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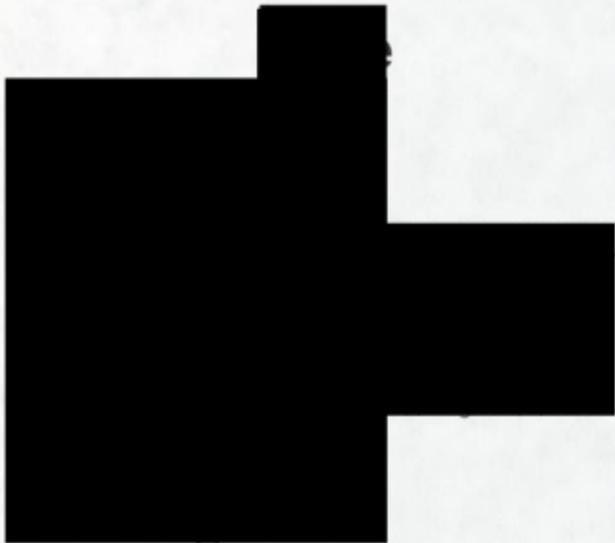
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[redacted] 6 28 07 ...till the day we die 1 ; and thats a promise

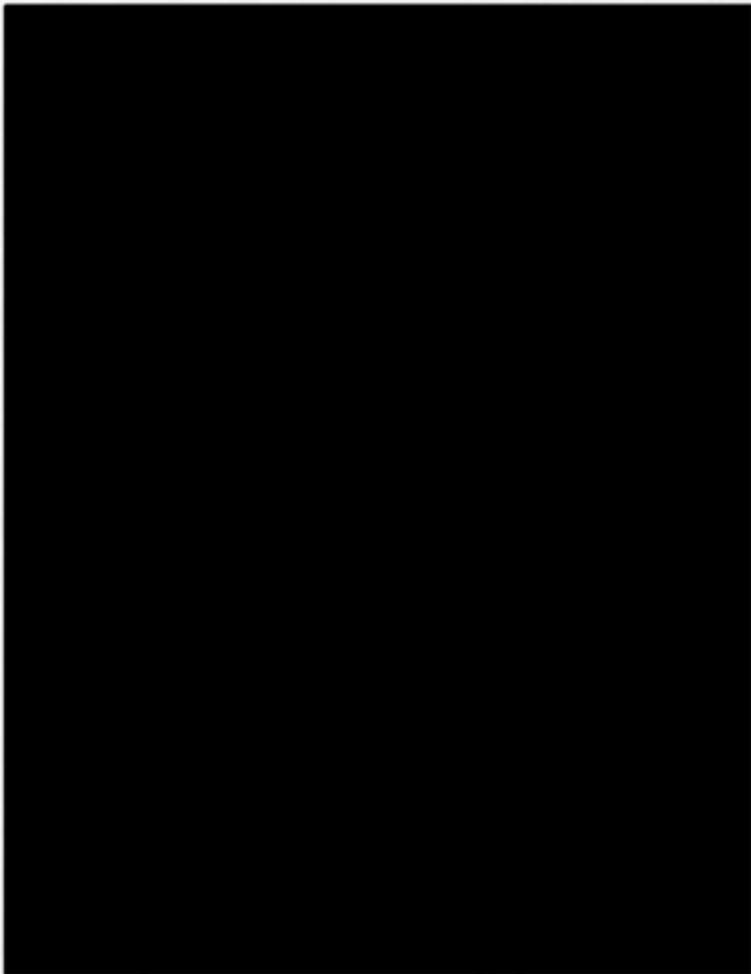
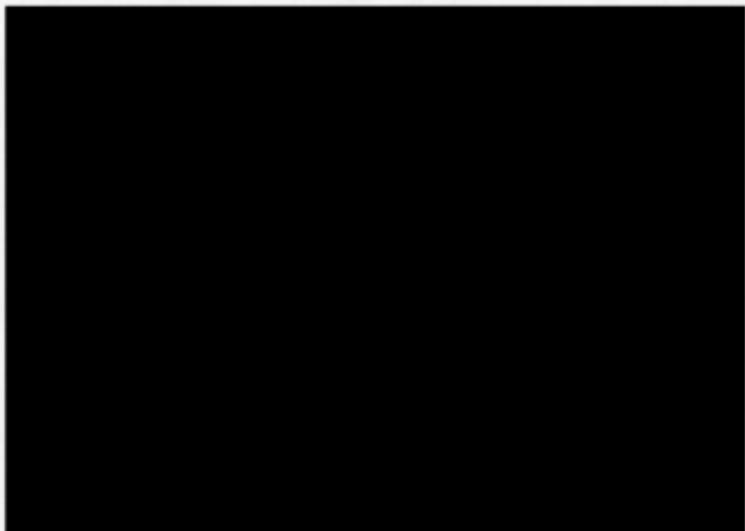


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myspace url:  
[http://www.myspace.com/\[redacted\]](http://www.myspace.com/[redacted])

[redacted]  
[redacted]



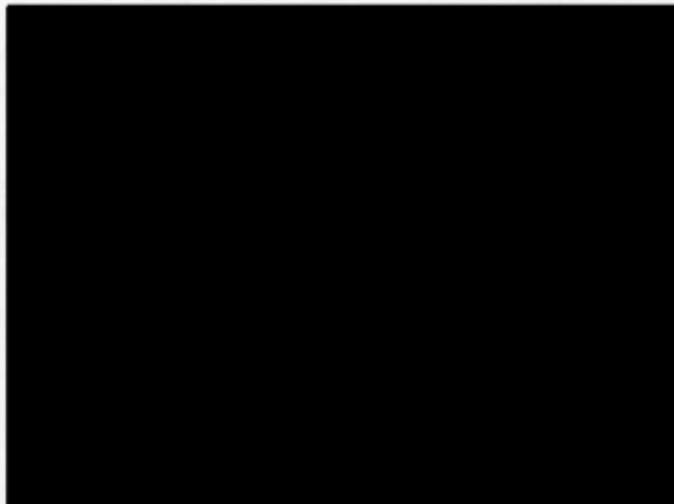
displaying 50 of 291 comments ( view all | add comment )

[redacted] [redacted]

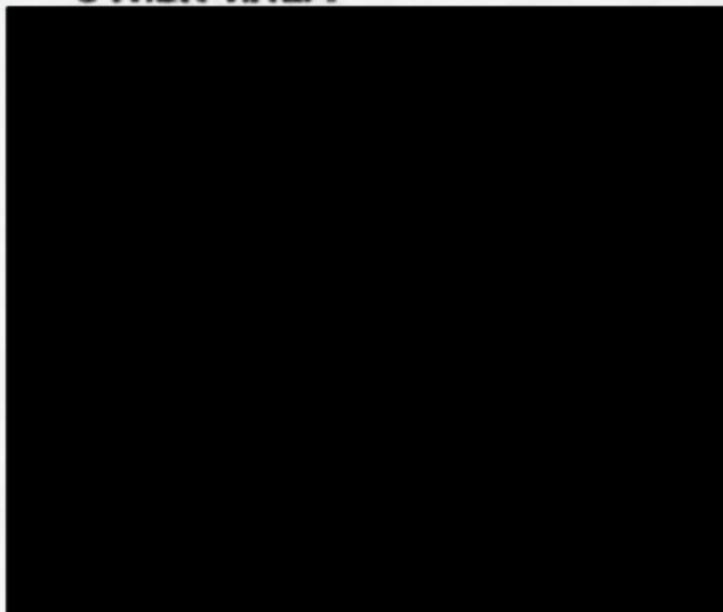
[redacted] jan 30 2008 1:37 pm

hey how are you?

♥BabyYourMyEverything♥



**BEST FRIEND.  
SISTER.  
OTHER HALF.**



jan 29 2008 4:47 pm



jan 29 2008 9:03 am



jan 29 2008 8:58 am



jan 29 2008 8:50 am



jan 27 2008 9:37 am



**THIS IS WHAT  
BESTFRIENDS  
LOOK LIKE.** 



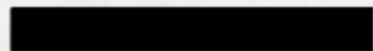
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jan 24 2008 8:25 pm



jan 24 2008 8:16 pm



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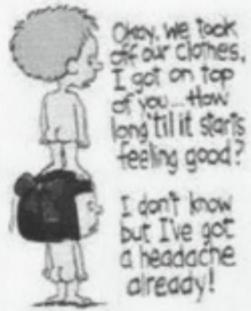


jan 24 2008 6:48 pm



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married  
straight  
taurus

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jan 23 2008 11:59 am

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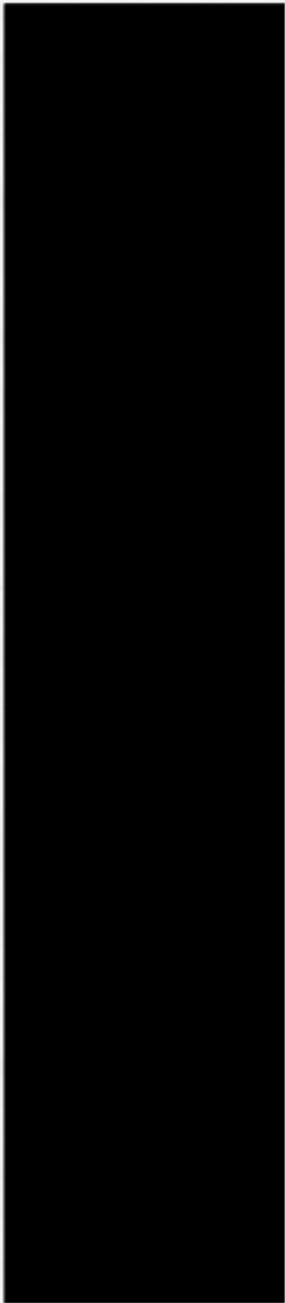
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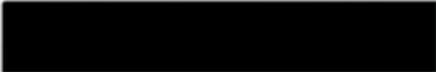
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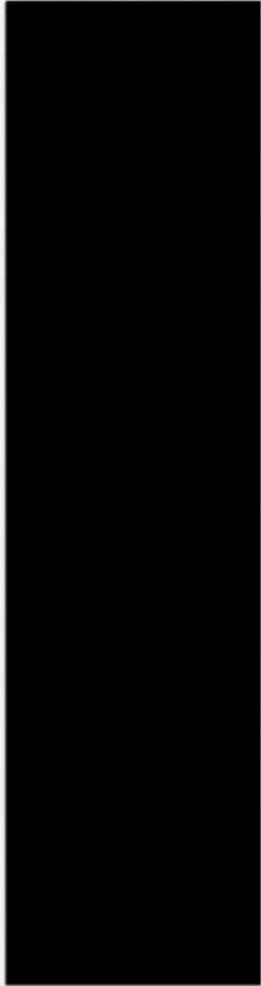


