

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

B.B.,

Plaintiff,

vs.

JEFFREY EPSTEIN,

Defendant.

CASE NO:

502008CA037319XXXXMB AB

SECOND AMENDED COMPLAINT

Plaintiff, JANE DOE (B.B.), brings this Complaint against Defendant, JEFFREY EPSTEIN, and states as follows:

Summary of Action

Numerous individuals, including but not limited to, Jeffrey Epstein, Ghislaine Maxwell, Jean Luc Brunel, Alfredo Rodriguez, [REDACTED] and the modeling agency MC2, for personal pleasure and sexual gratification, in violation of the law, deliberately engaged in a pattern of racketeering that involved obtaining underage (under the age of 18) girls, to engage in sexual contact for money. These repeated and pedophilias acts were engaged in by these co-conspirators over a period of numerous years. These sexual acts included touching minor girls in a sexual manner (including but not limited to penetration of sexual organs), allowing minor girls to touch them sexually, and engaging in sexual intercourse with minors.

3/8+15=  
9/23

**Parties, Jurisdiction and Venue**

1. B.B. brings this Complaint under a fictitious name to protect her identity, because the Complaint makes sensitive allegations of sexual assault and abuse that she suffered while a minor.

2. B.B. is a citizen and resident of the State of Florida. She is currently over the age of 18 and otherwise *sui juris*.

3. Defendant, Jeffrey Epstein, is currently on probation in Palm Beach County, is a citizen and resident of Palm Beach County, Florida, has full intent to stay in Palm Beach County and is otherwise *sui juris*.

4. Defendant, Jeffrey Epstein's, co-conspirators included (but were not limited to) [REDACTED], [REDACTED], [REDACTED], Lesley Groff, Ghislaine Maxwell, Alfredo Rodriguez, Jean Luc Brunel, [REDACTED], [REDACTED], the modeling agency MC2 and others (See Ex. A – U.S. Attorney's Non-Prosecution Agreement).

5. These co-conspirators, along with Epstein, joined together to create the non-party enterprise at issue, which is Epstein's house of prostitution and illegal sexual activity with minors (i.e. "Epstein's Sexual Enterprise").

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

7. 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, Defendant reside in Palm Beach County, Florida.

### Factual Allegations

8. 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. 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.

9. 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.

10. In or about 2005, B.B., then 15 years old, fell victim to Mr. Epstein's trap described above, at Mr. Epstein's Palm Beach estate.

11. 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.

12. Integral conspirators in Mr. Epstein's Florida scheme/enterprise were [REDACTED] [REDACTED] an assistant of Mr. Epstein from New York City, New York; and [REDACTED], a Palm Beach Community College student from Loxahatchee, Florida; and other Jane Does. [REDACTED], Ms. [REDACTED] and other Jane Does recruited girls ostensibly to give a wealthy man a platonic massage for monetary compensation in his Palm Beach mansion. Under Mr. Epstein's plan/enterprise, Ms. [REDACTED] was contacted shortly before or soon after Mr. Epstein was at his Palm Beach residence. Mr. Epstein, or Ms. [REDACTED], or someone on their behalf, directed Ms. [REDACTED] and others to bring

one or more underage girls to Mr. Epstein's residence. Upon information and belief, economically-disadvantaged, underage girls from Loxahatchee and surrounding areas were specifically targeted because they were easier to entice by the money being offered (generally \$200 to \$300 per "massage" session) and these girls were perceived as less likely to complain to authorities or have credibility if allegations of improper conduct were made. This was pivotal to Mr. Epstein's plan/enterprise.

13. Upon information and belief, at all material times, Epstein was a financial backer of co-conspirator corporation MC2. MC2 is a modeling agency which employs teenage girls as models. Epstein's colleague Jean Luc Brunel is a business partner in MC2. In 1997 Mr. Brunel was on the television program "60 Minutes" where there were allegations he took advantage of young models that were high on drugs. Upon information and belief, former Elite executive, Gerald Marie, is also involved with MC2. Mr. Marie was accused of having sex with underage models in a 1999 BBC documentary where he was filmed saying he hoped to seduce contestants in a modeling contest in which the average age of the participants was fifteen ("15"). Upon information and belief, Epstein as a financial backer of MC2 scouted the minor victims of his sexual enterprise for placement into MC2 for the benefit of MC2 and its business partners.

