

**IN THE SUPERIOR COURT OF THE VIRGIN ISLANDS
DIVISION OF ST. THOMAS AND ST. JOHN**

IN THE MATTER OF THE ESTATE OF
JEFFREY E. EPSTEIN,

Deceased.

PROBATE NO. ST-19-PB-80

SUPERIOR COURT
OF THE VIRGIN ISLANDS
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MOTION TO INTERVENE

COMES NOW Annie Farmer, Maria Farmer, Teresa Helm, Juliette Bryant and Jane Doe 1000 (hereinafter “Epstein’s Victims”), who have claims pending in the Southern District of New York, hereby file this Motion to Intervene in the Petition for Probate and for Letters of Testamentary filed by the Executors of the Estate of Jeffrey Epstein (“the Estate”) on August 15, 2019. Pursuant to Virgin Island Rules of Civil Procedure Rule 24, the Epstein Victims seek to intervene in the Estate action to protect their claims against the Estate and their involvement in the Voluntary Claims Resolution process.

I. BACKGROUND

The Epstein Victims have filed the following cases in the Southern District of New York seeking damages against the Estate for the severe abuse they suffered at the hands of Jeffrey Epstein, which are attached here to as Composite Exhibit 1:

- *Farmer v. Indyke, et al.*, Case No.: 19-cv-10474;
- *Farmer v. Indyke, et al.*, Case No.: 19-cv-10475;
- *Helm v. Indykye, et al.*, Case No.: 19-cv-10476;
- *Bryant v. Indyke, et al.*, Case No.: 19-cv-10479; and
- *Doe 1000 v. Indyke, et al.*, Case No.: 19-cv-10577

The Epstein Victims are presently being represented in that action by the law firm of Boies Schiller Flexner who has retained the undersigned as local counsel in the Virgin Islands for

purposes of this proceeding. As this Court is aware, many of the assets that Epstein acquired are held in the Virgin Islands. The Epstein Victims need to be intervenors in this action to ensure the protection of their rights and claims.

II. ARGUMENT


This Court should allow the Epstein Victims to intervene in this matter pursuant to Rule 24(a)(2) which provides: “On a timely motion, the court must permit anyone to intervene who claims an interest relating to the property or transaction that is the subject of the action and is so situated that disposing of the action may as a practical matter impair or impede the movant’s ability to protect its interest.” V.I.R. Civ. P. Rule 24(a). This case is still in its relatively early stage with the Court now turning to the issues of the potential claims administration process relating to the Epstein Victims on February 4, 2020 rendering this a timely motion to intervene. *See Hendricks v. Clyne*, No. ST-16-CV-147, 2019 WL 918607 at *2 (Super. Ct. Feb. 20, 2019). The Epstein Victims have significant interest in the subject matter of the pending litigation the disposition of which could impair their interest and the current parties are not adequately suited to articulate the Epstein Victim’s interest. Accordingly, the Epstein Victims respectfully request that they be allowed to intervene and participate in any court action relating to the distribution of the assets of the Epstein Estate.

CONCLUSION

For the foregoing reasons, the Epstein Victims respectfully request that they be allowed to intervene in this action and be heard at the Court’s hearing on February 4, 2020.

Dated: February 3, 2020

Kevin F. D'Amour, P.C.


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CERTIFICATE OF SERVICE

THIS IS TO CERTIFY that on this 3 day of February, 2020, I caused a true and correct copy of the foregoing be sent to the following via U.S. Mail, postage paid.

Christopher A. Kroblin, Esq.
Andrew W. Heymann, Esq.
William Blum, Esq.
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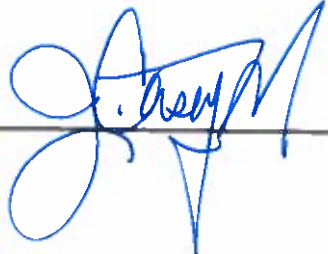


Exhibit 1

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

MARIA FARMER,

Plaintiff,

CASE NO:

v.

DARREN K. INDYKE and RICHARD D. KAHN,
in their capacities as the executors of the
ESTATE OF JEFFREY EDWARD EPSTEIN,

Defendants.

COMPLAINT

BOIES SCHILLER FLEXNER LLP

Plaintiff Maria Farmer, by her attorneys Boies Schiller Flexner LLP, for her Complaint against Defendants, Darren K. Indyke and Richard D. Kahn in their capacities as the executors of the Estate of Jeffrey Edward Epstein (“Epstein”), avers upon personal knowledge as to her own acts and status and upon information and belief and to all other matters as follows:

NATURE OF THE ACTION

1. This suit arises out of Jeffery Epstein’s sexual assault of Plaintiff.
2. Maria Farmer was sexually trafficked by Epstein and a co-conspirator as part of his organized ring of procuring young females for sex. As an aspiring artist, Maria believed that Epstein’s connections to the art world would help further her career when he offered her a position to procure art for him. Maria began working for Epstein in his Manhattan mansion, performing a variety of tasks including procuring art and manning the guest check in at the front door of the home. During the course of her employment for Epstein, Epstein and Ghislaine Maxwell violently sexually assaulted Maria while she was working on an art project at Epstein’s guest house on Les Wexner’s Ohio estate, and threatened to ruin her career and her life if she told anyone about the assault.
3. Epstein’s trafficking scheme involved recruiting young females by making false promises and using his wealth, power and threats to intimidate the females into submission to his demands. This same pattern was repeated numerous times with numerous young women.
4. As United States District Judge Kenneth Marra found, “From between about 1999 and 2007, Jeffrey Epstein sexually abused more than 30 minor girls . . . at his mansion in Palm Beach Florida, and elsewhere in the United States and overseas. . . . In addition to his own sexual abuse of the victims, Epstein directed other persons to abuse the girls sexually. Epstein used paid employees to find and bring minor girls to him. Epstein worked in concert with others to obtain

minors not only for his own sexual gratification, but also for the sexual gratification of others.” *Doe 1 v. United States*, 359 F. Supp. 3d 1201, 1204 (S.D. Fla. 2019) (internal citations omitted).

5. Epstein organized this sex trafficking network to obtain hundreds of young females for himself for sex, and also lent these females out to other powerful and wealthy individuals to be sexually abused.

6. Epstein conspired with others and hired staff to maintain and keep secret this network of sexual abuse for years, which sprawled throughout Epstein’s residences in New York, Florida, New Mexico, the United States Virgin Islands, and Paris. Epstein’s preference was to have three different girls a day for his sexual pleasure.

7. Despite his significant criminal activity, in 2008 Epstein received a shockingly minimal charge pleading guilty to a single Florida state law charge of procuring a minor for prostitution and a non-prosecution agreement (a “NPA”) with the U.S. Attorney for the Southern District of Florida. Unknown to the public and the victims at the time, Epstein’s lawyers were pressuring the Government to commit to the NPA without informing the victims. Epstein’s multiple victims were kept in the dark and told to be “patient” while Epstein’s lawyers worked to protect him and other potential co-conspirators from prosecution. Epstein served one year in jail, but was afforded the privilege of being able to leave the jail to go to work for twelve hours per day, six days per week.

8. The NPA allowed Epstein to escape proportionate punishment for his actions and to continue operating his sex trafficking enterprise with liberty.

9. A few years later, Epstein flippantly referred to his sexual abuse of multiple minors, and the slap on the wrist he had received for it, in a 2011 interview with the *New York Post*:
“Billionaire pervert Jeffrey Epstein is back in New York City – and making wisecracks about his

just-ended jail stint for having sex with an underage girl. ‘I am not a sexual predator, I’m an offender,’ the financier told The Post yesterday. ‘It’s the difference between a murderer and a person who steals a bagel,’ said Epstein.” Amber Sutherland, *Billionaire Jeffrey Epstein: I’m a Sex Offender Not a Predator*, N.Y. Post (Feb. 25, 2011),

<https://nypost.com/2011/02/25/billionaire-jeffrey-epstein-im-a-sex-offender-not-a-predator/>.

10. In August 2018, just one year before his death, Epstein told a New York Times reporter “that criminalizing sex with teenage girls was a cultural aberration and that at times in history it was perfectly acceptable.” James B. Stewart, *The Day Jeffrey Epstein Told Me He Had Dirt on Powerful People*, N.Y. Times (Aug. 12, 2019),

<https://www.nytimes.com/2019/08/12/business/jeffrey-epstein-interview.html>.

11. When Plaintiff was 26 years old, Epstein added her to his long list of victims by committing sexual assault and battery against her. As such, Epstein is responsible for battery and intentional infliction of emotional distress pursuant to New York common law. The damage to Plaintiff has been severe and lasting.

12. This action has been timely filed pursuant to N.Y. C.P.L.R. § 215(8)(a), which provides that a plaintiff shall have at least one year from the termination of a criminal action against the same defendant to commence an action with respect to the event or occurrence from which the criminal action arose. A criminal action against Epstein with respect to the same sex trafficking enterprise from which Plaintiff’s claims arise was terminated on August 29, 2019.

13. Any statute of limitations applicable to Plaintiff’s claims, if any, is tolled due to the continuous and active deception, duress, threats of retaliation, and other forms of misconduct that Epstein and his co-conspirators used to silence his many victims, including Plaintiff. Epstein’s actions deprived Plaintiff of the opportunity to commence this lawsuit before his death. Until his

death, Plaintiff feared that Epstein and his co-conspirators would harm her or her family, or ruin her life, if she came forward.

14. Defendants are equitably estopped from asserting a statute of limitations defense. Allowing Defendants to do so would be unjust. Epstein and his employees intimidated each of his victims into silence by threatening their lives and their livelihoods. They therefore prevented Plaintiff from commencing this lawsuit before his death. By using threats, along with his wealth and power, Epstein was able to escape punishment for his intolerable and brutal crimes against countless young women and underage girls for the duration of his life.

PARTIES

15. Plaintiff Maria Farmer is a citizen and resident of Arkansas.

16. Defendant Darren K. Indyke is sued in his capacity as an appointed executor of the Estate of Jeffrey E. Epstein.

17. Defendant Richard D. Kahn is sued in his capacity as an appointed executor of the Estate of Jeffrey E. Epstein.

JURISDICTION AND VENUE

18. Jeffrey Epstein was a citizen of the United States domiciled in the U.S. Virgin Islands at the time of his death. Jeffrey Epstein maintained a residence in the Southern District of New York. As the legal representatives of the Estate of Jeffrey E. Epstein, Darren K. Indyke and Richard D. Kahn are deemed citizens of the U.S. Virgin Islands.

19. The amount in controversy in this action exceeds the sum or value of \$75,000.00 excluding interests and costs and is between citizens of different states. Accordingly, jurisdiction is proper under 28 U.S.C. § 1332.

20. Venue is proper in this Court as Epstein's sexual abuse of Plaintiff began in New York, New York, where he recruited her to be a part of his organized sex trafficking ring.

21. Many of the events giving rise to these causes of action occurred in the Southern District of New York, where a substantial amount of Epstein's property is located. Thus, venue in this district is proper. 28 U.S.C. § 1391(b)(2).

FACTUAL ALLEGATIONS

A. Epstein's Sex Trafficking Enterprise

22. Jeffrey Epstein was widely renowned as a billionaire who used his vast connections to powerful individuals, and seemingly unlimited wealth and resources, to create a web of transcontinental sex trafficking that served himself, his co-conspirators, and some of the most powerful people in the world.

23. Epstein owned multiple residences and frequently travelled between them, including at 9 East 71st Street, New York, New York 10021, and at 49 Zorro Ranch Road, Stanley, New Mexico 87056, where the illegal sexual crimes against Plaintiff occurred. Epstein conservatively valued his New York townhome at \$55,931,000.00. Epstein conservatively valued his New Mexico ranch at \$17,246,208.00. In addition, Epstein owned residences in the Virgin Islands, Florida, France, and even on his own island, Great St. James Island, where his transcontinental sex trafficking of hundreds of young girls servicing him, his co-conspirators, and wealthy and powerful individuals around the world occurred.

24. At all times material to this cause of action, Jeffrey Epstein utilized his seemingly unlimited power, wealth, and resources, as well as his deep connections to powerful and politically connected individuals to intimidate and manipulate his victims of sexual abuse.

25. Epstein and his co-conspirators had perfected a scheme for manipulation and abuse of young females. As part of the scheme, a female “recruiter” would approach a young female and strike up a conversation in an effort to quickly learn about the young female’s background and any vulnerabilities they could expose. The recruiter would then manipulate the young female into coming back to one of Epstein’s residences by offering the young female something she needed. At times the recruiter’s lure would be a modeling opportunity, money for education, help for the young female’s family, and a whole host of other related offers depending on their target’s situation. Once in the residence, the recruiter and Epstein would work in concert to impress and intimidate the young female with displays of vast wealth, including having employees that were butlers and maids formally dressed around the house. They would also strategically place photographs of very powerful political and social figures amongst photographs and art displaying nude females in an effort to normalize the sexual abuse. They would also normalize the sexual abuse by placing a massage table and spa related products around the massage area in an effort to legitimize the area where the abuse was set to occur. Once abused, Epstein and his co-conspirators continued to manipulate the victims, using their financial power, promises, and threats to ensure that the victim returned as directed and remained compliant with their demands.

