organs, using vibrators or sexual toys on the then minor Plaintiff, coercing the then minor Plaintiff into sexual acts with himself, and digitally penetrating the then minor Plaintiff. He would then pay the Plaintiff for engaging in this sexual activity.

11. The Plaintiff was first brought to the Defendant, Jeffrey Epstein's mansion in 2002 when she was a fourteen-year old in middle school.

12. The Defendant, Jeffrey Epstein, a wealthy financier with a lavish home, significant wealth, and a network of assistants and employees, used his resources and his influence over a vulnerable minor child to engage in a systematic pattern of sexually exploitive behavior.

13. Beginning in approximately July 2002 and continuing until approximately September 2005, the Defendant, Jeffrey Epstein, coerced and/or enticed the impressionable, vulnerable, and economically deprived then minor Plaintiff to commit various acts of sexual misconduct. These acts included, but were not limited to, fondling and inappropriate and illegal sexual touching of the then minor Plaintiff, sexual misconduct and masturbation of the Defendant, Jeffrey Epstein, in the presence of the then minor Plaintiff, and encouraging the then minor Plaintiff to become involved in prostitution; Defendant, Jeffrey Epstein, committed numerous criminal sexual offenses against the then minor Plaintiff including, but not limited to,

sexual battery, solicitation of prostitution, procurement of a minor for the purposes of prostitution, and lewd and lascivious assaults upon the person of the then minor Plaintiff.

14. In addition to the direct sexual abuse and molestation of the then minor Plaintiff, Defendant, Jeffrey Epstein, instructed, coerced and otherwise induced the then minor Plaintiff to bring him numerous other minor children for the purposes of further satisfying his deviant sexual attraction to minors. Defendant, Jeffrey Epstein, used his money, wealth and power to unduly and improperly manipulate and influence the then minor Plaintiff to bring him these other minor girls in exchange for money. This influence led the then minor Plaintiff away from the life of a middle school aged child and into a delinquent lifestyle.

15. The acts referenced above in paragraphs 10 through 14, committed by Defendant, Jeffrey Epstein, against the then minor Plaintiff were committed in violation of numerous criminal State statutes condemning the sexual exploitation of minor children, prostitution, sexual performances by a child, lewd and lascivious assaults, sexual battery, contributing to the delinquency of a minor and other crimes, specifically including, but not limited to, those criminal offenses outlined in Chapters 794, 800, 827 and 847 of the Florida Statutes, as well as those designated in Florida Statutes §796.03, §796.07, §796.045, §796.04, §796.09, §39.01, and §827.04.

16. The above-described acts took place in Palm Beach County, Florida at the residence of the Defendant, Jeffrey Epstein. Any assertions by the Defendant, Jeffrey Epstein, that he was unaware of the age of the then minor Plaintiff are belied by his actions and rendered irrelevant by the provisions of applicable Florida Statutes concerning the sexual exploitation and

abuse of a minor child. The Defendant, Jeffrey Epstein, at all times material to this cause of action, knew and should have known of the Plaintiff's minority.

17. The above-described acts were perpetrated upon the person of the then minor Plaintiff regularly and on numerous occasions.

18. In June 2008, in the Fifteenth Judicial Circuit in Palm Beach County, Florida, the Defendant, Jeffrey Epstein, entered pleas of "guilty" to various Florida state crimes involving the solicitation of minors for prostitution and the procurement of minors for the purposes of prostitution.

19. As a condition of that plea, and in exchange for the Federal Government not prosecuting the Defendant, Jeffrey Epstein, for numerous federal offenses, Defendant, Jeffrey Epstein, additionally entered into an agreement with the Federal Government acknowledging that L.M. was a victim of his conduct.

20. The Plaintiff is included in the list of victims identified by the Federal Government as victims of the Defendant, Jeffrey Epstein's illegal conduct. The Defendant, Jeffrey Epstein, is thus estopped by his plea and agreement with the Federal Government from denying the acts alleged in this Complaint, and must effectively admit liability to the Plaintiff.

COUNT I

Sexual Exploitation, Sexual Abuse and/or Sexual Assault of a Minor

21. The Plaintiff repeats and realleges paragraphs 1 through 20 above.

22. Defendant, Jeffrey Epstein, tortiously assaulted Plaintiff sexually on numerous occasions between approximately July 2002 and approximately September 2005, and further

sexually exploited her and contributed to her delinquency during that time. Defendant's acts were outrageous, egregious, intentional, unlawful, offensive and harmful.

23. The sexual assaults were in violation of the numerous state statutes described in paragraph 15 above, and the assaults and acts of exploitation were committed by Defendant, Jeffrey Epstein, willfully and maliciously.

24. As a direct and proximate result of Defendant, Jeffrey Epstein's assaults on the Plaintiff, the Plaintiff has in the past suffered, and will in the future suffer, physical injury, pain and suffering, emotional distress, psychological trauma, mental anguish, humiliation, embarrassment, loss of self-esteem, loss of dignity, invasion of her privacy and other damages associated with Defendant, Jeffrey Epstein, controlling, manipulating and coercing her into a perverse and unconventional way of life for a minor. The then minor Plaintiff incurred medical and psychological expenses and the Plaintiff will in the future suffer additional medical and psychological expenses. The Plaintiff has suffered a loss of income, a loss of the capacity to earn income in the future, and a loss of the capacity to enjoy life. These injuries are permanent in nature and the Plaintiff will continue to suffer these losses in the future.

WHEREFORE, the Plaintiff, L.M., demands judgment against the Defendant, Jeffrey Epstein, for compensatory damages, attorney's fees, and such other and further relief as this Court deems just and proper, and hereby demands trial by jury on all issues triable as of right by a jury.

COUNT II

Cause of Action Pursuant to Florida Statute 796.09

25. The Plaintiff adopts and realleges paragraphs 1 through 20 above.
26. The allegations contained herein in Count II are a separate and distinct legal remedy.
27. Defendant, Jeffrey Epstein, was a wealthy and powerful man, and Plaintiff was an economically disadvantaged and impressionable minor.
28. Defendant, Jeffrey Epstein, used his vast wealth and power to coerce Plaintiff into prostitution and/or coerced her to remain in prostitution.
29. Defendant, Jeffrey Epstein coerced Plaintiff into prostitution in one or more of the following ways:
 - A. Domination of her mind and body through exploitive techniques;
 - B. Inducement;
 - C. Promise of greater financial rewards;
 - D. Exploitation of a condition of developmental disability, cognitive limitation, affective disorder, and/or substance dependency;
 - E. Exploitation of human needs for food, shelter or affection;
 - F. Exploitation of underprivileged and vulnerable economic condition or situation;
 - G. Use of a system of recruiting other similarly situated minor girls to further coerce and induce Plaintiff into the lifestyle of prostitution; and

H. Exploitation through demonstration of abundant wealth and power to impress a young and vulnerable then minor Plaintiff and to coerce her into prostitution.

30. As a direct and proximate result of the offenses committed by Defendant, Jeffrey Epstein, against Plaintiff pursuant to Florida Statutes §769.09, the Plaintiff has in the past suffered, and will in the future suffer, physical injury, pain and suffering, emotional distress, psychological trauma, mental anguish, humiliation, embarrassment, loss of self-esteem, loss of dignity, invasion of her privacy and other damages associated with Defendant, Jeffrey Epstein, controlling, manipulating and coercing her into a perverse and unconventional way of life for a minor. The then minor Plaintiff incurred medical and psychological expenses and the Plaintiff will in the future suffer additional medical and psychological expenses. The Plaintiff has suffered a loss of income, a loss of the capacity to earn income in the future, and a loss of the capacity to enjoy life. These injuries are permanent in nature and the Plaintiff will continue to suffer these losses in the future.

WHEREFORE, the Plaintiff, L.M., demands judgment against the Defendant, Jeffrey Epstein, for compensatory damages, attorney's fees, and such other and further relief as this Court deems just and proper, and hereby demands trial by jury on all issues triable as of right by a jury.

COUNT III

Intentional Infliction of Emotional Distress

31. The Plaintiff adopts and realleges paragraphs 1 through 20 above.

32. The Defendant, Jeffrey Epstein's conduct towards the then minor Plaintiff was intentional and reckless.

33. The Defendant, Jeffrey Epstein, deliberately and recklessly inflicted mental suffering upon the then minor Plaintiff.

34. The Defendant, Jeffrey Epstein's conduct was outrageous in character, and so extreme in degree, going beyond all bounds of decency.

35. The Defendant, Jeffrey Epstein's intentional, deliberate and reckless conduct caused severe emotional distress to the Plaintiff. Defendant, at the time he committed these numerous sexual assaults on Plaintiff, had a specific intent to harm the then minor Plaintiff and his conduct did so harm the Plaintiff.

36. As a direct and proximate result of the Defendant, Jeffrey Epstein's intentional and reckless conduct, the Plaintiff has in the past suffered and in the future will continue to suffer physical injury, pain and suffering, emotional distress, psychological trauma, mental anguish, humiliation, embarrassment, loss of self-esteem, loss of dignity, invasion of her privacy and other damages associated with the Defendant, Jeffrey Epstein, controlling, manipulating and coercing her into a perverse and unconventional way of life for a minor. The then minor Plaintiff incurred medical and psychological expenses and the Plaintiff will in the future suffer additional medical and psychological expenses. The Plaintiff has suffered a loss of income, a loss of the capacity to earn income in the future, and a loss of the capacity to enjoy life. These injuries are permanent in nature and the Plaintiff will continue to suffer these losses in the future.

WHEREFORE, the Plaintiff, L.M., demands judgment against the Defendant, Jeffrey Epstein, for compensatory damages, attorney's fees, and such other and further relief as this

Court deems just and proper, and hereby demands trial by jury on all issues triable as of right by a jury.

COUNT IV

Civil Remedy for Criminal Practices

37. The Plaintiff realleges paragraphs 1 through 20 above.

38. The allegations contained herein in Count IV are a separate and distinct legal remedy.

39. The Defendant, Jeffrey Epstein, participated in an enterprise, or conspired or endeavored to so participate, through a pattern of criminal activity in violation of Florida Statutes §772.103(3)-(4).

40. The Defendant, Jeffrey Epstein, participated in this pattern of criminal activity by engaging in at least two of the following acts of criminal misconduct with the same or similar intents, results, accomplices, victims, and methods of commission within a five year period:

A. Procuring for prostitution, or causing to be prostituted, any person who is under the age of 18 years in violation of Florida Statutes Chapter 796;

B. Forcing, compelling, or coercing another to become a prostitute in violation of Florida Statutes §796.04;

C. Acts of battery in violation of Florida Statutes Chapter 784;

D. Act of Lewdness in violation of Florida Statutes Chapter 800;

E. Sexual performance or exploitation of a child in violation of Florida Statutes §827.071; and

F. Other crimes involving contributing to the delinquency of a child, sexual abuse of a child, and coercing a child into prostitution.

41. Under the Defendant, Jeffrey Epstein's plan, scheme, and enterprise, the Defendant, Jeffrey Epstein, paid employees and underlings to repeatedly find and bring him minor girls in order for the Defendant to solicit, induce, coerce, entice, compel or force such girls to engage in acts of prostitution and sexual misconduct.

42. The Plaintiff was the victim of the Defendant, Jeffrey Epstein's plan, scheme, and enterprise. The Plaintiff was called on the telephone and transported by various individuals to the Defendant, Jeffrey Epstein's residence, where she was placed in a room along with the Defendant, enticed to commit acts of prostitution, battery, and sexual exploitation. The Defendant, Jeffrey Epstein, conspired with his assistants and employees and various adults and minor children in order to accomplish his enterprise of seeking out, gaining access to, and exploiting minor children such as the Plaintiff.

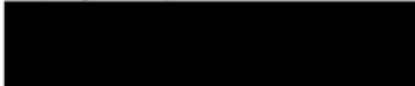
43. After introducing Plaintiff into prostitution, he enticed her to remain in prostitution and be a part of his deviant sexual lifestyle through exploitive techniques, such as offering additional money to Plaintiff in exchange for her bringing him additional minor girls to sexually abuse and commit sexual crimes against.

WHEREFORE, under the provisions of Florida Statutes Chapter 772, the Plaintiff, L.M., demands judgment against the Defendant, Jeffrey Epstein, for compensatory damages, treble

damages, costs and attorneys' fees, and such other and further relief as this Court deems just and proper, and hereby demands trial by jury on all issues triable as of right by a jury.

DATED this 10th day of September, 2008.

THE LAW OFFICE OF BRAD EDWARDS &
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JAY HOWELL & ASSOCIATES, P.A.
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By: 
Brad Edwards
Florida Bar #542075

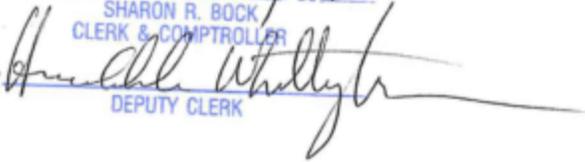


STATE OF FLORIDA - PALM BEACH COUNTY

I hereby certify that the foregoing is a true copy of the record in my office.

THIS 19 DAY OF January, 2012

SHARON R. BOCK
CLERK & COMPTROLLER

By: 
DEPUTY CLERK

IN THE CIRCUIT COURT OF THE 15th
JUDICIAL CIRCUIT IN AND FOR PALM
BEACH COUNTY, FLORIDA

CIVIL DIVISION

CASE NO.: 50 2008 CA 028051 XXXXMB AD

L.M.,

Plaintiff,

vs.

JEFFREY EPSTEIN and
[REDACTED]

Defendants.

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SHARON P. BOCK, CLERK
PALM BEACH COUNTY
CIRCUIT CIVIL/FACILITATE
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FILED

AMENDED COMPLAINT

Plaintiff, L.M., by and through her undersigned counsel, sues the Defendants, Jeffrey Epstein and [REDACTED], and alleges:

1. This is an action in an amount in excess of \$15,000.00, exclusive of interest and costs and is within the jurisdictional limits of this Court.
2. This Complaint is brought under a fictitious name in order to protect the identity of the Plaintiff because this Complaint makes allegations of sexual assault and child abuse of a then minor.
3. At all times material to this cause of action, the Plaintiff, L.M. (hereinafter referred to as "Plaintiff"), was a resident of Palm Beach County, Florida.

4. At all times material to this cause of action, Defendant, Jeffrey Epstein, had a residence located at 358 El Brillo Way, West Palm Beach, Palm Beach County, Florida.

5. Defendant, Jeffrey Epstein, is currently a citizen of the State of Florida, as he currently resides in West Palm Beach, Florida at the Palm Beach County Jail and has the intention to remain in Florida. This is substantiated by the residence that he maintains at 358 El Brillo Way, West Palm Beach, Florida where he spends the majority of his time, and intentions to remain at that address permanently are further evidenced by his statements to the Court during his State Plea colloquy on June 30, 2008, case number 06CF009454AMB, taken before the Honorable Judge Dale Pucillo, wherein he indicated that after his release from the Palm Beach County Jail he intends to reside permanently at his home at 358 El Brillo Way, West Palm Beach, Florida, and he plans to work in West Palm Beach, Florida as well.