14. Co-conspirator, Alfredo Rodriguez, was employed by Epstein as his house manager. At Epstein's direction, Mr. Rodriguez greeted the minor girls upon their entrance into Epstein's Palm Beach mansion. Mr. Rodriguez would attempt to comfort the minor girls by offering them hospitality as they waited for Mr. Epstein. Independent of Epstein's directions, Mr. Rodriguez kept a list of Epstein's minor victims. Mr. Rodriguez attempted to profit from his participation in Epstein's Sexual Enterprise by selling said list.

15. Co-conspirator, Ghislaine Maxwell, lived with Epstein at his mansion in Palm Beach, Florida. She maintained a closet at Epstein's estate in which she kept sexual toys and outfits. Ms. Maxwell procured minor girls for Epstein both pursuant to and independent from his direction. Upon information and belief, Ms. Maxwell, upon her own volition, actively and passively participated in sexual acts with the minor girls she recruited and received sexual gratification independent from Epstein's during her participation in Epstein's Sexual Enterprise.

16. Co-conspirator, [REDACTED], was romantically involved with Epstein. She was often in Epstein's presence when he received "massages" from minor girls. Upon information and belief, Ms. [REDACTED] assisted in coordinating "massages" for Epstein. Upon information and belief, Ms. [REDACTED], upon her own volition, actively and passively participated in sexual acts with the minor girls during the "massages" she coordinated and received sexual gratification independent from Epstein's during her participation in Epstein's Sexual Enterprise.

17. Additionally, Epstein utilized other women such as [REDACTED] and Lesley Groff to procure underage (under the age of 18) girls to bring to his home and other locations for sexual contact and Epstein's sexual gratification.

18. Mr. Epstein's plan, scheme, and/or enterprise had a particular pattern and method. Upon arrival at Mr. Epstein's mansion, the underage girls would be introduced to Ms. [REDACTED] who in turn gathered the victim's personal information, including her name and telephone number. The girls would then be brought up a flight of stairs to a bedroom that contained, among other furnishings, a massage table. Photographs of nude women lined the stairway hall and bedroom. Ms. [REDACTED] would then leave the girl alone in this room, whereupon Mr. Epstein would enter wearing only a towel. Mr. Epstein 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, touching the girl's vagina with a vibrator, or digitally penetrating the girl's vagina, and coerce or attempt to coerce the girl to engage in lewd acts and/or prostitution.

19. This scheme is outlined in the Non-Prosecution Agreement entered into between the U.S. Government and the Palm Beach State Attorney's Office. As outlined in the Agreement, Epstein, among other violations of law:

A. knowingly and willfully conspired with others known and unknown to commit an offense against the United States, that is, . . . to knowingly persuade, induce, or entice minor females to engage in prostitution;

B. recruiting, enticing, and obtaining by any means a person, knowing that the persona had not attained the age of 18 years and would be caused to engage in a commercial sex act.

(See Ex. A – Non-Prosecution Agreement).

20. In furtherance of this scheme, Epstein utilized his co-conspirators by calling, emailing, texting and otherwise utilizing the telecommunications systems to illegally entice and engage underage girls to come to his home for inappropriate and illegal sexual contact with him.

21. In furtherance of this scheme and conspiracy, Epstein's co-conspirators benefited financially by obtaining Epstein's victims. Epstein would pay his co-conspirators, such as [REDACTED], \$100 to \$200 for bringing underage victims to Epstein's home.

22. Epstein furthermore used his friends and acquaintances power, financial pressure, and political clout in an attempt to alter and improperly influence the criminal investigation of his illegal and illicit acts.

23. For example, Epstein utilized a Town of Palm Beach elected official and chairman of the police retirement board to petition the Chief of Police to stop the Epstein investigation:

A. I had one individual who actually came to see me a couple of times about this.

Q. Who was that?

A. Jerry Goldsmith.

Q. Okay. What did he say?

A. He said that this wasn't necessary, this was a case that really was very minor. The victims had lifestyles that don't make them - - shouldn't make them believable to the police department. And he said that I shouldn't have referred it to the FBI and Palm Beach solves its own problems, why did I do that, why am I after Jeffrey Epstein. A couple of occasions that was the general topic of the discussion.

...

Q. Did you get the impression that he was trying to get you to essentially either drop or smooth over or quiet down the investigation of Mr. Epstein in any way?

MR. CRITTON: Form.