B. The Arrest, Prosecution, and Death of Epstein

26. The sexual trafficking ring described herein started at least as early as 1995 and continued up until at least July 2, 2019, when the U.S. Attorney’s Office for the Southern District of New York (“SDNY”) charged Epstein with sex trafficking conspiracy and sex trafficking in violation of 18 U.S.C. § 1591. He was arrested on July 8, 2019, pursuant to the SDNY’s Sealed Two Count Indictment, which is attached as Exhibit A.

27. The Indictment described Epstein's conduct and his abuse and trafficking of females in the same trafficking operation he used to abuse and traffic Plaintiff.

28. Epstein's last will and testament (the "Will") was executed on August 8, 2019, at the Metropolitan Correctional Center. The witnesses were Mariel Colón Miró and Gulnora Tali. The Will included affidavits from Darren K. Indyke and Richard D. Kahn, in which they swear an "Oath of Willingness to Serve as Executor and Appointment of Local Counsel."

29. Epstein was found dead in his cell at the Metropolitan Correctional Center on August 10, 2019.

30. Epstein's last will and testament was filed on August 15, 2019, in the Probate Division of the Superior Court of the Virgin Islands.

31. Darren K. Indyke and Richard D. Kahn filed a Certificate of Trust in the Superior Court of the Virgin Islands for Epstein's 1953 Trust on August 26, 2019. *See* Certificate of Trust, *In the Matter of the Estate of Jeffrey E. Epstein*, Probate No. ST-19-PB-80 (Super. Ct. V.I. Aug. 26, 2019).

32. Epstein's will was entered into probate on September 6, 2019, and the Superior Court of the Virgin Islands accordingly authorized Darren K. Indyke and Richard D. Kahn to administer Epstein's estate. *See* Order for Probate, *In the Matter of the Estate of Jeffrey E. Epstein*, Probate No. ST-19-PB-80 (Super. Ct. V.I. Sept. 6, 2019); Letters Testamentary, *In the Matter of the Estate of Jeffrey E. Epstein*, Probate No. ST-19-PB-80 (Super. Ct. V.I. Sept. 6, 2019).

33. The Will's first article directs Epstein's executors "to pay from my estate all expenses of my last illness, my funeral and burial expenses, the administration expenses of my estate and all of my debts duly proven and allowed against my estate." The Will further directs that "after the

payments and distributions provided in Article FIRST,” Epstein “give[s] all of my property, real and personal, wherever situated . . . to the then acting Trustees of The 1953 Trust.”

34. Following Epstein’s death, SDNY submitted a proposed nolle prosequi order in the criminal matter against him because it was required by law to do so after Epstein was deceased. On August 29, 2019, U.S. District Judge Richard Berman formally dismissed SDNY’s indictment against Epstein, terminating the criminal action against him. Plaintiff’s claims are therefore timely under N.Y. C.P.L.R. § 215(8)(a).

C. Maria Farmer

35. Maria Farmer was born on November 28, 1969. Her parents divorced when she was young, and her mother struggled to financially support Maria and her siblings. In 1993, Maria moved to New York City to pursue art.

36. In approximately 1995, Maria was an accomplished artist and graduate student at the New York Academy of Art. She met Epstein and Ghislaine Maxwell, a British socialite known for recruiting young girls for Epstein, at one of her art openings in New York. Epstein noticed Maria’s artwork and offered to help her art career if she sold a piece of artwork to him for half price. Maria agreed and sold the painting to Epstein.

37. Epstein asked Maria many personal questions, including if she had a father, and other questions about her life and family. Maria told Epstein that her parents were divorced, and that she and her family were struggling financially.

38. Epstein later offered Maria a job to purchase art for him in New York, and she accepted.

39. Eventually, Epstein modified Maria’s job duties to focus on monitoring and keeping records of who entered Epstein’s New York mansion. In her position at the front door, she observed that Maxwell was regularly bringing school-aged girls to the mansion and that the girls

were always escorted upstairs. Among the guests that came to the mansion, Maria observed Alan Dershowitz, a lawyer, on a number of occasions, and observed that he would go upstairs at the same time the young girls were there.

40. Maxwell described her role to Maria as recruiting models for Epstein, and told Maria that the girls were interviewing for modeling positions with Victoria's Secret, a lingerie retailer. Maria witnessed Maxwell approaching young females on the street and talking to them outside of the mansion. Maxwell would leave the mansion claiming she had "to go get girls for Jeffrey" and referred to the girls she was recruiting as "nubiles."

41. At the time, Maria was unaware of the sex trafficking conspiracy and believed the girls and young women were being recruited for modeling positions.

42. Epstein also made very clear to Maria that he was incredibly wealthy, powerful, and regularly in contact with world leaders. In fact, in his New York mansion, he had photographs displayed of significant political figures to ensure that any young female entering the home would know that he had extensive government connections. Epstein was not to be disobeyed and he made clear by his words and actions that there would be consequences if Maria did not comply with his demands.

43. Epstein and Maxwell asked Maria many questions about her family. Maria often would use her family members as her subjects for her artwork so she had several photographs of her siblings, including her younger sister Annie. Epstein and Maxwell started asking a number of questions about Annie, and Maria told them how smart Annie was and how she hoped to go to a great college. After seeing photos of Annie, Epstein told Maria that he wanted to fly Annie to New York for a visit. Maria thought Epstein was simply being generous since Maria had

explained how much she missed seeing Annie. What Maria did not realize was Epstein was intending to groom Annie for sexual abuse.

44. Epstein paid for plane tickets to fly Annie to New York. During the visit, Epstein took Annie and Maria to a movie. During the movie, without Maria's knowledge, Epstein groped Annie against her will. Thereafter, Annie left New York to head home without telling Maria that Epstein groped her during the movie.

45. After Annie's visit to New York, Epstein began to call Annie and Maria's mother to discuss Annie and to falsely claim that he was interested in helping Annie with her goal of going to a great college. He eventually convinced Annie's mother to allow Annie to fly to his ranch in New Mexico at the age of 16, where Maxwell and Epstein assaulted her.

46. During the course of her employment with Epstein, he directed Maria to become an "artist in residence" at billionaire Les Wexner's Ohio estate. At the time, Wexner was the chief executive of the parent company of Victoria's Secret. Epstein informed Maria that she would be staying in Epstein's 30,000 square foot guest house that was located on Wexner's Ohio estate.

47. During Maria's time at Wexner's estate, Epstein and Maxwell visited. Epstein requested a foot massage from Maria. Maria found the request to be disturbing but complied because Epstein was her employer.

48. After complying with his request for a massage, Epstein invited Maria to sit on the bed where he was watching television. Maxwell then joined them on the bed. Epstein and Maxwell proceeded to attack Maria physically against her will, including by violently sexually assaulting Maria.

49. Maria fled from the room and called the police. But the police did not respond to her. Desperate for help, Maria then called her father for help. Despite demanding to be allowed to

leave the property, Wexner's security personnel held Maria against her will and did not let her leave the property for several hours, even after she pleaded with them and told them about her assault. They eventually let Maria leave with her father, who had driven from Kentucky to Ohio to get Maria away from Epstein and Maxwell.

50. After Maria returned to New York from Ohio, Maxwell called on behalf of Epstein and threatened Maria in order to keep her quiet: "We're going to burn all your art. And I just want you to know that anything you ever make will be burned. Your career is burned."

51. Instead of letting Maxwell's words silence her, Maria reported her assault to the Sixth Precinct of the New York City Police Department ("NYPD"). The NYPD referred Maria to the Federal Bureau of Investigation ("FBI"). Maria followed the instruction and called the FBI to make a report of the abuse. To the extreme detriment of Maria—and also countless other victims who came after her—authorities ignored Maria's reporting efforts and took no action.

52. Maria also called her younger sister, Annie, who was overseas studying at an educational seminar for high performing high school students. During the call, Annie shared with Maria that she too had been assaulted by Epstein and Maxwell in New York and New Mexico.

53. Frustrated that authorities did not appear to be taking any action and in the hopes of exposing the crimes that Epstein and Maxwell were committing, Maria and Annie decided to share their stories with Vanity Fair magazine. Tragically for Maria and Annie, Epstein threatened and intimidated the magazine and Vanity Fair bent to those threats, ultimately publishing a profile of Epstein without mentioning the sisters or their allegations.

54. Once Epstein and Maxwell learned that Maria had revealed their sexual abuse to Vanity Fair, they embarked on a campaign to destroy Maria's reputation and art career. They called

Maria's clients and other individuals in the art community in New York and were ultimately successful in shutting her out of all art-related opportunities.

55. Maxwell again called Maria to threaten her, but this time threatened her life: "I know you go to the West Side Highway all the time. While you're out there, just be really careful because there are a lot of ways to die there." Afraid for her safety, having informed the NYPD, FBI, and media to no avail, Maria moved several times to try to hide from Epstein and Maxwell. Her fear of Epstein's power was exacerbated by the fact that state and federal authorities, as well as the media, were not taking action against Epstein.

56. Maria was deeply impacted by her harrowing time with Epstein. She underwent breast reduction surgery because she was unable to forget Epstein and Maxwell's sexual assault.

57. Maria suffers extreme emotional distress from an experience that has affected her for her entire life.

58. Epstein's sexual assault and battery of Maria continues to cause her significant distress and harm.

FIRST CAUSE OF ACTION

(Battery)

59. Plaintiff repeats and re-alleges the allegations stated above in paragraphs 1–58 as if fully set forth herein.

60. Epstein intentionally committed battery by sexually assaulting Plaintiff when she was a young woman. As described above, Epstein intentionally touched intimate parts of Plaintiff's body in an offensive and sexual manner without her consent.

61. A criminal action against Epstein with respect to the same sex trafficking enterprise from which Plaintiff's first cause of action arises was terminated on August 29, 2019, less than one year prior to the filing of this Complaint. *See* N.Y. C.P.L.R. § 215(8)(a).

62. As a direct and proximate result of Epstein's conduct, Plaintiff has in the past and will in the future continue to suffer extreme emotional distress, humiliation, fear, psychological trauma, loss of dignity and self-esteem, and invasion of her privacy.

SECOND CAUSE OF ACTION

(Intentional Infliction of Emotional Distress)

63. Plaintiff repeats and re-alleges the allegations stated above in paragraphs 1–58 as if fully set forth herein.

64. As a direct result of these allegations as stated, Epstein committed intentional infliction of emotional distress against Plaintiff.

65. Epstein's actions, described above, constitute extreme and outrageous conduct that shocks the conscience. Epstein's plan to recruit, entice, and assault Plaintiff goes beyond all possible bounds of decency and is intolerable in a civilized community.

66. Epstein knew or disregarded the substantial likelihood that these actions would cause Plaintiff severe emotional distress.

67. A criminal action against Epstein with respect to the same sex trafficking enterprise from which Plaintiff's second cause of action arises was terminated on August 29, 2019, less than one year prior to the filing of this Complaint. *See* N.Y. C.P.L.R. § 215(8)(a).

68. As a direct and proximate result of Epstein's conduct, Plaintiff has in the past and will in the future continue to suffer extreme emotional distress, humiliation, fear, psychological trauma, loss of dignity and self-esteem, and invasion of her privacy.

PRAYER FOR RELIEF

WHEREFORE, Plaintiff respectfully requests judgment against Defendants, awarding compensatory, consequential, exemplary, and punitive damages in an amount to be determined at trial; costs of suit; attorneys' fees; and such other and further relief as the Court may deem just and proper.

JURY DEMAND

Plaintiff hereby demands a trial by jury on all causes of action asserted within this pleading.

Dated: November 12, 2019.

/s/ Joshua I. Schiller

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**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

ANNIE FARMER,

Plaintiff,

CASE NO:

v.

DARREN K. INDYKE and RICHARD D. KAHN,
in their capacities as the executors of the
ESTATE OF JEFFREY EDWARD EPSTEIN, and
GHISLAINE MAXWELL,

Defendants.

_____ /

COMPLAINT

BOIES SCHILLER FLEXNER LLP

Plaintiff Annie Farmer, by her attorneys Boies Schiller Flexner LLP, for her Complaint against Defendants, Darren K. Indyke and Richard D. Kahn in their capacities as the executors of the Estate of Jeffrey Edward Epstein (“Epstein”) and Ghislaine Maxwell (“Maxwell”) (collectively, “Defendants”), avers upon personal knowledge as to her own acts and status and upon information and belief and to all other matters as follows:

NATURE OF THE ACTION

1. This suit arises out of Defendants’ sexual abuse of Plaintiff beginning when Plaintiff was 16 years old.
2. When Plaintiff was 16, she was sexually trafficked by Defendants as part of Epstein and Maxwell’s organized ring of procuring young women and girls for sex.
3. Epstein’s trafficking scheme involved recruiting young women and girls by making false promises and using his wealth, power and threats to intimidate the females into submission to his demands. This same pattern was repeated numerous times with numerous young women and girls.
4. As United States District Judge Kenneth Marra found, “From between about 1999 and 2007, Jeffrey Epstein sexually abused more than 30 minor girls . . . at his mansion in Palm Beach, Florida, and elsewhere in the United States and overseas. . . . In addition to his own sexual abuse of the victims, Epstein directed other persons to abuse the girls sexually. Epstein used paid employees to find and bring minor girls to him. Epstein worked in concert with others to obtain minors not only for his own sexual gratification, but also for the sexual gratification of others.” *Doe I v. United States*, 359 F. Supp. 3d 1201, 1204 (S.D. Fla. 2019) (internal citations omitted).