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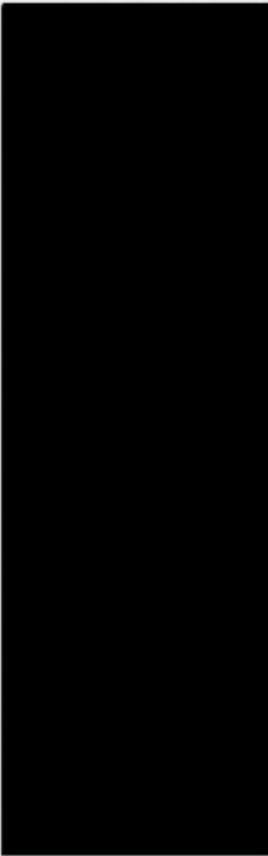


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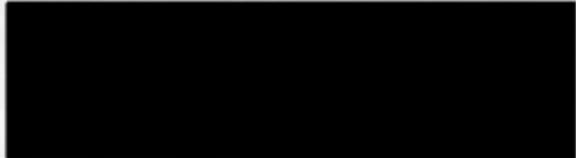
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jan 20 2008 10:14 am



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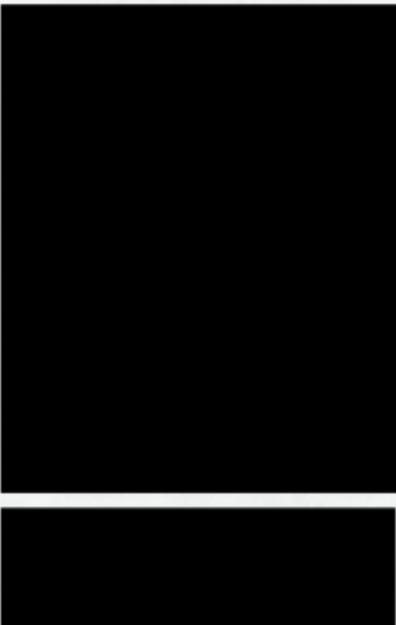
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**STATE OF FLORIDA**  
**Department of Highway Safety & Motor Vehicles**  
 Driver And Vehicle Information Database (DAVID)

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 S. 322.142(4), FLORIDA STATUTES - IMAGES INCLUDE PHOTOGRAPHS AND SIGNATURES

**Individual Summary Page**



DL/ID Number      Class      Status  
 [REDACTED]      E      VALID

[REDACTED]  
 LOXAHATCHEE FL 33470

All Addresses On File

Date of Birth      Sex      Height      State Of Birth  
 [REDACTED]      M      6'00      Florida

Restrictions      Endorsements

Issue Date    Duplicate    Expiration Date  
 05-30-06    Date      03-23-13

SSN      Form Number  
 [REDACTED]      [REDACTED]

Conditional Messages: **MOTORCYCLE TEMPORARY PERMIT UNTIL:** [REDACTED] **SAFE DRIVER**

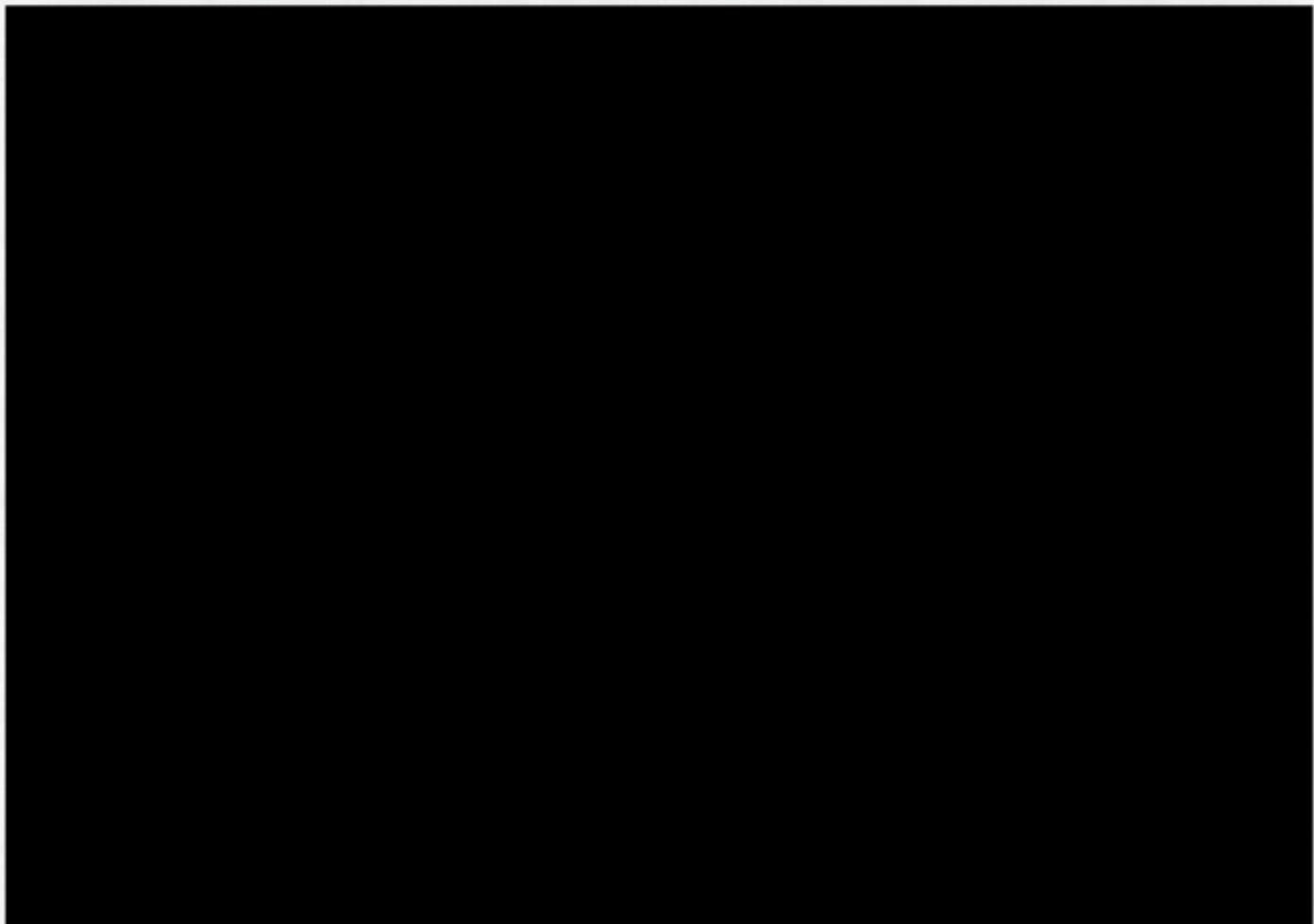
Law enforcement officers may continue to accept the insurance card indicating Property Damage only, as also including PIP, until June 30, 2008.

Vehicle Information							
Record	VIN	Type	Color	Body	Make	Acquired Date	Reg
View	[REDACTED]	TRUCK	ALUMINUM/ SILVER	TRUCK	DODGE	08-31-05	[REDACTED]
View	[REDACTED]	MOTORCYCLE	RED	MOTORCYCLE	HONDA	07-18-07	[REDACTED]

Driver License Transactions								
Record	DL/ID Number	Transaction Date	Issue Date	Update Time	Lic Type	Issue Type	Change Type	FL Disp
View	[REDACTED]	11-14-07	05-30-06	11-14-07 10:18:48	EXO	Exam Only		
View	[REDACTED]	05-30-06	05-30-06	05-31-06 18:25:23	DL	Renewal/CIPS		
View	[REDACTED]	12-09-05	06-20-00	12-12-05 17:47:22	DL	Address Change/CIPS		
View	[REDACTED]	04-28-05	06-20-00	04-29-05 00:06:53	DL	Duplicate	None	Lost

<a href="#">View</a>	[REDACTED]	10-24-03	06-20-00	10-24-03 15:56:05	DL	Duplicate	None	Lost
<a href="#">View</a>		03-23-01	06-20-00	03-23-01 10:07:42	DL	Replacement	None	Surrendered
<a href="#">View</a>		06-20-00	06-20-00	06-20-00 08:18:06	LL	Original	None	

- Historical Driver License Activity
- Vehicle Insurance
- Previous Vehicles
- Photo Array
- Signature Array
- New Search
- Main Menu



UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA

CASE NO.:

08-80069

JANE DOE NO. 1, by and through  
JANE DOE's FATHER as parent and natural  
guardian, and JANE DOE's FATHER, and  
JANE DOE's STEPMOTHER, individually,

Plaintiffs,

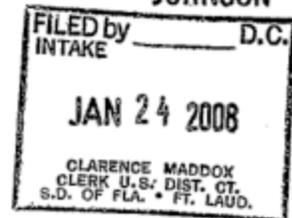
vs.

JEFFREY EPSTEIN,

Defendant.

**CIV-MARRA**

**MAGISTRATE JUDGE  
JOHNSON**



**COMPLAINT**

Plaintiff, Jane Doe No. 1 ("Jane" or "Jane Doe"), by and through Jane Doe's Father as parent and natural guardian, and Jane Doe's Father and Jane Doe's Stepmother, individually, bring this Complaint against Jeffrey Epstein, as follows:

**Parties, Jurisdiction and Venue**

1. Jane Doe is a citizen and resident of the State of Florida. She is a minor under the age of 18 years.
2. Jane Doe's Father brings this action individually and as parent and natural guardian of Jane Doe. Jane Doe's Father is a citizen and resident of the State of Florida.
3. Jane Doe's Stepmother brings this action individually. Jane Doe's Stepmother is a citizen and resident of the State of Florida.
4. This Complaint is brought under fictitious names to protect the identity of the Minor Plaintiff because this Complaint makes sensitive allegations of sexual assault and abuse upon a

minor.

5. Defendant Jeffrey Epstein is a citizen and resident of the State of New York.

6. This is an action for damages in excess of \$50 million.

7. This Court has jurisdiction of this action and the claims set forth herein pursuant to 28 U.S.C. §1332(a), as the matter in controversy (i) exceeds \$75,000, exclusive of interest and costs; and (ii) is between citizens of different states.

8. This Court has venue of this action pursuant to 28 U.S.C. §1391(a) as a substantial part of the events or omissions giving rise to the claim occurred in this District.

