

March 19, 2019

BY FEDERAL EXPRESS

Alan M. Dershowitz, Esq.
1500 Ocean Drive, Unit 805
Miami Beach, FL 33139

██████████ v. Jeffrey Epstein

Dear Mr. Dershowitz:

The history my client, ██████████ ("██████████"), shares with your client, Jeffrey Epstein ("Epstein"), is hands down the worst case of sexual depravity and misconduct I have come across in all my 27 years of representing victims of sexual assault and harassment. It is the sort of conduct that makes the blood boil and the stomach churn of any decent person. In short, your client raped Ms. ██████████ when she was a 14-15 year old girl. To be clear, it is not just that Ms. ██████████ was underage, really a baby at the time, that I say this is rape; Ms. ██████████ was forcibly and violently raped by Mr. Epstein. The consequences to Ms. ██████████ since her experiences with Mr. Epstein have been severe. He stole a chunk of her life without regard to the horrific damage he was inflicting. A summary of Mr. Epstein's sick and extremely harmful conduct, including the rape of Ms. ██████████, is outlined below.

Mr. Epstein's Rape and Sexual Assault of Ms. ██████████

Ms. ██████████ was born in ██████████. She grew up poor and largely raised by her mother, a single parent, in ██████████. The loss of her father at age 12 caused emotional vulnerability and issues surrounding the lack of having a father figure in her life. She was a prime target for grooming by a pedophile like Mr. Epstein.

In September of 2001, at age 14, Ms. ██████████ entered high school. She attended ██████████

██████████ The School had approximately 500 students.

During the course of Ms. ██████████ freshman year of high school, when she was 14, after school one day she was approached by a brunette woman in her early 20s on school property. The woman, who we shall refer to as the Recruiter, tried to befriend her. She asked her where she lived, where her parents were, if they were together, where she was born and where her parents worked. The Recruiter approached Ms. ██████████ repeatedly over the course of a week or two, continuing to ask personal questions about her.

At some point during this approximate two week period, the Recruiter began to speak about Jeffrey Epstein, almost as if he was her uncle or a family friend. The Recruiter said that Epstein was a “nice guy,” and that he takes care of her and her family. The Recruiter spoke glowingly of Epstein, stating he is very wealthy, and “you have to see his house.” The Recruiter eventually said that she told Epstein about her, about how pretty and smart she is and about how Ms. ██████████ recently lost her father. The Recruiter then told Ms. ██████████ that Epstein felt horrible and said he wanted to help her. The Recruiter said that Epstein is a “caring guy,” that he said she “should not be struggling,” and that he wanted “to be there for her.”

She then said that she wanted Ms. ██████████ to meet Epstein, that he knows a lot of people in the acting/modeling world and that he could possibly help her and introduce her to the right people for her career; the Recruiter said Epstein wanted to “guide her.” The Recruiter said that he was “very caring, very wealthy, very successful and someone good to know.” The Recruiter said that if Ms. ██████████ did not want to meet Epstein, she did not have to but doing so could “benefit her.” The Recruiter also enticed Ms. ██████████ by repeatedly saying how Epstein’s home is so beautiful, and that it was “right here” by Ms. ██████████ high school. The Recruiter said that they could go by Epstein’s house together.

One day, the Recruiter made plans with Ms. ██████████ to meet after school to visit Epstein’s home and meet him. Upon arrival at Epstein’s home at 9 East 71st Street, New York, NY 10021, Epstein appeared very welcoming, even humble. He gave Ms. ██████████ a tour of the house, but he did not show her the massage room – not in the beginning. Instead, during her first time at the 71st Street home, he showed her a trophy room, as she entered, filled with taxidermied animals he had allegedly hunted over the years.

As one might expect, Epstein’s home was massive. When one walked in, the huge entry door was in the middle of the city block and, upon entry, one would walk up a set of marble stairs. To the left there was Epstein’s secretary’s office with a waiting room, couches and chairs. To the right there was the trophy room filled with hunted animals. As one kept walking forward, there was a spiral staircase with a self-portrait of Epstein on the wall with a young girl.