5. Epstein organized this sex trafficking network to obtain hundreds of young girls for himself for sex, and also lent these girls out to other powerful and wealthy individuals to be sexually abused.

6. Despite his significant criminal activity, in 2008 Epstein received a shockingly minimal charge pleading guilty to a single Florida state law charge of procuring a minor for prostitution and a non-prosecution agreement (a “NPA”) with the U.S. Attorney for the Southern District of Florida. Unknown to the public and the victims at the time, Epstein’s lawyers were pressuring the Government to commit to the NPA without informing the victims. Epstein’s multiple victims were kept in the dark and told to be “patient” while Epstein’s lawyers worked to protect him and other potential co-conspirators from prosecution. Epstein served one year in jail, but was afforded the privilege of being able to leave the jail to go to work for twelve hours per day, six days per week.

7. The NPA allowed Epstein to escape proportionate punishment for his actions and to continue operating his sex trafficking enterprise with liberty.

8. A few years later, Epstein flippantly referred to his sexual abuse of multiple young women and girls, and the slap on the wrist he had received for it, in a 2011 interview with the New York Post: “Billionaire pervert Jeffrey Epstein is back in New York City – and making wisecracks about his just-ended jail stint for having sex with an underage girl. ‘I am not a sexual predator, I’m an offender,’ the financier told The Post yesterday. ‘It’s the difference between a murderer and a person who steals a bagel,’ said Epstein.” Amber Sutherland, *Billionaire Jeffrey Epstein: I’m a Sex Offender Not a Predator*, N.Y. Post (Feb. 25, 2011), <https://nypost.com/2011/02/25/billionaire-jeffrey-epstein-im-a-sex-offender-not-a-predator/>.

9. In August 2018, just one year before his death, Epstein told a New York Times reporter “that criminalizing sex with teenage girls was a cultural aberration and that at times in history it was perfectly acceptable.” James B. Stewart, *The Day Jeffrey Epstein Told Me He Had Dirt on Powerful People*, N.Y. Times (Aug. 12, 2019),

<https://www.nytimes.com/2019/08/12/business/jeffrey-epstein-interview.html>.

10. Maxwell spent years overseeing and managing Epstein’s sex trafficking network, and actively recruited underage girls to provide to Epstein and others for sex.

11. Epstein and Maxwell conspired with friends and hired staff to maintain and keep secret this network of sexual abuse for years, which sprawled throughout Epstein’s residences in New York, Florida, New Mexico, the United States Virgin Islands, and Paris. Epstein’s preference was to have three different girls a day for his sexual pleasure and Maxwell was in charge of recruiting the girls.

12. Maxwell facilitated Epstein’s sexual trafficking ring by activities including, but not limited to: (1) identifying and recruiting girls, including several minors, for Epstein’s sexual pleasure and that of his co-conspirators, including herself; (2) identifying and hiring individuals to recruit underage girls; (3) scheduling appointments between the trafficked girls, many of whom were minors, and Epstein; (4) administering Epstein’s sex trafficking organization and hiding it from criminal repercussions; and (5) intimidating girls, many of whom were minors, who attempted to escape or report Epstein’s sex trafficking operation.

13. Epstein and Maxwell committed sexual assault and battery upon Plaintiff when she was 16 years old. As such, the Defendants are responsible for battery, unlawful imprisonment, and intentional infliction of emotional distress pursuant to New York common law. The damage to Plaintiff has been severe and lasting.

14. This action has been timely filed pursuant to the Child Victims Act, N.Y. C.P.L.R. § 214-g. The actions described herein constitute sexual offenses by Defendants under New York Penal Law Article 130, and were committed against Plaintiff when she was a child less than eighteen years of age, for which she suffered physical, psychological, and other injuries as a result.

15. This action has been timely filed pursuant to N.Y. C.P.L.R. § 215(8)(a), which provides that a plaintiff shall have at least one year from the termination of a criminal action against the same defendant to commence an action with respect to the event or occurrence from which the criminal action arose. A criminal action against Epstein with respect to the same sex trafficking enterprise from which Plaintiff's claims arise was terminated on August 29, 2019.

16. Any statute of limitations applicable to Plaintiff's claims, if any, is tolled due to the continuous and active deception, duress, threats of retaliation, and other forms of misconduct that Defendants used to silence their many victims, including Plaintiff. Defendants' actions deprived Plaintiff of the opportunity to commence this lawsuit before Epstein's death. Until his death, Plaintiff feared that Epstein and his co-conspirators, including Maxwell, would harm her or her family, or ruin her life, if she came forward.

17. Defendants are equitably estopped from asserting a statute of limitations defense. Allowing Defendants to do so would be unjust. Defendants intimidated each of their victims into silence by threatening their lives and their livelihoods. They therefore prevented Plaintiff from commencing this lawsuit before Epstein's death. By using threats, along with his wealth and power, Epstein was able to escape punishment for his intolerable and brutal crimes against countless young women and underage girls for the duration of his life.

PARTIES

18. Plaintiff Annie Farmer is a citizen and resident of Texas.
19. Defendant Darren K. Indyke is sued in his capacity as an appointed executor of the Estate of Jeffrey E. Epstein.
20. Defendant Richard D. Kahn is sued in his capacity as an appointed executor of the Estate of Jeffrey E. Epstein.
21. Defendant Ghislaine Maxwell is a New York citizen and is domiciled in the Southern District of New York.

JURISDICTION AND VENUE

22. Jeffrey Epstein was a citizen of the United States domiciled in the U.S. Virgin Islands at the time of his death. Jeffrey Epstein maintained a residence in the Southern District of New York. As the legal representatives of the Estate of Jeffrey E. Epstein, Darren K. Indyke and Richard D. Kahn are deemed citizens of the U.S. Virgin Islands.
23. Defendant Maxwell is a citizen of both the United States and the United Kingdom and is domiciled in the Southern District of New York.
24. The amount in controversy in this action exceeds the sum or value of \$75,000.00 excluding interests and costs and is between citizens of different states. Accordingly, jurisdiction is proper under 28 U.S.C. § 1332.
25. Venue is proper in this Court as the sexual abuse of Plaintiff by Defendants Epstein and Maxwell began and occurred in New York, New York, where they recruited her at the age of 16, physically molested her, and began grooming her for sex in their organized sex trafficking ring.

26. Many of the events giving rise to these causes of action occurred in the Southern District of New York, where a substantial amount of Epstein's property is located. Thus, venue in this district is proper. 28 U.S.C. § 1391(b)(2).

FACTUAL ALLEGATIONS

A. Epstein's Sex Trafficking Enterprise

27. Jeffrey Epstein was widely renowned as a billionaire who used his vast connections to powerful individuals, and seemingly unlimited wealth and resources, to create a web of transcontinental sex trafficking that served himself, his coconspirators, and some of the most powerful people in the world.

28. Epstein owned multiple residences and frequently travelled between them, including at 9 East 71st Street, New York, New York 10021, and at 49 Zorro Ranch Road, Stanley, New Mexico 87056, where the illegal sexual crimes against Plaintiff occurred. Epstein conservatively valued his New York townhome at \$55,931,000.00. Epstein conservatively valued his New Mexico ranch at \$17,246,208.00. In addition, Epstein owned residences in the Virgin Islands, Florida, France, and even on his own island, Great St. James Island, where his transcontinental sex trafficking of hundreds of young girls servicing him, his co-conspirators, and wealthy and powerful individuals around the world occurred.

29. The allegations herein concern Epstein's and Maxwell's tortious acts against Plaintiff while in New York, where Epstein was staying at his 71st Street mansion, and at his ranch in New Mexico.

30. At all times material to this cause of action, Jeffrey Epstein utilized his seemingly unlimited power, wealth, and resources, as well as his deep connections to powerful and politically connected individuals to intimidate and manipulate his victims of sexual abuse.

31. Epstein and Maxwell had perfected a scheme for manipulation and abuse of young females. As part of the scheme, Maxwell or another female would approach a young female and strike up a conversation in an effort to quickly learn about the young female's background and any vulnerabilities they could expose. Maxwell would then manipulate the young female into coming back to one of Epstein's residences by offering the young female something she needed. At times Maxwell's lure would be a modeling opportunity, money for education, help for the young female's family, and a whole host of other related offers depending on their target's situation. Once in the residence, Maxwell and Epstein would work in concert to impress and intimidate the young female with displays of vast wealth, including having employees that were butlers and maids formally dressed around the house. They would also strategically place photographs of very powerful political and social figures amongst photographs and art displaying nude females in an effort to normalize the sexual abuse. They would also normalize the sexual abuse by placing a massage table and spa related products around the massage area in an effort to legitimize the area where the abuse was set to occur. Once abused, Epstein and Maxwell continued to manipulate the victims, using their financial power, promises, and threats to ensure that the victim returned as directed and remained compliant with their demands.

B. The Arrest, Prosecution, and Death of Epstein

32. The sexual trafficking ring described herein started at least as early as 1995 and continued up until at least July 2, 2019, when the U.S. Attorney's Office for the Southern District of New York ("SDNY") charged Epstein with sex trafficking conspiracy and sex trafficking in violation of 18 U.S.C. § 1591. He was arrested on July 8, 2019, pursuant to the SDNY's Sealed Two Count Indictment, which is attached as Exhibit A.

33. The Indictment described Epstein's conduct and his abuse and trafficking of females in the same trafficking operation he used to abuse and traffic Plaintiff.

34. Epstein's last will and testament (the "Will") was executed on August 8, 2019, at the Metropolitan Correctional Center. The witnesses were Mariel Colón Miró and Gulnora Tali. The Will included affidavits from Darren K. Indyke and Richard D. Kahn, in which they swear an "Oath of Willingness to Serve as Executor and Appointment of Local Counsel."

35. Epstein was found dead in his cell at the Metropolitan Correctional Center on August 10, 2019.

36. Epstein's last will and testament was filed on August 15, 2019, in the Probate Division of the Superior Court of the Virgin Islands.

37. Darren K. Indyke and Richard D. Kahn filed a Certificate of Trust in the Superior Court of the Virgin Islands for Epstein's 1953 Trust on August 26, 2019. *See* Certificate of Trust, *In the Matter of the Estate of Jeffrey E. Epstein*, Probate No. ST-19-PB-80 (Super. Ct. V.I. Aug. 26, 2019).

38. Epstein's will was entered into probate on September 6, 2019, and the Superior Court of the Virgin Islands accordingly authorized Darren K. Indyke and Richard D. Kahn to administer Epstein's estate. *See* Order for Probate, *In the Matter of the Estate of Jeffrey E. Epstein*, Probate No. ST-19-PB-80 (Super. Ct. V.I. Sept. 6, 2019); Letters Testamentary, *In the Matter of the Estate of Jeffrey E. Epstein*, Probate No. ST-19-PB-80 (Super. Ct. V.I. Sept. 6, 2019).

39. The Will's first article directs Epstein's executors "to pay from my estate all expenses of my last illness, my funeral and burial expenses, the administration expenses of my estate and all of my debts duly proven and allowed against my estate." The Will further directs that "after the

payments and distributions provided in Article FIRST,” Epstein “give[s] all of my property, real and personal, wherever situated . . . to the then acting Trustees of The 1953 Trust.”

40. Following Epstein’s death, SDNY submitted a proposed nolle prosequi order in the criminal matter against him because it was required by law to do so after Epstein was deceased. On August 29, 2019, U.S. District Judge Richard Berman formally dismissed SDNY’s indictment against Epstein, terminating the criminal action against him.

C. Annie Farmer

41. Annie Farmer was born on July 2, 1979. Ms. Farmer’s parents divorced when she was young, and her mother struggled financially to support Annie and her siblings.

42. In 1995 and 1996, Annie was a high school student at Xavier College Preparatory in Phoenix, Arizona. She was a top performing student with the goal of going to college.

43. In approximately 1995, Annie’s sister, Maria Farmer, was an artist and a graduate student in New York. She met Epstein and Maxwell at an art show. Epstein noticed her artwork. Epstein offered to help her in her art career if she sold Epstein some of her artwork.

44. Epstein asked Maria if she had a father. He also asked her personal questions about her family situation, including about her younger sister, Annie. Maria explained that her parents were divorced, and that she and her family were financially struggling.

45. Maria accepted a job offer from Epstein to purchase art for him.

46. Her role later included keeping records of people who entered Epstein’s New York mansion. Maria observed that Defendant Maxwell was regularly bringing over school-aged girls to the New York mansion. Maxwell told Maria that these girls were interviewing for Victoria’s Secret modeling positions.

47. Maxwell described her role to Maria as recruiting Victoria's Secret models for Epstein. Maria witnessed Maxwell spotting girls and talking to them outside of the mansion, which Maxwell claimed was for recruiting purposes. Maxwell would leave the mansion claiming she had "to go get girls for Jeffrey."

48. At the time, Maria was unaware of the sex trafficking conspiracy and believed the girls were being recruited for modeling positions.