#### **Factual Allegations**

9. At all relevant times, Defendant Jeffrey Epstein ("Epstein") was an adult male, 52 years old. Epstein is a financier and money manager with a secret clientele limited exclusively to billionaires. He is himself a man of tremendous wealth, power and influence. He maintains his principal home in New York and also owns residences in New Mexico, St. Thomas and Palm Beach, FL. The allegations herein concern Epstein's conduct while at his lavish estate in Palm Beach.

10. Upon information and belief, Epstein has a sexual preference and obsession for underage minor girls. He engaged in a plan and scheme in which he gained access to primarily economically disadvantaged minor girls in his home, sexually assaulted these girls, and then gave them money. In or about 2005, Jane Doe, then 14 years old, fell into Epstein's trap and became one of his victims.

11. Upon information and belief, Jeffrey Epstein carried out his scheme and assaulted girls in Florida, New York and on his private island, known as Little St. James, in St. Thomas.

12. An integral player in Epstein's Florida scheme was [REDACTED], a Palm Beach

Community College student from Loxahatchee, Florida. She recruited girls ostensibly to give a wealthy man a massage for monetary compensation in his Palm Beach mansion. Under Epstein's plan, Ms. Robson would be contacted when Epstein was planning to be at his Palm Beach residence or soon after he had arrived there. Epstein or someone on his behalf directed Ms. Robson to bring one or more underage girls to the residence. Ms. Robson, upon information and belief, generally sought out economically disadvantaged underage girls from Loxahatchee and surrounding areas who would be enticed by the money being offered - generally \$200 to \$300 per "massage" session - and who were perceived as less likely to complain to authorities or have credibility if allegations of improper conduct were made. This was an important element of Epstein's plan.

13. Epstein's plan and scheme reflected a particular pattern and method. Upon arrival at Epstein's mansion, Mr. Robson would introduce each victim to [REDACTED], Epstein's assistant, who gathered the girl's personal information, including her name and telephone number. Ms. Kellen would then bring the girl up a flight of stairs to a bedroom that contained a massage table in addition to other furnishings. There were photographs of nude women lining the stairway hall and in the bedroom. Ms. Kellen would then leave the girl alone in this room, whereupon Epstein would enter wearing only a towel. He would then remove his towel, lay down naked on the massage table, and direct the girl to remove her clothes. He then would perform one or more lewd, lascivious and sexual acts, including masturbation and touching the girl's vagina with a vibrator.

14. Consistent with the foregoing plan and scheme, Ms. Robson recruited Jane Doe to give Epstein a massage for monetary compensation. Ms. Robson brought Jane to Epstein's mansion in Palm Beach. Jane was introduced to [REDACTED], who led her up the flight of stairs to the room with the massage table. She was alone in the room when Epstein arrived wearing only a towel. He

removed his towel, and laid down naked on the massage table. He demanded that Jane remove her clothes. In shock, fear and trepidation, Jane complied, removing her clothes except for her underwear. Epstein then sexually assaulted Jane.

15. After Epstein had completed the assault, he left the room. Jane was then able to get dressed, leave the room and go back down the stairs. She then met Ms. Robson again who brought Jane home. Jane was paid \$300 by Epstein. Ms. Robson was paid \$200 by Epstein for bringing Jane to him.

16. As a result of this encounter with Epstein, the 14-year old Jane experienced confusion, shame, humiliation, embarrassment and the assault sent her life into a downward spiral.

**COUNT I**  
**Sexual Assault**

17. Plaintiff Jane Doe by and through her Father, as parent and natural guardian, repeats and realleges paragraphs 1 through 16 above.

18. Epstein tortiously assaulted Jane Doe sexually in or about 2005.

19. This sexual assault was in violation of Chapter 800 of the Florida Statutes, which recognizes as a crime the lewd and lascivious acts committed by Epstein upon Jane.

20. As a direct and proximate result of Epstein's assault on Jane, she has suffered and will continue to suffer severe and permanent traumatic injuries, including mental, psychological and emotional damages.

WHEREFORE, Plaintiff Jane Doe, by and through her Father, as parent and natural guardian, demands judgment against Defendant Jeffrey Epstein for compensatory damages, punitive damages, costs, and such other and further relief as this Court deems just and proper.

**COUNT II**  
**Intentional Infliction of Emotional Distress**

21. Plaintiffs Jane Doe by and through her Father, as parent and natural guardian, Jane Doe's Father and Jane Doe's Stepmother, individually, repeat and reallege paragraphs 1 through 16 above.

22. Epstein's conduct was intentional or reckless.

23. Epstein's conduct was outrageous, going beyond all bounds of decency.

24. Epstein's conduct caused severe emotional distress not only to Jane Doe, but also to her parents, Jane Doe's Father and Jane Doe's Stepmother. Epstein knew or had reason to know that his intentional and outrageous conduct would cause emotional trauma and damage to Jane Doe's parents.

25. As a direct and proximate result of Epstein's intentional or reckless conduct, Jane Doe, Jane Does' Father and Jane Doe's Stepmother have suffered and will continue to suffer severe mental anguish and pain.

WHEREFORE, Plaintiffs Jane Doe by and through her Father, as parent and natural guardian, Jane Doe's Father and Jane Doe's Stepmother demand judgment against Defendant Jeffrey Epstein for compensatory damages, costs, punitive damages, and such other and further relief as this Court deems just and proper.

**COUNT III**  
**Loss of Parental Consortium**

26. Plaintiff Jane Doe's Father repeats and realleges paragraphs 1 through 16 above.

27. Epstein's tortious conduct is the direct and proximate cause of damages to Jane Doe's Father, consisting of parental loss of comfort, companionship and society and healthcare costs

associated with the treatment of Jane.

28. Jane Doe's Father experienced and will continue to experience great mental anguish, pain and suffering from the time that Defendant's tortious conduct occurred.

WHEREFORE, Plaintiff Jane Doe's Father demands judgment for loss of consortium damages, costs and such other and further relief as this Court deems proper.

**JURY TRIAL DEMAND**

Plaintiffs demand a jury trial in this action.

Dated: January 24, 2008

Respectfully submitted,

HERMAN & MERMELSTEIN, P.A.  
*Attorneys for Plaintiffs*  
18205 Biscayne Blvd.  
Suite 2218  
Miami, Florida 33160  
Tel: 305-931-2200  
Fax: 305-931-0877

By: \_\_\_\_\_

  
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## Billionaire investor sued for alleged sexual assault of teen

THE ASSOCIATED PRESS

WEST PALM BEACH, Fla. -- Another woman is suing a New York billionaire, claiming he sexually assaulted her when she was underage.

The unidentified woman says she was 16 when she was brought to Jeffrey Epstein's Palm Beach mansion and paid \$200 to give the money manager a massage. Instead, she claims he abused her.

The suit filed Wednesday in federal court is seeking more than \$50 million in damages from Epstein.

Another teenage girl made similar claims against Epstein in a lawsuit filed last month.

Epstein also faces a felony charge of solicitation of prostitution. A conviction could send him to prison for five years.

Epstein's attorney has denied the allegations, but did not return phone messages Wednesday.

Last modified: February 06, 2008 12:01PM

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UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA

CASE NO.:

JANE DOE NO. 2,

Plaintiff,

vs.

JEFFREY EPSTEIN,

Defendant.

---

**COMPLAINT**

Plaintiff, Jane Doe No. 2 ("Jane" or "Jane Doe"), brings this Complaint against Jeffrey Epstein, as follows:

**Parties, Jurisdiction and Venue**

1. Jane Doe No. 2 is a citizen and resident of the Commonwealth of Virginia, and is sui juris.
2. This Complaint is brought under a fictitious name to protect the identity of the Plaintiff because this Complaint makes sensitive allegations of sexual assault and abuse upon a minor.
3. Defendant Jeffrey Epstein is a citizen and resident of the State of New York.
4. This is an action for damages in excess of \$50 million.
5. This Court has jurisdiction of this action and the claims set forth herein pursuant to 28 U.S.C. §1332(a), as the matter in controversy (i) exceeds \$75,000, exclusive of interest and costs; and (ii) is between citizens of different states.
6. This Court has venue of this action pursuant to 28 U.S.C. §1391(a) as a substantial

part of the events or omissions giving rise to the claim occurred in this District.

### **Factual Allegations**

7. At all relevant times, Defendant Jeffrey Epstein (“Epstein”) was an adult male, 52 years old. Epstein is a financier and money manager with a secret clientele limited exclusively to billionaires. He is himself a man of tremendous wealth, power and influence. He maintains his principal home in New York and also owns residences in New Mexico, St. Thomas and Palm Beach, FL. The allegations herein concern Epstein’s conduct while at his lavish estate in Palm Beach.

8. Upon information and belief, Epstein has a sexual preference and obsession for underage minor girls. He engaged in a plan and scheme in which he gained access to primarily economically disadvantaged minor girls in his home, sexually assaulted these girls, and then gave them money. In or about 2004-2005, Jane Doe, then approximately 16 years old, fell into Epstein’s trap and became one of his victims.

9. Upon information and belief, Jeffrey Epstein carried out his scheme and assaulted girls in Florida, New York and on his private island, known as Little St. James, in St. Thomas.

10. Epstein’s scheme involved the use of young girls to recruit underage girls. (Upon information and belief, the young girl who brought Jane Doe to Epstein was herself a minor victim of Epstein, and will therefore not be named in this Complaint). Under Epstein’s plan, underage girls were recruited ostensibly to give a wealthy man a massage for monetary compensation in his Palm Beach mansion. The recruiter would be contacted when Epstein was planning to be at his Palm Beach residence or soon after he had arrived there. Epstein or someone on his behalf would direct the recruiter to bring one or more underage girls to the residence. The recruiter, upon information and belief, generally sought out economically disadvantaged underage girls from western Palm Beach County who would be enticed by the money being offered - generally \$200 to \$300 per

“massage” session - and who were perceived as less likely to complain to authorities or have credibility if allegations of improper conduct were made. This was an important element of Epstein’s plan.

11. Epstein’s plan and scheme reflected a particular pattern and method. Upon arrival at Epstein’s mansion, the underage victim would be introduced to [REDACTED], Epstein’s assistant, who gathered the girl’s personal information, including her name and telephone number. Ms. Kellen would then bring the girl up a flight of stairs to a bedroom that contained a massage table in addition to other furnishings. There were photographs of nude women lining the stairway hall and in the bedroom. The girl would then find herself alone in the room with Epstein, who would be wearing only a towel. He would then remove his towel and lie naked on the massage table, and direct the girl to remove her clothes. Epstein would then perform one or more lewd, lascivious and sexual acts, including masturbation and touching the girl’s vagina.

