

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

JANE DOE, by and through
JANE DOE'S MOTHER as parent and natural
guardian,

CASE NO:

Plaintiff,

vs.

JEFFREY EPSTEIN,
and [REDACTED]

Defendants.

COMPLAINT

Plaintiff, JANE DOE, by and through JANE DOE'S MOTHER as parent and natural
guardian of JANE DOE, brings this Complaint against Defendants JEFFREY EPSTEIN,

[REDACTED], and states 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.

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2. Jane Doe Doe's Mother brings this action by and through her Mother who is parent and
natural guardian of Jane Doe.

3. 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.

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

5. Defendant [REDACTED] is a citizen and resident of Palm Beach County, Florida.

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Consistent with the foregoing plan, scheme, and/or enterprise, Mr. [REDACTED] recruited Jane Doe to give Epstein a massage for monetary compensation. Mr. [REDACTED] brought Jane Doe to his mansion in Palm Beach. Jane was introduced to [REDACTED] who led her up the flight of stairs to the room with the massage table. Mr. [REDACTED] got on the massage table and laid out massage oil. Mr. [REDACTED] told Jane Doe that Epstein would be in shortly and then left the room. Jane Doe was alone in the room when Epstein arrived. Epstein told her to remove her clothes and lie on the stomach. When she returned he was wearing only a towel. He removed his towel and laid down on his back on the massage table. Epstein again told Jane Doe to remove her clothes. In shock, fear,

plaintiff Jane Doe complied, removing her clothing for her pants and her bra. Plaintiff Jane Doe then told Epstein to go to the room and told her to go to the room. After a period of time Epstein got up from the table and went to the room. For several minutes Jane Doe heard loud moans and screams and believed that Epstein was masturbating. Thereafter Epstein returned to the [redacted] table and had her up on the table. Epstein then told Jane Doe to continue with the massage and told her to sit on top of him. Jane Doe complied. As Jane Doe rubbed Epstein's chest Epstein began to masturbate on Jane Doe's vagina. Thereafter Epstein began to digitally stimulate her to penetrate Jane Doe's vagina. At this same time, Epstein was masturbating. Upon his orgasm, Epstein got up from the [redacted] table and told Jane Doe to write down her phone number and then left the room.

Jane Doe was then able to get dressed, leave the room and go back down the stairs and to her room. Epstein, [redacted] were waiting for Jane Doe. Epstein paid Jane Doe \$200 for bringing Jane to him. Ms. [redacted] brought Jane to him.

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

COUNT I Sexual Assault against Defendant Epstein

Plaintiff Jane Doe, by and through her Mother, as parent and natural guardian, reports:

after paragraphs 1 through 16 above.

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

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19. The sexual abuse was in violation of Chapter 800 of the Florida Statutes, which recognizes a crime of the first and highest degree committed by Epstein upon Jane Doe.

20. As a direct and proximate result of Epstein's sexual abuse of Jane Doe, 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 Mother, as parent and natural guardian, demands judgment against Defendant Jeffrey Epstein for compensation, 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 II

Civil Conspiracy against Defendants Epstein, [REDACTED]

21. Plaintiff Jane Doe, by and through her Mother, as parent and natural guardian, repeats and restates paragraphs 1 through 16 above.

22. Defendants Epstein, [REDACTED] conspired to subject Jane Doe to the sexual abuse of Defendant Epstein.

23. Each of the Defendants committed an overt act in pursuance of this conspiracy. Defendant [REDACTED] used false pretenses to lure Jane Doe to the home of Defendant Epstein so that Epstein could sexually assault Jane Doe. Defendant [REDACTED] delivered Jane Doe to Defendant Epstein's bedroom so that Epstein could sexually assault Jane Doe, and Defendant Epstein actually committed sexual assault against Jane Doe.

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Under G.L. 30A, § 27B

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all conduct to suffer severe and prolonged emotional distress, including mental, physical and emotional damages.

WHEREFORE, Plaintiff Jane Doe, by and through her Mother, as parent and natural guardian, demands judgment against Defendant Jeffrey Epstein, [REDACTED]

[REDACTED] for compensatory damages, costs attorney's fees and such other and further relief as the Court may deem just and proper. Further, Plaintiff reserves the right to amend this Complaint to add a for punitive damages pursuant to Florida Law.

COUNT III

Intentional Infliction of Emotional Distress against Defendant Epstein

Plaintiff Jane Doe, by and through her Mother, as parent and natural guardian repeats allegations paragraphs 1 through 16 above.