49. Annie understood her older sister, Maria, to be working for a billionaire in New York.

50. Epstein began taking an interest in Annie. He asked Maria questions about her younger sister in Arizona. He presented this interest to Maria in a friendly and fatherly manner. Maria was very proud of Annie's strong academic record, and supported Annie's goal of going to a good college after high school.

51. Epstein offered Maria ideas on how he could help Annie get into college. He used this as a ruse to get Annie to come to New York so that he could abuse her. Epstein purchased Annie's plane tickets, and she flew to New York.

52. Epstein gave Maria money to buy Annie a dress. He paid for a limousine to pick up the sisters and take them to Epstein's townhome. He talked to Annie about going to college and potential schools before sending them to see a Broadway show.

53. During Annie's stay in New York, Epstein asked Annie and Maria to go to the movie theater with him. This is where he began initiating non-consensual physical contact with Annie in an attempt to groom Annie for sexual activity and normalize sexual behavior with him.

54. At the movie, Epstein intentionally positioned himself between the sisters to ensure they were separated, and to prevent Maria from seeing that he was touching Annie. Epstein began caressing and petting Annie on various parts of her body against her will. He would repeatedly

touch Annie only when Maria was unaware and looking away. Annie was distressed, frightened, and confused.

55. Annie then left to go back home to Arizona.

56. Epstein began calling Annie and her mother from New York under the false pretense of discussing Annie's education and plans for college. He offered to send Annie on an international trip to help with her college applications.

57. As part of his plan to recruit Annie for sexual purposes, Epstein explained to Annie's mother that he sponsored educational trips for high school students, and was sponsoring an event in New Mexico at his ranch called Zorro Ranch. He invited Annie. He explained that Maxwell would be a host or chaperone for Annie at the event. Under these false pretenses, Annie's mother agreed to send Annie to Epstein's program for high school students.

58. Epstein and Maxwell, who were in New York at the time, arranged and paid for Annie to fly to New Mexico in the spring of 1996. Epstein mailed her airline tickets from New York to her mother in Arizona. When Annie arrived in New Mexico, Epstein had a driver take her to his ranch. Epstein's Zorro Ranch sits on over 10,000 acres and is very remote. Upon arriving at the ranch, Annie learned that Epstein had not invited any other students. She was the only person at the massive ranch in a different state, away from her family in Arizona, her sister in New York, and anyone she knew. She was alone with Maxwell and Epstein.

59. Maxwell appeared charming and friendly to Annie. Upon arriving, Maxwell and Epstein took Annie shopping and lavished her with gifts, including beauty products and a pair of brand new cowboy boots. After returning to the ranch, Maxwell began pressuring Annie to touch Epstein and give him a foot massage. Annie was very scared and did not want to touch Epstein, but Maxwell was relentless and demanded that Annie massage Epstein. Both adults explained to

Annie that it was just a massage, and attempted to normalize this sexual behavior with an adult to her.

60. Epstein and Maxwell took Annie to a movie theater. While in line for the movie, Maxwell pulled down Epstein's sweatpants, exposing part of his buttocks. Both Epstein and Maxwell repeatedly fondled each other in front of Annie, trying to normalize sexual behavior to Annie, a child.

61. In the movie theater in New Mexico, Epstein caressed and petted various parts of Annie's body against her will. Annie was incredibly scared, and did not know how to escape because she was a child alone with Epstein and Maxwell. Annie did not have a phone or any other means of communication without Epstein or Maxwell knowing.

62. Epstein, Maxwell, and Annie returned to Epstein's ranch. Upon returning from the movie, Maxwell repeatedly told Annie that she wanted to give her a massage. Annie was very uncomfortable with the idea of Maxwell touching her, but realized that she was completely alone with Epstein and Maxwell. Annie feared what would happen if she did not comply with their demands. Annie said that she had never had a massage and tried to avoid having Maxwell touch her body, but Maxwell continued to pressure her. Maxwell directed Annie to take off all of her clothes and lay on the massage table. Annie was extremely scared to be naked in front of Epstein and Maxwell.

63. Maxwell left the door open so that Epstein could view Annie's naked body during the massage.

64. Maxwell touched intimate parts of Annie's body against her will for the sexual benefit of Maxwell and Epstein.

65. Maxwell exposed Annie's breasts and groped her.

66. Annie was extremely distressed and afraid. She was a child in a massive ranch in New Mexico, away from her family in Arizona, and isolated from any source of help. She was alone with Epstein and Maxwell. She had no way to access a phone or other method of communication without Epstein or Maxwell knowing. She had no way of leaving.

67. Annie woke up the next morning to find Epstein entering her room. He climbed into the bed with her and announced, "I want to cuddle." Without her consent, Epstein got into the bed with Annie, physically restrained her with his arms and proceeded to press his body (including his genitals) against Annie. Annie was frozen in fear. She was sixteen years old.

68. Annie knew she had no way of escaping Epstein's massive estate, and attempted to escape by saying she needed to use the restroom. She was in shock, and frightened by what she was experiencing. She feared for her safety, knowing she was alone in Epstein's ranch in another state and that Maxwell and Epstein were closely monitoring her activity.

69. Annie escaped to Epstein's bathroom. She was in extreme fear and emotional distress, not knowing how to escape Epstein's ranch in New Mexico, where these two adults were groping her, a child, against her will.

70. Epstein and Maxwell eventually allowed Annie to fly back home to Arizona and they returned to New York. Out of fear of what could happen to her and her family because of Epstein and Maxwell's great power, wealth, and connections that they had displayed to her, Annie did not tell anyone about Epstein and Maxwell touching her against her will.

71. Devastatingly, Annie was not the only Farmer family member that Epstein and Maxwell sexually abused. During that summer, Maria was lured into an "artist in residence" position by Epstein at billionaire Les Wexner's Ohio estate on which Epstein owned a guest house. There, Epstein and Maxwell both sexually assaulted Maria. Wexner's security personnel did not allow

Maria to exit his estate, even after she pleaded with them and told them about her assault. There was only one entrance with a guard house to Wexner's estate.

72. After Maria's sexual assault in Ohio, Maxwell called on behalf of Epstein and threatened Maria in order to keep her quiet: "We're going to burn all your art. And I just want you to know that anything you ever make will be burned. Your career is burned."

73. Instead of letting Maxwell's words silence her, Maria reported her assault to the Sixth Precinct of the New York City Police Department ("NYPD"). The NYPD referred Maria to the Federal Bureau of Investigation ("FBI"). Maria followed the instruction and called the FBI to make a report of the abuse. To the extreme detriment of Maria and Annie—and also countless other victims who came after them—authorities ignored Maria's reporting efforts and took no action.

74. Maria also called Annie, who was overseas studying at an educational seminar for high performing high school students. During the call, Annie shared with Maria her own assaults in New York and New Mexico, as well as her false imprisonment at Epstein's New Mexico ranch.

75. Frustrated that authorities did not appear to be taking any action and in the hopes of exposing the crimes that Maxwell and Epstein were committing, Annie and Maria decided to share their stories with *Vanity Fair* magazine. Tragically for Annie and Maria, Epstein threatened and intimidated the magazine and *Vanity Fair* bent to those threats and ultimately published a profile of Epstein without mentioning the sisters or their allegations.

76. Once Maxwell and Epstein learned that Maria had revealed the abuse to *Vanity Fair*, they embarked on a campaign to destroy Maria's reputation and art career. Afraid for her safety, having informed the NYPD, FBI, and media to no avail, Maria left New York and Annie moved

to Alaska. Annie and Maria's fear of Epstein's power was exacerbated by the fact that state and federal authorities, as well as the media, were not taking action against Epstein.

77. Annie was deeply affected by her harrowing experiences at the hands of Epstein and Maxwell as a child. She suffers severe emotional distress from an experience that has affected her for her entire life.

78. The Defendants' sexual assault, battery, and false imprisonment of Annie continue to cause her significant distress and harm.

FIRST CAUSE OF ACTION

(Battery)

79. Plaintiff repeats and re-alleges the allegations stated above in paragraphs 1–78 as if fully set forth herein.

80. Epstein and Maxwell intentionally committed battery by sexually assaulting Plaintiff when she was a young girl. As described above, on multiple occasions Epstein and Maxwell intentionally touched Plaintiff in an offensive and sexual manner without her consent.

81. Epstein and Maxwell's actions constitute sexual offenses as defined in New York Penal Law Article 130, including but not limited to forcible touching as defined in Article 130.52, inasmuch as Epstein and Maxwell intentionally and forcibly touched sexual and intimate parts of Plaintiff's body for their own sexual gratification on multiple occasions. *See* N.Y. C.P.L.R. § 214-g.

82. A criminal action against Epstein with respect to the same sex trafficking enterprise from which Plaintiff's first cause of action arises was terminated on August 29, 2019, less than one year prior to the filing of this Complaint. *See* N.Y. C.P.L.R. § 215(8)(a).

83. As a direct and proximate result of Epstein's and Maxwell's criminal acts, Plaintiff has in the past and will in the future continue to suffer extreme emotional distress, humiliation, fear, psychological trauma, loss of dignity and self-esteem, and invasion of her privacy.

SECOND CAUSE OF ACTION

(False Imprisonment)

84. Plaintiff repeats and re-alleges the allegations stated above in paragraphs 1–78 as if fully set forth herein.

85. As a direct result of these allegations as stated, Defendants falsely imprisoned Plaintiff at Epstein's New Mexico residence while Plaintiff was a young girl for the purpose of degrading her, abusing her, or gratifying their sexual desires.

86. Epstein and Maxwell brought Plaintiff to Epstein's New Mexico Ranch with the intent to confine her in that location so that they could sexually abuse her. Plaintiff was conscious of her confinement and did not consent that confinement. Epstein and Maxwell prevented Plaintiff, a child with no way to communicate with anyone other than Epstein and Maxwell and with no access to a car or other means of transportation, from leaving the premises, Epstein's remote 10,000 acre Zorro Ranch in New Mexico.

87. A criminal action against Epstein with respect to the same sex trafficking enterprise from which Plaintiff's second cause of action arises was terminated on August 29, 2019, less than one year prior to the filing of this Complaint. *See* N.Y. C.P.L.R. § 215(8)(a).

88. As a direct and proximate result of Epstein and Maxwell's criminal acts, Plaintiff has in the past and will in the future continue to suffer extreme emotional distress, humiliation, fear, psychological trauma, loss of dignity and self-esteem, and invasion of her privacy.

THIRD CAUSE OF ACTION

(Intentional Infliction of Emotional Distress)

89. Plaintiff repeats and re-alleges the allegations stated above in paragraphs 1–78 as if fully set forth herein.

90. As a direct result of these allegations as stated, Defendants committed intentional infliction of emotional distress against Plaintiff.

91. Defendants' actions, described above, constitute extreme and outrageous conduct that shocks the conscience. Epstein and Maxwell's plan to recruit, entice, and assault Plaintiff, a sixteen-year-old child, on multiple occasions, goes beyond all possible bounds of decency and is intolerable in a civilized community.

92. Defendants knew or disregarded the substantial likelihood that these actions would cause Plaintiff severe emotional distress.

93. A criminal action against Epstein with respect to the same sex trafficking enterprise from which Plaintiff's third cause of action arises was terminated on August 29, 2019, less than one year prior to the filing of this Complaint. *See* N.Y. C.P.L.R. § 215(8)(a).

94. As a direct and proximate result of Epstein and Maxwell's criminal acts, Plaintiff has in the past and will in the future continue to suffer extreme emotional distress, humiliation, fear, psychological trauma, loss of dignity and self-esteem, and invasion of her privacy.

PRAYER FOR RELIEF

WHEREFORE, Plaintiff respectfully requests judgment against Defendants, awarding compensatory, consequential, exemplary, and punitive damages in an amount to be determined at trial; costs of suit; attorneys' fees; and such other and further relief as the Court may deem just and proper.

JURY DEMAND

Plaintiff hereby demands a trial by jury on all causes of action asserted within this pleading.

Dated: November 12, 2019.

/s/ Joshua I. Schiller

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**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

TERESA HELM,

Plaintiff,

CASE NO:

v.

DARREN K. INDYKE and RICHARD D. KAHN,
in their capacities as the executors of the
ESTATE OF JEFFREY EDWARD EPSTEIN,

Defendants.

COMPLAINT

BOIES SCHILLER FLEXNER LLP

Plaintiff Teresa Helm, by her attorneys Boies Schiller Flexner LLP, for her Complaint against Defendants, Darren K. Indyke and Richard D. Kahn in their capacities as the executors of the Estate of Jeffrey Edward Epstein (“Epstein”), avers upon personal knowledge as to her own acts and status and upon information and belief and to all other matters as follows:

NATURE OF THE ACTION

1. This suit arises out of Jeffrey Epstein’s sexual abuse of Plaintiff.
2. Teresa was sexually trafficked by Epstein, Sarah Kellen, and Ghislaine Maxwell as part of Epstein’s organized ring of procuring young women for sex. She was recruited by a woman who worked for Epstein and who offered Teresa the opportunity to become a traveling masseuse. As Teresa was studying massage at the California Healing Arts College, this seemed like a dream opportunity, but her hopes were dashed when it quickly turned into sexual assault.
3. Epstein’s trafficking scheme involved recruiting young females by making false promises and using his wealth, power and threats to intimidate the females into submission to his demands. This same pattern was repeated numerous times with numerous young women.
4. As United States District Judge Kenneth Marra found, “From between about 1999 and 2007, Jeffrey Epstein sexually abused more than 30 minor girls . . . at his mansion in Palm Beach Florida, and elsewhere in the United States and overseas. . . . In addition to his own sexual abuse of the victims, Epstein directed other persons to abuse the girls sexually. Epstein used paid employees to find and bring minor girls to him. Epstein worked in concert with others to obtain minors not only for his own sexual gratification, but also for the sexual gratification of others.” *Doe 1 v. United States*, 359 F. Supp. 3d 1201, 1204 (S.D. Fla. 2019) (internal citations omitted).