THE WITNESS: Initially, yes.

(Depo of Chief Reiter at 72-73).

24. Phone records show that around this time, Goldsmith was calling Epstein's home and likely discussing the investigation with Mr. Epstein.

25. Epstein further paid and provided other non-cash financial benefits such as gifts, travel, jewelry, attorneys fees etc. to his other co-conspirators including [REDACTED]. These cash and non-cash financial benefits total in the hundreds of thousands, if not millions of dollars.

26. For example, co-conspirator [REDACTED] testified:

Q. Does your mom know who is paying for the civil attorneys?

A. Yes.

Q. How does she know?

A. Because I told her.

Q. What did you tell her?

...

A. I told her that my attorney was being paid by Mr. Epstein.

[REDACTED] depo at 145).

...

Q. The times that you would bring the other girls, you would get paid money, correct?

A. Yes.

Q. Who would give you the money?

A. Jeffrey [Epstein].

Q. Anyone else?

A. No.

Q. You mentioned you brought 12-some-odd girls. Does that mean that you went there to the house those times with the girls when you brought them every time?

A. Yes.

Q. Did you go there more than just those 12 times, plus the time that you went, so we got 13 now, did you go there more often?

A. I don't remember.

Q. Did you bring some girls more than once?

A. Yes.

(Deposition of [REDACTED] p. 104).

27. These cash and non-cash financial benefits were utilized in the furtherance of Epstein's scheme to sexually molest underage girls and attempt to subvert the criminal and civil justice system.

28. For example, at or around the time of the investigation being conducted by the Town of Palm Beach Police Department, Epstein made a substantial \$100,000 donation to the Palm Beach Police Department:

A. . . . He [Epstein] had made donations to the police department in the past.

Q. I'm sorry, who had made donations?

A. He being Mr. Epstein.

...

Q. And do you know what the amount of the larger donation was?

A. It was in the \$100,000 range.

(Chief Reiter deposition at p. 166).

This "donation", was ultimately and properly returned by the Palm Beach Police Department.

29. Additionally, in furtherance of this scheme, Epstein has retained attorneys and investigators with the sole purpose and direction to intimidate and harass his victims so as to pressure them into refusing to act as witnesses in any judicial proceedings against him.

30. Plaintiff, B.B., among many other young women, has been injured in the scope that the criminal and racketeering activity of Epstein and his co-conspirators has damaged them

emotionally, physically and financially. Specifically, B.B. has had to retain attorneys and expend costs to litigate these matters and she has incurred the expense of a mental health counselor.

**Facts Specific to B.B.**

31. Consistent with the foregoing plan, scheme, and/or enterprise, B.B., then 15 years of age, was recruited to give Mr. Epstein a massage for monetary compensation. B.B. was brought by taxi with another girl 15 years of age to Mr. Epstein's mansion in Palm Beach. B.B. and the other girl were brought into the kitchen of the home and led up the flight of stairs to a large bathroom containing a massage table. Upon arriving in the bathroom, a young woman, on information and belief, Ms. [REDACTED], exited a sauna wearing only a towel, placed a tube of lotion on the counter and stated, "I guess you will need this more than I will."

32. Several minutes later, Mr. Epstein came into the bathroom and shut the door behind him, told both girls to remove their clothes and undressed himself. Mr. Epstein then placed a small washcloth over his genitals and asked both girls to rub lotion on his naked body. At some point Mr. Epstein told the other 15 year old girl to leave the room, leaving B.B. alone with Mr. Epstein. Mr. Epstein then began to masturbate while B.B. was massaging him.

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

34. Mr. Epstein took his free hand and began to touch B.B. between her legs and in her genitals while simultaneously masturbating himself. B.B. told Mr. Epstein to stop, but he continued to rub B.B. between her legs in her genital area. Mr. Epstein then ejaculated and told B.B. she could get dressed.

35. B.B. was then allowed to get dressed, leave the room and go back down the stairs and into the kitchen. Mr. Epstein gave the other 15 year old girl money and told B.B. that this girl “had her money” and then left. B.B. was given \$200 by the other 15 year old girl.

36. As a result of this encounter with Mr. Epstein, then 15 year old B.B. experienced confusion, shame, humiliation and embarrassment, and the assault sent her life into a downward spiral.