12. Consistent with the foregoing plan and scheme, Jane Doe was recruited to give Epstein a massage for monetary compensation. Jane was brought to Epstein’s mansion in Palm Beach. Once at the mansion, Jane was introduced to [REDACTED], who led her up the flight of stairs to the room with the massage table. In this room, Epstein told Jane to take off her clothes and give him a massage. Jane kept her panties and bra on and complied with Epstein’s instructions. Epstein wore only a towel around his waste. After a short period of time, Epstein removed the towel and rolled over exposing his penis. Epstein began to masturbate and he sexually assaulted Jane.

13. After Epstein had completed the assault, Jane was then able to get dressed, leave the room and go back down the stairs. Jane was paid \$200 by Epstein. The young girl who recruited Jane was paid \$100 by Epstein for bringing Jane to him.

14. As a result of this encounter with Epstein, Jane experienced confusion, shame,

humiliation and embarrassment, and has suffered severe psychological and emotional injuries.

**COUNT I**  
**Sexual Assault**

15. Plaintiff Jane Doe repeats and realleges paragraphs 1 through 14 above.

16. Epstein tortiously assaulted Jane Doe sexually. Epstein's acts were intentional, unlawful, offensive and harmful.

17. Epstein's plan and scheme in which he committed such acts upon Jane Doe were done willfully and maliciously.

18. This sexual assault was in violation of Chapter 800 of the Florida Statutes, which recognizes as a crime the lewd and lascivious acts committed by Epstein upon Jane.

19. As a direct and proximate result of Epstein's assault on Jane, she has suffered and will continue to suffer severe and permanent traumatic injuries, including mental, psychological and emotional damages.

WHEREFORE, Plaintiff Jane Doe No. 2 demands judgment against Defendant Jeffrey Epstein for compensatory damages, punitive damages, costs, and such other and further relief as this Court deems just and proper.

**COUNT II**  
**Intentional Infliction of Emotional Distress**

20. Plaintiff Jane Doe repeats and realleges paragraphs 1 through 14 above.

21. Epstein's conduct was intentional or reckless.

22. Epstein's conduct was outrageous, going beyond all bounds of decency.

23. Epstein's conduct caused severe emotional distress to Jane Doe. Epstein knew or had reason to know that his intentional and outrageous conduct would cause emotional trauma and damage to Jane Doe.

24. As a direct and proximate result of Epstein's intentional or reckless conduct, Jane Doe, has suffered and will continue to suffer severe mental anguish and pain.

WHEREFORE, Plaintiff Jane Doe No. 2 demands judgment against Defendant Jeffrey Epstein for compensatory damages, costs, punitive damages, and such other and further relief as this Court deems just and proper.

**JURY TRIAL DEMAND**

Plaintiffs demand a jury trial in this action.

Dated: February \_\_, 2008

Respectfully submitted,

HERMAN & MERMELSTEIN, P.A.  
*Attorneys for Plaintiffs*  
18205 Biscayne Blvd.  
Suite 2218  
Miami, Florida 33160  
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By: \_\_\_\_\_  
Jeffrey M. Herman  
[jherman@hermanlaw.com](mailto:jherman@hermanlaw.com)  
Florida Bar No. 521647  
Stuart S. Mermelstein  
[smermelstein@hermanlaw.com](mailto:smermelstein@hermanlaw.com)  
Florida Bar No. 947245  
Adam D. Horowitz  
Florida Bar No. 376980  
[ahorowitz@hermanlaw.com](mailto:ahorowitz@hermanlaw.com)

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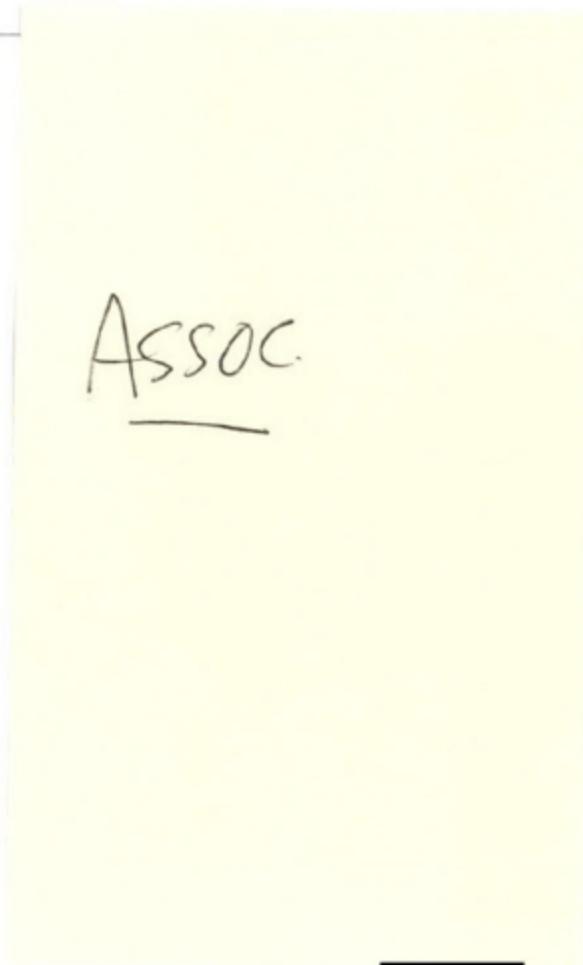
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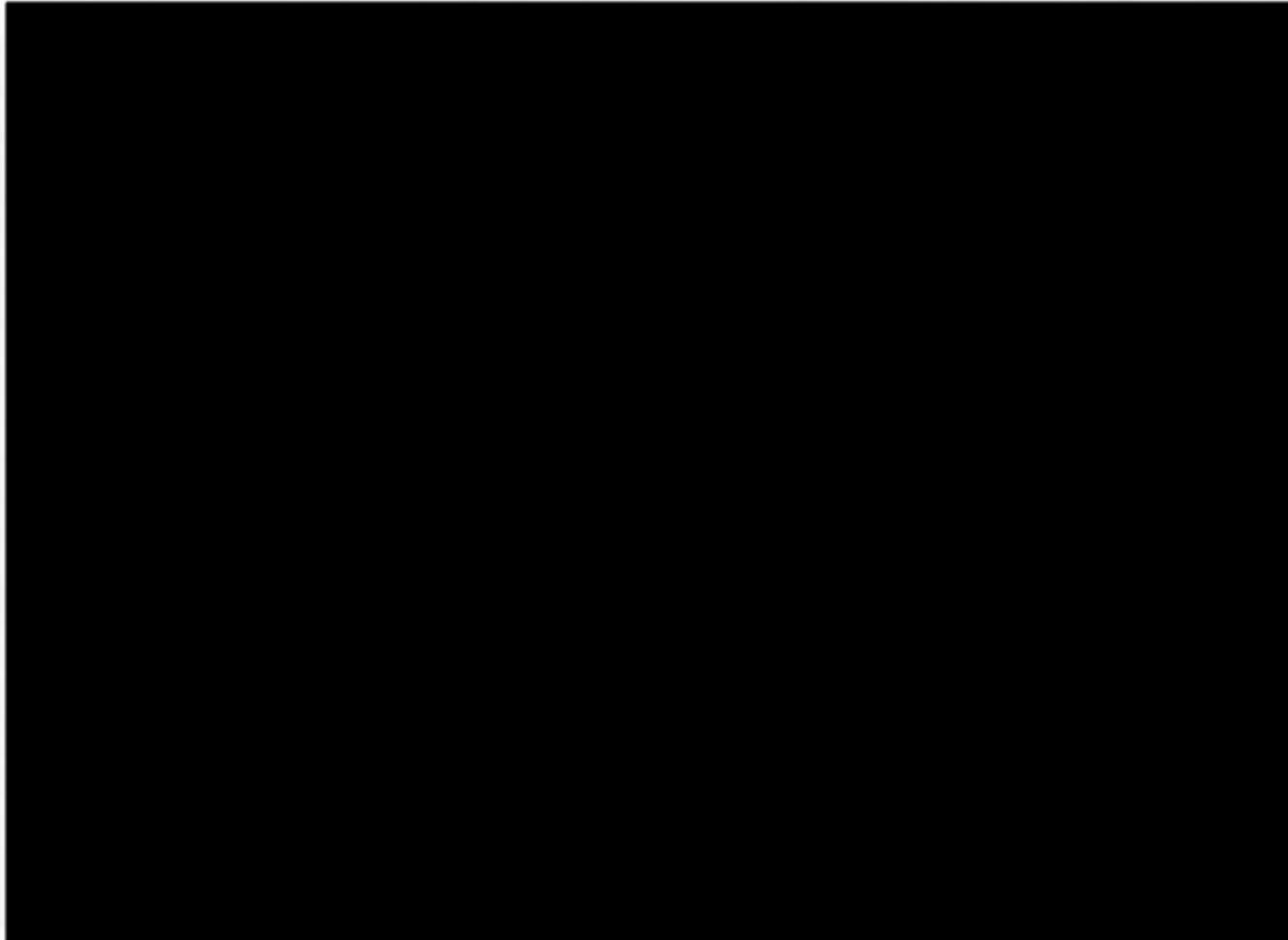
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[REDACTED]	<b>December 18, 2007 9:58 AM</b> thats whats up lol ahaha ...