5. Epstein organized this sex trafficking network to obtain hundreds of young females for himself for sex, and also lent these females out to other powerful and wealthy individuals to be sexually abused.

6. Epstein conspired with others and hired staff to maintain and keep secret this network of sexual abuse for years, which sprawled throughout Epstein's residences in New York, Florida, New Mexico, the United States Virgin Islands, and Paris. Epstein's preference was to have three different young females a day for his sexual pleasure.

7. Despite his significant criminal activity, in 2008 Epstein received a shockingly minimal charge, pleading guilty to a single Florida state law charge of procuring a minor for prostitution and a non-prosecution agreement (a "NPA") with the U.S. Attorney for the Southern District of Florida. Unknown to the public and the victims at the time, Epstein's lawyers were pressuring the Government to commit to the NPA without informing the victims. Epstein's multiple victims were kept in the dark and told to be "patient" while Epstein's lawyers worked to protect him and other potential co-conspirators from prosecution. Epstein served one year in jail, but was afforded the privilege of being able to leave the jail to go to work for twelve hours per day, six days per week.

8. The NPA allowed Epstein to escape proportionate punishment for his actions and to continue operating his sex trafficking enterprise with liberty.

9. A few years later, Epstein flippantly referred to his sexual abuse of multiple minors, and the slap on the wrist he had received for it, in a 2011 interview with the New York Post: "Billionaire pervert Jeffrey Epstein is back in New York City – and making wisecracks about his just-ended jail stint for having sex with an underage girl. 'I am not a sexual predator, I'm an offender,' the financier told The Post yesterday. 'It's the difference between a murderer and a

person who steals a bagel,' said Epstein." Amber Sutherland, *Billionaire Jeffrey Epstein: I'm a Sex Offender Not a Predator*, N.Y. Post (Feb. 25, 2011),

<https://nypost.com/2011/02/25/billionaire-jeffrey-epstein-im-a-sex-offender-not-a-predator/>.

10. In August 2018, just one year before his death, Epstein told a New York Times reporter "that criminalizing sex with teenage girls was a cultural aberration and that at times in history it was perfectly acceptable." James B. Stewart, *The Day Jeffrey Epstein Told Me He Had Dirt on Powerful People*, N.Y. Times (Aug. 12, 2019),

<https://www.nytimes.com/2019/08/12/business/jeffrey-epstein-interview.html>.

11. When Plaintiff was 22 years old, Epstein added her to his long list of victims by committing sexual assault and battery against her. As such, Epstein is responsible for battery and intentional infliction of emotional distress pursuant to New York common law. The damage to Plaintiff has been severe and lasting.

12. This action has been timely filed pursuant to N.Y. C.P.L.R. § 215(8)(a), which provides that a plaintiff shall have at least one year from the termination of a criminal action against the same defendant to commence an action with respect to the event or occurrence from which the criminal action arose. A criminal action against Epstein with respect to the same sex trafficking enterprise from which Plaintiff's claims arise was terminated on August 29, 2019.

13. Any statute of limitations applicable to Plaintiff's claims, if any, is tolled due to the continuous and active deception, duress, threats of retaliation, and other forms of misconduct that Epstein and his co-conspirators used to silence his many victims, including Plaintiff. Epstein's actions deprived Plaintiff of the opportunity to commence this lawsuit before his death. Until his death, Plaintiff feared that Epstein and his co-conspirators would harm her or her family, or ruin her life, if she came forward.

14. Defendants are equitably estopped from asserting a statute of limitations defense. Allowing Defendants to do so would be unjust. Epstein and his co-conspirators intimidated each of his victims into silence by threatening their lives and their livelihoods. They therefore prevented Plaintiff from commencing this lawsuit before his death. By using threats, along with his wealth and power, Epstein was able to escape punishment for his intolerable and brutal crimes against countless young women and underage girls for the duration of his life.

PARTIES

15. Plaintiff Teresa Helm is a citizen and resident of Ohio.

16. Defendant Darren K. Indyke is sued in his capacity as an appointed executor of the Estate of Jeffrey E. Epstein.

17. Defendant Richard D. Kahn is sued in his capacity as an appointed executor of the Estate of Jeffrey E. Epstein.

JURISDICTION AND VENUE

18. Jeffrey Epstein was a citizen of the United States domiciled in the U.S. Virgin Islands at the time of his death. Jeffrey Epstein maintained a residence in the Southern District of New York. As the legal representatives of the Estate of Jeffrey E. Epstein, Darren K. Indyke and Richard D. Kahn are deemed citizens of the U.S. Virgin Islands.

19. The amount in controversy in this action exceeds the sum or value of \$75,000.00 excluding interests and costs and is between citizens of different states. Accordingly, jurisdiction is proper under 28 U.S.C. § 1332.

20. Venue is proper in this Court as Epstein's sexual abuse of Plaintiff occurred in New York, New York, where he recruited her at the age of 22, physically molested her, and began grooming her for sex in his organized sex trafficking ring.

21. Many of the events giving rise to these causes of action occurred in the Southern District of New York, where a substantial amount of Epstein's property is located. Thus, venue in this district is proper. 28 U.S.C. § 1391(b)(2).

FACTUAL ALLEGATIONS

A. Epstein's Sex Trafficking Enterprise

22. Jeffrey Epstein was widely renowned as a billionaire who used his vast connections to powerful individuals, and seemingly unlimited wealth and resources, to create a web of transcontinental sex trafficking that served himself, his co-conspirators, and some of the most powerful people in the world.

23. Epstein owned multiple residences and frequently travelled between them, including at 9 East 71st Street, New York, New York 10021, where the illegal sexual crimes against Plaintiff occurred. Epstein conservatively valued his New York townhome at \$55,931,000.00. Epstein conservatively valued his ranch at 49 Zorro Ranch Road, Stanley, New Mexico 87056, at \$17,246,208.00. In addition, Epstein owned residences in the Virgin Islands, Florida, France, and even on his own island, Great St. James Island, where his transcontinental sex trafficking of hundreds of young females servicing him, his co-conspirators, and wealthy and powerful individuals around the world occurred.

24. The allegations herein concern Epstein's tortious acts against Plaintiff while in New York, where Epstein was staying at his 71st Street mansion.

25. At all times material to this cause of action, Jeffrey Epstein utilized his seemingly unlimited power, wealth, and resources, as well as his deep connections to powerful and politically connected individuals to intimidate and manipulate his victims of sexual abuse.

26. Epstein and his co-conspirators had perfected a scheme for manipulation and abuse of young females. As part of the scheme, a female “recruiter” would approach a young female and strike up a conversation in an effort to quickly learn about the young female’s background and any vulnerabilities they could expose. The recruiter would then manipulate the young female into coming back to one of Epstein’s residences by offering the young female something she needed. At times the recruiter’s lure would be a modeling opportunity, money for education, help for the young female’s family, and a whole host of other related offers depending on their target’s situation. Once in the residence, the recruiter and Epstein would work in concert to impress and intimidate the young female with displays of vast wealth, including having employees that were butlers and maids formally dressed around the house. They would also strategically place photographs of very powerful political and social figures amongst photographs and art displaying nude females in an effort to normalize the sexual abuse. They would also normalize the sexual abuse by placing a massage table and spa related products around the massage area in an effort to legitimize the area where the abuse was set to occur. Once abused, Epstein and his co-conspirators continued to manipulate the victims, using their financial power, promises, and threats to ensure that the victim returned as directed and remained compliant with their demands.

B. The Arrest, Prosecution, and Death of Epstein

27. The sexual trafficking ring described herein started at least as early as 1995 and continued up until at least July 2, 2019, when the U.S. Attorney’s Office for the Southern District of New York (“SDNY”) charged Epstein with sex trafficking conspiracy and sex trafficking in violation of 18 U.S.C. § 1591. He was arrested on July 8, 2019, pursuant to the SDNY’s Sealed Two Count Indictment, which is attached as Exhibit A.

28. The Indictment described Epstein's conduct and his abuse and trafficking of females in the same trafficking operation he used to abuse and traffic Plaintiff.

29. Epstein's last will and testament (the "Will") was executed on August 8, 2019, at the Metropolitan Correctional Center. The witnesses were Mariel Colón Miró and Gulnora Tali. The Will included affidavits from Darren K. Indyke and Richard D. Kahn, in which they swear an "Oath of Willingness to Serve as Executor and Appointment of Local Counsel."

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C. Teresa Helm

36. In or around September 2002, Teresa was 22 years old and living in Santa Monica, California. She was working towards obtaining her certificate in massage therapy at the California Healing Arts College. A fellow massage therapy student approached Teresa and asked her if she would be interested in a traveling masseuse position. The student explained to Teresa that the position involved traveling around the world on a private jet with a wealthy couple. Teresa expressed interest.

37. The student arranged for Teresa to meet an employee of the couple at Santa Monica beach. That woman was Sarah Kellen, one of Epstein’s co-conspirators and recruiters.

38. Teresa and Kellen discussed the position for about an hour. Kellen made the job sound like a dream, explaining that Teresa would be working for a highly educated and worldly couple in New York with their own private jet. Kellen told Teresa that she would be taken to lavish parties, receive expensive clothes, travel all over the world in luxury, and receive the best education available all around the world.

39. About two weeks after her initial interview with Kellen, Kellen told Teresa that the couple wanted to fly her to New York for another interview. The couple bought her a ticket for a flight from California to New York City.

40. When she arrived, a driver brought Teresa to an apartment building in Manhattan, where he said Teresa would be staying. Upon information and belief, that apartment building was on 66th Street and is where Epstein housed many of the models and other young women he was abusing.

41. Once she arrived, Teresa received instructions by telephone to go to Ghislaine Maxwell's home the following day. Maxwell is a British socialite and was one of Epstein's primary "recruiters" of young women. Teresa did as she was told and went to Maxwell's home the next day. She was greeted by a butler and shown into a large sitting room. She noticed a framed photograph of Maxwell and a former high U.S. government official in the bathroom.

42. When Teresa went back into the sitting room, Maxwell came in wearing only a bathrobe. She and Teresa spoke for about an hour. She had set up a massage table and Teresa proceeded to give Maxwell a massage as she had been trained to do.

43. After the massage, Maxwell informed Teresa that she would be meeting Epstein for a massage and interview. Maxwell bragged about Epstein's mansion and called it the largest brownstone in Manhattan. She then paid Teresa \$100 for the massage and told her to give Epstein "whatever he wants" during his massage because Epstein "always gets what he wants."

44. When Teresa returned to the 66th Street apartment building, she received a call with instructions to go to Epstein's mansion. She walked to Epstein's mansion as instructed and was overwhelmed by its lavishness. She was told to wait in what appeared to be an office.

45. Eventually, Epstein led Teresa upstairs and down a hallway to his personal office.

46. Epstein asked Teresa to sit down and began asking her personal questions. He eventually asked her to give him a foot massage. She agreed and placed his foot in her lap so that she could begin the massage. As Teresa began massaging Epstein's foot, he started pressing his foot against intimate parts of Teresa's body. Teresa became uncomfortable, adjusted her position, and moved Epstein's foot up to keep it away from her body. But Epstein continued pushing his foot into her body.

47. Teresa tried to remain calm and professional despite Epstein's nonconsensual touching. She asked Epstein to change his position so she could massage him at a different angle, but Epstein continued to push his foot into her intimate parts of Teresa's body.

48. While still on the couch in Epstein's office, Epstein got close to Teresa, grabbed her chin with his hand, turned her face towards him, and said that he knew he could trust Teresa. Specifically, he said, "I know I can always trust a woman who shows her gums when she smiles." Epstein's actions terrified Teresa.

49. Epstein then got up to walk Teresa out of the room. Teresa was walking in front of Epstein when he abruptly grabbed her and proceeded to sexually assault her against her will. Teresa stopped walking and Epstein then forcefully grabbed her and sexually assaulted her again. Teresa was frozen with shock and fear. Once Epstein released her she continued walking towards the front door of the mansion.

50. Just before Teresa stepped out the front door, Epstein grabbed her buttocks and said, "Don't do anything I wouldn't do." Teresa proceeded to leave Epstein's mansion, and went back to the 66th Street apartment building.

51. Teresa was devastated that the traveling masseuse position was not what she had anticipated. She was also scared because she recognized that Epstein was a very powerful

person based on what Kellen told her and the photographs and other clear displays of wealth in his home.