6. At all times material to this cause of action, Defendant, Jeffrey Epstein, was an adult male born in 1953.

7. Defendant, [REDACTED], is a citizen and resident of the State of New York.

8. At all times material to this cause of action, Defendant, [REDACTED], was an adult female.

9. At all times material to this cause of action, the Defendants, Jeffrey Epstein and [REDACTED], owed a duty unto Plaintiff to treat her in a non-negligent manner and to not commit intentional or tortious or illegal acts against her.

10. All of the allegations within this Complaint occurred in West Palm Beach, Florida.

FACTUAL ALLEGATIONS

11 Upon information and belief, Defendant, Jeffrey Epstein, has demonstrated a sexual preference and obsession for minor girls.

12. Defendant, Jeffrey Epstein, assisted by Defendant, [REDACTED], developed a plan, scheme, and criminal enterprise that included an elaborate system wherein the then minor Plaintiff was brought to the Defendant, Jeffrey Epstein's residence by the Defendant's employees, recruiters, and assistants, including Defendant, [REDACTED]. When the assistants and employees left the then minor Plaintiff and other minor girls alone in a room at the Defendant's mansion, Defendant, Jeffrey Epstein, himself would appear, remove his clothing, and direct the then minor Plaintiff to remove her clothing. He would then perform one or more lewd, lascivious, and sexual acts, including, but not limited to, masturbation, touching of the then minor Plaintiff's sexual organs, using vibrators or sexual toys on the then minor Plaintiff, coercing the then minor Plaintiff into sexual acts with himself or others, and digitally penetrating the then minor Plaintiff. He would then pay the Plaintiff for engaging in this sexual activity.

13. The Plaintiff was first brought to Defendant, Jeffrey Epstein's mansion in 2002 when she was a fourteen-year old in middle school.

14. The Defendant, Jeffrey Epstein, a wealthy financier with a lavish home, significant wealth, and a network of assistants and employees, including Defendant, [REDACTED], used his resources and his influence over a vulnerable minor child to engage in a systematic pattern of sexually exploitive behavior.

15. Beginning in approximately July 2002 and continuing until approximately September 2005, Defendant, Jeffrey Epstein, coerced, induced and/or enticed the impressionable,

vulnerable, and economically deprived then minor Plaintiff to commit various acts of sexual misconduct. These acts included, but were not limited to, fondling and inappropriate and illegal sexual touching of the then minor Plaintiff, sexual misconduct and masturbation of Defendant, Jeffrey Epstein, in the presence of the then minor Plaintiff, and encouraging the then minor Plaintiff to become involved in prostitution; Defendant, Jeffrey Epstein, committed numerous criminal sexual offenses against the then minor Plaintiff including, but not limited to, sexual battery, solicitation of prostitution, procurement of a minor for the purposes of prostitution, and lewd and lascivious assaults upon the person of the then minor Plaintiff.

16. In addition to the direct sexual abuse and molestation of the then minor Plaintiff, Defendant, Jeffrey Epstein, instructed, coerced and otherwise induced the then minor Plaintiff to bring him numerous other minor children for the purposes of further satisfying his deviant sexual attraction to minors. Defendant, Jeffrey Epstein, used his money, wealth and power to unduly and improperly manipulate and influence the then minor Plaintiff to bring him these other minor girls in exchange for money. This influence led the then minor Plaintiff away from the life of a middle school aged child and into a delinquent lifestyle.

17. The acts referenced above in paragraphs 12 through 16, committed by Defendant, Jeffrey Epstein, against the then minor Plaintiff were committed in violation of numerous criminal State statutes condemning the sexual exploitation of minor children, prostitution, sexual performances by a child, lewd and lascivious assaults, sexual battery, contributing to the delinquency of a minor and other crimes, specifically including, but not limited to, those criminal offenses outlined in Chapters 794, 800, and 827 of the Florida Statutes, as well as those

designated in Florida Statutes §796.03, §796.07, §796.045, §796.04, §796.09, §39.01, §450.151, and §827.04.

18. The above-described acts took place in Palm Beach County, Florida at the residence of the Defendant, Jeffrey Epstein. Any assertions by Defendants, Jeffrey Epstein and [REDACTED], that they were unaware of the age of the then minor Plaintiff are belied by their actions and rendered irrelevant by the provisions of applicable Florida Statutes concerning the sexual exploitation and abuse of a minor child. The Defendants, Jeffrey Epstein and [REDACTED], at all times material to this cause of action, knew and should have known of the Plaintiff's minority.

19. The above-described acts were perpetrated upon the person of the then minor Plaintiff on numerous occasions.

20. In June 2008, in the Fifteenth Judicial Circuit in Palm Beach County, Florida, Defendant, Jeffrey Epstein, entered pleas of "guilty" to various Florida state crimes involving the solicitation of minors for prostitution and the procurement of minors for the purposes of prostitution.

21. As a condition of that plea, and in exchange for the Federal Government not prosecuting Defendant, Jeffrey Epstein, for numerous federal offenses, Defendant, Jeffrey Epstein, additionally entered into an agreement with the Federal Government acknowledging that the Plaintiff was a victim of his conduct.

22. The Plaintiff is included in the list of victims identified by the Federal Government as victims of the Defendant, Jeffrey Epstein's illegal conduct. Defendant, Jeffrey

Epstein, is thus estopped by his plea and agreement with the Federal Government from denying the acts alleged in this Complaint, and must effectively admit liability to the Plaintiff.

COUNT I

**Sexual Exploitation, Sexual Abuse and/or Sexual Assault of a Minor
Against Defendant, Jeffrey Epstein**

23. The Plaintiff adopts and realleges paragraphs 1 through 22 above.

24. Defendant, Jeffrey Epstein, tortiously assaulted Plaintiff sexually on numerous occasions between approximately July 2002 and approximately September 2005, and further sexually exploited her and contributed to her delinquency during that time. Defendant's tortious acts were intentional and these acts are described in the preceding paragraphs.

25. In sexually abusing, assaulting and exploiting Plaintiff in the manner described in paragraphs 1 through 22, Defendant, Jeffrey Epstein, violated a duty to refrain from committing criminal actions that proximately caused damages to Plaintiff. A violation of any criminal statute constitutes a breach of that duty and also negligence per se. The Florida Statutes which Epstein violated include, but may not be limited to:

- A. Chapters 794 – Sexual Battery;
- B. Chapter 800 – Lewdness; Indecent exposure;
- C. Section 827.04 – Contributing to the delinquency of a child;
- D. Section 827.071 – Sexual performance by a child;
- E. Section 796.03 – Procuring a minor for prostitution;
- F. Section 796.07 – Crimes against prostitution;
- G. Section 796.045 – Sex trafficking;

- H. Section 796.04 – Forcing, compelling, or coercing another to become a prostitute;
- I. Section 450.151 – Hiring or employing minor; infliction of pain and suffering; and
- J. Section 39.01 (67) – Sexual abuse of a child

26. As a direct and proximate result of Defendant, Jeffrey Epstein's assaults and acts of exploitation on Plaintiff, the Plaintiff has in the past suffered, and will in the future suffer, physical injury, pain and suffering, emotional distress, psychological trauma, mental anguish, humiliation, embarrassment, loss of self-esteem, loss of dignity, invasion of her privacy and other damages associated with Defendant, Jeffrey Epstein, controlling, manipulating and coercing her into a perverse and unconventional way of life for a minor. The then minor Plaintiff incurred medical and psychological expenses and the Plaintiff will in the future suffer additional medical and psychological expenses. The Plaintiff has suffered a loss of income, a loss of the capacity to earn income in the future, and a loss of the capacity to enjoy life. These injuries are permanent in nature and the Plaintiff will continue to suffer these losses in the future.

WHEREFORE, the Plaintiff, L.M., demands judgment against the Defendant, Jeffrey Epstein, for compensatory damages and such other and further relief as this Court deems just and proper, and hereby demands trial by jury on all issues triable as of right by a jury.

COUNT II

Cause of Action Pursuant to Florida Statute 796.09 Against Defendant, Jeffrey Epstein

- 27. The Plaintiff adopts and realleges paragraphs 1 through 22 above.
- 28. The allegations contained herein in Count II are a separate and distinct legal remedy.

29. Defendant, Jeffrey Epstein, was a wealthy and powerful man, and Plaintiff was an economically disadvantaged and impressionable minor.

30. Defendant, Jeffrey Epstein, used his vast wealth and power to coerce Plaintiff into prostitution and/or coerced her to remain in prostitution.

31. Defendant, Jeffrey Epstein, coerced Plaintiff into prostitution in one or more of the following ways:

- A. Domination of her mind and body through exploitive techniques;
- B. Inducement;
- C. Promise of greater financial rewards;
- D. Exploitation of a condition of developmental disability, cognitive limitation, affective disorder, and/or substance dependency;
- E. Exploitation of human needs for food, shelter or affection;
- F. Exploitation of underprivileged and vulnerable economic condition or situation;
- G. Use of a system of recruiting other similarly situated minor girls to further coerce and induce Plaintiff into the lifestyle of prostitution; and
- H. Exploitation through demonstration of abundant wealth and power to impress a young and vulnerable then minor Plaintiff and to coerce her into prostitution.

32. As a direct and proximate result of the offenses committed by Defendant, Jeffrey Epstein, against Plaintiff pursuant to Florida Statutes §796.09, the Plaintiff has in the past suffered, and will in the future suffer, physical injury, pain and suffering, emotional distress, psychological trauma, mental anguish, humiliation, embarrassment, loss of self-esteem, loss of

dignity, invasion of her privacy and other damages associated with Defendant, Jeffrey Epstein, controlling, manipulating and coercing her into a perverse and unconventional way of life for a minor. The then minor Plaintiff incurred medical and psychological expenses and the Plaintiff will in the future suffer additional medical and psychological expenses. The Plaintiff has suffered a loss of income, a loss of the capacity to earn income in the future, and a loss of the capacity to enjoy life. These injuries are permanent in nature and the Plaintiff will continue to suffer these losses in the future.

WHEREFORE, the Plaintiff, L.M., demands judgment against the Defendant, Jeffrey Epstein, for compensatory damages, attorney's fees, and such other and further relief as this Court deems just and proper, and hereby demands trial by jury on all issues triable as of right by a jury.

COUNT III

Intentional Infliction of Emotional Distress Against Defendant, Jeffrey Epstein

33. The Plaintiff adopts and realleges paragraphs 1 through 22 above.
34. The Defendant, Jeffrey Epstein's conduct towards the then minor Plaintiff was intentional and reckless.
35. The Defendant, Jeffrey Epstein, deliberately and recklessly inflicted mental suffering upon the then minor Plaintiff.
36. The Defendant, Jeffrey Epstein's conduct was outrageous in character, and so extreme in degree, going beyond all bounds of decency.
37. The Defendant, Jeffrey Epstein's intentional, deliberate and reckless conduct caused severe emotional distress to the Plaintiff. Defendant, at the time he committed these

numerous sexual assaults on Plaintiff, had a specific intent to harm the then minor Plaintiff and his conduct did so harm the Plaintiff.

38. As a direct and proximate result of the Defendant, Jeffrey Epstein's intentional and reckless conduct, the Plaintiff has in the past suffered and in the future will continue to suffer physical injury, pain and suffering, emotional distress, psychological trauma, mental anguish, humiliation, embarrassment, loss of self-esteem, loss of dignity, invasion of her privacy and other damages associated with the Defendant, Jeffrey Epstein, controlling, manipulating and coercing her into a perverse and unconventional way of life for a minor. The then minor Plaintiff incurred medical and psychological expenses and the Plaintiff will in the future suffer additional medical and psychological expenses. The Plaintiff has suffered a loss of income, a loss of the capacity to earn income in the future, and a loss of the capacity to enjoy life. These injuries are permanent in nature and the Plaintiff will continue to suffer these losses in the future.

WHEREFORE, the Plaintiff, L.M., demands judgment against the Defendant, Jeffrey Epstein, for compensatory damages and such other and further relief as this Court deems just and proper, and hereby demands trial by jury on all issues triable as of right by a jury.

COUNT IV

**Civil Remedy for Criminal Practices
Against Defendants, Jeffrey Epstein and [REDACTED]**

39. The Plaintiff adopts and realleges paragraphs 1 through 22 above.

40. The allegations contained herein in Count IV are a separate and distinct legal remedy.

41. The Defendants, Jeffrey Epstein and [REDACTED], participated in an enterprise, or conspired or endeavored to so participate, through a pattern of criminal activity in violation of Florida Statutes §772.103(3)-(4).

42. Defendants, Jeffrey Epstein's and [REDACTED] enterprise included, at a minimum, a group of individuals associated in fact to assist Defendant, Jeffrey Epstein, in recruiting and procuring minor girls and obtaining criminal gratification of his illegal sexual interest in minor girls.

43. The persons constituting the enterprise included a group of individuals associated in fact. These individuals include Defendants, Jeffrey Epstein and [REDACTED], and [REDACTED], as well as other persons unknown at this time.

44. The criminal enterprise had a definite structure. The enterprise operated together on a continuing basis, with largely the same personnel for a common purpose.

45. The shared purpose of the enterprise was to satisfy Defendant, Jeffrey Epstein's illegal interest in having sexual activities with minor girls.

46. The enterprise was not a mere informal conspiracy, but had a definite hierarchical structure. Defendant, Jeffrey Epstein, served informally but effectively as the leader, C.E.O. or "boss" of this organization, directing his underlings how to recruit and procure young girls for his sexual activities and when to bring the girls to his mansion. Defendant, Jeffrey Epstein's key "lieutenant" in the organization was Defendant, [REDACTED], who served as both his scheduler and a recruiter/procurer of the girls. This was an important function, as the recruiting was necessary to satisfy Defendant, Jeffrey Epstein's desire to abuse a large number of different minor girls with different (albeit similar) physical attributes and the scheduling was necessary to

insure that the minor girls would be brought to Defendant, Jeffrey Epstein's mansion to be sexually abused and prostituted at a time when Defendant, Jeffrey Epstein was there (but not at the same time, when they might learn of other girls' identities and possibly become emboldened to report his activities to law enforcement).

47. Scheduling was also necessary to ensure secrecy, so that as few persons as possible were aware that minor girls were coming at unusual hours to Defendant, Jeffrey Epstein's mansion.

48. Defendant, [REDACTED], also needed (directly or indirectly) to make transportation arrangements for many of the girls, as they were often too young to drive themselves to and from the mansion. [REDACTED] also served as a recruiter and helped Defendant, Jeffrey Epstein, satisfy his criminal sexual desires by, on occasion, directly participating in sexual abuse and prostitution of the minor girls.

