

5. This is an action for damages in excess of Fifteen Thousand Dollars (\$15,000), exclusive of interest and costs.

6. Venue is proper in this Court under section 47.011, Florida Statutes, because the causes of action brought herein accrued in Palm Beach County, Florida, and one or more Defendants reside in Palm Beach County, Florida.

Factual Allegations

7. At all relevant times, Defendant, Jeffrey Epstein, was an adult male. Mr. Epstein is a financier and money manager with a secret clientele limited exclusively to billionaires. He is a man of tremendous wealth, power and influence. Before confinement, he maintained homes in New York, New Mexico, St. Thomas, U.S. Virgin Islands, and Palm Beach, Florida. The allegations herein concern Mr. Epstein's conduct while at his lavish estate in Palm Beach.

8. Upon information and belief, Mr. Epstein has a sexual preference and obsession for minor girls. He engaged in a plan, scheme, and/or enterprise wherein he gained access to primarily economically disadvantaged minor girls in his Palm Beach home and sexually assaulted the girls, or coerced or attempted to coerce the girls to engage in prostitution, and then gave them money.

9. In or about 2005, [REDACTED], then [REDACTED] years old, fell victim to Mr. Epstein's trap described above, at Mr. Epstein's Palm Beach estate.

10. Upon information and belief, Mr. Epstein carried out this scheme/enterprise and assaulted girls in Florida, New York and on his private island, known as Little St. James, in St. Thomas, U.S. Virgin Islands.

11. Integral conspirators in Mr. Epstein's Florida scheme/enterprise were Defendant;
[REDACTED]

[REDACTED] and other Jane Does. Ms.

[REDACTED], Ms. [REDACTED] and other Jane Does [REDACTED]

[REDACTED] Under Mr. Epstein's

plan/enterprise, [REDACTED]

[REDACTED]

[REDACTED] This was pivitol to Mr. Epstein's plan/enterprise.

12. Mr. Epstein's plan, scheme, and/or enterprise had a particular pattern and method.

[REDACTED]

Facts Specific to [REDACTED].

13. Consistent with the foregoing plan, scheme, and/or enterprise, [REDACTED], then [REDACTED] years of age, [REDACTED]

15. At this point, Mr. Epstein specifically asked [REDACTED] her age, to which [REDACTED] honestly advised she was [REDACTED] years old.

17. [REDACTED] was then allowed to get dressed, leave the room and go back down the stairs and into the kitchen. Mr. Epstein gave the other [REDACTED] year old girl money and told [REDACTED] that this girl “had her money” and then left. [REDACTED] was given \$200 by the other [REDACTED] year old girl.

18. As a result of this encounter with Mr. Epstein, the [REDACTED]

[REDACTED]

COUNT I

Sexual Battery against Defendant Epstein

19. Plaintiff [REDACTED], repeats and realleges paragraphs 1 through 18 above.

20. This is a count for sexual battery against Defendant, Mr. Epstein.

21. Mr. Epstein sexually battered [REDACTED], at a time when she was [REDACTED] years old.

22. During this incident Epstein exploited his natural authority and trust as an adult with a minor.

23. Plaintiff [REDACTED], because of her age at the time of this incident, did not have the legal ability to consent to the sexual acts as described above.

24. Mr. Epstein's actions amounted to a harmful, unapproved and intentional touching of [REDACTED].

25. Epstein inflicted harmful or offensive contact on [REDACTED], with the intent to cause such contact, alternatively, [REDACTED], had the apprehension that such contact was imminent.

[REDACTED]

27. As a direct and proximate result of Mr. Epstein's assault on [REDACTED], she has suffered and will continue to suffer severe and permanent traumatic injuries, including [REDACTED]

[REDACTED]

WHEREFORE, Plaintiff, [REDACTED], demands judgment against Defendant, Jeffrey Epstein, for compensatory damages, costs, and such other and further relief as this Court deems just and proper.

COUNT II
**Intentional and/or Reckless Infliction of Emotional Distress against
Defendants Epstein**

28. Plaintiff [REDACTED]. repeats and realleges paragraphs 1 through 18 above.

29. This is a count for intentional infliction of emotional distress against Defendant, Mr. Epstein.

30. The conduct of Defendant Mr. Epstein in subjecting [REDACTED]. to Mr. Epstein's actions as described above was intentional or reckless.

31. The conduct of Defendant, Mr. Epstein in subjecting [REDACTED]. to Mr. Epstein's conduct described above was outrageous, going beyond all bounds of decency.

32. The conduct of Defendant Mr. Epstein, in subjecting [REDACTED]. to Mr. Epstein's conduct described above, caused [REDACTED]. [REDACTED] Defendant knew or had reason to know that their intentional and outrageous conduct would cause emotional trauma and damage to [REDACTED].

33. As a direct and proximate result of Defendant's intentional and/or reckless conduct, [REDACTED]. [REDACTED]

WHEREFORE, Plaintiff [REDACTED]. demands judgment against Defendant, Jeffrey Epstein, for compensatory damages, costs, attorney's fees, and such other and further relief as this Court deems just and proper. Further, Plaintiff reserves the right to amend this Complaint to add a claim for punitive damages pursuant to Florida Law.

JURY TRIAL DEMAND

Plaintiff demands a jury trial in this action.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing was furnished by U. S. Mail, postage prepaid, this ___ day of April, 2009 to Jack A. Goldberger, Esq./Bruce E. Reinhart, Esq., [REDACTED] Robert D. Critton, Jr., Michael J. Pike [REDACTED]
[REDACTED]

LEOPOLD-KUVIN, P.A.



By: _____
SPENCER T. KUVIN, Esq.
Florida Bar No.: 089737