**COUNT I**  
**Sexual Battery against Defendant Epstein**

37. Plaintiff B.B. repeats and re-alleges paragraphs 1 through 36 above.

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

39. Mr. Epstein sexually battered B.B. at a time when she was 15 years old.

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

41. Plaintiff B.B., 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.

42. Mr. Epstein’s actions amounted to a harmful, unapproved and intentional touching of B.B.

43. Epstein inflicted harmful or offensive contact on B.B. with the intent to cause such contact, alternatively, B.B. had the apprehension that such contact was imminent.

44. Plaintiff is in need of therapy and counseling, so that she can deal with the shame associated with this incident.

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

46. As a direct and proximate result of Defendant's intentional, illegal and/or reckless conduct, Plaintiff B.B. seeks punitive damages against Jeffrey Epstein.

WHEREFORE, Plaintiff, B.B., 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 Defendant Epstein**

47. Plaintiff B.B. repeats and realleges paragraphs 1 through 36 above.

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

49. The conduct of Defendant Mr. Epstein in subjecting B.B. to Mr. Epstein's actions as described above was intentional or reckless.

50. The conduct of Defendant, Mr. Epstein in subjecting B.B. to Mr. Epstein's conduct described above was outrageous, going beyond all bounds of decency.

51. The conduct of Defendant Mr. Epstein, in subjecting B.B. to Mr. Epstein's conduct described above, caused B.B. severe emotional distress. Defendant knew or had reason to know that their intentional and outrageous conduct would cause emotional trauma and damage to B.B.

52. As a direct and proximate result of Defendant's intentional and/or reckless conduct, B.B. suffered and will continue to suffer severe mental anguish and pain.

53. As a direct and proximate result of Defendant's intentional, illegal and/or reckless conduct, Plaintiff B.B. seeks punitive damages against Jeffrey Epstein.

WHEREFORE, Plaintiff B.B. 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.

### **Count III**

#### **“Racketeer Influenced and Corrupt Organization Act”** **Pursuant to §§895.01, et.seq., Fla. Stat. (2009)** **Against Defendant Epstein**

54. Plaintiff realleges and reincorporates paragraphs 1 through 36 as if fully set forth herein.

55. Epstein, along with numerous other co-conspirators as named above, each and collectively constitute an enterprise pursuant to §895.02(3), Fla. Stat. (2009).

56. During all times relevant hereto, Epstein and his above named co-conspirators were and are associated with the enterprise and each other.

57. Defendant, Epstein, as a person associated with Epstein’s Sexual Enterprise, unlawfully conducted and participated, directly and indirectly, in such an enterprise through a pattern of racketeering, § 895.03(3), Fla. Stat., as alleged above herein.

58. The breadth and scope of Epstein’s racketeering activity continues to be uncovered in the various State and Federal Civil actions filed against him for this conduct.

59. Substantially more than two predicate acts (i.e. inappropriate and illegal sexual contact with minor girls) occurred within a five year time period.

60. Pursuant to § 895.02, Fla. Stat., Epstein engaged in a pattern of “racketeering activity” through the commission of crimes as defined in § 895.02(1)(a)-(b), Fla. Stat., including solicitation of minors for prostitution in violation of State and Federal law.

61. Pursuant to §895.05 Fla. Stat., Plaintiff seeks the following relief against Defendant Epstein:

a) Ordering Epstein to divest himself in an interest of the Epstein Sexual Enterprise, which would include, but is not limited to paying for attorneys for members of his conspiracy, paying money and non-cash benefits to members of his conspiracy;

b) Enjoin Epstein from engaging in the same type of conduct and activities as described herein; and

62. Pursuant to §895.05 Fla. Stat., Plaintiff further seeks compensatory damages, attorneys fees and punitive damages against Defendant Epstein.

**JURY TRIAL DEMAND**

Plaintiff demands a jury trial on all matters so triable.

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true and correct copy of the foregoing was furnished by U. S. Mail, postage prepaid, this 8<sup>th</sup> day of March, 2010 to Jack A. Goldberger, Esq./Bruce E. Reinhart, Esq., 250 Australian Ave, Ste 1400, WPB, FL 334101; Robert D. Critton, Jr., Michael J. Pike, 515 North Flagler Drive, Suite 400, West Palm Beach, FL 33401.

LEOPOLD-KUVIN, P.A.  
2925 PGA Boulevard  
Suite 200  
Palm Beach Gardens, FL 33410

 (facsimile)

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