49. Defendant, Jeffrey Epstein, Defendant, [REDACTED], and [REDACTED] all took steps to conceal the existence of the enterprise and to discourage the girls from reporting the sexual abuse and prostitution to law enforcement or other authority figures. Defendant, Jeffrey Epstein, also used otherwise-legitimate business activities to help further the purpose of the criminal enterprise. These apparently legitimate activities provided "cover" for Defendant, Jeffrey Epstein, Defendant, [REDACTED], and their associates to commit the crimes.

50. Defendant, Jeffrey Epstein, also maintained the appearance of an upstanding and prominent banker and investor to discourage the minor girls from reporting the abuse to law enforcement. By projecting an image of financial power (and, relatedly, strong political connections to prominent politicians and current and former government officials and personal

connections to prominent scientists), Defendant, Jeffrey Epstein, hoped to discourage the minor girls from reporting what he was doing to them by making it appear that they would not be believed. These business activities helped Defendant, Jeffrey Epstein, secure the financial resources to commit the crimes against the minor girls and to pay for prostituting them.

51. For example, the activities paid for maintaining the mansion where the girls were abused and paid for the cellular telephones and other means of communications that were used to recruit and procure the girls. The business activities also helped to provide the funds to pay Defendant, [REDACTED] and [REDACTED] large sums of money to participate in the illegal enterprise and make payments to the girls for performing sexual acts.

52. This enterprise produced a course of conduct that led to a pattern of criminal activity involving more than 100 instances of sexual abuse and prostitution of minor girls. This enterprise was the vehicle for Defendant, Jeffrey Epstein, assisted by Defendant, [REDACTED] to commit his crimes against Plaintiff and other minor girls and operated on a continuing basis from at least as early as June 2002 to November 2005 (and, in regard to witness tampering and harassment, through at least early 2008). The enterprise enabled Defendant, Jeffrey Epstein, to sexually abuse and prostitute the Plaintiff on numerous occasions.

53. The usual and daily activities of the criminal enterprise included scheduling meetings, activities, and other events for Defendant, Jeffrey Epstein – including scheduling “private time” in his mansion for Defendant, Jeffrey Epstein, to commit sexual crimes against minor girls. Defendant, [REDACTED], served as Defendant, Jeffrey Epstein’s scheduler, scheduling both otherwise-lawful activities to provide “cover” for Defendant, Jeffrey Epstein, as well as the illegal sexual activities.

54. The exact frequency with which the sexual crimes took place varied and is not known; however, when Defendant, Jeffrey Epstein, was in West Palm Beach, Florida, it often occurred on a weekly or daily basis (and, in some instances, took place on several times during a single day).

55. The scheduling was designed to secure a private place in Defendant, Jeffrey Epstein's mansion when few other persons would be present at the mansion, so as to reduce the chance of detection of Defendant, Jeffrey Epstein's sexual abuse and prostitution as well as to make it more difficult for the minor girls to report his actions to law enforcement or other authorities.

56. The usual activities of the enterprise also included maintaining the mansion and securing means of communication (i.e., cellular telephones) to recruit minor girls and procure them for prostitution. The activities further included arranging transportation for the girls to and from the mansion if it was necessary.

57. The enterprise also attempted to make Defendant, Jeffrey Epstein, appear to be an upstanding and law-abiding member of the community and a successful businessperson. The enterprise served as the usual way in which Defendant, Jeffrey Epstein, would obtain sexual gratification.

58. The criminal acts of Defendants, Jeffrey Epstein and [REDACTED], occurred repeatedly over a substantial period of time and were not isolated events.

59. Defendant, Jeffrey Epstein, assisted by Defendant, [REDACTED], committed repeated (more than 20) criminal acts of sexual abuse against Plaintiff from approximately July 2002 to September 2005.

60. In addition, since November 2005 and through the early part of 2008 (and perhaps later), Defendant, Jeffrey Epstein, and others acting at his direction have attempted to discourage the victims of his crimes from reporting his crimes and cooperating with law enforcement. For example, persons acting at the direction of Defendant, Jeffrey Epstein, have aggressively attempted to “interview” the victims or to “tail” the victims in their cars. They also harassed a victim shortly before she was to testify at a grand jury investigating Defendant, Jeffrey Epstein. These efforts have been made not for legitimate investigative reasons but rather for the purpose of discouraging the victims from cooperating with law enforcement (and, in at least one case, the investigating grand jury) and from filing civil lawsuits to vindicate their rights.

61. The Defendants, Jeffrey Epstein and [REDACTED], participated in this pattern of criminal activity by engaging in at least two of the following acts of criminal misconduct with the same or similar intents, results, accomplices, victims, and methods of commission within a five year period:

A. Procuring for prostitution, or causing to be prostituted, any person who is under the age of 18 years in violation of Florida Statutes Chapter 796;

B. Forcing, compelling, or coercing another to become a prostitute in violation of Florida Statutes §796.04;

C. Acts of battery in violation of Florida Statutes Chapter 784; and

D. Sexual performance or exploitation of a child in violation of Florida Statutes §827.071.

62. Under the plan, scheme, and enterprise, Defendant, Jeffrey Epstein, paid employees and underlings to repeatedly find and bring him minor girls in order for the

Defendant, Jeffrey Epstein, to solicit, induce, coerce, entice, compel or force such girls to engage in acts of prostitution and sexual misconduct.

63. The Plaintiff was the victim of the Defendants, Jeffrey Epstein's and [REDACTED] plan, scheme, and enterprise. The Plaintiff was called on the telephone and transported by various individuals, including Defendant, [REDACTED], to the Defendant, Jeffrey Epstein's residence, where she was placed in a room along with the Defendant, Jeffrey Epstein, enticed to commit acts of prostitution, battery, and sexual exploitation. The Defendant, Jeffrey Epstein, conspired with Defendant, [REDACTED], and his other assistants and employees and various adults and minor children in order to accomplish his enterprise of seeking out, gaining access to, and exploiting minor children such as the Plaintiff.

64. After introducing Plaintiff into prostitution, Defendant, Jeffrey Epstein, assisted by Defendant, [REDACTED], enticed Plaintiff to remain in prostitution and be a part of his deviant sexual lifestyle through exploitive techniques, such as offering additional money to Plaintiff in exchange for her bringing him additional minor girls to sexually abuse and commit sexual crimes against.

65. As a direct and proximate result of Defendant, Jeffrey Epstein's assaults and acts of exploitation on Plaintiff, as assisted by Defendant, [REDACTED], the Plaintiff has in the past suffered, and will in the future suffer, physical injury, pain and suffering, emotional distress, psychological trauma, mental anguish, humiliation, embarrassment, loss of self-esteem, loss of dignity, invasion of her privacy and other damages associated with Defendant, Jeffrey Epstein, assisted by Defendant, [REDACTED], controlling, manipulating and coercing her into a perverse and unconventional way of life for a minor. The then minor Plaintiff incurred medical and

psychological expenses and the Plaintiff will in the future suffer additional medical and psychological expenses. The Plaintiff has suffered a loss of income, a loss of the capacity to earn income in the future, and a loss of the capacity to enjoy life. These injuries are permanent in nature and the Plaintiff will continue to suffer these losses in the future.

WHEREFORE, under the provisions of Florida Statutes Chapter 772, the Plaintiff demands judgment against the Defendants, Jeffrey Epstein and [REDACTED], for compensatory damages, treble damages, costs and attorneys' fees, and such other and further relief as this Court deems just and proper, and hereby demands trial by jury on all issues triable as of right by a jury.

I HEREBY CERTIFY that a true and correct copy of the above and foregoing has been provided by facsimile and United States mail to: Robert D. Critton, Esquire and Michael J. Pike, Esquire, Burman, Critton, et al., Attorneys for Defendant, 515 North Flagler Drive, Suite 400, West Palm Beach, Florida 33401, this 23rd day of December, 2008.

THE LAW OFFICE OF BRAD EDWARDS &
ASSOCIATES, LLC
Attorneys for Plaintiff
2028 Harrison Street - Suite 202
Hollywood, Florida 33020

[REDACTED]

Jay Howell, Esquire
Florida Bar #225657
JAY HOWELL & ASSOCIATES, P.A.
Co-Counsel for Plaintiff
644 Cesery Boulevard - Suite 250
Jacksonville, Florida 32211

[REDACTED]

By: 
Brad Edwards
Florida Bar #542075



STATE OF FLORIDA - PALM BEACH COUNTY
I hereby certify that the foregoing is a true copy of the record in my office.
THIS 19 DAY OF January 20 12
SHARON R. BOCK
CLERK & COMPTROLLER
By: 
DEPUTY CLERK

IN THE CIRCUIT COURT OF THE 15TH
JUDICIAL CIRCUIT IN AND FOR PALM
BEACH COUNTY, FLORIDA

CIVIL DIVISION

CASE NO.: 50 2008 CA 028051 XXXXMB AB

L.M.,

Plaintiff,

vs.

JEFFREY EPSTEIN,

Defendant.

FILED
2010 JUN - 1 PM 3: 02
SHARON R. BOCK, CLERK
PALM BEACH COUNTY
CIRCUIT CIVIL

PLAINTIFF'S THIRD AMENDED COMPLAINT

Plaintiff, L.M., by and through her undersigned counsel, sues the Defendant, Jeffrey Epstein, and alleges:

GENERAL ALLEGATIONS AS TO ALL COUNTS

1. This is an action in an amount in excess of \$15,000.00, exclusive of interest and costs and is within the jurisdictional limits of this Court.
2. This Complaint is brought under a fictitious name in order to protect the identity of the plaintiff because this Complaint makes allegations of a sensitive sexual nature.
3. At all times material to this cause of action, the plaintiff, L.M. (hereinafter referred to as "Plaintiff"), was a resident of Palm Beach County, Florida.
4. At all times material to this cause of action, Defendant, Jeffrey Epstein, had a residence located at 358 El Brillo Way, West Palm Beach, Palm Beach County, Florida.

5. Defendant, Jeffrey Epstein, is currently a citizen of the State of Florida, as he currently resides at 358 El Brillo Way, West Palm Beach, Florida where he is currently under community control as a condition of his sentence in criminal case number 06CF009454AMB.

6. At all times material to this cause of action, Defendant, Jeffrey Epstein, was an adult male born in 1953.

7. All of the allegations within this Complaint occurred in West Palm Beach, Florida.

8. Upon information and belief, Defendant, Jeffrey Epstein, has demonstrated a sexual preference and obsession for minor girls.

9. Defendant, Jeffrey Epstein, along with numerous assistants, developed a plan, scheme, and criminal enterprise that included an elaborate system wherein the then minor Plaintiff was brought to Defendant Jeffrey Epstein's residence by the Defendant's employees, recruiters, and assistants. When the assistants and employees left the then minor Plaintiff and other minor girls alone in a room at the defendant's mansion, Defendant, Jeffrey Epstein, himself would appear, remove his clothing, and direct the then minor Plaintiff to remove her clothing. He would then perform one or more lewd, lascivious, and sexual acts, including, but not limited to, masturbation, touching of the then minor Plaintiff's sexual organs, using vibrators or sexual toys on the then minor Plaintiff, coercing the then minor Plaintiff into sexual acts with himself or others, and digitally penetrating the then minor Plaintiff. He would then pay the plaintiff for engaging in this sexual activity.

10. The plaintiff was first brought to Defendant, Jeffrey Epstein's mansion in 2002 when she was a thirteen or fourteen-year old.

11. The then minor Plaintiff was a vulnerable child without adequate parental support at all times material to this Complaint. The defendant, Jeffrey Epstein, a *wealthy financier with a lavish home, significant wealth, and a network of assistants and employees*, used his resources and his influence over a vulnerable minor child to engage in a systematic pattern of sexually exploitive behavior.

12. Beginning in approximately July 2002 and continuing until approximately September 2005, Defendant, Jeffrey Epstein, coerced, induced and/or enticed the impressionable, vulnerable, and economically deprived then minor Plaintiff to commit various acts of sexual misconduct. These acts included, but were not limited to, fondling and inappropriate and illegal sexual touching of the then minor Plaintiff, forcing or inducing the then minor Plaintiff into sexual misconduct, masturbation of Defendant, Jeffrey Epstein, in the presence of the then minor Plaintiff, handling and fondling of the then minor Plaintiff's sexual organs, and encouraging the then minor Plaintiff to become involved in prostitution; Defendant, Jeffrey Epstein, committed numerous criminal sexual offenses against the then minor Plaintiff including, but not limited to, sexual battery, solicitation of prostitution, molestation, coercing a minor into prostitution, contributing to the delinquency of a minor, and the commission of lewd and lascivious acts upon the person of the then minor Plaintiff.

13. In addition to the direct sexual abuse and molestation of the then minor Plaintiff, Defendant, Jeffrey Epstein, instructed, coerced and otherwise induced the then

minor Plaintiff to bring him numerous other minor children for the purposes of further satisfying his deviant sexual attraction to minors. Defendant, Jeffrey Epstein, used his money, wealth and power to unduly and improperly manipulate and influence the then minor Plaintiff to bring him these other minor girls in exchange for money. This influence led the then minor Plaintiff away from the life of an adolescent teenage child and into a delinquent lifestyle.

14. The above-described acts took place in Palm Beach County, Florida at the residence of the Defendant, Jeffrey Epstein. Any assertions by Defendant, Jeffrey Epstein, that he was unaware of the age of the then minor Plaintiff are belied by his actions and rendered irrelevant by the provisions of applicable Florida Statutes concerning the sexual exploitation and abuse of a minor child. The defendant, Jeffrey Epstein, at all times material to this cause of action, knew and should have known of the Plaintiff's minority.

15. The above-described acts were perpetrated upon the person of the then minor Plaintiff on numerous occasions.

COUNT I
Negligence Per Se, violation of criminal statutes

16. The plaintiff adopts and realleges paragraphs 1 through 15 above.

17. Defendant, Jeffrey Epstein, negligently injured Plaintiff, and/or failed to understand or appreciate that his conduct as alleged herein would injure Plaintiff, on numerous occasions between approximately July 2002 and approximately September 2005.

18. In acting in the manner described in paragraphs 1 through 15, Defendant, Jeffrey Epstein, violated a duty to refrain from committing criminal actions against Plaintiff that proximately caused damages to Plaintiff.

19. In committing various crimes against Plaintiff, Defendant violated penal statutes that were designed to protect a class of persons, of which Plaintiff is a member, against a particular type of harm.

20. Particularly, the Florida Statutes which Epstein violated include, but may not be limited to:

A. Chapter 800.04(4-7) – Lewd or lascivious offenses; Defendant Epstein engaged in sexual activity with Plaintiff when Plaintiff was less than 16 years of age, and also encouraged or enticed her at that time to become involved in prostitution or some other act of sexual activity; Defendant also violated this statute by touching in a lewd or lascivious manner the breasts, genitals, genital area or buttocks, or the clothing covering them, of Plaintiff at a time when Plaintiff was less than 16 years old, or enticed Plaintiff at that time to so touch Epstein. Epstein masturbated in the presence of Plaintiff when Plaintiff was less than 16 years of age.