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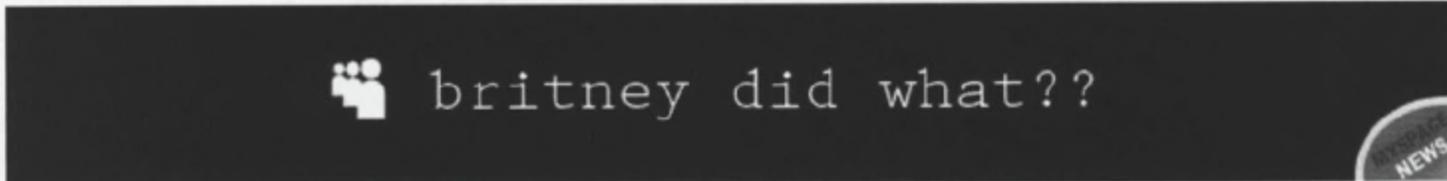
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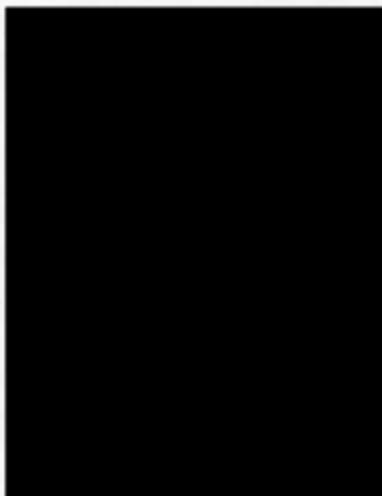
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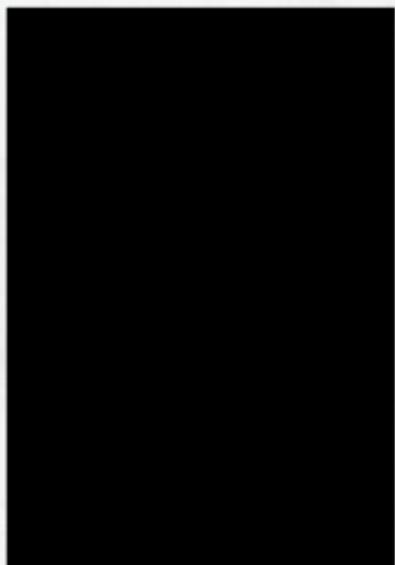
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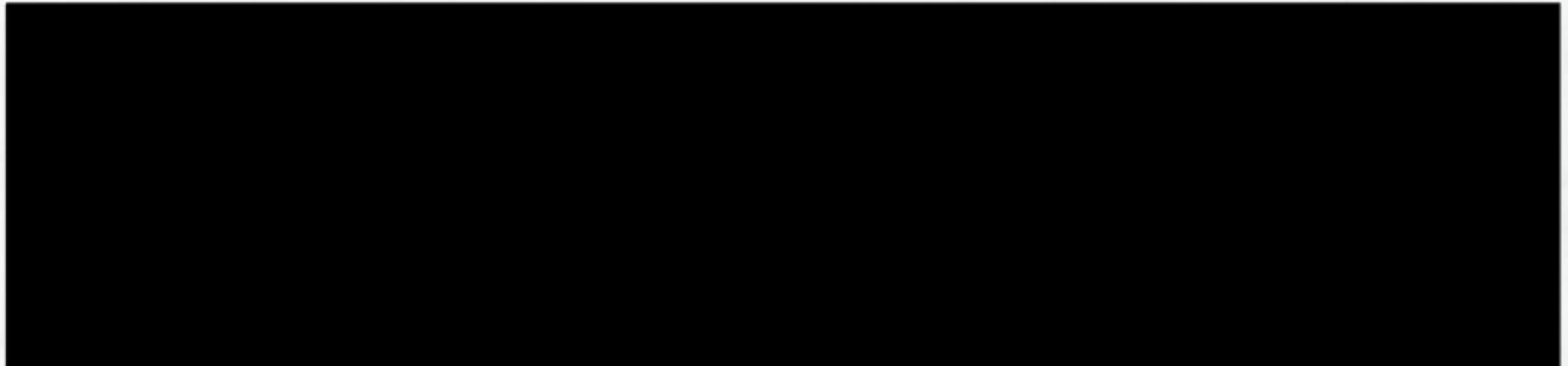


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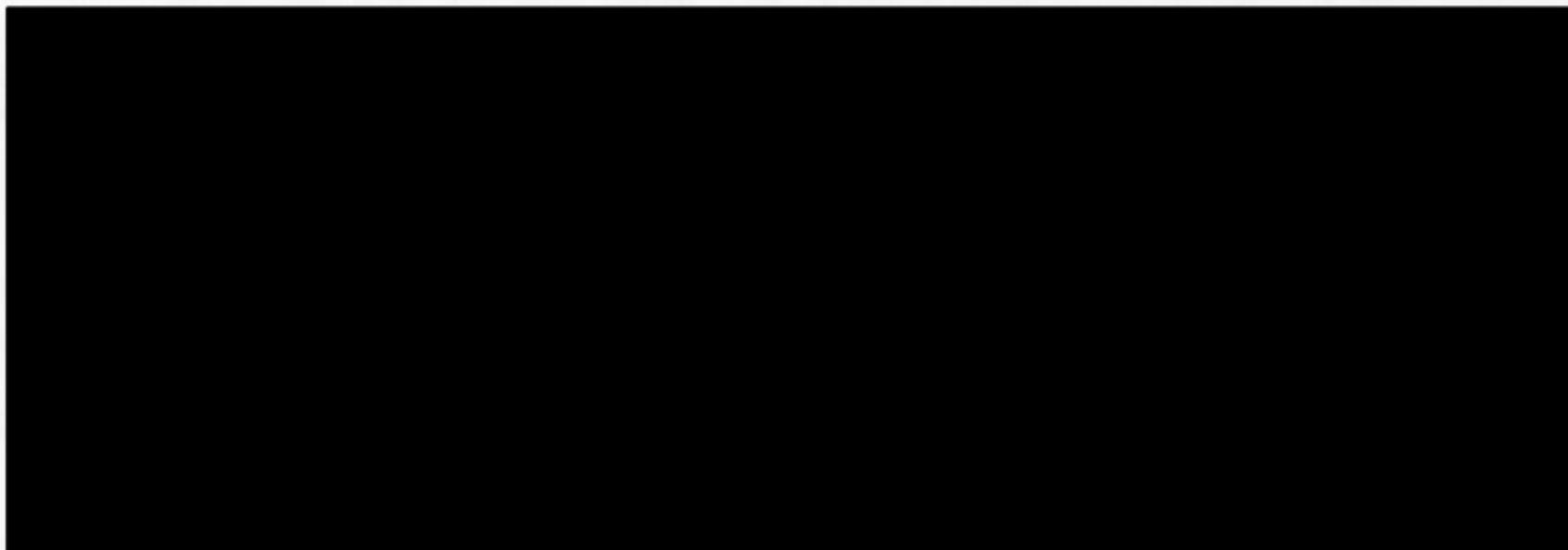


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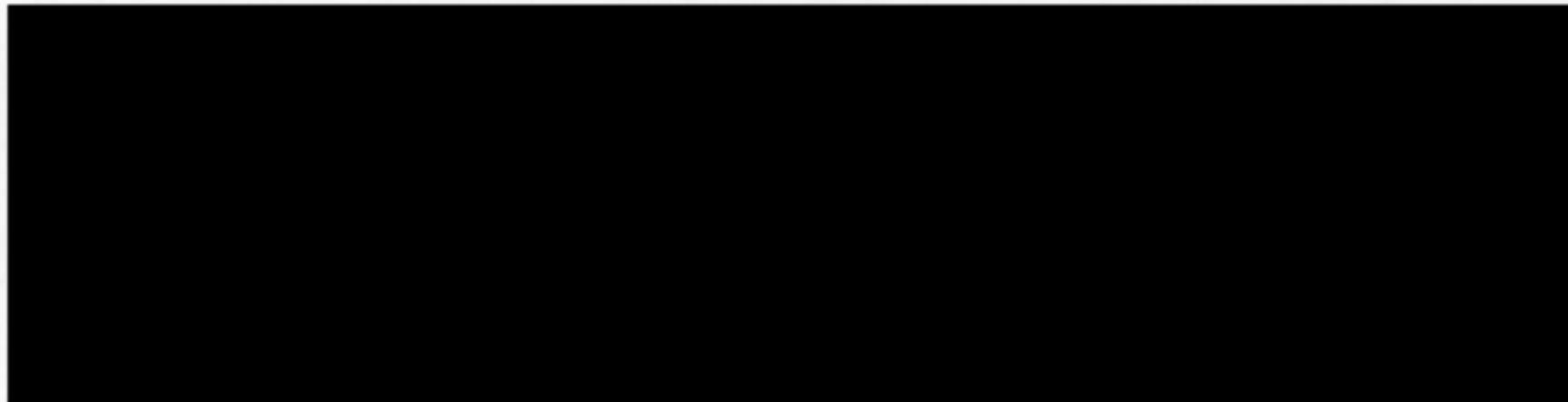
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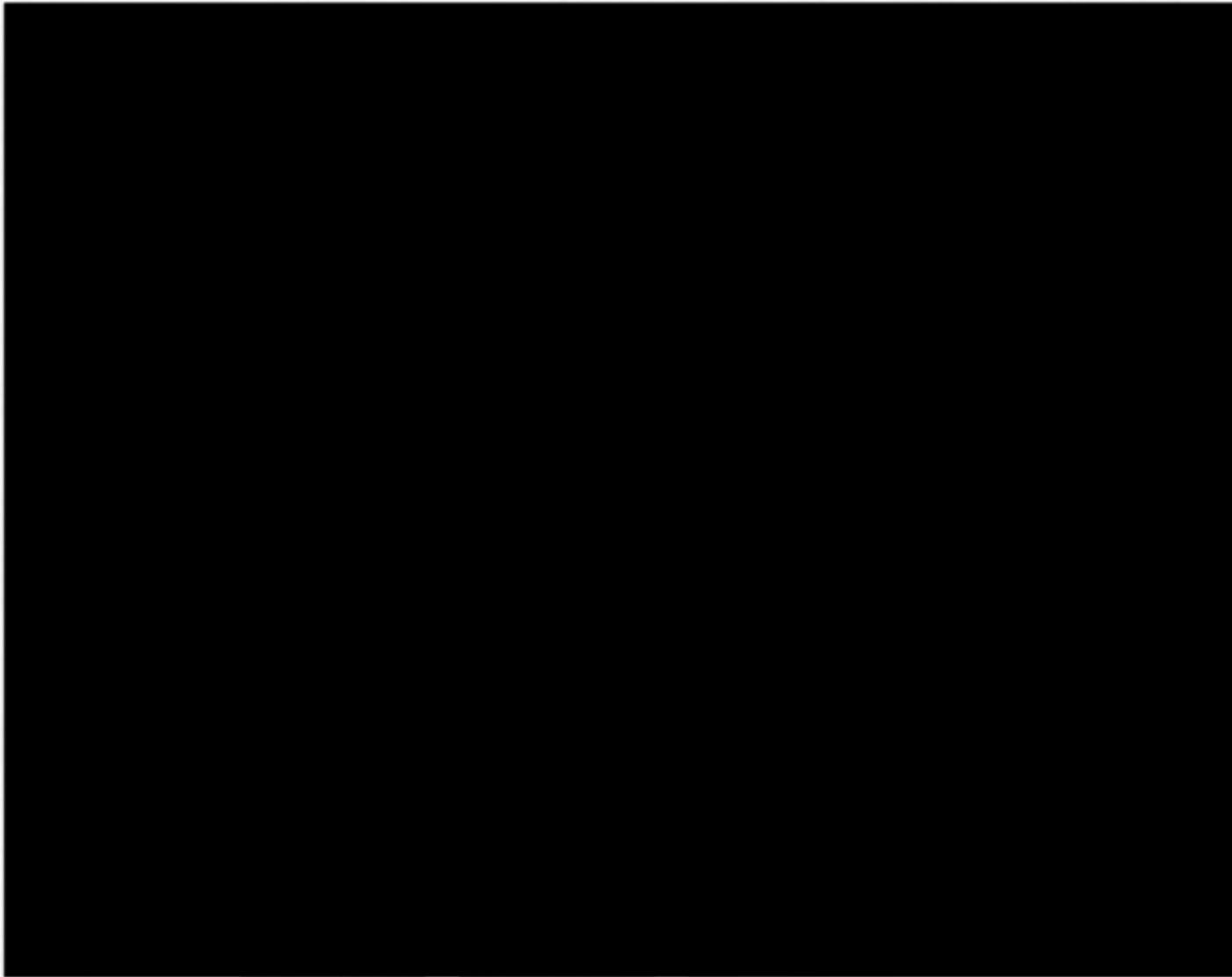
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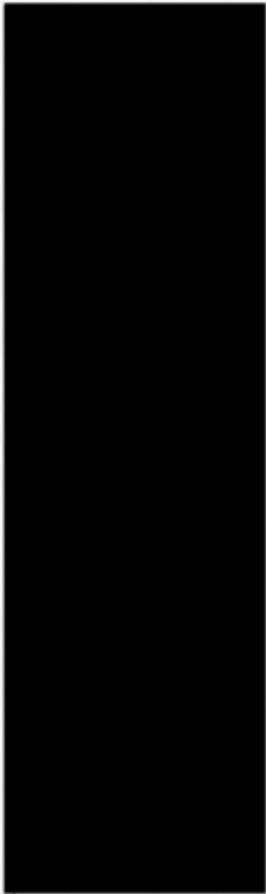