On Ms. ██████████ first visit, she recalls Epstein giving the Recruiter a gift – a digital camera. The Recruiter then said to Ms. ██████████, “You see what I mean, he’s such a nice guy.” Epstein then gave Ms. ██████████ \$300 on this first visit, and said, “Here’s a little something to help you out. I take care of the people I care about.” He also told Ms. ██████████ that he was “a big AIDS activist,” which meant a lot to Ms. ██████████ at the time, because ██████████. After an hour or two, Ms. ██████████ and the Recruiter left together.

Within a couple days, the Recruiter reached out to Ms. ██████████ and said that she made a great impression on Epstein and that he wanted to see her again. Ms. ██████████ figured there was no harm as Epstein's house was only a couple blocks from her high school and at this point, he had done nothing to her to give her pause or cause her concern. So, again, the Recruiter brought ██████████ back to Epstein's 71st Street home after school. The second time Ms. ██████████ went to Epstein's house, he gave ██████████ the same camera that he had previously given the Recruiter on Ms. ██████████ first visit to his home.

Ms. ██████████ visited Epstein's home with the Recruiter about once or twice a week for the first month. Each time, Ms. ██████████ stayed between 1-2 hours, and Epstein would give her \$300 and just say that he "wanted to help her out." Ms. ██████████, obviously underage, and the Recruiter would be served cheese, crackers and wine during these visits.

After about a month of making these visits with the Recruiter, Epstein's assistant began contacting Ms. ██████████ directly and scheduling arrangements for her to visit Epstein's home alone. At this point, during ██████████ first visit *alone*, Epstein showed ██████████ his massage room.

Upon showing Ms. ██████████ his massage room for the first time, Epstein said, "I want to show you something now. I love this room. It's my favorite room in the house." He showed her the art work in the room and the massage table, stating that "not many people know about this room." He then stated "You really should be a model," "You're beautiful," "I'll bet your body is incredible," and "If you don't mind, I'd love to see your body." He had a lot of paintings of nude women on the walls. He even commented on one painting of a nude woman with small breasts that was right behind the massage table, and said how much the woman in the picture looked like Ms. ██████████. He said he liked "girls with small breasts" because they were "natural and real." He then complimented Ms. ██████████ repeatedly about her breasts. He then told Ms. ██████████ again that she would "do great" in the modeling industry, and said that he had a lot of connections in the modeling industry and could help her.

Still in the massage room, Epstein asked Ms. ██████████ to take her top off so he could see her body and frame, which he insinuated he needed to see if he was going to help her with modeling. He was very complimentary. Feeling uncomfortable and confused, Ms. ██████████ did as Epstein instructed. Epstein then immediately started feeling Ms. ██████████ breasts and rubbing her nude shoulders. He then asked her if she was good at giving massages, stripped down to his underwear, told Ms. ██████████ to remove everything but her bottom underwear, he laid down on the massage table and then told Ms. ██████████ to give him a back massage. Ms. ██████████ recalls Epstein having a lot of birth marks and/or freckles on his back.

After massaging Epstein's back for about 20 to 25 minutes, Epstein turned over and said that he wanted Ms. ██████████ to massage and rub his chest, arms and legs, and pinch his nipples because that "turned him on." Ms. ██████████ did as Epstein instructed while standing to the side of the massage table. Epstein then proceeded to take off his underwear. Ms. ██████████ recalls Epstein also having a lot of birth marks and/or freckles around his genitalia area. Epstein's exposing his

penis made Ms. ██████████ extremely nervous and uncomfortable, but she felt intimidated so she did as she was told. Also, Epstein insinuated that because of the money he gave her, she owed him.