B. Section 827.04 – Contributing to the delinquency of a child; Defendant induced or endeavored to induce by act, threat, command, or persuasion, the then minor Plaintiff to commit or perform acts, follow a course of conduct, and live in a manner that caused or tended to cause Plaintiff to become or remain delinquent, when he committed the acts described in paragraphs 12-15 above against Plaintiff.

C. Section 796.03 – Procuring a minor for prostitution; Defendant procured for prostitution, or caused to be prostituted, Plaintiff when Plaintiff was under the age of 18.

D. Section 796.07 – Prohibiting prostitution; Defendant owned, maintained and operated a place, to wit: his home located at 358 El Brillo Way, West Palm Beach, Palm Beach County, Florida, for the purpose of lewdness or prostitution, he received minors into his house for the purpose of lewdness or prostitution, and directed, took, transported, or offered or agreed to transport Plaintiff to and from his house with the reasonable belief that the purpose of such directing, taking, or transporting was lewdness or prostitution;

E. Section 796.045 – Sex trafficking; Defendant knowingly recruited, enticed, harbored, transported, or obtained Plaintiff, knowing that coercion would be used to cause Plaintiff to engage in prostitution;

F. Section 796.04 – Forcing, compelling, or coercing another to become a prostitute; Defendant coerced Plaintiff to become a prostitute; and

G. Section 39.01 (67) – Sexual abuse of a child; Defendant intruded into the genitals of Plaintiff, when Plaintiff was a child, and touched her genitals or intimate parts, he intentionally masturbated in front of her, he intentionally exposed his genitals in her presence, and encouraged Plaintiff to engage in prostitution.

21. As to each of the above referenced criminal statutes, Plaintiff was a member of the class of persons intended to be protected, the injury was of the type the

statute intended to protect, and the injuries suffered by Plaintiff proximately resulted from the violation of the criminal statute.

22. As a direct and proximate result of Defendant, Jeffrey Epstein's acts on Plaintiff, the plaintiff has in the past suffered, and will in the future suffer, physical injury, pain and suffering, emotional distress, psychological trauma, mental anguish, humiliation, embarrassment, loss of self-esteem, loss of dignity, invasion of her privacy and other damages associated with Defendant, Jeffrey Epstein, controlling, manipulating and coercing her into a perverse and unconventional way of life for a minor. The then minor Plaintiff incurred medical and psychological expenses and the plaintiff will in the future suffer additional medical and psychological expenses. The plaintiff has suffered a loss of income, a loss of the capacity to earn income in the future, and a loss of the capacity to enjoy life. These injuries are permanent in nature and the Plaintiff will continue to suffer these losses in the future.

WHEREFORE, the plaintiff, L.M., demands judgment against the defendant, Jeffrey Epstein, for compensatory damages, punitive damages, and such other and further relief as this Court deems just and proper, and hereby demands trial by jury on all issues triable as of right by a jury.

COUNT II
Intentional Sexual Tort Per Se in Violation of Criminal Statutes

23. The plaintiff adopts and realleges paragraphs 1 through 15 above.

24. Defendant, Jeffrey Epstein, intentionally injured Plaintiff sexually on numerous occasions between approximately July 2002 and approximately September

2005, and further sexually exploited her and contributed to her delinquency during that time.

25. In sexually abusing, battering and exploiting Plaintiff in the manner described in paragraphs 1 through 15, Defendant, Jeffrey Epstein, violated a duty to refrain from committing criminal actions against Plaintiff that proximately caused damages to Plaintiff.

26. In committing various crimes against Plaintiff, Defendant violated penal statutes that were designed to protect a class of persons, of which Plaintiff is a member, against a particular type of harm.

27. Particularly, the Florida Statutes which Epstein violated include, but may not be limited to:

A. Chapter 800.04(4-7) – Lewd or lascivious offenses; Defendant Epstein engaged in sexual activity with Plaintiff when Plaintiff was less than 16 years of age, and also encouraged or enticed her at that time to become involved in prostitution or some other act of sexual activity; Defendant also violated this statute by touching in a lewd or lascivious manner the breasts, genitals, genital area or buttocks, or the clothing covering them, of Plaintiff at a time when Plaintiff was less than 16 years old, or enticed Plaintiff at that time to so touch Epstein. Epstein masturbated in the presence of Plaintiff when Plaintiff was less than 16 years of age.

B. Section 827.04 – Contributing to the delinquency of a child; Defendant induced or endeavored to induce by act, threat, command, or persuasion, the then minor Plaintiff to commit or perform acts, follow a course of conduct, and live in

a manner that caused or tended to cause Plaintiff to become or remain delinquent, when he committed the acts described in paragraphs 12-15 above against Plaintiff.

C. Section 796.03 – Procuring a minor for prostitution; Defendant procured for prostitution, or caused to be prostituted, Plaintiff when Plaintiff was under the age of 18.

D. Section 796.07 – Prohibiting prostitution; Defendant owned, maintained and operated a place, to wit: his home located at 358 El Brillo Way, West Palm Beach, Palm Beach County, Florida, for the purpose of lewdness or prostitution, he received minors into his house for the purpose of lewdness or prostitution, and directed, took, transported, or offered or agreed to transport Plaintiff to and from his house with the reasonable belief that the purpose of such directing, taking, or transporting was lewdness or prostitution;

E. Section 796.045 – Sex trafficking; Defendant knowingly recruited, enticed, harbored, transported, or obtained Plaintiff, knowing that coercion would be used to cause Plaintiff to engage in prostitution;

F. Section 796.04 – Forcing, compelling, or coercing another to become a prostitute; Defendant coerced Plaintiff to become a prostitute; and

G. Section 39.01 (67) – Sexual abuse of a child; Defendant intruded into the genitals of Plaintiff, when Plaintiff was a child, and touched her genitals or intimate parts, he intentionally masturbated in front of her, he intentionally exposed his genitals in her presence, and encouraged Plaintiff to engage in prostitution.

28. As to each of the above referenced criminal statutes, Plaintiff was a member of the class of persons intended to be protected, the injury was of the type the statute intended to protect, and the injuries suffered by Plaintiff proximately resulted from the violation of the criminal statute.

29. As a direct and proximate result of Defendant, Jeffrey Epstein's criminal acts on Plaintiff, the plaintiff has in the past suffered, and will in the future suffer, physical injury, pain and suffering, emotional distress, psychological trauma, mental anguish, humiliation, embarrassment, loss of self-esteem, loss of dignity, invasion of her privacy and other damages associated with Defendant, Jeffrey Epstein, controlling, manipulating and coercing her into a perverse and unconventional way of life for a minor. The then minor plaintiff incurred medical and psychological expenses and the plaintiff will in the future suffer additional medical and psychological expenses. The plaintiff has suffered a loss of income, a loss of the capacity to earn income in the future, and a loss of the capacity to enjoy life. These injuries are permanent in nature and the plaintiff will continue to suffer these losses in the future.

WHEREFORE, the plaintiff, L.M., demands judgment against the defendant, Jeffrey Epstein, for compensatory damages, punitive damages, and such other and further relief as this Court deems just and proper, and hereby demands trial by jury on all issues triable as of right by a jury.

COUNT III
Cause of Action Pursuant to Florida Statute 796.09
Against Defendant, Jeffrey Epstein

30. The plaintiff adopts and realleges paragraphs 1 through 15 above.

31. The allegations contained herein in Count II are a separate and distinct legal remedy.

32. Defendant, Jeffrey Epstein, was a wealthy and powerful man, and Plaintiff was an economically disadvantaged and impressionable minor.

33. Defendant, Jeffrey Epstein, used his vast wealth and power to coerce Plaintiff into prostitution and/or coerced her to remain in prostitution.

34. Defendant, Jeffrey Epstein, coerced Plaintiff into prostitution in one or more of the following ways:

- A. Domination of her mind and body through exploitive techniques;
- B. Inducement;
- C. Promise of greater financial rewards;
- D. Exploitation of a condition of developmental disability, cognitive limitation, affective disorder, and/or substance dependency;
- E. Exploitation of human needs for food, shelter or affection;
- F. Exploitation of underprivileged and vulnerable economic condition or situation;
- G. Use of a system of recruiting other similarly situated minor girls to further coerce and induce Plaintiff into the lifestyle of prostitution; and
- H. Exploitation through demonstration of abundant wealth and power to impress a young and vulnerable then minor Plaintiff and to coerce her into prostitution.

35. As a direct and proximate result of the offenses committed by Defendant, Jeffrey Epstein, against Plaintiff pursuant to Florida Statutes §796.09, the plaintiff has in the past suffered, and will in the future suffer, physical injury, pain and suffering, emotional distress, psychological trauma, mental anguish, humiliation, embarrassment, loss of self-esteem, loss of dignity, invasion of her privacy and other damages associated with Defendant, Jeffrey Epstein, controlling, manipulating and coercing her into a perverse and unconventional way of life for a minor. The then minor Plaintiff incurred medical and psychological expenses and the plaintiff will in the future suffer additional medical and psychological expenses. The plaintiff has suffered a loss of income, a loss of the capacity to earn income in the future, and a loss of the capacity to enjoy life. These injuries are permanent in nature and the Plaintiff will continue to suffer these losses in the future.

WHEREFORE, the plaintiff, L.M., demands judgment against the defendant, Jeffrey Epstein, for compensatory damages, punitive damages, attorney's fees, and such other and further relief as this Court deems just and proper, and hereby demands trial by jury on all issues triable as of right by a jury.

COUNT IV
Intentional Infliction of Emotional Distress
Against Defendant, Jeffrey Epstein

36. The plaintiff adopts and realleges paragraphs 1 through 15 above.

37. The defendant, Jeffrey Epstein's conduct towards the then minor plaintiff was intentional and reckless and was outrageous in character, and so extreme in degree, going beyond all bounds of decency.

38. The defendant, Jeffrey Epstein's intentional, deliberate and reckless conduct caused severe emotional distress to the plaintiff. Defendant, at the time he committed these numerous sexual assaults on Plaintiff, had a specific intent to harm the then minor Plaintiff and his conduct did so harm the plaintiff.

39. As a direct and proximate result of the defendant, Jeffrey Epstein's intentional and reckless conduct, the plaintiff has in the past suffered and in the future will continue to suffer physical injury, pain and suffering, emotional distress, psychological trauma, mental anguish, humiliation, embarrassment, loss of self-esteem, loss of dignity, invasion of her privacy and other damages associated with the defendant, Jeffrey Epstein, controlling, manipulating and coercing her into a perverse and unconventional way of life for a minor. The then minor Plaintiff incurred medical and psychological expenses and the plaintiff will in the future suffer additional medical and psychological expenses. The plaintiff has suffered a loss of income, a loss of the capacity to earn income in the future, and a loss of the capacity to enjoy life. These injuries are permanent in nature and the plaintiff will continue to suffer these losses in the future.

WHEREFORE, the plaintiff, L.M., demands judgment against the defendant, Jeffrey Epstein, for compensatory damages, punitive damages, and such other and further relief as this Court deems just and proper, and hereby demands trial by jury on all issues triable as of right by a jury.

COUNT IV
Battery

40. The plaintiff, L.M., repeats and realleges paragraphs 1 through 15 above.

41. On numerous occasions, Defendant Epstein did in fact intentionally touch Plaintiff, L.M., on her person against her will and/or without her legal consent.

42. Defendant Epstein battered Plaintiff sexually, in that he touched her in intimate areas of her body and person in an offensive manner while she was a minor child, and therefore the touchings were without legal consent.

43. Defendant Epstein touched her in intimate areas of her body on dozens of occasions between approximately July 2002 and September 2005.

44. The conduct described in this count constitutes battery against the person of the then minor Plaintiff.

45. As a direct and proximate result of Defendant, Jeffrey Epstein's battery on Plaintiff, the plaintiff has in the past suffered, and will in the future suffer, physical injury, pain and suffering, emotional distress, psychological trauma, mental anguish, humiliation, embarrassment, loss of self-esteem, loss of her childhood, loss of dignity, invasion of her privacy and other damages associated with Defendant, Jeffrey Epstein, controlling, manipulating and coercing her into a perverse and unconventional way of life for a minor. The then minor Plaintiff incurred medical and psychological expenses and Plaintiff will in the future suffer additional medical and psychological expenses. Plaintiff has suffered a loss of income, a loss of the capacity to earn income in the

future, and a loss of the capacity to enjoy life. These injuries are permanent in nature and Plaintiff will continue to suffer these losses in the future.

WHEREFORE, Plaintiff, demands judgment against the defendant, Jeffrey Epstein, for compensatory damages, punitive damages, and such other and further relief as this Court deems just and proper, and hereby demands trial by jury on all issues triable as of right by a jury.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing has been provided this 20th day of May 2010 via U.S. Mail and email transmittal to all those on the attached service list.

**Farmer, Jaffe, Weissing,
Edwards, Fistos & Lehrman, P.L.**
425 N. Andrews Ave., Suite 2
Fort Lauderdale, FL 33301

By:



BRADLEY J. EDWARDS
Florida Bar No.: 542075

SERVICE LIST

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Atterbury Goldberger et al.
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STATE OF FLORIDA • PALM BEACH COUNTY

I hereby certify that the foregoing is a true copy of the record in my office.

THIS 19 DAY OF January 20 12
SHARON R. BOCK
CLERK & COMPTROLLER

By [Signature]
DEPUTY CLERK

IN THE CIRCUIT COURT OF THE 15TH
JUDICIAL CIRCUIT IN AND FOR PALM
BEACH COUNTY, FLORIDA

CIVIL DIVISION

CASE NO.: 50 2008 CA 0280 58 XXXXMB AD

E.W.,

Plaintiff,

vs.

JEFFREY EPSTEIN,

Defendant.

COMPLAINT

Plaintiff, E.W., by and through her undersigned counsel, sues the Defendant, Jeffrey Epstein, and alleges:

1. This is an action in an amount in excess of \$15,000.00, exclusive of interest and costs and is within the jurisdictional limits of this Court.
2. This Complaint is brought under a fictitious name in order to protect the identity of the Plaintiff because this Complaint makes allegations of sexual assault and child abuse of a then minor.
3. At all times material to this cause of action, the Plaintiff, E.W. (hereinafter referred to as "Plaintiff"), was a resident of Palm Beach County, Florida.
4. At all times material to this cause of action, the Defendant, Jeffrey Epstein, had a residence located at 358 El Brillo Way, West Palm Beach, Palm Beach County, Florida.

5. Defendant, Jeffrey Epstein, is currently a citizen of the State of Florida, as he currently resides in West Palm Beach, Florida at the Palm Beach County Jail and has the intention to remain in Florida. This is substantiated by the residence that he maintains at 358 El Brillo Way, West Palm Beach, Florida where he spends the majority of his time, and intentions to remain at that address permanently are further evidenced by his statements to the Court during his State Plea colloquy on June 30, 2008, case number 06CF009454AMB, taken before the Honorable Judge Dale Pucillo, wherein he indicated that after his release from the Palm Beach County Jail he intends to reside permanently at his home at 358 El Brillo Way, West Palm Beach, Florida, and he plans to work in West Palm Beach, Florida as well.