52. Epstein made very clear to Teresa that he was incredibly wealthy, powerful, and regularly in contact with world leaders. In fact, in his New York mansion he had photographs displayed of significant political figures to ensure that any young female entering the home would know that he had extensive government connections. Epstein was not to be disobeyed and he made clear by his words and actions that there would be consequences if Teresa did not comply with his demands.

53. When Teresa got back to California, she received an e-mail from one of Epstein's co-conspirators thanking her for visiting New York and letting her know that Epstein and his co-conspirators would need to decide whether or not they wanted to hire her. She did not respond to the e-mail.

54. Due to the distress caused by Epstein's assault, Teresa did not finish massage therapy school with the same certification that she initially set out to achieve. Teresa also ended up leaving California and moving back to Ohio a few short months after the assault.

55. Teresa was deeply affected by the assault and she suffers severe emotional distress from an experience that has affected her for her entire life.

56. Epstein's sexual assault and battery of Teresa continues to cause her significant distress and harm.

FIRST CAUSE OF ACTION

(Battery)

57. Plaintiff repeats and re-alleges the allegations stated above in paragraphs 1–56 as if fully set forth herein.

58. Epstein intentionally committed battery by sexually assaulting Plaintiff when she was a young woman. As described above, Epstein intentionally touched intimate parts of Plaintiff's body in an offensive and sexual manner without her consent.

59. A criminal action against Epstein with respect to the same sex trafficking enterprise from which Plaintiff's first cause of action arises was terminated on August 29, 2019, less than one year prior to the filing of this Complaint. *See* N.Y. C.P.L.R. § 215(8)(a).

60. As a direct and proximate result of Epstein's conduct, Plaintiff has in the past and will in the future continue to suffer extreme emotional distress, humiliation, fear, psychological trauma, loss of dignity and self-esteem, and invasion of her privacy.

SECOND CAUSE OF ACTION

(Intentional Infliction of Emotional Distress)

61. Plaintiff repeats and re-alleges the allegations stated above in paragraphs 1–56 as if fully set forth herein.

62. As a direct result of these allegations as stated, Epstein committed intentional infliction of emotional distress against Plaintiff.

63. Epstein's actions, described above, constitute extreme and outrageous conduct that shocks the conscience. Epstein's plan to recruit, entice, and assault Plaintiff goes beyond all possible bounds of decency and is intolerable in a civilized community.

64. Epstein knew or disregarded the substantial likelihood that these actions would cause Plaintiff severe emotional distress.

65. A criminal action against Epstein with respect to the same sex trafficking enterprise from which Plaintiff's second cause of action arises was terminated on August 29, 2019, less than one year prior to the filing of this Complaint. *See* N.Y. C.P.L.R. § 215(8)(a).

66. As a direct and proximate result of Epstein's conduct, Plaintiff has in the past and will in the future continue to suffer extreme emotional distress, humiliation, fear, psychological trauma, loss of dignity and self-esteem, and invasion of her privacy.

PRAYER FOR RELIEF

WHEREFORE, Plaintiff respectfully requests judgment against Defendants, awarding compensatory, consequential, exemplary, and punitive damages in an amount to be determined at trial; costs of suit; attorneys' fees; and such other and further relief as the Court may deem just and proper.

JURY DEMAND

Plaintiff hereby demands a trial by jury on all causes of action asserted within this pleading.

Dated: November 12, 2019.

/s/ Joshua I. Schiller

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**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

JULIETTE BRYANT,

Plaintiff,

CASE NO:

v.

DARREN K. INDYKE and RICHARD D. KAHN,
in their capacities as the executors of the
ESTATE OF JEFFREY EDWARD EPSTEIN,

Defendants.

COMPLAINT

BOIES SCHILLER FLEXNER LLP

Plaintiff Juliette Bryant, by her attorneys Boies Schiller Flexner LLP, for her Complaint against Defendants, Darren K. Indyke and Richard D. Kahn in their capacities as the executors of the Estate of Jeffrey Edward Epstein (“Epstein”), avers upon personal knowledge as to her own acts and status and upon information and belief and to all other matters as follows:

NATURE OF THE ACTION

1. This suit arises out of Jeffrey Epstein’s sexual abuse of Plaintiff beginning when Plaintiff was 20 years old that lasted years and included trafficking Plaintiff to each of his homes in the United States and Paris.
2. Plaintiff was a young girl living in South Africa with hopes of becoming a model when she was approached by one of Epstein’s recruiters about a prospective modeling opportunity in the United States and invited to a restaurant to meet Epstein, who was dining with a former high U.S. Government official, a famous actor, and a well-known comedian. What appeared on the outside as a legitimate opportunity to break into the modeling business in the United States turned into years of horrific abuse and manipulation at the hands of Jeffrey Epstein.
3. Epstein’s trafficking scheme involved recruiting young females by making false promises and using his wealth, power and threats to intimidate the females into submission to his demands. This same pattern was repeated numerous times with numerous young women.
4. As United States District Judge Kenneth Marra found, “From between about 1999 and 2007, Jeffrey Epstein sexually abused more than 30 minor girls . . . at his mansion in Palm Beach Florida, and elsewhere in the United States and overseas. . . . In addition to his own sexual abuse of the victims, Epstein directed other persons to abuse the girls sexually. Epstein used paid employees to find and bring minor girls to him. Epstein worked in concert with others to obtain

minors not only for his own sexual gratification, but also for the sexual gratification of others.”
Doe 1 v. United States, 359 F. Supp. 3d 1201, 1204 (S.D. Fla. 2019) (internal citations omitted).

5. Epstein organized this sex trafficking network to obtain hundreds of young females for himself for sex, and also lent these females out to other powerful and wealthy individuals to be sexually abused.

6. Epstein conspired with others and hired staff to maintain and keep secret this network of sexual abuse for years, which sprawled throughout Epstein’s residences in New York, Florida, New Mexico, the United States Virgin Islands, and Paris. Epstein’s preference was to have three different young females a day for his sexual pleasure.

7. Despite his significant criminal activity, in 2008 Epstein received a shockingly minimal charge, pleading guilty to a single Florida state law charge of procuring a minor for prostitution and a non-prosecution agreement (a “NPA”) with the U.S. Attorney for the Southern District of Florida. Unknown to the public and the victims at the time, Epstein’s lawyers were pressuring the Government to commit to the NPA without informing the victims. Epstein’s multiple victims were kept in the dark and told to be “patient” while Epstein’s lawyers worked to protect him and other potential co-conspirators from prosecution. Epstein served one year in jail, but was afforded the privilege of being able to leave the jail to go to work for twelve hours per day, six days per week.

8. The NPA allowed Epstein to escape proportionate punishment for his actions and to continue operating his sex trafficking enterprise with liberty.

9. A few years later, Epstein flippantly referred to his sexual abuse of multiple minors, and the slap on the wrist he had received for it, in a 2011 interview with the New York Post:

“Billionaire pervert Jeffrey Epstein is back in New York City – and making wisecracks about his

just-ended jail stint for having sex with an underage girl. ‘I am not a sexual predator, I’m an offender,’ the financier told The Post yesterday. ‘It’s the difference between a murderer and a person who steals a bagel,’ said Epstein.” Amber Sutherland, *Billionaire Jeffrey Epstein: I’m a Sex Offender Not a Predator*, N.Y. Post (Feb. 25, 2011), <https://nypost.com/2011/02/25/billionaire-jeffrey-epstein-im-a-sex-offender-not-a-predator/>.

10. In August 2018, just one year before his death, Epstein told a New York Times reporter “that criminalizing sex with teenage girls was a cultural aberration and that at times in history it was perfectly acceptable.” James B. Stewart, *The Day Jeffrey Epstein Told Me He Had Dirt on Powerful People*, N.Y. Times (Aug. 12, 2019), <https://www.nytimes.com/2019/08/12/business/jeffrey-epstein-interview.html>.

11. When Plaintiff was 20 years old, Epstein added her to his long list of victims by committing sexual assault and battery against her. As such, Epstein is responsible for battery and intentional infliction of emotional distress pursuant to New York common law. The damage to Plaintiff has been severe and lasting.

12. This action has been timely filed pursuant to N.Y. C.P.L.R. § 215(8)(a), which provides that a plaintiff shall have at least one year from the termination of a criminal action against the same defendant to commence an action with respect to the event or occurrence from which the criminal action arose. A criminal action against Epstein with respect to the same sex trafficking enterprise from which Plaintiff’s claims arise was terminated on August 29, 2019.

13. This action has also been timely filed pursuant to N.Y. C.P.L.R. § 213-C, which provides that a plaintiff shall have 20 years to file civil claims “for physical, psychological or other injury or condition suffered by such person as a result of conduct which would constitute rape in the

first degree as defined in section 130.35 of the penal law.” Epstein raped Plaintiff within 20 years of filing this Complaint.

14. Any statute of limitations applicable to Plaintiff’s claims, if any, is tolled due to the continuous and active deception, duress, threats of retaliation, and other forms of misconduct that Epstein and his co-conspirators used to silence his many victims, including Plaintiff. Epstein’s actions deprived Plaintiff of the opportunity to commence this lawsuit before his death. Until his death, Plaintiff feared that Epstein and his co-conspirators would harm her or her family, or ruin her life, if she came forward.

15. Defendants are equitably estopped from asserting a statute of limitations defense. Allowing Defendants to do so would be unjust. Epstein and his co-conspirators intimidated each of his victims into silence by threatening their lives and their livelihoods. They therefore prevented Plaintiff from commencing this lawsuit before his death. By using threats, along with his wealth and power, Epstein was able to escape punishment for his intolerable and brutal crimes against countless young women and underage girls for the duration of his life.

PARTIES

16. Plaintiff Juliette Bryant is a citizen and resident of South Africa.

17. Defendant Darren K. Indyke is sued in his capacity as an appointed executor of the Estate of Jeffrey E. Epstein.

18. Defendant Richard D. Kahn is sued in his capacity as an appointed executor of the Estate of Jeffrey E. Epstein.

JURISDICTION AND VENUE

19. Jeffrey Epstein was a citizen of the United States domiciled in the U.S. Virgin Islands at the time of his death. Jeffrey Epstein maintained a residence in the Southern District of New

York. As the legal representatives of the Estate of Jeffrey E. Epstein, Darren K. Indyke and Richard D. Kahn are deemed citizens of the U.S. Virgin Islands.

20. The amount in controversy in this action exceeds the sum or value of \$75,000.00 excluding interests and costs and is between citizens of different states. Accordingly, jurisdiction is proper under 28 U.S.C. § 1332.

21. Venue is proper in this Court as Epstein's sexual abuse of Plaintiff began in New York, New York, where he recruited her at the age of 20 and began grooming her for sex in his organized sex trafficking ring.

22. Many of the events giving rise to these causes of action occurred in the Southern District of New York, where a substantial amount of Epstein's property is located. Thus, venue in this district is proper. 28 U.S.C. § 1391(b)(2).

FACTUAL ALLEGATIONS

A. Epstein's Sex Trafficking Enterprise

23. Jeffrey Epstein was widely renowned as a billionaire who used his vast connections to powerful individuals, and seemingly unlimited wealth and resources, to create a web of transcontinental sex trafficking that served himself, his co-conspirators, and some of the most powerful people in the world.

24. Epstein owned multiple residences and frequently travelled between them, including at 9 East 71st Street, New York, New York 10021, and at 49 Zorro Ranch Road, Stanley, New Mexico 87056, where the illegal sexual crimes against Plaintiff occurred. Epstein conservatively valued his New York townhome at \$55,931,000.00. Epstein conservatively valued his New Mexico ranch at \$17,246,208.00. In addition, Epstein owned residences in the Virgin Islands, Florida, and France, and even on his own island, Great St. James Island, where his

transcontinental sex trafficking of hundreds of young females servicing him, his co-conspirators, and wealthy and powerful individuals around the world occurred.

25. The allegations herein concern Epstein's tortious acts against Plaintiff while at Epstein's mansion in New York, his home in Florida, his home in the Virgin Islands, his apartment in Paris, and his New Mexico ranch.

26. At all times material to this cause of action, Jeffrey Epstein utilized his seemingly unlimited power, wealth, and resources, as well as his deep connections to powerful and politically connected individuals to intimidate and manipulate his victims of sexual abuse.

27. Epstein and his co-conspirators had perfected a scheme for manipulation and abuse of young females. As part of the scheme, a female "recruiter" would approach a young female and strike up a conversation in an effort to quickly learn about the young female's background and any vulnerabilities they could expose. The recruiter would then manipulate the young female into coming back to one of Epstein's residences by offering the young female something she needed. At times the recruiter's lure would be a modeling opportunity, money for education, help for the young female's family, and a whole host of other related offers depending on their target's situation. Once in the residence, the recruiter and Epstein would work in concert to impress and intimidate the young female with displays of vast wealth, including having employees that were butlers and maids formally dressed around the house. They would also strategically place photographs of very powerful political and social figures amongst photographs and art displaying nude females in an effort to normalize the sexual abuse. They would also normalize the sexual abuse by placing a massage table and spa related products around the massage area in an effort to legitimize the area where the abuse was set to occur. Once abused, Epstein and his co-conspirators continued to manipulate the victims, using their

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C. Juliette Bryant

37. Plaintiff Juliette Bryant was born on July 23, 1982, in South Africa.

38. In 2002, Juliette was 20 years old and an aspiring model. In Cape Town, Naja Hill, an American model, approached Juliette in an attempt to befriend her. Hill asked Juliette if she would like to meet Epstein, who she called the "King of America." Hill described Epstein as a well-connected billionaire who could help her with her modeling career and explained that he was visiting Africa with a former high U.S. Government official, a famous actor, and a well-known comedian.