Epstein said, "I take care of you, you take care of me," and started to masturbate while touching ██████████ breasts and, per his instructions, Ms. ██████████ massaged and rubbed his chest, arms and legs, and pinched his nipples, which was one of the main things Epstein liked that really turned him on sexually. He was giving Ms. ██████████ instructions and telling her what to do the entire time. Epstein ultimately came on himself, and then it ended. He said, "This was amazing, you're beautiful, I can't wait to see you again. I will give you a call during week and we'll see each other again." Going forward, sometimes Epstein would call Ms. ██████████ directly, and other times he would have an assistant email or page Ms. ██████████.

Ms. ██████████ remembers after the first sexual encounter with Epstein, he showed her a room on the same floor as the massage room that he said was designed to look like his favorite room at the White House, showed her some artwork, his master bedroom with a large jacuzzi and prosthetic breasts on the wall in a bathroom that he could look at or play with while in the bathtub.

These sexual encounters with Epstein, which of course were horribly abusive sexual assaults of a child, would continue on a weekly basis, once or twice a week, throughout Ms. ██████████ freshman year of high school and part of her sophomore year. Each time, Epstein would leave \$300 for Ms. ██████████ in a drawer in the massage room (the same drawer each time), and leave after they were done, stating that he had left it for her. At the time, this was a lot of money to Ms. ██████████.

Later on, this became routine where Epstein would have his maid send Ms. ██████████ upstairs to the massage room. The maid would put towels and lotions out and tell ██████████ to get changed in the bathroom. When you walked in the massage room, there was the painting of a nude woman, previously mentioned. To the right, when one walked into the massage room, there was the massage table, and to the right of the massage table, there was a bathroom, which is where Ms. ██████████ would get changed as directed.

Finally, one day, during the Fall of her sophomore year (while she was still 15 year old), she was giving Epstein a massage in her underwear, as she had routinely done, but this time instead of turning over to masturbate and fondle her breasts, while she stood off to the side of the massage table, Epstein became more aggressive with her and started touching her vaginal area. He said, "Why don't we do it where you're on top of me massaging me and take your underwear off."

Ms. ██████████ said to Epstein that this made her uncomfortable and she wanted to stick to what they were doing before. Epstein said that he "loved her" and "cared for her," was going to "look out for her," that "it was okay" and that she should just climb on top of him and "try something different." Ms. ██████████ felt completely intimidated and did not know what to do, so

she just listened to what he instructed her to do and got on top of him. Mr. Epstein masturbated, as she rubbed his chest.

Then, all of a sudden, without giving Ms. ██████████ any notice, Epstein forced his penis (which already had lubricant on it) inside her vagina and proceeded to have sex with her. Ms. ██████████ was petrified, felt trapped and did not know what to do, so she just did what she was told. Epstein held her and guided her. Epstein did not use a condom. Afterwards, Epstein had \$300 waiting in the drawer for Ms. ██████████, as usual.

In addition to constituting illicit sex with a minor, this was also a brutal rape. To describe Mr. Epstein's conduct as monstrous is, of course, to understate how evil he was towards Ms. ██████████. Mr. Epstein, despite having raped Ms. ██████████, told her that "she was amazing, that she felt amazing, and that she did nothing wrong."

Ms. ██████████ was disgusted with Mr. Epstein (and herself at the time) and left his home soon thereafter, never to return. Afterwards, he tried to contact her, but she ignored his calls. Epstein also tried to reach out to Ms. ██████████ in later years, but she did not take his calls.

Following the rape, Ms. ██████████ dropped out of high school. At the time, she told her mom the reason was that she was being bullied at school, concealing from her the truth involving Mr. Epstein, reflecting her extreme shame about what she experienced and the intimidation of your client.

Next Steps

As a consequence of the repugnant criminal behavior outlined above, I will be filing, on behalf of my client, a Summons and Complaint in New York State Supreme Court, New York County, alleging sexual assault, sexual battery, intentional infliction of emotional distress and negligent infliction of emotional distress. She is entitled to both compensatory and punitive damages. A punitive award may legally account for Mr. Epstein's extreme wealth.