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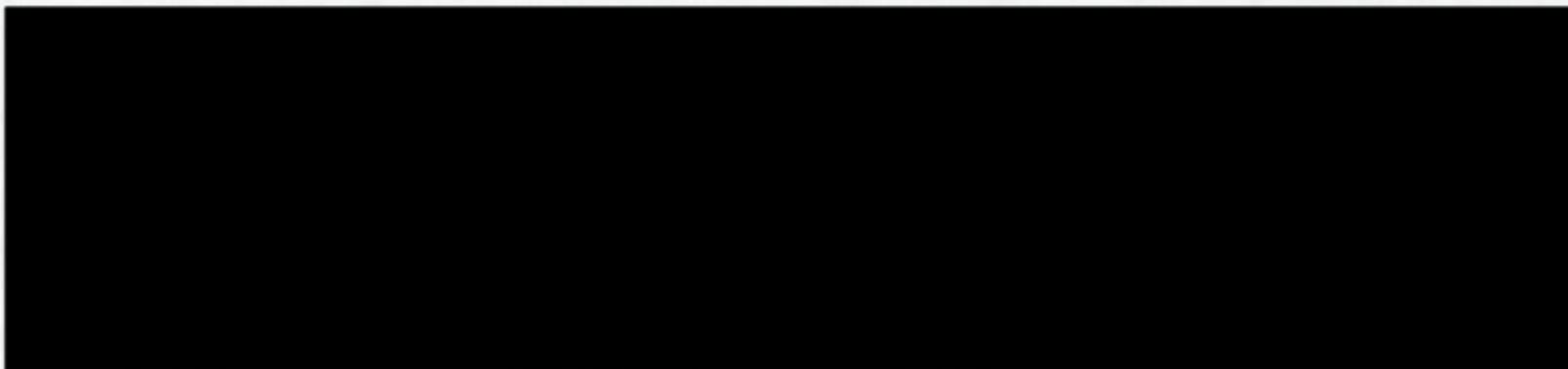
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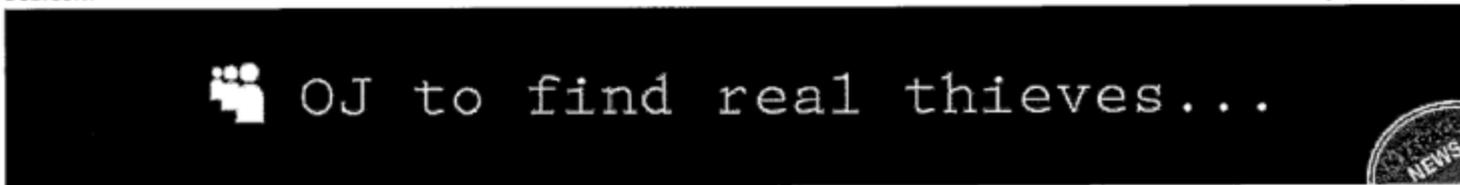
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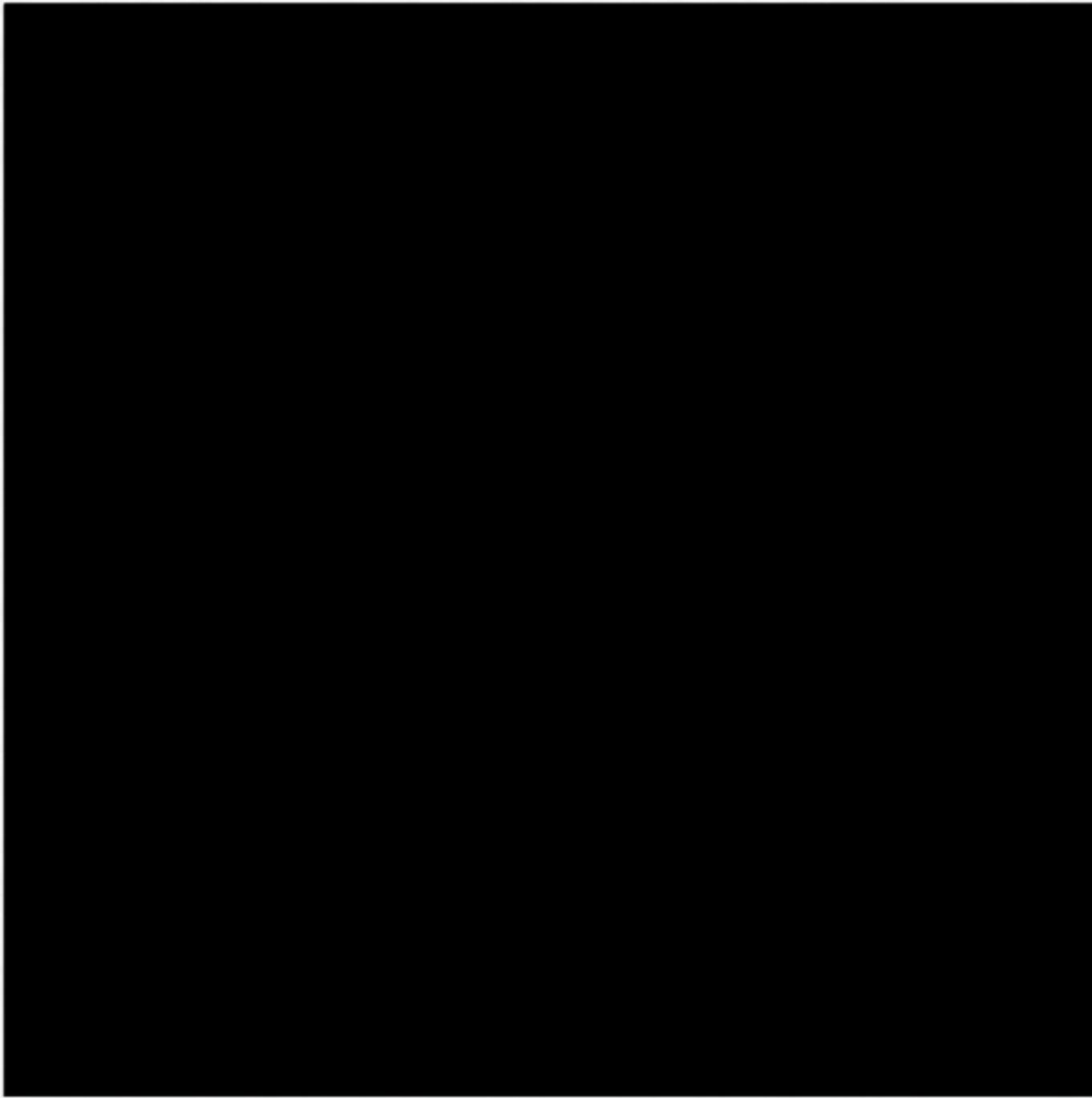
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	<p><b>January 23, 2008 8:02 PM</b> hahah thats sum good shit</p>
	<p><b>January 23, 2008 7:08 PM</b> it says ... omg !!! yummmmmmmmy ! love this pic.. you guys look hott together !!</p>

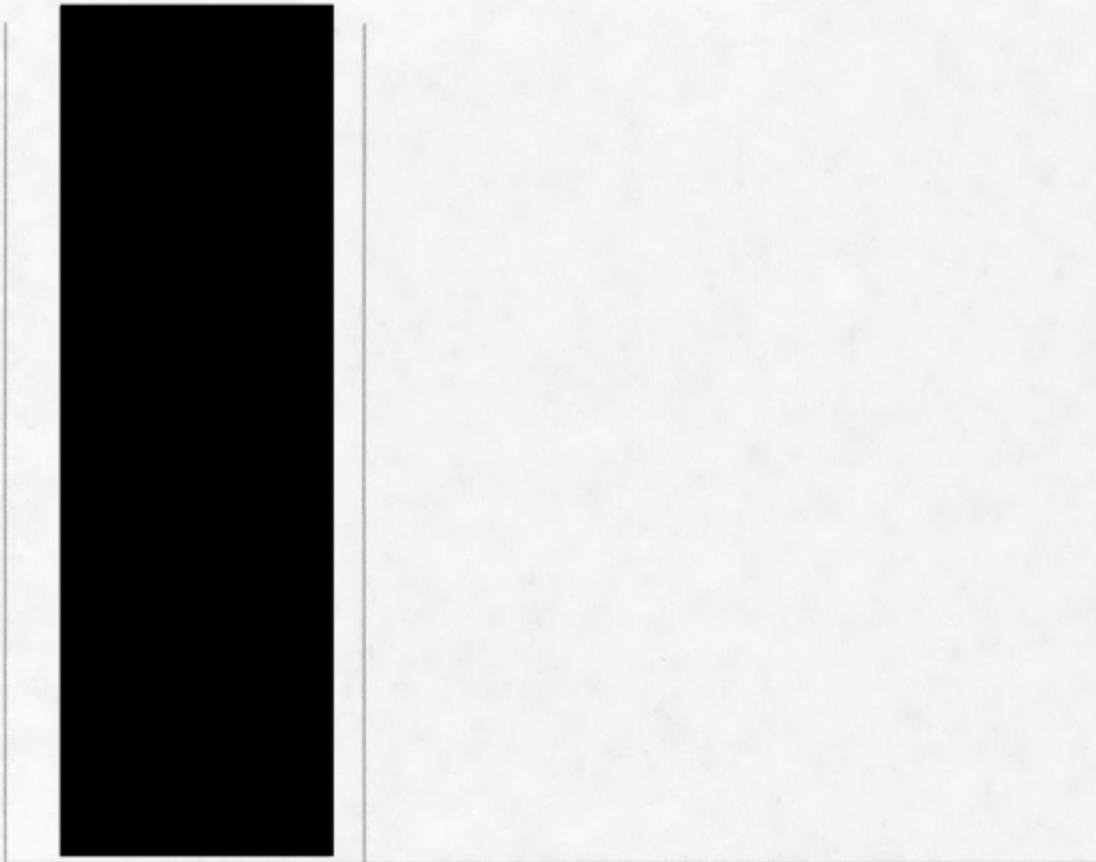
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[redacted] ...till the day we die 1 ; and thats a promise