6. At all times material to this cause of action, the Defendant, Jeffrey Epstein, was an adult male born in 1953.

7. At all times material, the Defendant, Jeffrey Epstein, owed a duty unto Plaintiff to treat her in a non-negligent manner and to not commit intentional or tortious or illegal acts against her.

8. All of the allegations within this Complaint occurred in West Palm Beach, Florida.

FACTUAL ALLEGATIONS

9. Upon information and belief, the Defendant, Jeffrey Epstein, has demonstrated a sexual preference and obsession for minor girls.

10. The Defendant, Jeffrey Epstein, developed a plan, scheme, and criminal enterprise that included an elaborate system wherein the then minor Plaintiff was brought to the Defendant,

Jeffrey Epstein's residence by the Defendant's employees, recruiters, and assistants. When the assistants and employees left the then minor Plaintiff and other minor girls alone in a room at the Defendant's mansion, the Defendant, Jeffrey Epstein, himself would appear, remove his clothing, and direct the then minor Plaintiff to remove her clothing. He would then perform one or more lewd, lascivious, and sexual acts, including, but not limited to, masturbation, touching of the then minor Plaintiff's sexual organs, coercing or forcing the then minor Plaintiff to perform oral sex on him, using vibrators or sexual toys on the then minor Plaintiff, coercing the then minor Plaintiff into sexual acts with himself or others, and digitally penetrating the then minor Plaintiff. He would then pay the Plaintiff for engaging in this sexual activity.

11. The Plaintiff was first brought to the Defendant, Jeffrey Epstein's mansion in 2002 when she was a fourteen-year old in middle school.

12. The then minor Plaintiff was a vulnerable child without adequate parental support at all times material to this Complaint. The Defendant, Jeffrey Epstein, a wealthy financier with a lavish home, significant wealth, and a network of assistants and employees, used his resources and his influence over a vulnerable minor child to engage in a systematic pattern of sexually exploitive behavior.

13. Beginning in approximately August 2002 and continuing until approximately September 2005, the Defendant, Jeffrey Epstein, coerced, induced and/or enticed the impressionable, vulnerable, and economically deprived then minor Plaintiff to commit various acts of sexual misconduct. These acts included, but were not limited to, fondling and inappropriate and illegal sexual touching of the then minor Plaintiff, forcing the then minor Plaintiff into oral sex, sexual misconduct and masturbation of the Defendant, Jeffrey Epstein, in

the presence of the then minor Plaintiff, handling and fondling of the then minor Plaintiff's sexual organs for the purpose of masturbation, and encouraging the then minor Plaintiff to become involved in prostitution; Defendant, Jeffrey Epstein, committed numerous criminal sexual offenses against the then minor Plaintiff including, but not limited to, sexual battery, solicitation of prostitution, coercing a minor into a life of prostitution, and lewd and lascivious assaults upon the person of the then minor Plaintiff.

14. In addition to the direct sexual abuse and molestation of the then minor Plaintiff, Defendant, Jeffrey Epstein, instructed, coerced and otherwise induced the then minor Plaintiff to bring him numerous other minor children for the purposes of further satisfying his deviant sexual attraction to minors. Defendant, Jeffrey Epstein, used his money, wealth and power to unduly and improperly manipulate and influence the then minor Plaintiff to bring him these other minor girls in exchange for money. This influence led the then minor Plaintiff away from the life of a middle school aged child and into a delinquent lifestyle.

15. The acts referenced above in paragraphs 10 through 14, committed by Defendant, Jeffrey Epstein, against the then minor Plaintiff were committed in violation of numerous criminal State statutes condemning the sexual exploitation of minor children, prostitution, sexual performances by a child, lewd and lascivious assaults, sexual battery, contributing to the delinquency of a minor and other crimes, specifically including, but not limited to, those criminal offenses outlined in Chapters 794, 800, 827 and 847 of the Florida Statutes, as well as those designated in Florida Statutes §796.03, §796.07, §796.045, §796.04, §796.09, §39.01, and §827.04.

16. The above-described acts took place in Palm Beach County, Florida at the residence of the Defendant, Jeffrey Epstein. Any assertions by the Defendant, Jeffrey Epstein, that he was unaware of the age of the then minor Plaintiff are belied by his actions and rendered irrelevant by the provisions of applicable Florida Statutes concerning the sexual exploitation and abuse of a minor child. The Defendant, Jeffrey Epstein, at all times material to this cause of action, knew and should have known of the Plaintiff's minority.

17. The above-described acts were perpetrated upon the person of the then minor Plaintiff on numerous occasions.

18. In June 2008, in the Fifteenth Judicial Circuit in Palm Beach County, Florida, the Defendant, Jeffrey Epstein, entered pleas of "guilty" to various Florida state crimes involving the solicitation of minors for prostitution and the procurement of minors for the purposes of prostitution.

19. As a condition of that plea, and in exchange for the Federal Government not prosecuting the Defendant, Jeffrey Epstein, for numerous federal offenses, Defendant, Jeffrey Epstein, additionally entered into an agreement with the Federal Government acknowledging that E.W. was a victim of his conduct.

20. The Plaintiff is included in the list of victims identified by the Federal Government as victims of the Defendant, Jeffrey Epstein's illegal conduct. The Defendant, Jeffrey Epstein, is thus estopped by his plea and agreement with the Federal Government from denying the acts alleged in this Complaint, and must effectively admit liability to the Plaintiff.

COUNT I

Sexual Exploitation, Sexual Abuse and/or Sexual Assault of a Minor

21. The Plaintiff repeats and realleges paragraphs 1 through 20 above.

22. Defendant, Jeffrey Epstein, tortiously assaulted Plaintiff sexually on numerous occasions between approximately August 2002 and approximately September 2005, and further sexually exploited her and contributed to her delinquency during that time. Defendant's acts were outrageous, egregious, intentional, unlawful, offensive and harmful.

23. The sexual assaults were in violation of the numerous state statutes described in paragraph 15 above, and the assaults and acts of exploitation were committed by Defendant, Jeffrey Epstein, willfully and maliciously.

24. As a direct and proximate result of Defendant, Jeffrey Epstein's assaults on the Plaintiff, the Plaintiff has in the past suffered, and will in the future suffer, physical injury, pain and suffering, emotional distress, psychological trauma, mental anguish, humiliation, embarrassment, loss of self-esteem, loss of dignity, invasion of her privacy and other damages associated with Defendant, Jeffrey Epstein, controlling, manipulating and coercing her into a perverse and unconventional way of life for a minor. The then minor Plaintiff incurred medical and psychological expenses and the Plaintiff will in the future suffer additional medical and psychological expenses. The Plaintiff has suffered a loss of income, a loss of the capacity to earn income in the future, and a loss of the capacity to enjoy life. These injuries are permanent in nature and the Plaintiff will continue to suffer these losses in the future.

WHEREFORE, the Plaintiff, E.W., demands judgment against the Defendant, Jeffrey Epstein, for compensatory damages, attorney's fees, and such other and further relief as this

Court deems just and proper, and hereby demands trial by jury on all issues triable as of right by a jury.

COUNT II

Cause of Action Pursuant to Florida Statute 796.09

25. The Plaintiff adopts and realleges paragraphs 1 through 20 above.
26. The allegations contained herein in Count II are a separate and distinct legal remedy.
27. Defendant, Jeffrey Epstein, was a wealthy and powerful man, and Plaintiff was an economically disadvantaged and impressionable minor.
28. Defendant, Jeffrey Epstein, used his vast wealth and power to coerce Plaintiff into prostitution and/or coerced her to remain in prostitution.
29. Defendant, Jeffrey Epstein, coerced Plaintiff into prostitution in one or more of the following ways:
 - A. Domination of her mind and body through exploitive techniques;
 - B. Inducement;
 - C. Promise of greater financial rewards;
 - D. Exploitation of a condition of developmental disability, cognitive limitation, affective disorder, and/or substance dependency;
 - E. Exploitation of human needs for food, shelter or affection;
 - F. Exploitation of underprivileged and vulnerable economic condition or situation;

G. Use of a system of recruiting other similarly situated minor girls to further coerce and induce Plaintiff into the lifestyle of prostitution; and

H. Exploitation through demonstration of abundant wealth and power to impress a young and vulnerable then minor Plaintiff and to coerce her into prostitution.

30. As a direct and proximate result of the offenses committed by Defendant, Jeffrey Epstein, against Plaintiff pursuant to Florida Statutes §769.09, the Plaintiff has in the past suffered, and will in the future suffer, physical injury, pain and suffering, emotional distress, psychological trauma, mental anguish, humiliation, embarrassment, loss of self-esteem, loss of dignity, invasion of her privacy and other damages associated with Defendant, Jeffrey Epstein, controlling, manipulating and coercing her into a perverse and unconventional way of life for a minor. The then minor Plaintiff incurred medical and psychological expenses and the Plaintiff will in the future suffer additional medical and psychological expenses. The Plaintiff has suffered a loss of income, a loss of the capacity to earn income in the future, and a loss of the capacity to enjoy life. These injuries are permanent in nature and the Plaintiff will continue to suffer these losses in the future.

WHEREFORE, the Plaintiff, E.W., demands judgment against the Defendant, Jeffrey Epstein, for compensatory damages, attorney's fees, and such other and further relief as this Court deems just and proper, and hereby demands trial by jury on all issues triable as of right by a jury.

COUNT III

Intentional Infliction of Emotional Distress

31. The Plaintiff adopts and realleges paragraphs 1 through 20 above.

32. The Defendant, Jeffrey Epstein's conduct towards the then minor Plaintiff was intentional and reckless.

33. The Defendant, Jeffrey Epstein, deliberately and recklessly inflicted mental suffering upon the then minor Plaintiff.

34. The Defendant, Jeffrey Epstein's conduct was outrageous in character, and so extreme in degree, going beyond all bounds of decency.

35. The Defendant, Jeffrey Epstein's intentional, deliberate and reckless conduct caused severe emotional distress to the Plaintiff. Defendant, at the time he committed these numerous sexual assaults on Plaintiff, had a specific intent to harm the then minor Plaintiff and his conduct did so harm the Plaintiff.

36. As a direct and proximate result of the Defendant, Jeffrey Epstein's intentional and reckless conduct, the Plaintiff has in the past suffered and in the future will continue to suffer physical injury, pain and suffering, emotional distress, psychological trauma, mental anguish, humiliation, embarrassment, loss of self-esteem, loss of dignity, invasion of her privacy and other damages associated with the Defendant, Jeffrey Epstein, controlling, manipulating and coercing her into a perverse and unconventional way of life for a minor. The then minor Plaintiff incurred medical and psychological expenses and the Plaintiff will in the future suffer additional medical and psychological expenses. The Plaintiff has suffered a loss of income, a loss of the capacity to

earn income in the future, and a loss of the capacity to enjoy life. These injuries are permanent in nature and the Plaintiff will continue to suffer these losses in the future.

WHEREFORE, the Plaintiff, E.W., demands judgment against the Defendant, Jeffrey Epstein, for compensatory damages, attorney's fees, and such other and further relief as this Court deems just and proper, and hereby demands trial by jury on all issues triable as of right by a jury.

COUNT IV

Civil Remedy for Criminal Practices

37. The Plaintiff realleges paragraphs 1 through 20 above.
38. The allegations contained herein in Count IV are a separate and distinct legal remedy.
39. The Defendant, Jeffrey Epstein, participated in an enterprise, or conspired or endeavored to so participate, through a pattern of criminal activity in violation of Florida Statutes §772.103(3)-(4).
40. The Defendant, Jeffrey Epstein, participated in this pattern of criminal activity by engaging in at least two of the following acts of criminal misconduct with the same or similar intents, results, accomplices, victims, and methods of commission within a five year period:
 - A. Procuring for prostitution, or causing to be prostituted, any person who is under the age of 18 years in violation of Florida Statutes Chapter 796;
 - B. Forcing, compelling, or coercing another to become a prostitute in violation of Florida Statutes §796.04;
 - C. Acts of battery in violation of Florida Statutes Chapter 784;

D. Act of lewdness in violation of Florida Statutes Chapter 800;

E. Sexual performance or exploitation of a child in violation of Florida Statutes §827.071; and

F. Other crimes involving contributing to the delinquency of a child, sexual abuse of a child, and coercing a child into prostitution.

41. Under the Defendant, Jeffrey Epstein's plan, scheme, and enterprise, the Defendant, Jeffrey Epstein, paid employees and underlings to repeatedly find and bring him minor girls in order for the Defendant to solicit, induce, coerce, entice, compel or force such girls to engage in acts of prostitution and sexual misconduct.

42. The Plaintiff was the victim of the Defendant, Jeffrey Epstein's plan, scheme, and enterprise. The Plaintiff was called on the telephone and transported by various individuals to the Defendant, Jeffrey Epstein's residence, where she was placed in a room along with the Defendant, enticed to commit acts of prostitution, battery, and sexual exploitation. The Defendant, Jeffrey Epstein, conspired with his assistants and employees and various adults and minor children in order to accomplish his enterprise of seeking out, gaining access to, and exploiting minor children such as the Plaintiff.

43. After introducing Plaintiff into prostitution, he enticed her to remain in prostitution and be a part of his deviant sexual lifestyle through exploitive techniques, such as offering additional money to Plaintiff in exchange for her bringing him additional minor girls to sexually abuse and commit sexual crimes against.

WHEREFORE, under the provisions of Florida Statutes Chapter 772, the Plaintiff demands judgment against the Defendant, Jeffrey Epstein, for compensatory damages, treble

damages, costs and attorneys' fees, and such other and further relief as this Court deems just and proper, and hereby demands trial by jury on all issues triable as of right by a jury.

DATED this 10th day of September, 2008.

THE LAW OFFICE OF BRAD EDWARDS &
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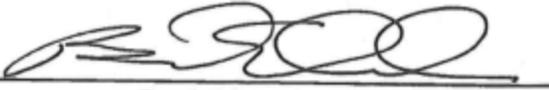
STATE OF FLORIDA - PALM BEACH COUNTY

I hereby certify that the foregoing is a true copy of the record in my office.

THIS 19 DAY OF January 2012

SHARON R. BOCK
CLERK & COMPTROLLER

By: 
DEPUTY CLERK

By: 
Brad Edwards
Florida Bar #542075

IN THE CIRCUIT COURT OF THE 15TH
JUDICIAL CIRCUIT IN AND FOR PALM
BEACH COUNTY, FLORIDA

CIVIL DIVISION

CASE NO.: 50 2008 CA 028058 XXXXMB AD

E.W.,
:
Plaintiff,
:
vs.
:
JEFFREY EPSTEIN and
:
[REDACTED],
:
Defendants.
:

FILED

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SHARON R. BOCK, CLERK
PALM BEACH COUNTY
CIRCUIT CIVIL/PROBATE

AMENDED COMPLAINT

Plaintiff, E.W., by and through her undersigned counsel, sues the Defendants, Jeffrey Epstein and [REDACTED], and alleges:

1. This is an action in an amount in excess of \$15,000.00, exclusive of interest and costs and is within the jurisdictional limits of this Court.
2. This Complaint is brought under a fictitious name in order to protect the identity of the Plaintiff because this Complaint makes allegations of sexual assault and child abuse of a then minor.
3. At all times material to this cause of action, the Plaintiff, E.W. (hereinafter referred to as "Plaintiff"), was a resident of Palm Beach County, Florida.