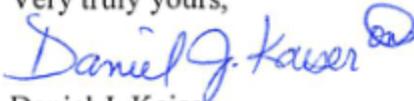
Ms. ██████████ life has been forever compromised by the unspeakable cruelty of Mr. Epstein. He shamelessly exploited her, tossed her aside as if her life had no value, and gave my client not a moment's second thought without regard to the carnage he left behind.

Ms. ██████████ has not yet provided permission to any media outlets to pursue her story but some have learned of the potential story and as you can imagine there is intense interest. Of course, she has every right to tell her story to whomever she pleases but has thus far decided to wait until a formal complaint is filed.

Although my client is determined to publicly file her claims, she will consider resolving the matter if an amicable resolution accounts for her legal claims' full value. If not, we will swiftly file and pursue litigation. [For a copy of draft complaint see Exhibit "A"]

Alan M. Dershowitz, Esq.
Re: [REDACTED] v. Jeffrey Epstein
March 19, 2019
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If I do not hear from you, or some other representative of Mr. Epstein within seven days, I will assume there is no interest in resolution and I will file the pleadings.

Very truly yours,

Daniel J. Kaiser

Copy to:

Alan M. Dershowitz, Esq.
2255 Glades Road, Suite 321A
Boca Raton, Florida 33431

Alan M. Dershowitz, Esq.
1675 North Military Trail, 5th Floor
Boca Raton, FL 33486

Alan M. Dershowitz, Esq.
45 Sutton Place South, # 16F
New York, NY 10022

Alan M. Dershowitz, Esq.
201 E. 17th Street, # 15A,
New York, NY 10003

Exhibit A

**SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF NEW YORK**

-----X
[REDACTED]

Plaintiff,

-against-

JEFFREY EDWARD EPSTEIN,

Defendant.
-----X

Index No.

**DRAFT
COMPLAINT**

Plaintiff, [REDACTED] (“[REDACTED]”), by her attorneys Kaiser Saurborn & Mair, P.C., as and for her complaint against defendant, alleges as follows:

I.

PARTIES, JURISDICTION, AND NATURE OF ACTION

1. Plaintiff, [REDACTED] (“plaintiff” or “[REDACTED]”), is a citizen of Glendale, New York.
2. Defendant Jeffrey Epstein has a residence in New York, New York.
3. Defendant Epstein committed repeated sexual assault and battery upon Ms. [REDACTED] while Ms. [REDACTED] was a 14-15 year old high school student, including forcibly raping Ms. [REDACTED]. As such defendant has committed sexual assault, sexual battery, intentional infliction of emotional distress and negligent infliction of emotional distress pursuant to New York common law. The damage defendant Epstein inflicted upon plaintiff has been severe and lasting.
4. Venue is proper in that all of the illegal conduct described herein occurred within New York County.

13. She asked her where Ms. [REDACTED] lived, where her parents were, if they were together, where she was born and where her parents worked.

14. The Recruiter approached Ms. [REDACTED] repeatedly over the course of a week or two, continuing to ask personal questions about her.

15. At some point during this approximate two week period, the Recruiter began to speak about defendant Epstein, almost as if he was her uncle or a family friend.

16. The Recruiter said that Epstein was a “nice guy,” and that he takes care of her and her family. The Recruiter spoke glowingly of Epstein, stating he is very wealthy, and “you have to see his house.”

17. The Recruiter eventually said that she told Epstein about her, about how pretty and smart she is and about how Ms. [REDACTED] recently lost her father.

18. The Recruiter then told Ms. [REDACTED] that Epstein felt horrible and said he wanted to help her. The Recruiter said that Epstein is a “caring guy,” that he said she “should not be struggling,” and that he wanted “to be there for her.”

19. The Recruiter then said that she wanted Ms. [REDACTED] to meet Epstein, that he knows a lot of people in the acting/modeling world and that he could possibly help her and introduce her to the right people for her career; the Recruiter said Epstein wanted to “guide her.”