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myspace url:  
http://www.myspace.com/[redacted]

[redacted] interests

heroes



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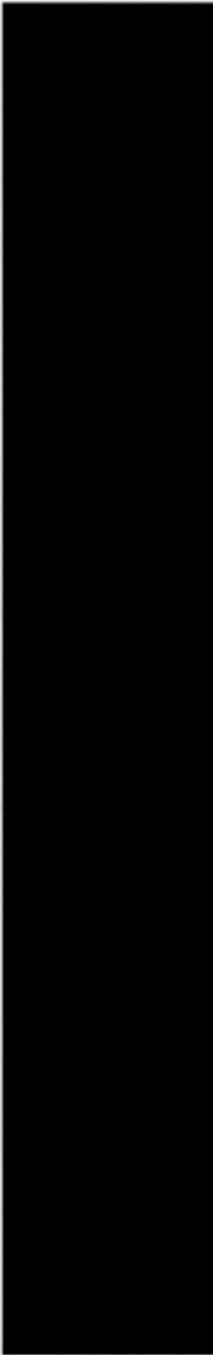
[redacted] feb 8 2008 4:13 pm

[redacted] feb 9 2008 4:15 pm  
i like this default better :)

[redacted] feb 8 2008 9:13 pm  
your workinn next fri. rightt ?

[redacted] feb 8 2008 3:01 pm

[redacted] feb 7 2008 8:13 am  
hahah you finally made ur page somethig worth going



to ... yaaa lol. what u up to hoe.. hey guess what.....

**i love you ♥**

feb 6 2008 9:39 am



feb 6 2008 9:31 am

heyy what the hell u doing.. so u cant fuckn talk to ur sister no more.. what the fuck is this shiit !!!??

feb 6 2008 8:10 am

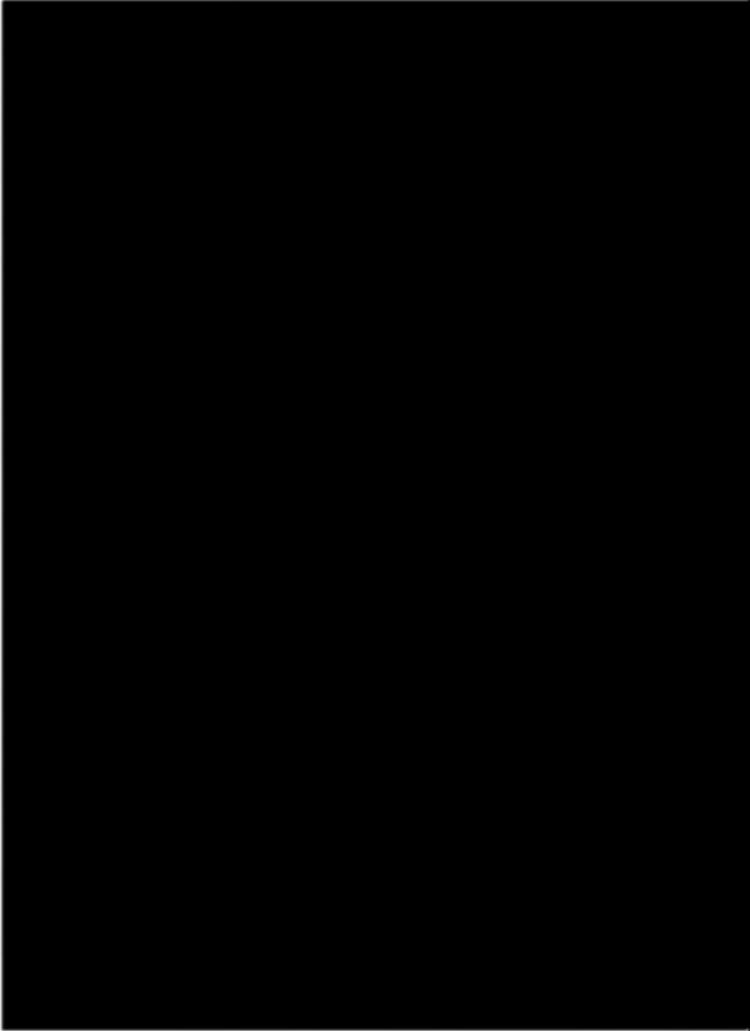
yes ill b workin tonight...u?actually text me if u want cuz im gettin off the comp now lol [redacted] peace

feb 6 2008 7:40 am

hey loser

feb 5 2008 1:37 pm

heyy hoee what if do bitchh ..lol soo yeah i went to go



feb 4 2008 7:00 am



feb 4 2008 7:00 am  
not too much

feb 4 2008 6:50 am  
hey you!

jan 30 2008 1:37 pm  
hey how are you?

jan 29 2008 4:47 pm



jan 29 2008 9:03 am









jan 22 2008 9:34 am

[REDACTED]

jan 23 2008 8:57 am

hey gurl...how u been? its been a long while lol..jus  
wna sum luv!

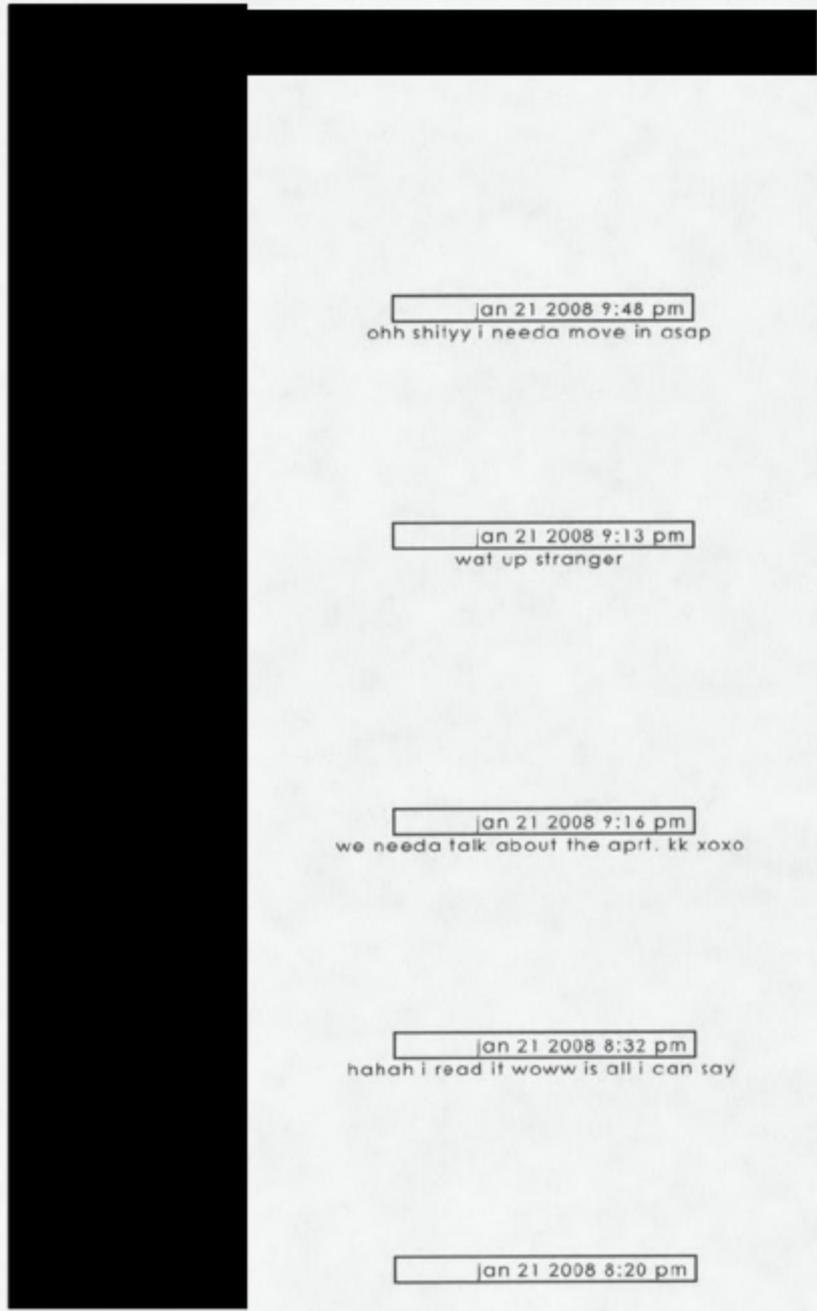
jan 22 2008 10:15 am

that where u talkin bout amber railey is 5 not 4 huh??