4. At all times material to this cause of action, Defendant, Jeffrey Epstein, had a residence located at 358 El Brillo Way, West Palm Beach, Palm Beach County, Florida.

5. Defendant, Jeffrey Epstein, is currently a citizen of the State of Florida, as he currently resides in West Palm Beach, Florida at the Palm Beach County Jail and has the intention to remain in Florida. This is substantiated by the residence that he maintains at 358 El Brillo Way, West Palm Beach, Florida where he spends the majority of his time, and intentions to remain at that address permanently are further evidenced by his statements to the Court during his State Plea colloquy on June 30, 2008, case number 06CF009454AMB, taken before the Honorable Judge Dale Pucillo, wherein he indicated that after his release from the Palm Beach County Jail he intends to reside permanently at his home at 358 El Brillo Way, West Palm Beach, Florida, and he plans to work in West Palm Beach, Florida as well.

6. At all times material to this cause of action, Defendant, Jeffrey Epstein, was an adult male born in 1953.

7. Defendant, [REDACTED] is a citizen and resident of the State of New York.

8. At all times material to this cause of action, Defendant, [REDACTED] was an adult female.

9. At all times material to this cause of action, the Defendants, Jeffrey Epstein and [REDACTED] owed a duty unto Plaintiff to treat her in a non-negligent manner and to not commit intentional or tortious or illegal acts against her.

10. All of the allegations within this Complaint occurred in West Palm Beach, Florida.

FACTUAL ALLEGATIONS

11 Upon information and belief, Defendant, Jeffrey Epstein, has demonstrated a sexual preference and obsession for minor girls.

12. Defendant, Jeffrey Epstein, assisted by Defendant, [REDACTED], developed a plan, scheme, and criminal enterprise that included an elaborate system wherein the then minor Plaintiff was brought to the Defendant, Jeffrey Epstein's residence by the Defendant's employees, recruiters, and assistants, including Defendant, [REDACTED]. When the assistants and employees left the then minor Plaintiff and other minor girls alone in a room at the Defendant's mansion, Defendant, Jeffrey Epstein, himself would appear, remove his clothing, and direct the then minor Plaintiff to remove her clothing. He would then perform one or more lewd, lascivious, and sexual acts, including, but not limited to, masturbation, touching of the then minor Plaintiff's sexual organs, coercing or forcing the then minor Plaintiff to perform oral sex on him, using vibrators or sexual toys on the then minor Plaintiff, coercing the then minor Plaintiff into sexual acts with himself or others, and digitally penetrating the then minor Plaintiff. He would then pay the Plaintiff for engaging in this sexual activity.

13. The Plaintiff was first brought to Defendant, Jeffrey Epstein's mansion in 2002 when she was a fourteen-year old in middle school.

14. The then minor Plaintiff was a vulnerable child without adequate parental support at all times material to this Complaint. The Defendant, Jeffrey Epstein, a wealthy financier with a lavish home, significant wealth, and a network of assistants and employees, including Defendant, [REDACTED], used his resources and his influence over a vulnerable minor child to engage in a systematic pattern of sexually exploitive behavior.

15. Beginning in approximately August 2002 and continuing until approximately September 2005, Defendant, Jeffrey Epstein, coerced, induced and/or enticed the impressionable, vulnerable, and economically deprived then minor Plaintiff to commit various acts of sexual misconduct. These acts included, but were not limited to, fondling and inappropriate and illegal sexual touching of the then minor Plaintiff, forcing the then minor Plaintiff into oral sex, sexual misconduct and masturbation of Defendant, Jeffrey Epstein, in the presence of the then minor Plaintiff, handling and fondling of the then minor Plaintiff's sexual organs for the purpose of masturbation, and encouraging the then minor Plaintiff to become involved in prostitution; Defendant, Jeffrey Epstein, committed numerous criminal sexual offenses against the then minor Plaintiff including, but not limited to, sexual battery, solicitation of prostitution, coercing a minor into a life of prostitution, contributing to the delinquency of a minor, and lewd and lascivious assaults upon the person of the then minor Plaintiff.

16. In addition to the direct sexual abuse and molestation of the then minor Plaintiff, Defendant, Jeffrey Epstein, instructed, coerced and otherwise induced the then minor Plaintiff to bring him numerous other minor children for the purposes of further satisfying his deviant sexual attraction to minors. Defendant, Jeffrey Epstein, used his money, wealth and power to unduly and improperly manipulate and influence the then minor Plaintiff to bring him these other minor girls in exchange for money. This influence led the then minor Plaintiff away from the life of a middle school aged child and into a delinquent lifestyle.

17. The acts referenced above in paragraphs 12 through 16, committed by Defendant, Jeffrey Epstein, against the then minor Plaintiff were committed in violation of numerous criminal State statutes condemning the sexual exploitation of minor children, prostitution, sexual

performances by a child, lewd and lascivious assaults, sexual battery, contributing to the delinquency of a minor and other crimes, specifically including, but not limited to, those criminal offenses outlined in Chapters 794, 800, and 827 of the Florida Statutes, as well as those designated in Florida Statutes §796.03, §796.07, §796.045, §796.04, §796.09, §39.01, §450.151, and §827.04.

18. The above-described acts took place in Palm Beach County, Florida at the residence of the Defendant, Jeffrey Epstein. Any assertions by Defendants, Jeffrey Epstein and [REDACTED] that they were unaware of the age of the then minor Plaintiff are belied by their actions and rendered irrelevant by the provisions of applicable Florida Statutes concerning the sexual exploitation and abuse of a minor child. The Defendants, Jeffrey Epstein and [REDACTED] at all times material to this cause of action, knew and should have known of the Plaintiff's minority.

19. The above-described acts were perpetrated upon the person of the then minor Plaintiff on numerous occasions.

20. In June 2008, in the Fifteenth Judicial Circuit in Palm Beach County, Florida, Defendant, Jeffrey Epstein, entered pleas of "guilty" to various Florida state crimes involving the solicitation of minors for prostitution and the procurement of minors for the purposes of prostitution.

21. As a condition of that plea, and in exchange for the Federal Government not prosecuting Defendant, Jeffrey Epstein, for numerous federal offenses, Defendant, Jeffrey Epstein, additionally entered into an agreement with the Federal Government acknowledging that the Plaintiff was a victim of his conduct.

22. The Plaintiff is included in the list of victims identified by the Federal Government as victims of the Defendant, Jeffrey Epstein's illegal conduct. Defendant, Jeffrey Epstein, is thus estopped by his plea and agreement with the Federal Government from denying the acts alleged in this Complaint, and must effectively admit liability to the Plaintiff.

COUNT I

Sexual Exploitation, Sexual Abuse and/or Sexual Assault of a Minor Against Defendant, Jeffrey Epstein

23. The Plaintiff adopts and realleges paragraphs 1 through 22 above.

24. Defendant, Jeffrey Epstein, tortiously assaulted Plaintiff sexually on numerous occasions between approximately August 2002 and approximately September 2005, and further sexually exploited her and contributed to her delinquency during that time. Defendant's tortious acts were intentional and these acts are described in the preceding paragraphs.

25. In sexually abusing, assaulting and exploiting Plaintiff in the manner described in paragraphs 1 through 22, Defendant, Jeffrey Epstein, violated a duty to refrain from committing criminal actions that proximately caused damages to Plaintiff. A violation of any criminal statute constitutes a breach of that duty and also negligence per se. The Florida Statutes which Epstein violated include, but may not be limited to:

- A. Chapters 794 – Sexual Battery;
- B. Chapter 800 – Lewdness; Indecent exposure;
- C. Section 827.04 – Contributing to the delinquency of a child;
- D. Section 827.071 – Sexual performance by a child;
- E. Section 796.03 – Procuring a minor for prostitution;
- F. Section 796.07 – Crimes against prostitution;

- G. Section 796.045 – Sex trafficking;
- H. Section 796.04 – Forcing, compelling, or coercing another to become a prostitute;
- I. Section 450.151 – Hiring or employing minor; infliction of pain and suffering; and
- J. Section 39.01 (67) – Sexual abuse of a child

26. As a direct and proximate result of Defendant, Jeffrey Epstein's assaults and acts of exploitation on Plaintiff, the Plaintiff has in the past suffered, and will in the future suffer, physical injury, pain and suffering, emotional distress, psychological trauma, mental anguish, humiliation, embarrassment, loss of self-esteem, loss of dignity, invasion of her privacy and other damages associated with Defendant, Jeffrey Epstein, controlling, manipulating and coercing her into a perverse and unconventional way of life for a minor. The then minor Plaintiff incurred medical and psychological expenses and the Plaintiff will in the future suffer additional medical and psychological expenses. The Plaintiff has suffered a loss of income, a loss of the capacity to earn income in the future, and a loss of the capacity to enjoy life. These injuries are permanent in nature and the Plaintiff will continue to suffer these losses in the future.

WHEREFORE, the Plaintiff, E.W., demands judgment against the Defendant, Jeffrey Epstein, for compensatory damages and such other and further relief as this Court deems just and proper, and hereby demands trial by jury on all issues triable as of right by a jury.

COUNT II

Cause of Action Pursuant to Florida Statute 796.09 Against Defendant, Jeffrey Epstein

27. The Plaintiff adopts and realleges paragraphs 1 through 22 above.

28. The allegations contained herein in Count II are a separate and distinct legal remedy.

29. Defendant, Jeffrey Epstein, was a wealthy and powerful man, and Plaintiff was an economically disadvantaged and impressionable minor.

30. Defendant, Jeffrey Epstein, used his vast wealth and power to coerce Plaintiff into prostitution and/or coerced her to remain in prostitution.

31. Defendant, Jeffrey Epstein, coerced Plaintiff into prostitution in one or more of the following ways:

- A. Domination of her mind and body through exploitive techniques;
- B. Inducement;
- C. Promise of greater financial rewards;
- D. Exploitation of a condition of developmental disability, cognitive limitation, affective disorder, and/or substance dependency;
- E. Exploitation of human needs for food, shelter or affection;
- F. Exploitation of underprivileged and vulnerable economic condition or situation;
- G. Use of a system of recruiting other similarly situated minor girls to further coerce and induce Plaintiff into the lifestyle of prostitution; and
- H. Exploitation through demonstration of abundant wealth and power to impress a young and vulnerable then minor Plaintiff and to coerce her into prostitution.

32. As a direct and proximate result of the offenses committed by Defendant, Jeffrey Epstein, against Plaintiff pursuant to Florida Statutes §796.09, the Plaintiff has in the past

suffered, and will in the future suffer, physical injury, pain and suffering, emotional distress, psychological trauma, mental anguish, humiliation, embarrassment, loss of self-esteem, loss of dignity, invasion of her privacy and other damages associated with Defendant, Jeffrey Epstein, controlling, manipulating and coercing her into a perverse and unconventional way of life for a minor. The then minor Plaintiff incurred medical and psychological expenses and the Plaintiff will in the future suffer additional medical and psychological expenses. The Plaintiff has suffered a loss of income, a loss of the capacity to earn income in the future, and a loss of the capacity to enjoy life. These injuries are permanent in nature and the Plaintiff will continue to suffer these losses in the future.

WHEREFORE, the Plaintiff, E.W., demands judgment against the Defendant, Jeffrey Epstein, for compensatory damages, attorney's fees, and such other and further relief as this Court deems just and proper, and hereby demands trial by jury on all issues triable as of right by a jury.

COUNT III

Intentional Infliction of Emotional Distress Against Defendant, Jeffrey Epstein

33. The Plaintiff adopts and realleges paragraphs 1 through 22 above.

34. The Defendant, Jeffrey Epstein's conduct towards the then minor Plaintiff was intentional and reckless.

35. The Defendant, Jeffrey Epstein, deliberately and recklessly inflicted mental suffering upon the then minor Plaintiff.

36. The Defendant, Jeffrey Epstein's conduct was outrageous in character, and so extreme in degree, going beyond all bounds of decency.

37. The Defendant, Jeffrey Epstein's intentional, deliberate and reckless conduct caused severe emotional distress to the Plaintiff. Defendant, at the time he committed these numerous sexual assaults on Plaintiff, had a specific intent to harm the then minor Plaintiff and his conduct did so harm the Plaintiff.

38. As a direct and proximate result of the Defendant, Jeffrey Epstein's intentional and reckless conduct, the Plaintiff has in the past suffered and in the future will continue to suffer physical injury, pain and suffering, emotional distress, psychological trauma, mental anguish, humiliation, embarrassment, loss of self-esteem, loss of dignity, invasion of her privacy and other damages associated with the Defendant, Jeffrey Epstein, controlling, manipulating and coercing her into a perverse and unconventional way of life for a minor. The then minor Plaintiff incurred medical and psychological expenses and the Plaintiff will in the future suffer additional medical and psychological expenses. The Plaintiff has suffered a loss of income, a loss of the capacity to earn income in the future, and a loss of the capacity to enjoy life. These injuries are permanent in nature and the Plaintiff will continue to suffer these losses in the future.

WHEREFORE, the Plaintiff, E.W., demands judgment against the Defendant, Jeffrey Epstein, for compensatory damages and such other and further relief as this Court deems just and proper, and hereby demands trial by jury on all issues triable as of right by a jury.

COUNT IV

Civil Remedy for Criminal Practices
Against Defendants, Jeffrey Epstein and [REDACTED]

39. The Plaintiff adopts and realleges paragraphs 1 through 22 above.

40. The allegations contained herein in Count IV are a separate and distinct legal remedy.

41. The Defendants, Jeffrey Epstein and [REDACTED], participated in an enterprise, or conspired or endeavored to so participate, through a pattern of criminal activity in violation of Florida Statutes §772.103(3)-(4).

42. Defendants, Jeffrey Epstein's and [REDACTED] enterprise included, at a minimum, a group of individuals associated in fact to assist Defendant, Jeffrey Epstein, in recruiting and procuring minor girls and obtaining criminal gratification of his illegal sexual interest in minor girls.

43. The persons constituting the enterprise included a group of individuals associated in fact. These individuals include Defendants, Jeffrey Epstein and [REDACTED], and [REDACTED], as well as other persons unknown at this time.

44. The criminal enterprise had a definite structure. The enterprise operated together on a continuing basis, with largely the same personnel for a common purpose.

45. The shared purpose of the enterprise was to satisfy Defendant, Jeffrey Epstein's illegal interest in having sexual activities with minor girls.