20. The Recruiter said that he was “very caring, very wealthy, very successful, and someone good to know.”

21. The Recruiter said that if Ms. [REDACTED] did not want to meet Epstein, she did not have to but doing so could “benefit her.” The Recruiter also enticed Ms. [REDACTED] by

repeatedly saying how Epstein's home is so beautiful, and that it was "right here" by Ms. [REDACTED] high school.

22. The Recruiter said that they could go by Epstein's house together.

23. One day, the Recruiter made plans with Ms. [REDACTED] to meet after school to visit Epstein's home and meet him.

III.

EPSTEIN'S SEXUAL ASSAULT, BATTERY AND RAPE OF MS. [REDACTED]

24. Upon arrival at Epstein's home at 9 East 71st Street, New York, NY 10021, Epstein appeared very welcoming, even humble.

25. He gave Ms. [REDACTED] a tour of the house, but he did not show her the massage room – not in the beginning.

26. Instead, during her first time at the 71st Street home, he showed her a trophy room, as she entered, filled with taxidermied animals he had allegedly hunted over the years.

27. As one might expect, Epstein's home was massive. When one walked in, the huge entry door was in the middle of the city block and, upon entry, one would walk up a set of marble stairs.

28. To the left there was Epstein's secretary's office with a waiting room, couches and chairs. To the right there was the trophy room filled with hunted animals. As one kept walking forward, there was a spiral staircase with a self-portrait of Epstein on the wall with a young girl.

29. On Ms. [REDACTED] first visit, she recalls Epstein giving the Recruiter a gift – a digital camera. The Recruiter then said to Ms. [REDACTED], “You see what I mean, he’s such a nice guy.”

30. Epstein then gave Ms. [REDACTED] \$300 on this first visit, and said, “Here’s a little something to help you out. I take care of the people I care about.”

31. He also told Ms. [REDACTED] that he was “a big AIDS activist,” which meant a lot to Ms. [REDACTED] at the time, because [REDACTED] [REDACTED].

32. After an hour or two, Ms. [REDACTED] and the Recruiter left together.

33. Within a couple days, the Recruiter reached out to Ms. [REDACTED] and said that she made a great impression on Epstein and that he wanted to see her again.

34. At the time, Ms. [REDACTED] figured there was no harm as Epstein’s house was only a couple blocks from her high school and, at this point, he had done nothing to her to give her pause or cause her concern.

35. So, again, the Recruiter brought [REDACTED] back to Epstein’s 71st Street home after school.

36. The second time Ms. [REDACTED] went to Epstein’s house, he gave [REDACTED] the same camera that he had previously given the Recruiter on Ms. [REDACTED] first visit to his home.

37. Ms. [REDACTED] visited Epstein’s home with the Recruiter about once or twice a week for the first month. Each time, Ms. [REDACTED] stayed between 1-2 hours, and Epstein would give her \$300 and just say that he “wanted to help her out.” Ms. [REDACTED], who was

obviously underage, and the Recruiter would be served cheese, crackers and wine during these visits.

38. After about a month of making these visits with the Recruiter, Epstein's assistant began contacting Ms. [REDACTED] directly and scheduling arrangements for her to visit Epstein's home alone.

39. At this point, during [REDACTED] first visit *alone*, Epstein showed [REDACTED] his massage room.

40. Upon showing Ms. [REDACTED] his massage room for the first time, Epstein said, "I want to show you something now. I love this room. It's my favorite room in the house."

41. He showed her the art work in the room and the massage table, stating that "not many people know about this room." He then stated "You really should be a model," "You're beautiful," "I'll bet your body is incredible," and "If you don't mind, I'd love to see your body."

42. He had a lot of paintings of nude women on the walls. He even commented on one painting of a nude woman with small breasts that was right behind the massage table, and said how much the woman in the picture looked like Ms. [REDACTED], then 14 years old.