39. Juliette considered meeting Epstein an amazing opportunity because modeling in New York City had always been one of her biggest dreams. Hill brought Juliette to a restaurant to meet Epstein, who at the time was dining with the former high U.S. Government official, the famous actor, and the well-known comedian. Juliette had never met a celebrity before. She was invited to attend a speech the former high U.S. Government official was giving in Cape Town the next day, and was escorted to the speech by police cars with individuals associated with the former official.

40. Later, Epstein asked Juliette to bring her modeling portfolio to his hotel for “casting.” Epstein told Juliette that he owned a modeling agency and would get her an agent in New York. He also mentioned that his good friend, Les Wexner, owned Victoria’s Secret, a lingerie conglomerate.

41. Within a few days, Leslie Groff began calling Juliette. Groff told Juliette that Epstein wanted to bring her to New York City to model. Groff, who was in New York at the time, helped Juliette get a visa, passport, and airline tickets. It was Juliette’s first time traveling overseas, so she was nervous. Epstein called Juliette’s mother from New York to assure her that Juliette would be safe with him in New York.

42. Within two weeks, Juliette arrived in New York. A car picked her up from the airport and brought her to an apartment building on 66th Street, where Epstein housed some of the other models who he was abusing. But Juliette was not there for long. Shortly after arriving at the apartment, Sarah Kellen, another one of Epstein’s co-conspirators, called and told Juliette that Juliette was going to the Caribbean. Juliette did not understand why she was traveling to the Caribbean so soon after arriving in New York City, but hoped it was for a modeling job.

2002			From	To		
29	B-727-311H	N909JK	LFPB	EGGW	146	SAME AS ABOVE LESS JC, SK, GM, AMERICA METROVECH WAS GLENN
1	"	"	EGGW	LFPB	147	GM, NICK & CATHERINA SEMMONS
2	"	"	LFPB	JFK	148	JC, SK, AMERICA METROVECH, NICK SEMMONS, CATHERINA SEMMONS
3	"	"	JFK	PBI	149	JC, SK, AMERICA METROVECH, NICK SEMMONS, CATHERINA SEMMONS
6	G-1154B	N909JK	PBI	TEB	150	JC, SK, AMERICA METROVECH, NICK SEMMONS, CATHERINA SEMMONS
11	"	"	TEB	PBI	151	JC, GM, AMERICA METROVECH, NICK SEMMONS, CATHERINA SEMMONS
14	"	"	PBI OPE	PBI	1519	MAYRE POSTER - PPE JLS SINGLE GAS LINE + GONDOLI SE
15	"	"	PBI	TEB	1600	JC, GM, AMERICA METROVECH, NICK SEMMONS, CATHERINA SEMMONS
17	"	"	TEB	TEST	1601	JC, SK, AMERICA METROVECH
21	"	"	TEST	PBI	1602	JC, SK, AMERICA METROVECH, JULIETTE PRYANT

43. Juliette was taken on Epstein's private plane. During the flight, Epstein began sexually touching Juliette's leg. She felt trapped and terrified, and feared that she would be killed.

44. They arrived at Epstein's home in the Virgin Islands. Epstein's abuse of Juliette there began when Kellen sent Juliette to Epstein's room to massage him. For the rest of the trip, Epstein repeatedly raped Juliette by forcible compulsion. Kellen repeatedly sent Juliette to Epstein's room, where he would touch her, use massage devices on her, force her to perform oral sex on him, and sexually force himself on her. Juliette also witnessed another young girl performing oral sex on Epstein in front of Juliette while they were watching a movie. Juliette was terrified of Epstein and his power. No one knew where she was and she believed that if anything happened to her, no one would ever know.

45. Instead of fulfilling her dreams of becoming a model in New York City, Juliette was subject to extreme and repeated sexual abuse. Epstein's sexual abuse of Juliette was humiliating and degrading, and caused Juliette to cry herself to sleep each night. She felt trapped and alone on Epstein's private island. Juliette learned very quickly that Epstein was incredibly powerful and that she should not disobey his demands.

46. Epstein's abuse of Juliette lasted for years. Epstein forced her to travel to the United States many times to see Epstein and be subjected to repeated sexual abuse for one to two weeks

at a time, sometimes staying in his New York apartment. Epstein never introduced Juliette to a modeling agent, and she was never hired for a modeling job.

47. For those years, Juliette felt like a prisoner and was afraid of betraying Epstein because of his money and power. She was afraid he would hurt her or her family. In fact, the very first time Epstein brought Juliette to the United States, in order to scare her, he told her that when another woman had accused him of rape, he planted drugs in the woman's apartment and had her sent to prison.

48. Epstein made very clear to Juliette that he was incredibly wealthy, powerful, and regularly in contact with world leaders. In fact, in his New York mansion he had photographs displayed of significant political figures to ensure that any young female entering the home would know that he had extensive government connections. Epstein was not to be disobeyed and he made clear by his words and actions that there would be consequences if Juliette did not comply with his demands.

49. Juliette was also forced to travel to Epstein's home in Paris where she had to stay with Ghislaine Maxwell, one of Epstein's main recruiters of young females, and where Sarah Kellen forced her to be photographed nude for Epstein. During that trip, Juliette witnessed that young females were on call to sexually pleasure Epstein.

50. Juliette's final trip to the United States was in 2004. She flew to see Epstein at his New Mexico ranch, called "Zorro Ranch." Epstein abused Juliette at Zorro Ranch. During that trip, Epstein took Juliette with him to meet another important government official. Juliette complied and went with Epstein. At the meeting, Juliette believed that Epstein had brought her there so that the official could look her over. Juliette felt very uncomfortable and she and Epstein began to fight because he claimed she was not being obedient. Epstein then informed Juliette that he

wanted her to travel with him on his plane to California and serve drinks to some of his scientist friends who were going to be flying with him to California. But before the flight, after an argument with Epstein, Juliette flew home to South Africa. This was the last time Juliette visited Epstein.

51. Epstein attempted to keep in contact with Juliette through e-mail over the years. For example, in 2016, Epstein e-mailed Juliette to ask if she knew Sarah Ransome, another woman who was a victim of Epstein's sex trafficking scheme. In June 2019, only two months before his death, Epstein sent Juliette an e-mail asking her to send him nude photographs.

52. Juliette was deeply affected by her harrowing experiences at the hands of Epstein. She developed eating disorders that affected her for years afterwards. She also suffered from substance abuse, debilitating panic attacks, and severe anxiety.

53. Epstein's sexual assault and battery of Juliette continues to cause her significant distress and harm.

FIRST CAUSE OF ACTION

(Battery)

54. Plaintiff repeats and re-alleges the allegations stated above in paragraphs 1–53 as if fully set forth herein.

55. Epstein intentionally committed battery by sexually assaulting Plaintiff on numerous occasions at his homes in New York, New Mexico, Florida, France, and the U.S. Virgin Islands. As described above, on multiple occasions over a years-long period, Epstein raped Plaintiff and intentionally touched intimate parts of her body in an offensive and sexual manner without her consent.

56. Epstein's actions constitute sexual offenses as defined in New York Penal Law Article 130, including but not limited to rape in the first degree as defined in Article 130.35, inasmuch as Epstein engaged in sexual intercourse with Plaintiff by forcible compulsion. *See* N.Y. C.P.L.R. § 213-C.

57. A criminal action against Epstein with respect to the same sex trafficking enterprise from which Plaintiff's first cause of action arises was terminated on August 29, 2019, less than one year prior to the filing of this Complaint. *See* N.Y. C.P.L.R. § 215(8)(a).

58. As a direct and proximate result of Epstein's conduct, Plaintiff has in the past and will in the future continue to suffer extreme emotional distress, humiliation, fear, anxiety, panic attacks, psychological trauma, loss of dignity and self-esteem, and invasion of her privacy.

SECOND CAUSE OF ACTION

(Intentional Infliction of Emotional Distress)

59. Plaintiff repeats and re-alleges the allegations stated above in paragraphs 1–53 as if fully set forth herein.

60. As a direct result of these allegations as stated, Epstein committed intentional infliction of emotional distress against Plaintiff.

61. Epstein's actions, described above, constitute extreme and outrageous conduct that shocks the conscience. Epstein's plan to recruit, entice, rape, and assault Plaintiff on multiple occasions goes beyond all possible bounds of decency and is intolerable in a civilized community.

62. Epstein knew or disregarded the substantial likelihood that these actions would cause Plaintiff severe emotional distress.

63. A criminal action against Epstein with respect to the same sex trafficking enterprise from which Plaintiff's second cause of action arises was terminated on August 29, 2019, less than one year prior to the filing of this Complaint. *See* N.Y. C.P.L.R. § 215(8)(a).

64. As a direct and proximate result of Epstein's conduct, Plaintiff has in the past and will in the future continue to suffer extreme emotional distress, humiliation, fear, anxiety, panic attacks, psychological trauma, loss of dignity and self-esteem, and invasion of her privacy.

PRAYER FOR RELIEF

WHEREFORE, Plaintiff respectfully requests judgment against Defendants, awarding compensatory, consequential, exemplary, and punitive damages in an amount to be determined at trial; costs of suit; attorneys' fees; and such other and further relief as the Court may deem just and proper.

JURY DEMAND

Plaintiff hereby demands a trial by jury on all causes of action asserted within this pleading.

Dated: November 14, 2019.

/s/ Joshua I. Schiller

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**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

JANE DOE 1000,

Plaintiff,

CASE NO:

v.

DARREN K. INDYKE and RICHARD D. KAHN,
in their capacities as the executors of the
ESTATE OF JEFFREY EDWARD EPSTEIN,

Defendants.

COMPLAINT

BOIES SCHILLER FLEXNER LLP

Plaintiff Jane Doe 1000, by her attorneys Boies Schiller Flexner LLP, for her Complaint against Defendants, Darren K. Indyke and Richard D. Kahn in their capacities as the executors of the Estate of Jeffrey Edward Epstein (“Epstein”), avers upon personal knowledge as to her own acts and status and upon information and belief and to all other matters as follows:

NATURE OF THE ACTION

1. This suit arises out of Jeffrey Epstein’s sexual abuse of Plaintiff.
2. Jane Doe 1000 was sexually trafficked by Epstein as part of his organized ring of procuring young and underage girls for sex. One of Epstein’s co-conspirators contacted Jane Doe after a modeling appearance and arranged to have Jane Doe meet Epstein under the false pretense that he was involved in the modeling industry and wanted to interview her about opportunities. Rather than help her with her modeling career, Epstein manipulated and intimidated Jane Doe and subjected her to years of sexual abuse in his New York mansion.
3. Epstein’s trafficking scheme involved recruiting young females by making false promises and using his wealth, power and threats to intimidate the females into submission to his demands. This same pattern was repeated numerous times with numerous young women.
4. As United States District Judge Kenneth Marra found, “From between about 1999 and 2007, Jeffrey Epstein sexually abused more than 30 minor girls . . . at his mansion in Palm Beach Florida, and elsewhere in the United States and overseas. . . . In addition to his own sexual abuse of the victims, Epstein directed other persons to abuse the girls sexually. Epstein used paid employees to find and bring minor girls to him. Epstein worked in concert with others to obtain minors not only for his own sexual gratification, but also for the sexual gratification of others.” *Doe 1 v. United States*, 359 F. Supp. 3d 1201, 1204 (S.D. Fla. 2019) (internal citations omitted).

5. Epstein organized this sex trafficking network to obtain hundreds of young females for himself for sex, and also lent these females out to other powerful and wealthy individuals to be sexually abused.

6. Epstein conspired with others and hired staff to maintain and keep secret this network of sexual abuse for years, which sprawled throughout Epstein's residences in New York, Florida, New Mexico, the United States Virgin Islands, and Paris. Epstein's preference was to have three different young females a day for his sexual pleasure.

7. Despite his significant criminal activity, in 2008 Epstein received a shockingly minimal charge pleading guilty to a single Florida state law charge of procuring a minor for prostitution and a non-prosecution agreement (a "NPA") with the U.S. Attorney for the Southern District of Florida. Unknown to the public and the victims at the time, Epstein's lawyers were pressuring the Government to commit to the NPA without informing the victims. Epstein's multiple victims were kept in the dark and told to be "patient" while Epstein's lawyers worked to protect him and other potential co-conspirators from prosecution. Epstein served one year in jail, but was afforded the privilege of being able to leave the jail to go to work for twelve hours per day, six days per week.

8. The NPA allowed Epstein to escape proportionate punishment for his actions and to continue operating his sex trafficking enterprise with liberty.

9. A few years later, Epstein flippantly referred to his sexual abuse of multiple minors, and the slap on the wrist he had received for it, in a 2011 interview with the New York Post: "Billionaire pervert Jeffrey Epstein is back in New York City – and making wisecracks about his just-ended jail stint for having sex with an underage girl. 'I am not a sexual predator, I'm an offender,' the financier told The Post yesterday. 'It's the difference between a murderer and a

person who steals a bagel,' said Epstein." Amber Sutherland, *Billionaire Jeffrey Epstein: I'm a Sex Offender Not a Predator*, N.Y. Post (Feb. 25, 2011),

<https://nypost.com/2011/02/25/billionaire-jeffrey-epstein-im-a-sex-offender-not-a-predator/>.