46. The enterprise was not a mere informal conspiracy, but had a definite hierarchical structure. Defendant, Jeffrey Epstein, served informally but effectively as the leader, C.E.O. or "boss" of this organization, directing his underlings how to recruit and procure young girls for his sexual activities and when to bring the girls to his mansion. Defendant, Jeffrey Epstein's key "lieutenant" in the organization was Defendant, [REDACTED], who served as both his scheduler and a recruiter/procurer of the girls. This was an important function, as the recruiting was necessary to satisfy Defendant, Jeffrey Epstein's desire to abuse a large number of different minor girls with different (albeit similar) physical attributes and the scheduling was necessary to

insure that the minor girls would be brought to Defendant, Jeffrey Epstein's mansion to be sexually abused and prostituted at a time when Defendant, Jeffrey Epstein was there (but not at the same time, when they might learn of other girls' identities and possibly become emboldened to report his activities to law enforcement).

47. Scheduling was also necessary to ensure secrecy, so that as few persons as possible were aware that minor girls were coming at unusual hours to Defendant, Jeffrey Epstein's mansion.

48. Defendant, [REDACTED], also needed (directly or indirectly) to make transportation arrangements for many of the girls, as they were often too young to drive themselves to and from the mansion. [REDACTED] also served as a recruiter and helped Defendant, Jeffrey Epstein, satisfy his criminal sexual desires by, on occasion, directly participating in sexual abuse and prostitution of the minor girls.

49. Defendant, Jeffrey Epstein, Defendant, [REDACTED], and [REDACTED] all took steps to conceal the existence of the enterprise and to discourage the girls from reporting the sexual abuse and prostitution to law enforcement or other authority figures. Defendant, Jeffrey Epstein, also used otherwise-legitimate business activities to help further the purpose of the criminal enterprise. These apparently legitimate activities provided "cover" for Defendant, Jeffrey Epstein, Defendant, [REDACTED], and their associates to commit the crimes.

50. Defendant, Jeffrey Epstein, also maintained the appearance of an upstanding and prominent banker and investor to discourage the minor girls from reporting the abuse to law enforcement. By projecting an image of financial power (and, relatedly, strong political connections to prominent politicians and current and former government officials and personal

connections to prominent scientists), Defendant, Jeffrey Epstein, hoped to discourage the minor girls from reporting what he was doing to them by making it appear that they would not be believed. These business activities helped Defendant, Jeffrey Epstein, secure the financial resources to commit the crimes against the minor girls and to pay for prostituting them.

51. For example, the activities paid for maintaining the mansion where the girls were abused and paid for the cellular telephones and other means of communications that were used to recruit and procure the girls. The business activities also helped to provide the funds to pay Defendant, [REDACTED], and [REDACTED] large sums of money to participate in the illegal enterprise and make payments to the girls for performing sexual acts.

52. This enterprise produced a course of conduct that led to a pattern of criminal activity involving more than 100 instances of sexual abuse and prostitution of minor girls. This enterprise was the vehicle for Defendant, Jeffrey Epstein, assisted by Defendant, [REDACTED], to commit his crimes against Plaintiff and other minor girls and operated on a continuing basis from at least as early as June 2002 to November 2005 (and, in regard to witness tampering and harassment, through at least early 2008). The enterprise enabled Defendant, Jeffrey Epstein, to sexually abuse and prostitute the Plaintiff on numerous occasions.

53. The usual and daily activities of the criminal enterprise included scheduling meetings, activities, and other events for Defendant, Jeffrey Epstein – including scheduling “private time” in his mansion for Defendant, Jeffrey Epstein, to commit sexual crimes against minor girls. Defendant, [REDACTED], served as Defendant, Jeffrey Epstein’s scheduler, scheduling both otherwise-lawful activities to provide “cover” for Defendant, Jeffrey Epstein, as well as the illegal sexual activities.

54. The exact frequency with which the sexual crimes took place varied and is not known; however, when Defendant, Jeffrey Epstein, was in West Palm Beach, Florida, it often occurred on a weekly or daily basis (and, in some instances, took place on several times during a single day).

55. The scheduling was designed to secure a private place in Defendant, Jeffrey Epstein's mansion when few other persons would be present at the mansion, so as to reduce the chance of detection of Defendant, Jeffrey Epstein's sexual abuse and prostitution as well as to make it more difficult for the minor girls to report his actions to law enforcement or other authorities.

56. The usual activities of the enterprise also included maintaining the mansion and securing means of communication (i.e., cellular telephones) to recruit minor girls and procure them for prostitution. The activities further included arranging transportation for the girls to and from the mansion if it was necessary.

57. The enterprise also attempted to make Defendant, Jeffrey Epstein, appear to be an upstanding and law-abiding member of the community and a successful businessperson. The enterprise served as the usual way in which Defendant, Jeffrey Epstein, would obtain sexual gratification.

58. The criminal acts of Defendants, Jeffrey Epstein and [REDACTED], occurred repeatedly over a substantial period of time and were not isolated events.

59. Defendant, Jeffrey Epstein, assisted by Defendant, [REDACTED], committed repeated (more than 20) criminal acts of sexual abuse against Plaintiff from approximately August 2002 to September 2005.

60. In addition, since November 2005 and through the early part of 2008 (and perhaps later), Defendant, Jeffrey Epstein, and others acting at his direction have attempted to discourage the victims of his crimes from reporting his crimes and cooperating with law enforcement. For example, persons acting at the direction of Defendant, Jeffrey Epstein, have aggressively attempted to "interview" the victims or to "tail" the victims in their cars. They also harassed a victim shortly before she was to testify at a grand jury investigating Defendant, Jeffrey Epstein. These efforts have been made not for legitimate investigative reasons but rather for the purpose of discouraging the victims from cooperating with law enforcement (and, in at least one case, the investigating grand jury) and from filing civil lawsuits to vindicate their rights.

61. The Defendants, Jeffrey Epstein and [REDACTED] participated in this pattern of criminal activity by engaging in at least two of the following acts of criminal misconduct with the same or similar intents, results, accomplices, victims, and methods of commission within a five year period:

A. Procuring for prostitution, or causing to be prostituted, any person who is under the age of 18 years in violation of Florida Statutes Chapter 796;

B. Forcing, compelling, or coercing another to become a prostitute in violation of Florida Statutes §796.04;

C. Acts of battery in violation of Florida Statutes Chapter 784; and

D. Sexual performance or exploitation of a child in violation of Florida Statutes §827.071.

62. Under the plan, scheme, and enterprise, Defendant, Jeffrey Epstein, paid employees and underlings to repeatedly find and bring him minor girls in order for the

Defendant, Jeffrey Epstein, to solicit, induce, coerce, entice, compel or force such girls to engage in acts of prostitution and sexual misconduct.

63. The Plaintiff was the victim of the Defendants, Jeffrey Epstein's and [REDACTED] [REDACTED] plan, scheme, and enterprise. The Plaintiff was called on the telephone and transported by various individuals, including Defendant, [REDACTED] to the Defendant, Jeffrey Epstein's residence, where she was placed in a room along with the Defendant, Jeffrey Epstein, enticed to commit acts of prostitution, battery, and sexual exploitation. The Defendant, Jeffrey Epstein, conspired with Defendant, [REDACTED] and his other assistants and employees and various adults and minor children in order to accomplish his enterprise of seeking out, gaining access to, and exploiting minor children such as the Plaintiff.

64. After introducing Plaintiff into prostitution, Defendant, Jeffrey Epstein, assisted by Defendant, [REDACTED] enticed Plaintiff to remain in prostitution and be a part of his deviant sexual lifestyle through exploitive techniques, such as offering additional money to Plaintiff in exchange for her bringing him additional minor girls to sexually abuse and commit sexual crimes against.

65. As a direct and proximate result of Defendant, Jeffrey Epstein's assaults and acts of exploitation on Plaintiff, as assisted by Defendant, [REDACTED], the Plaintiff has in the past suffered, and will in the future suffer, physical injury, pain and suffering, emotional distress, psychological trauma, mental anguish, humiliation, embarrassment, loss of self-esteem, loss of dignity, invasion of her privacy and other damages associated with Defendant, Jeffrey Epstein, assisted by Defendant, [REDACTED], controlling, manipulating and coercing her into a perverse and unconventional way of life for a minor. The then minor Plaintiff incurred medical and

psychological expenses and the Plaintiff will in the future suffer additional medical and psychological expenses. The Plaintiff has suffered a loss of income, a loss of the capacity to earn income in the future, and a loss of the capacity to enjoy life. These injuries are permanent in nature and the Plaintiff will continue to suffer these losses in the future.

WHEREFORE, under the provisions of Florida Statutes Chapter 772, the Plaintiff demands judgment against the Defendants, Jeffrey Epstein and [REDACTED], for compensatory damages, treble damages, costs and attorneys' fees, and such other and further relief as this Court deems just and proper, and hereby demands trial by jury on all issues triable as of right by a jury.

I HEREBY CERTIFY that a true and correct copy of the above and foregoing has been provided by facsimile and United States mail to: Robert D. Critton, Esquire and Michael J. Pike, Esquire, Burman, Critton, et al., Attorneys for Defendant, 515 North Flagler Drive, Suite 400, West Palm Beach, Florida 33401, this 23rd day of December, 2008.

THE LAW OFFICE OF BRAD EDWARDS &
ASSOCIATES, LLC
Attorneys for Plaintiff
2028 Harrison Street - Suite 202
Hollywood, Florida 33020
[REDACTED]

Jay Howell, Esquire
Florida Bar #225657
JAY HOWELL & ASSOCIATES, P.A.
Co-Counsel for Plaintiff
644 Cesery Boulevard - Suite 250
Jacksonville, Florida 32211
[REDACTED]



STATE OF FLORIDA • PALM BEACH COUNTY

I hereby certify that the foregoing is a true copy of the record in my office.

THIS 19 DAY OF January, 2012

SHARON R. BOCK
CLERK & COMPTROLLER

By: [Signature]

DEPUTY CLERK

By: [Signature]

Brad Edwards
Florida Bar #542075

IN THE CIRCUIT COURT OF THE 15TH
JUDICIAL CIRCUIT IN AND FOR PALM
BEACH COUNTY, FLORIDA

CIVIL DIVISION

CASE NO.: 50 2008 CA 028058 XXXXMB AB

E.W.,

Plaintiff,

vs.

JEFFREY EPSTEIN,

Defendant.

FILED
2010 JUN - 1 PM 3: 02
SHARON R. BOCK, CLERK
PALM BEACH COUNTY
CIRCUIT CIVIL

PLAINTIFF'S THIRD AMENDED COMPLAINT

Plaintiff, E.W., by and through her undersigned counsel, sues the defendant, Jeffrey Epstein, and alleges:

GENERAL ALLEGATIONS AS TO ALL COUNTS

1. This is an action in an amount in excess of \$15,000.00, exclusive of interest and costs and is within the jurisdictional limits of this Court.
2. This Complaint is brought under a fictitious name in order to protect the identity of the plaintiff because this Complaint makes allegations of a sensitive sexual nature.
3. At all times material to this cause of action, the plaintiff, E.W. (hereinafter referred to as "Plaintiff"), was a resident of Palm Beach County, Florida.
4. At all times material to this cause of action, Defendant, Jeffrey Epstein, had a residence located at 358 El Brillo Way, West Palm Beach, Palm Beach County, Florida.

5. Defendant, Jeffrey Epstein, is currently a citizen of the State of Florida, as he currently resides at 358 El Brillo Way, West Palm Beach, Florida where he is currently under community control as a condition of his sentence in criminal case number 06CF009454AMB.

6. At all times material to this cause of action, Defendant, Jeffrey Epstein, was an adult male born in 1953.

7. All of the allegations within this Complaint occurred in West Palm Beach, Florida.

8. Upon information and belief, Defendant, Jeffrey Epstein, has demonstrated a sexual preference and obsession for minor girls.

9. Defendant, Jeffrey Epstein, along with numerous assistants, developed a plan, scheme, and criminal enterprise that included an elaborate system wherein the then minor Plaintiff was brought to Defendant Jeffrey Epstein's residence by the Defendant's employees, recruiters, and assistants. When the assistants and employees left the then minor Plaintiff and other minor girls alone in a room at the defendant's mansion, Defendant, Jeffrey Epstein, himself would appear, remove his clothing, and direct the then minor Plaintiff to remove her clothing. He would then perform one or more lewd, lascivious, and sexual acts, including, but not limited to, masturbation, touching of the then minor Plaintiff's sexual organs, coercing or forcing the then minor Plaintiff to perform oral sex on him, using vibrators or sexual toys on the then minor Plaintiff, coercing the then minor Plaintiff into sexual acts with himself or others, and

digitally penetrating the then minor Plaintiff. He would then pay the plaintiff for engaging in this sexual activity.

10. The plaintiff was first brought to Defendant, Jeffrey Epstein's mansion in 2002 when she was a fourteen-year old.

11. The then minor Plaintiff was a vulnerable child without adequate parental support at all times material to this Complaint. The defendant, Jeffrey Epstein, a wealthy financier with a lavish home, significant wealth, and a network of assistants and employees, used his resources and his influence over a vulnerable minor child to engage in a systematic pattern of sexually exploitive behavior.

12. Beginning in approximately August 2002 and continuing until approximately September 2005, Defendant, Jeffrey Epstein, coerced, induced and/or enticed the impressionable, vulnerable, and economically deprived then minor Plaintiff to commit various acts of sexual misconduct. These acts included, but were not limited to, fondling and inappropriate and illegal sexual touching of the then minor Plaintiff, forcing or inducing the then minor Plaintiff into oral sex or other sexual misconduct, masturbation of Defendant, Jeffrey Epstein, in the presence of the then minor Plaintiff, handling and fondling of the then minor Plaintiff's sexual organs, and encouraging the then minor Plaintiff to become involved in prostitution; Defendant, Jeffrey Epstein, committed numerous criminal sexual offenses against the then minor Plaintiff including, but not limited to, sexual battery, solicitation of prostitution, molestation, coercing a minor into prostitution, contributing to the delinquency of a minor, and the commission of lewd and lascivious acts upon the person of the then minor Plaintiff.

13. In addition to the direct sexual abuse and molestation of the then minor Plaintiff, Defendant, Jeffrey Epstein, instructed, coerced and otherwise induced the then minor Plaintiff to bring him numerous other minor children for the purposes of further satisfying his deviant sexual attraction to minors. Defendant, Jeffrey Epstein, used his money, wealth and power to unduly and improperly manipulate and influence the then minor Plaintiff to bring him these other minor girls in exchange for money. This influence led the then minor Plaintiff away from the life of an adolescent teenage child and into a delinquent lifestyle.

14. The above-described acts took place in Palm Beach County, Florida at the residence of the Defendant, Jeffrey Epstein. Any assertions by Defendant, Jeffrey Epstein, that he was unaware of the age of the then minor Plaintiff are belied by his actions and rendered irrelevant by the provisions of applicable Florida Statutes concerning the sexual exploitation and abuse of a minor child. The defendant, Jeffrey Epstein, at all times material to this cause of action, knew and should have known of the Plaintiff's minority.