43. He said he liked "girls with small breasts" because they were "natural and real." He then complimented Ms. [REDACTED] repeatedly about her breasts.

44. He then told Ms. [REDACTED] again that she would "do great" in the modeling industry, and said that he had a lot of connections in the modeling industry and could help her.

45. Still in the massage room, Epstein asked Ms. [REDACTED] to take her top off so he could see her body and frame, which he insinuated he needed to see if he was going to help her with modeling. He was very complimentary.

46. Feeling uncomfortable and confused, Ms. [REDACTED] did as Epstein instructed. Epstein then immediately started feeling Ms. [REDACTED] breasts and rubbing her nude shoulders.

47. He then asked her if she was good at giving massages, stripped down to his underwear, told Ms. [REDACTED] to remove everything but her bottom underwear, he laid down on the massage table and instructed Ms. [REDACTED] to give him a back massage. Ms. [REDACTED] recalls Epstein having a lot of birth marks and/or freckles on his back.

48. After massaging Epstein's back for about 20 to 25 minutes, Epstein turned over and said that he wanted Ms. [REDACTED] to massage and rub his chest, arms and legs, and pinch his nipples because that "turned him on."

49. Ms. [REDACTED] did as Epstein instructed while standing to the side of the massage table.

50. Epstein then proceeded to take off his underwear.

51. Ms. [REDACTED] recalls Epstein also having a lot of birth marks and/or freckles around his genitalia area.

52. Epstein's exposing his penis made Ms. [REDACTED] extremely nervous and uncomfortable, but she felt intimidated so she did as she was told.

53. Also, Epstein insinuated that because of the money he gave her, she owed him. Epstein said, "I take care of you, you take care of me," and started to masturbate while touching Ms. [REDACTED] breasts and, per his instructions, Ms. [REDACTED] massaged and

rubbed his chest, arms and legs, and pinched his nipples, which was one of the main things Epstein liked that really turned him on sexually.

54. He was giving Ms. [REDACTED] instructions and telling her what to do the entire time. Epstein ultimately came on himself, and then it ended.

55. He said, "This was amazing, you're beautiful, I can't wait to see you again. I will give you a call during the week and we'll see each other again."

56. Going forward, sometimes Epstein would call Ms. [REDACTED] directly, and other times he would have an assistant email or page Ms. [REDACTED].

57. Ms. [REDACTED] remembers after the first sexual encounter with Epstein, he showed her a room on the same floor as the massage room that he said was designed to look like his favorite room at the White House, and then he showed her some artwork, his master bedroom with a large jacuzzi and prosthetic breasts on the wall in a bathroom that he could look at or play with while in the bathtub.

58. These sexual encounters with Epstein, which of course were horribly abusive sexual assaults of a child, would continue on a weekly basis, once or twice a week, throughout Ms. [REDACTED] freshman year of high school and part of her sophomore year.

59. Each time, Epstein would leave \$300 for Ms. [REDACTED] in a drawer in the massage room (the same drawer each time), and as he left the room stated that he had left it for her. At the time, this was a lot of money to Ms. [REDACTED].

60. Later on, this became routine where Epstein would have his maid send Ms. [REDACTED] upstairs to the massage room. The maid would put towels and lotions out and tell [REDACTED] to get changed in the bathroom.

61. When one walked in the massage room, there was the painting of a nude woman, previously mentioned. To the right, when one walked into the massage room, there was the massage table, and to the right of the massage table, there was a bathroom, which is where [REDACTED] would get changed.

62. Finally, one day, during the Fall of her sophomore year of high school (while she was still 15 years old), she was giving Epstein a massage in her underwear, as she had routinely done, but this time instead of turning over to masturbate and fondle her breasts, while she stood off to the side of the massage table, Epstein became more aggressive with her and started touching her vaginal area.