jan 22 2008 9:32 am

lol its all good lol that was so funny that you thought  
that your too funnny!<3

jan 22 2008 9:27 am



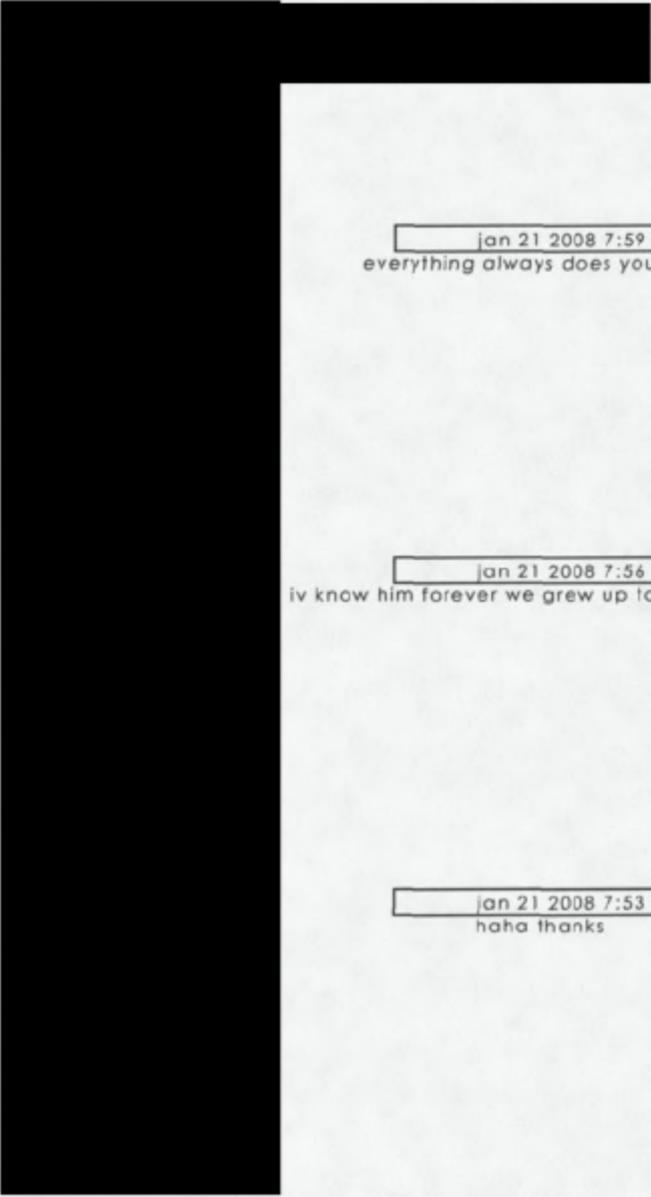
[REDACTED] jan 21 2008 9:48 pm  
ohh shityy i needa move in asap

[REDACTED] jan 21 2008 9:13 pm  
wat up stranger

[REDACTED] jan 21 2008 9:16 pm  
we needa talk about the aprt. kk xoxo

[REDACTED] jan 21 2008 8:32 pm  
hahah i read it woww is all i can say

[REDACTED] jan 21 2008 8:20 pm



[REDACTED] jan 21 2008 7:59 pm  
everything always does you know

[REDACTED] jan 21 2008 7:56 pm  
iv know him forever we grew up together haha

[REDACTED] jan 21 2008 7:53 pm  
haha thanks

[REDACTED]

[REDACTED] jan 21 2008 7:48 pm  
[REDACTED]



[REDACTED] |an 21 2008 6:26 pm|  
whats up?

[REDACTED] |an 21 2008 5:50 pm|

[REDACTED] |an 21 2008 5:33 pm|  
what do i have to do to get it though.. go to aim.com  
or sum shit ...

[REDACTED] |an 21 2008 5:29 pm|  
how did the apartment thingy go on sunday?

[REDACTED] |an 21 2008 4:10 pm|

jan 21 2008 3:55 pm

what's good

jan 21 2008 11:47 am

ay beautiful thanks for the add.. check us out and leave some love.. let us know what ya think..

jan 21 2008 10:40 am

[redacted]

jan 21 2008 10:14 am

[redacted]

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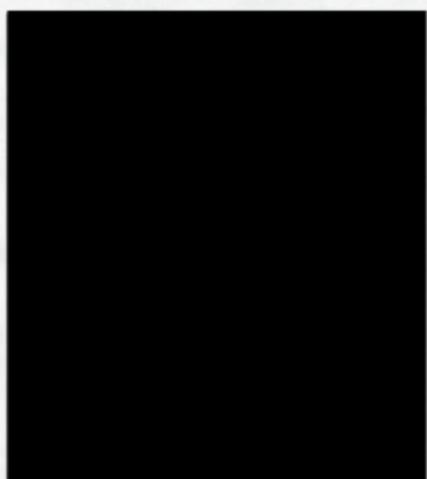
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DL/ID Number [REDACTED] Class ID CARD Status **VALID**

[REDACTED]  
 LOXAHATCHEE FL 334704014

All Addresses On File

Date of Birth [REDACTED] Sex **F** Height **5'03** State Of Birth **Florida**

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View	[REDACTED]	05-12-06	05-12-06	05-12-06 16:26:08	ID	Original	None	

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UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA

CASE NO.:

JANE DOE NO. 2,

Plaintiff,

vs.

JEFFREY EPSTEIN,

Defendant.

---

**COMPLAINT**

Plaintiff, Jane Doe No. 2 ("Jane" or "Jane Doe"), brings this Complaint against Jeffrey Epstein, as follows:

**Parties, Jurisdiction and Venue**

1. Jane Doe No. 2 is a citizen and resident of the Commonwealth of Virginia, and is sui juris.
2. This Complaint is brought under a fictitious name to protect the identity of the Plaintiff because this Complaint makes sensitive allegations of sexual assault and abuse upon a minor.
3. Defendant Jeffrey Epstein is a citizen and resident of the State of New York.
4. This is an action for damages in excess of \$50 million.
5. This Court has jurisdiction of this action and the claims set forth herein pursuant to 28 U.S.C. §1332(a), as the matter in controversy (i) exceeds \$75,000, exclusive of interest and costs; and (ii) is between citizens of different states.
6. This Court has venue of this action pursuant to 28 U.S.C. §1391(a) as a substantial

part of the events or omissions giving rise to the claim occurred in this District.

**Factual Allegations**

7. At all relevant times, Defendant Jeffrey Epstein (“Epstein”) was an adult male, 52 years old. Epstein is a financier and money manager with a secret clientele limited exclusively to billionaires. He is himself a man of tremendous wealth, power and influence. He maintains his principal home in New York and also owns residences in New Mexico, St. Thomas and Palm Beach, FL. The allegations herein concern Epstein’s conduct while at his lavish estate in Palm Beach.

8. Upon information and belief, Epstein has a sexual preference and obsession for underage minor girls. He engaged in a plan and scheme in which he gained access to primarily economically disadvantaged minor girls in his home, sexually assaulted these girls, and then gave them money. In or about 2004-2005, Jane Doe, then approximately 16 years old, fell into Epstein’s trap and became one of his victims.

9. Upon information and belief, Jeffrey Epstein carried out his scheme and assaulted girls in Florida, New York and on his private island, known as Little St. James, in St. Thomas.

10. Epstein’s scheme involved the use of young girls to recruit underage girls. (Upon information and belief, the young girl who brought Jane Doe to Epstein was herself a minor victim of Epstein, and will therefore not be named in this Complaint). Under Epstein’s plan, underage girls were recruited ostensibly to give a wealthy man a massage for monetary compensation in his Palm Beach mansion. The recruiter would be contacted when Epstein was planning to be at his Palm Beach residence or soon after he had arrived there. Epstein or someone on his behalf would direct the recruiter to bring one or more underage girls to the residence. The recruiter, upon information and belief, generally sought out economically disadvantaged underage girls from western Palm Beach County who would be enticed by the money being offered - generally \$200 to \$300 per

“massage” session - and who were perceived as less likely to complain to authorities or have credibility if allegations of improper conduct were made. This was an important element of Epstein’s plan.

11. Epstein’s plan and scheme reflected a particular pattern and method. Upon arrival at Epstein’s mansion, the underage victim would be introduced to [REDACTED] Epstein’s assistant, who gathered the girl’s personal information, including her name and telephone number. Ms. Kellen would then bring the girl up a flight of stairs to a bedroom that contained a massage table in addition to other furnishings. There were photographs of nude women lining the stairway hall and in the bedroom. The girl would then find herself alone in the room with Epstein, who would be wearing only a towel. He would then remove his towel and lie naked on the massage table, and direct the girl to remove her clothes. Epstein would then perform one or more lewd, lascivious and sexual acts, including masturbation and touching the girl’s vagina.

12. Consistent with the foregoing plan and scheme, Jane Doe was recruited to give Epstein a massage for monetary compensation. Jane was brought to Epstein’s mansion in Palm Beach. Once at the mansion, Jane was introduced to [REDACTED] who led her up the flight of stairs to the room with the massage table. In this room, Epstein told Jane to take off her clothes and give him a massage. Jane kept her panties and bra on and complied with Epstein’s instructions. Epstein wore only a towel around his waste. After a short period of time, Epstein removed the towel and rolled over exposing his penis. Epstein began to masturbate and he sexually assaulted Jane.

13. After Epstein had completed the assault, Jane was then able to get dressed, leave the room and go back down the stairs. Jane was paid \$200 by Epstein. The young girl who recruited Jane was paid \$100 by Epstein for bringing Jane to him.

14. As a result of this encounter with Epstein, Jane experienced confusion, shame,

humiliation and embarrassment, and has suffered severe psychological and emotional injuries.

**COUNT I**  
**Sexual Assault**

15. Plaintiff Jane Doe repeats and realleges paragraphs 1 through 14 above.

16. Epstein tortiously assaulted Jane Doe sexually. Epstein's acts were intentional, unlawful, offensive and harmful.

17. Epstein's plan and scheme in which he committed such acts upon Jane Doe were done willfully and maliciously.

18. This sexual assault was in violation of Chapter 800 of the Florida Statutes, which recognizes as a crime the lewd and lascivious acts committed by Epstein upon Jane.

19. As a direct and proximate result of Epstein's assault on Jane, she has suffered and will continue to suffer severe and permanent traumatic injuries, including mental, psychological and emotional damages.

WHEREFORE, Plaintiff Jane Doe No. 2 demands judgment against Defendant Jeffrey Epstein for compensatory damages, punitive damages, costs, and such other and further relief as this Court deems just and proper.

**COUNT II**  
**Intentional Infliction of Emotional Distress**

20. Plaintiff Jane Doe repeats and realleges paragraphs 1 through 14 above.

21. Epstein's conduct was intentional or reckless.

22. Epstein's conduct was outrageous, going beyond all bounds of decency.

23. Epstein's conduct caused severe emotional distress to Jane Doe. Epstein knew or had reason to know that his intentional and outrageous conduct would cause emotional trauma and damage to Jane Doe.

24. As a direct and proximate result of Epstein's intentional or reckless conduct, Jane Doe, has suffered and will continue to suffer severe mental anguish and pain.

WHEREFORE, Plaintiff Jane Doe No. 2 demands judgment against Defendant Jeffrey Epstein for compensatory damages, costs, punitive damages, and such other and further relief as this Court deems just and proper.

**JURY TRIAL DEMAND**

Plaintiffs demand a jury trial in this action.

Dated: February \_\_, 2008

Respectfully submitted,

HERMAN & MERMELSTEIN, P.A.  
*Attorneys for Plaintiffs*  
18205 Biscayne Blvd.  
Suite 2218  
Miami, Florida 33160  
Tel: 305-931-2200  
Fax: 305-931-0877

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