15. The above-described acts were perpetrated upon the person of the then minor Plaintiff on numerous occasions.

COUNT I
Negligence Per Se, violation of criminal statutes

16. The plaintiff adopts and realleges paragraphs 1 through 15 above.

17. Defendant, Jeffrey Epstein, negligently injured Plaintiff, and/or failed to understand or appreciate that his conduct as alleged herein would injure Plaintiff, on

numerous occasions between approximately August 2002 and approximately September 2005.

18. In acting in the manner described in paragraphs 1 through 15, Defendant, Jeffrey Epstein, violated a duty to refrain from committing criminal actions against Plaintiff that proximately caused damages to Plaintiff.

19. In committing various crimes against Plaintiff, Defendant violated penal statutes that were designed to protect a class of persons, of which Plaintiff is a member, against a particular type of harm.

20. Particularly, the Florida Statutes which Epstein violated include, but may not be limited to:

A. Chapter 800.04(4-7) – Lewd or lascivious offenses; Defendant Epstein engaged in sexual activity with Plaintiff when Plaintiff was less than 16 years of age, and also encouraged or enticed her at that time to become involved in prostitution or some other act of sexual activity; Defendant also violated this statute by touching in a lewd or lascivious manner the breasts, genitals, genital area or buttocks, or the clothing covering them, of Plaintiff at a time when Plaintiff was less than 16 years old, or enticed Plaintiff at that time to so touch Epstein. Epstein masturbated in the presence of Plaintiff when Plaintiff was less than 16 years of age.

B. Section 827.04 – Contributing to the delinquency of a child; Defendant induced or endeavored to induce by act, threat, command, or persuasion, the then minor Plaintiff to commit or perform acts, follow a course of conduct, and live in

a manner that caused or tended to cause Plaintiff to become or remain delinquent, when he committed the acts described in paragraphs 12-15 above against Plaintiff.

C. Section 796.03 – Procuring a minor for prostitution; Defendant procured for prostitution, or caused to be prostituted, Plaintiff when Plaintiff was under the age of 18.

D. Section 796.07 – Prohibiting prostitution; Defendant owned, maintained and operated a place, to wit: his home located at 358 El Brillo Way, West Palm Beach, Palm Beach County, Florida, for the purpose of lewdness or prostitution, he received minors into his house for the purpose of lewdness or prostitution, and directed, took, transported, or offered or agreed to transport Plaintiff to and from his house with the reasonable belief that the purpose of such directing, taking, or transporting was lewdness or prostitution;

E. Section 796.045 – Sex trafficking; Defendant knowingly recruited, enticed, harbored, transported, or obtained Plaintiff, knowing that coercion would be used to cause Plaintiff to engage in prostitution;

F. Section 796.04 – Forcing, compelling, or coercing another to become a prostitute; Defendant coerced Plaintiff to become a prostitute; and

G. Section 39.01 (67) – Sexual abuse of a child; Defendant intruded into the genitals of Plaintiff, when Plaintiff was a child, and touched her genitals or intimate parts, he intentionally masturbated in front of her, he intentionally exposed his genitals in her presence, and encouraged Plaintiff to engage in prostitution.

21. As to each of the above referenced criminal statutes, Plaintiff was a member of the class of persons intended to be protected, the injury was of the type the statute intended to protect, and the injuries suffered by Plaintiff proximately resulted from the violation of the criminal statute.

22. As a direct and proximate result of Defendant, Jeffrey Epstein's acts on Plaintiff, the plaintiff has in the past suffered, and will in the future suffer, physical injury, pain and suffering, emotional distress, psychological trauma, mental anguish, humiliation, embarrassment, loss of self-esteem, loss of dignity, invasion of her privacy and other damages associated with Defendant, Jeffrey Epstein, controlling, manipulating and coercing her into a perverse and unconventional way of life for a minor. The then minor Plaintiff incurred medical and psychological expenses and the plaintiff will in the future suffer additional medical and psychological expenses. The plaintiff has suffered a loss of income, a loss of the capacity to earn income in the future, and a loss of the capacity to enjoy life. These injuries are permanent in nature and the Plaintiff will continue to suffer these losses in the future.

WHEREFORE, the plaintiff, E.W., demands judgment against the defendant, Jeffrey Epstein, for compensatory damages, punitive damages, and such other and further relief as this Court deems just and proper, and hereby demands trial by jury on all issues triable as of right by a jury.

COUNT II
Intentional Sexual Tort Per Se in Violation of Criminal Statutes

23. The plaintiff adopts and realleges paragraphs 1 through 15 above.

24. Defendant, Jeffrey Epstein, intentionally injured Plaintiff sexually on numerous occasions between approximately August 2002 and approximately September 2005, and further sexually exploited her and contributed to her delinquency during that time.

25. In sexually abusing, battering and exploiting Plaintiff in the manner described in paragraphs 1 through 15, Defendant, Jeffrey Epstein, violated a duty to refrain from committing criminal actions against Plaintiff that proximately caused damages to Plaintiff.

26. In committing various crimes against Plaintiff, Defendant violated penal statutes that were designed to protect a class of persons, of which Plaintiff is a member, against a particular type of harm.

27. Particularly, the Florida Statutes which Epstein violated include, but may not be limited to:

A. Chapter 800.04(4-7) – Lewd or lascivious offenses; Defendant Epstein engaged in sexual activity with Plaintiff when Plaintiff was less than 16 years of age, and also encouraged or enticed her at that time to become involved in prostitution or some other act of sexual activity; Defendant also violated this statute by touching in a lewd or lascivious manner the breasts, genitals, genital area or buttocks, or the clothing covering them, of Plaintiff at a time when Plaintiff was less than 16 years old, or enticed

Plaintiff at that time to so touch Epstein. Epstein masturbated in the presence of Plaintiff when Plaintiff was less than 16 years of age.

B. Section 827.04 – Contributing to the delinquency of a child; Defendant induced or endeavored to induce by act, threat, command, or persuasion, the then minor Plaintiff to commit or perform acts, follow a course of conduct, and live in a manner that caused or tended to cause Plaintiff to become or remain delinquent, when he committed the acts described in paragraphs 12-15 above against Plaintiff.

C. Section 796.03 – Procuring a minor for prostitution; Defendant procured for prostitution, or caused to be prostituted, Plaintiff when Plaintiff was under the age of 18.

D. Section 796.07 – Prohibiting prostitution; Defendant owned, maintained and operated a place, to wit: his home located at 358 El Brillo Way, West Palm Beach, Palm Beach County, Florida, for the purpose of lewdness or prostitution, he received minors into his house for the purpose of lewdness or prostitution, and directed, took, transported, or offered or agreed to transport Plaintiff to and from his house with the reasonable belief that the purpose of such directing, taking, or transporting was lewdness or prostitution;

E. Section 796.045 – Sex trafficking; Defendant knowingly recruited, enticed, harbored, transported, or obtained Plaintiff, knowing that coercion would be used to cause Plaintiff to engage in prostitution;

F. Section 796.04 – Forcing, compelling, or coercing another to become a prostitute; Defendant coerced Plaintiff to become a prostitute; and

G. Section 39.01 (67) – Sexual abuse of a child; Defendant intruded into the genitals of Plaintiff, when Plaintiff was a child, and touched her genitals or intimate parts, he intentionally masturbated in front of her, he intentionally exposed his genitals in her presence, and encouraged Plaintiff to engage in prostitution.

28. As to each of the above referenced criminal statutes, Plaintiff was a member of the class of persons intended to be protected, the injury was of the type the statute intended to protect, and the injuries suffered by Plaintiff proximately resulted from the violation of the criminal statute.

29. As a direct and proximate result of Defendant, Jeffrey Epstein's criminal acts on Plaintiff, the plaintiff has in the past suffered, and will in the future suffer, physical injury, pain and suffering, emotional distress, psychological trauma, mental anguish, humiliation, embarrassment, loss of self-esteem, loss of dignity, invasion of her privacy and other damages associated with Defendant, Jeffrey Epstein, controlling, manipulating and coercing her into a perverse and unconventional way of life for a minor. The then minor plaintiff incurred medical and psychological expenses and the plaintiff will in the future suffer additional medical and psychological expenses. The plaintiff has suffered a loss of income, a loss of the capacity to earn income in the future, and a loss of the capacity to enjoy life. These injuries are permanent in nature and the plaintiff will continue to suffer these losses in the future.

WHEREFORE, the plaintiff, E.W., demands judgment against the defendant, Jeffrey Epstein, for compensatory damages, punitive damages, and such other and

further relief as this Court deems just and proper, and hereby demands trial by jury on all issues triable as of right by a jury.

COUNT III
Cause of Action Pursuant to Florida Statute 796.09
Against Defendant, Jeffrey Epstein

30. The plaintiff adopts and realleges paragraphs 1 through 15 above.

31. The allegations contained herein in Count II are a separate and distinct legal remedy.

32. Defendant, Jeffrey Epstein, was a wealthy and powerful man, and Plaintiff was an economically disadvantaged and impressionable minor.

33. Defendant, Jeffrey Epstein, used his vast wealth and power to coerce Plaintiff into prostitution and/or coerced her to remain in prostitution.

34. Defendant, Jeffrey Epstein, coerced Plaintiff into prostitution in one or more of the following ways:

- A. Domination of her mind and body through exploitive techniques;
- B. Inducement;
- C. Promise of greater financial rewards;
- D. Exploitation of a condition of developmental disability, cognitive limitation, affective disorder, and/or substance dependency;
- E. Exploitation of human needs for food, shelter or affection;
- F. Exploitation of underprivileged and vulnerable economic condition or situation;

G. Use of a system of recruiting other similarly situated minor girls to further coerce and induce Plaintiff into the lifestyle of prostitution; and

H. Exploitation through demonstration of abundant wealth and power to impress a young and vulnerable then minor Plaintiff and to coerce her into prostitution.

35. As a direct and proximate result of the offenses committed by Defendant, Jeffrey Epstein, against Plaintiff pursuant to Florida Statutes §796.09, the plaintiff has in the past suffered, and will in the future suffer, physical injury, pain and suffering, emotional distress, psychological trauma, mental anguish, humiliation, embarrassment, loss of self-esteem, loss of dignity, invasion of her privacy and other damages associated with Defendant, Jeffrey Epstein, controlling, manipulating and coercing her into a perverse and unconventional way of life for a minor. The then minor Plaintiff incurred medical and psychological expenses and the plaintiff will in the future suffer additional medical and psychological expenses. The plaintiff has suffered a loss of income, a loss of the capacity to earn income in the future, and a loss of the capacity to enjoy life. These injuries are permanent in nature and the Plaintiff will continue to suffer these losses in the future.

WHEREFORE, the plaintiff, E.W., demands judgment against the defendant, Jeffrey Epstein, for compensatory damages, punitive damages, attorney's fees, and such other and further relief as this Court deems just and proper, and hereby demands trial by jury on all issues triable as of right by a jury.

COUNT IV
Intentional Infliction of Emotional Distress
Against Defendant, Jeffrey Epstein

36. The plaintiff adopts and realleges paragraphs 1 through 15 above.

37. The defendant, Jeffrey Epstein's conduct towards the then minor plaintiff was intentional and reckless and was outrageous in character, and so extreme in degree, going beyond all bounds of decency.

38. The defendant, Jeffrey Epstein's intentional, deliberate and reckless conduct caused severe emotional distress to the plaintiff. Defendant, at the time he committed these numerous sexual assaults on Plaintiff, had a specific intent to harm the then minor Plaintiff and his conduct did so harm the plaintiff.

39. As a direct and proximate result of the defendant, Jeffrey Epstein's intentional and reckless conduct, the plaintiff has in the past suffered and in the future will continue to suffer physical injury, pain and suffering, emotional distress, psychological trauma, mental anguish, humiliation, embarrassment, loss of self-esteem, loss of dignity, invasion of her privacy and other damages associated with the defendant, Jeffrey Epstein, controlling, manipulating and coercing her into a perverse and unconventional way of life for a minor. The then minor Plaintiff incurred medical and psychological expenses and the plaintiff will in the future suffer additional medical and psychological expenses. The plaintiff has suffered a loss of income, a loss of the capacity to earn income in the future, and a loss of the capacity to enjoy life. These injuries are permanent in nature and the plaintiff will continue to suffer these losses in the future.

WHEREFORE, the plaintiff, E.W., demands judgment against the defendant, Jeffrey Epstein, for compensatory damages, punitive damages, and such other and further relief as this Court deems just and proper, and hereby demands trial by jury on all issues triable as of right by a jury.

COUNT IV
Battery

40. The plaintiff, E.W., repeats and realleges paragraphs 1 through 15 above.

41. On numerous occasions, Defendant Epstein did in fact intentionally touch plaintiff, E.W., on her person against her will and/or without her legal consent.

42. Defendant Epstein battered Plaintiff sexually, in that he touched her in intimate areas of her body and person in an offensive manner while she was a minor child, and therefore the touchings were without legal consent.

43. Defendant Epstein touched her in intimate areas of her body on dozens of occasions between approximately August 2002 and September 2005.

44. The conduct described in this count constitutes battery against the person of the then minor Plaintiff.

45. As a direct and proximate result of Defendant, Jeffrey Epstein's battery on Plaintiff, the plaintiff has in the past suffered, and will in the future suffer, physical injury, pain and suffering, emotional distress, psychological trauma, mental anguish, humiliation, embarrassment, loss of self-esteem, loss of her childhood, loss of dignity, invasion of her privacy and other damages associated with Defendant, Jeffrey Epstein, controlling, manipulating and coercing her into a perverse and unconventional way of life for a minor. The then minor Plaintiff incurred medical and psychological expenses

and Plaintiff will in the future suffer additional medical and psychological expenses. Plaintiff has suffered a loss of income, a loss of the capacity to earn income in the future, and a loss of the capacity to enjoy life. These injuries are permanent in nature and Plaintiff will continue to suffer these losses in the future.

WHEREFORE, Plaintiff, demands judgment against the defendant, Jeffrey Epstein, for compensatory damages, punitive damages, and such other and further relief as this Court deems just and proper, and hereby demands trial by jury on all issues triable as of right by a jury.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing has been provided this 20th day of May 2010 via U.S. Mail and email transmittal to all those on the attached service list.

**Farmer, Jaffe, Weissing,
Edwards, Fistos & Lehrman, P.L.**
425 N. Andrews Ave., Suite 2
Fort Lauderdale, FL 33301



By:

A handwritten signature in black ink, appearing to read 'Bradley J. Edwards', written over a horizontal line.

BRADLEY J. EDWARDS
Florida Bar No.: 542075

SERVICE LIST

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STATE OF FLORIDA • PALM BEACH COUNTY

I hereby certify that the foregoing is a true copy of the record in my office.

THIS 19 DAY OF January 20 12

SHARON R. BOCK
CLERK & COMPTROLLER

By *Arundelle K. Hylton*
DEPUTY CLERK