63. He said, "Why don't we do it where you're on top of me massaging me and take your underwear off."

64. Ms. [REDACTED] said to Epstein that this made her uncomfortable and she wanted to stick to what they were doing before.

65. Epstein responded that he "loved her and cared for her," was going to "look out for her," that it "was okay" and that she should just climb on top of him and "try something different."

66. Ms. [REDACTED] felt completely intimidated and did not know what to do, so she just did as she was told and got on top of him.

67. Epstein masturbated, as she rubbed his chest.

68. Then, all of a sudden, without giving Ms. [REDACTED] any notice, Epstein forced his penis (which already had lubricant on it) inside her vagina and proceeded to have sex with her.

69. [REDACTED] was petrified, felt trapped and didn't know what to do, so she just did as she was told. Epstein held her and guided her. Epstein did not use a condom.

70. Afterwards, Epstein had \$300 waiting in the drawer for Ms. [REDACTED], as usual.

71. In addition to constituting illicit sex with a minor, this was also a brutal rape.

72. Epstein's monstrous conduct can not be understated.

73. Epstein, after raping Ms. [REDACTED], told her that "she was amazing, that she felt amazing, and that she did nothing wrong."

74. Ms. [REDACTED] was disgusted with Mr. Epstein (and herself at the time) and left his home soon thereafter, never to return.

75. Afterward, Epstein tried to contact Ms. [REDACTED], but she ignored all of his calls.

76. Epstein also tried to reach out to Ms. [REDACTED] in later years, but she did not take his calls.

77. Following the rape, Ms. [REDACTED] dropped out of High School.

78. At the time, she told her mom the reason was that she was being bullied at school concealing from her the truth involving Mr. Epstein, reflecting her extreme shame about what she experienced and the intimidation she felt from Epstein.

79. Defendant's conduct has had a continuing impact on plaintiff.

CAUSE OF ACTION I

80. Plaintiff repeats and reiterates the allegations contained in paragraphs "1" through "79" as if incorporated and realleged herein.

81. Defendant committed repeated sexual assaults upon plaintiff.

82. By reason thereof, plaintiff has suffered extreme emotional injuries.

CAUSE OF ACTION II

83. Plaintiff repeats and reiterates the allegations contained in paragraphs "1" through "79" and "81" as if incorporated and realleged herein.

84. Defendant committed repeated sexual battery of plaintiff.

85. By reason thereof, plaintiff has suffered extreme emotional injuries.

CAUSE OF ACTION III

86. Plaintiff repeats and reiterates the allegations contained in paragraphs "1" through "79", "81" and "84" as if incorporated and realleged herein.

87. By reason Mr. Epstein's outrageous and unconscionable conduct that violated all norms of decent and civil society, defendant intentionally inflicted emotional distress upon plaintiff.

88. By reason thereof, plaintiff has suffered extreme emotional injuries.

CAUSE OF ACTION IV

89. Plaintiff repeats and reiterates the allegations contained in paragraphs "1" through "79", "81", "84" and "87" as if incorporated and realleged herein.

90. By reason thereof, defendant has committed negligent infliction of emotional distress.

91. By reason thereof, plaintiff has suffered extreme emotional injuries.

WHEREFORE, plaintiff demands judgment against defendant as follows:

(i) On the First Cause of Action assessing compensatory damages and punitive damages in an amount to be determined at trial;

- (ii) On the Second Cause of Action assessing compensatory damages and punitive damages in an amount to be determined at trial;
- (iii) On the Third Cause of Action assessing compensatory and punitive damages in an amount to be determined at trial;
- (iv) On the Fourth Cause of Action, compensatory damages in an amount to be determined at trial; and
- (v) For such other relief as the Court deems just and proper.

Dated: New York, New York
March 19, 2019

KAISER SAURBORN & MAIR, P.C.

By: _____
Daniel J. Kaiser, Esq.
William H. Kaiser, Esq.

Attorneys for plaintiff
30 Broad Street, 37th Floor
New York, New York 10004
(212) 338-9100