Epstein's conduct was intentional or reckless.

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

Epstein's conduct caused severe emotional distress not only to Jane Doe. Epstein knew or should have known that his intentional and outrageous conduct would cause emotional distress to Jane Doe and her mother.

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

WHEREFORE, Plaintiff Jane Doe, by and through her Mother as parent and natural guardian, demands, and Jane Doe's Mother, individually, demand judgment against Defendants Epstein, [REDACTED] for compensatory damages, costs attorney's fees and such other and further relief as this Court deems just and proper. Further, Plaintiff

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to the right to amend this Complaint to add a claim for punitive damages pursuant to 19 C.F.R. 101.11.

COUNT IV

Civil Remedy for Violation of Florida Statute Section 772.103 against
Defendants Epstein [REDACTED]

Plaintiff Jane Doe, by and through her Mother as parent and natural guardian, hereby alleges, paragraph 1 through 16 above.

Defendants participated in an enterprise, or conspired or endeavored to so participate, in a pattern of criminal activity in violation of Florida Statute section 772.103(3)(a).

Defendants engaged in this pattern of criminal activity by engaging in at least two of the six incidents of criminal activity with the same or similar means, results, accomplices,

and methods of commission within a 5 year period

- a. Pretending for prostitution or causing to be procured, any person who is under the age of 18 years in violation of Florida Statute section 796.03
- b. Soliciting, inducing, enticing, or procuring another to commit prostitution, lewdness, or assignation in violation of Florida Statute section 796.07(2)(f) or aiding, abetting or participating in such act in violation of Florida Statute section 796.07(2)(h);
- c. Knowingly recruiting, enticing, harboring, transposing, providing, or obtaining by any means a person, knowing that force, fraud, or coercion will be used to cause that person to engage in prostitution in violation of Florida Statute section 796.045, or
- d. Forcing, compelling, or coercing another to become a prostitute in violation of Florida Statute section 796.04

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Plaintiff Jane Doe was the victim of Defendant's plan, scheme and enterprise. Defendant took Jane Doe to Epstein's house under the pretense that Jane Doe would be paid to give him a massage. Defendant [REDACTED] advised Jane Doe to a room with a massage table and that Epstein would be in shortly. Jane Doe was alone in the room when Epstein arrived. He told her to remove her clothes and left the room. When Epstein returned he was wearing a towel. He removed his towel, and laid down on his stomach on the massage table. Epstein told Jane Doe remove her clothes. In shock, fear and trepidation, Jane Doe complied, removing her clothes except for her underwear and bra. Shortly after starting to rub Epstein's back, he told Jane Doe to sit on his back. Jane Doe, out of fear and trepidation, complied. After a short time Epstein got up from the table and went behind the door. For several minutes Jane heard loud noises and moans and believes that Epstein was masturbating. Thereafter, naked, returned to the massage table and laid face up on the table. Epstein then told Jane Doe to continue with the massage and told her to sit on top of him. Out of fear and pain, she complied. As Jane Doe rubbed Epstein's chest, Epstein began to use a vibrator on Jane Doe's vagina. Thereafter, Epstein began to digitally stimulate and attempt to penetrate Jane Doe's vagina. At this same time, with his other hand, Epstein was masturbating. Upon hearing orgasm, Epstein got up from the massage table and told Jane Doe to wipe down her back and phone number and then left the room.

1. Jane Doe was then able to get dressed, leave the room and go back down the street, and
 at this time, Defendant [REDACTED] for Jane Doe. Defendant [REDACTED] paid
 Mr. [REDACTED] was paid \$200 by Defendant [REDACTED] for bringing Jane Doe to him. Mr. [REDACTED] brought
 her home.

WHEREFORE, Plaintiff Jane Doe, by and through her Mother, as parent and natural
 guardian, demands judgment against Defendants Jeffrey Epstein, [REDACTED]
 [REDACTED] for compensatory damages, treble damages under Florida Statute section 772.101, civil
 attorney's fees under Florida Statute section 772.101, and such other and further relief as the
 court deems just and proper. Further, Plaintiff reserves the right to amend this Complaint to add
 claims for punitive damages pursuant to Florida Law.

JURY TRIAL DEMAND

Plaintiff demand a jury trial in this action.

March 1, 2006

Respectfully submitted,

RUCCI-LEOPOLD, P.A.

[REDACTED]

By

THEODORE J. LEOPOLD
 Florida Bar No. 705698

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