10. In August 2018, just one year before his death, Epstein told a New York Times reporter "that criminalizing sex with teenage girls was a cultural aberration and that at times in history it was perfectly acceptable." James B. Stewart, *The Day Jeffrey Epstein Told Me He Had Dirt on Powerful People*, N.Y. Times (Aug. 12, 2019),

<https://www.nytimes.com/2019/08/12/business/jeffrey-epstein-interview.html>.

11. When Plaintiff was a young woman, Epstein added her to his long list of victims by committing sexual assault and battery against her. As such, Epstein is responsible for battery and intentional infliction of emotional distress pursuant to New York common law. The damage to Plaintiff has been severe and lasting.

12. This action has been timely filed pursuant to N.Y. C.P.L.R. § 215(8)(a), which provides that a plaintiff shall have at least one year from the termination of a criminal action against the same defendant to commence an action with respect to the event or occurrence from which the criminal action arose. A criminal action against Epstein with respect to the same sex trafficking enterprise from which Plaintiff's claims arise was terminated on August 29, 2019.

13. This action has also been timely filed pursuant to N.Y. C.P.L.R. § 213-C, which provides that a plaintiff shall have 20 years to file civil claims "for physical, psychological or other injury or condition suffered by such person as a result of conduct which would constitute" certain sex crimes under New York Penal Law Article 130. Epstein and Ghislaine Maxwell sexually assaulted Plaintiff by forcible compulsion within 20 years of filing this Complaint, and that sexual assault constitutes one or more sex crimes described in N.Y. C.P.L.R. § 213-C.

14. Any statute of limitations applicable to Plaintiff's claims, if any, is tolled due to the continuous and active deception, duress, threats of retaliation, and other forms of misconduct that Epstein and his co-conspirators used to silence his many victims, including Plaintiff. Epstein's actions deprived Plaintiff of the opportunity to commence this lawsuit before his death. Until his death, Plaintiff feared that Epstein and his co-conspirators would harm her or her family, or ruin her life, if she came forward.

15. Defendants are equitably estopped from asserting a statute of limitations defense. Allowing Defendants to do so would be unjust. Epstein and his co-conspirators intimidated each of his victims into silence by threatening their lives and their livelihoods. They therefore prevented Plaintiff from commencing this lawsuit before his death. By using threats, along with his wealth and power, Epstein was able to escape punishment for his intolerable and brutal crimes against countless young women and underage girls for the duration of his life.

PARTIES

16. Plaintiff Jane Doe 1000 is a citizen and resident of New Jersey.

17. Defendant Darren K. Indyke is sued in his capacity as an appointed executor of the Estate of Jeffrey E. Epstein.

18. Defendant Richard D. Kahn is sued in his capacity as an appointed executor of the Estate of Jeffrey E. Epstein.

JURISDICTION AND VENUE

19. Jeffrey Epstein was a citizen of the United States domiciled in the U.S. Virgin Islands at the time of his death. Jeffrey Epstein maintained a residence in the Southern District of New York. As the legal representatives of the Estate of Jeffrey E. Epstein, Darren K. Indyke and Richard D. Kahn are deemed citizens of the U.S. Virgin Islands.

20. The amount in controversy in this action exceeds the sum or value of \$75,000.00 excluding interests and costs and is between citizens of different states. Accordingly, jurisdiction is proper under 28 U.S.C. § 1332.

21. Venue is proper in this Court as Epstein's sexual abuse of Plaintiff began and occurred in New York, New York, where he recruited her, physically molested her, and began grooming her for sex in his organized sex trafficking ring.

22. Many of the events giving rise to these causes of action occurred in the Southern District of New York, where a substantial amount of Epstein's property is located. Thus, venue in this district is proper. 28 U.S.C. § 1391(b)(2).

FACTUAL ALLEGATIONS

A. Epstein's Sex Trafficking Enterprise

23. Jeffrey Epstein was widely renowned as a billionaire who used his vast connections to powerful individuals, and seemingly unlimited wealth and resources, to create a web of transcontinental sex trafficking that served himself, his coconspirators, and some of the most powerful people in the world.

24. Epstein owned multiple residences and frequently travelled between them, including at 9 East 71st Street, New York, New York 10021, where the illegal sexual crimes against Plaintiff occurred. Epstein conservatively valued his New York townhome at \$55,931,000.00. Epstein conservatively valued his ranch at 49 Zorro Ranch Road, Stanley, New Mexico 87056, at \$17,246,208.00. In addition, Epstein owned residences in the Virgin Islands, Florida, France, and even on his own island, Great St. James Island, where his transcontinental sex trafficking of hundreds of young girls servicing him, his co-conspirators, and wealthy and powerful individuals around the world occurred.

25. The allegations herein concern Epstein's tortious acts against Plaintiff while in New York, where Epstein was staying at his mansion.

26. At all times material to this cause of action, Jeffrey Epstein utilized his seemingly unlimited power, wealth, and resources, as well as his deep connections to powerful and politically connected individuals to intimidate and manipulate his victims of sexual abuse.

27. Epstein and his co-conspirators had perfected a scheme for manipulation and abuse of young females. As part of the scheme, a female "recruiter" would approach a young female and strike up a conversation in an effort to quickly learn about the young female's background and any vulnerabilities they could expose. The recruiter would then manipulate the young female into coming back to one of Epstein's residences by offering the young female something she needed. At times the recruiter's lure would be a modeling opportunity, money for education, help for the young female's family, and a whole host of other related offers depending on their target's situation. Once in the residence, the recruiter and Epstein would work in concert to impress and intimidate the young female with displays of vast wealth, including having employees that were butlers and maids formally dressed around the house. They would also strategically place photographs of very powerful political and social figures amongst photographs and art displaying nude females in an effort to normalize the sexual abuse. They would also normalize the sexual abuse by placing a massage table and spa related products around the massage area in an effort to legitimize the area where the abuse was set to occur. Once abused, Epstein and his co-conspirators continued to manipulate the victims, using their financial power, promises, and threats to ensure that the victim returned as directed and remained compliant with their demands.

B. The Arrest, Prosecution, and Death of Epstein

28. The sexual trafficking ring described herein started at least as early as 1995 and continued up until at least July 2, 2019, when the U.S. Attorney's Office for the Southern District of New York ("SDNY") charged Epstein with sex trafficking conspiracy and sex trafficking in violation of 18 U.S.C. § 1591. He was arrested on July 8, 2019, pursuant to the SDNY's Sealed Two Count Indictment, which is attached as Exhibit A.

29. The Indictment described Epstein's conduct and his abuse and trafficking of females in the same trafficking operation he used to abuse and traffic Plaintiff.

30. Epstein's last will and testament (the "Will") was executed on August 8, 2019, at the Metropolitan Correctional Center. The witnesses were Mariel Colón Miró and Gulnora Tali. The Will included affidavits from Darren K. Indyke and Richard D. Kahn, in which they swear an "Oath of Willingness to Serve as Executor and Appointment of Local Counsel."

31. Epstein was found dead in his cell at the Metropolitan Correctional Center on August 10, 2019.

32. Epstein's last will and testament was filed on August 15, 2019, in the Probate Division of the Superior Court of the Virgin Islands.

33. Darren K. Indyke and Richard D. Kahn filed a Certificate of Trust in the Superior Court of the Virgin Islands for Epstein's 1953 Trust on August 26, 2019. *See* Certificate of Trust, *In the Matter of the Estate of Jeffrey E. Epstein*, Probate No. ST-19-PB-80 (Super. Ct. V.I. Aug. 26, 2019).

34. Epstein's will was entered into probate on September 6, 2019, and the Superior Court of the Virgin Islands accordingly authorized Darren K. Indyke and Richard D. Kahn to administer Epstein's estate. *See* Order for Probate, *In the Matter of the Estate of Jeffrey E. Epstein*, Probate

No. ST-19-PB-80 (Super. Ct. V.I. Sept. 6, 2019); Letters Testamentary, *In the Matter of the Estate of Jeffrey E. Epstein*, Probate No. ST-19-PB-80 (Super. Ct. V.I. Sept. 6, 2019).

35. The Will's first article directs Epstein's executors "to pay from my estate all expenses of my last illness, my funeral and burial expenses, the administration expenses of my estate and all of my debts duly proven and allowed against my estate." The Will further directs that "after the payments and distributions provided in Article FIRST," Epstein "give[s] all of my property, real and personal, wherever situated... to the then acting Trustees of The 1953 Trust."

36. Following Epstein's death, SDNY submitted a proposed nolle prosequi order in the criminal matter against him because it was required by law to do so after Epstein was deceased. On August 29, 2019, U.S. District Judge Richard Berman formally dismissed SDNY's indictment against Epstein, terminating the criminal action against him. Plaintiff's claims are therefore timely under N.Y. C.P.L.R. § 215(8)(a).

C. Jane Doe 1000

37. Jane Doe 1000 grew up in extreme poverty. At various times throughout her childhood, her mother had been homeless. Jane Doe was unable to enroll in high school because she did not have a residence and often lived without running water or electricity.

38. In late 1999, Jane Doe made a modeling appearance. A man called her and told her that Jeffrey Epstein had connections to various modeling jobs and asked her if she would like to meet with Epstein to discuss opportunities. The opportunity sounded enticing to Jane Doe, so she agreed and met Epstein at his New York City mansion on 71st Street.

39. Upon meeting Jane Doe, Epstein offered her a position modeling with Victoria's Secret, a lingerie retailer. He explained that he was friends with Les Wexner, the chief executive of

Victoria's Secret's parent company. Epstein reiterated his connection to Victoria's Secret each time he saw and spoke with Jane Doe.

40. Eventually, Epstein moved Jane Doe into his apartment building on 66th Street, where he housed other models and young women that he sexually abused, so that he could have complete control over her life. Her relationship with Epstein quickly turned into one of sexual abuse. Ghislaine Maxwell, one of Epstein's main "recruiters," along with additional unidentified co-conspirators, would call Jane Doe and direct her to go to Epstein's mansion to give him a massage. The massages quickly escalated into Epstein forcing himself on Jane Doe against her will and engaging in one or more sex act with her for his own sexual gratification. Jane Doe was terrified of Epstein, who repeatedly threatened her and made representations about his wealth, power, and connections.

41. During Jane Doe's time with Epstein, he forced her to give him sexual massages and made her use sex toys.

42. Epstein also flew Jane Doe to his residence in Palm Beach, Florida, where she was also forced to give Epstein sexual massages.

43. On one occasion, Epstein forced Jane Doe to meet with a lawyer, even though she did not express any need for a lawyer to Epstein. The lawyer she met with was a prominent attorney and a law professor who was described to Jane Doe as Epstein's close friend and lawyer. The lawyer appeared to be interviewing her, asking personal questions about her family's financial situation. The meeting had no legal purpose, and Epstein later used the information that the lawyer had obtained through his meeting with Jane Doe to intimidate her and to keep her compliant in his sex-trafficking scheme.

44. Epstein made very clear to Jane Doe that he was incredibly wealthy, powerful and regularly in contact with world leaders. In fact, in his New York mansion he had photographs displayed of significant political figures to ensure that any young female entering the home would know that he had extensive government connections. Epstein was not to be disobeyed and he made clear by his words and actions that there would be consequences if Jane Doe did not comply with his demands.

45. Epstein constantly promised Jane Doe modeling opportunities with Victoria's Secret each time she saw him. He continued to make that promise for years, up until the last time Jane Doe saw Epstein.

46. One day, Epstein had someone call Jane Doe to his mansion. When Jane Doe arrived, Maxwell was waiting for her and led her upstairs to Epstein's master bedroom. When they got to the bedroom, sex toys were laid out on the bed. Epstein and Maxwell proceeded to sexually assault Jane Doe simultaneously and by forcible compulsion. Maxwell forcibly penetrated Jane Doe with a sex toy. She was horrified and terrified by the experience and knew she had to try to get away from Epstein even though she risked harm to herself by disobeying Epstein. She proceeded to move out of the 66th Street apartment building and, having nowhere else to go, found shelter at the Salvation Army housing facility.

47. Jane Doe was deeply affected by her harrowing experiences at the hands of Epstein. She suffers extreme emotional distress from an experience that has affected her for her entire life.

48. Epstein's sexual assault and battery of Jane Doe continues to cause her significant distress and harm.

FIRST CAUSE OF ACTION

(Battery)

49. Plaintiff repeats and re-alleges the allegations stated above in paragraphs 1–48 as if fully set forth herein.

50. Epstein intentionally committed battery by sexually assaulting Plaintiff when she was a young woman. As described above, on multiple occasions, Epstein intentionally sexually assaulted and touched Plaintiff in an offensive and sexual manner without her consent.

51. Epstein’s actions constitute sexual offenses as defined in New York Penal Law Article 130, including but not limited to Article 130.35, inasmuch as Epstein and Maxwell sexually assaulted Plaintiff by forcible compulsion within 20 years of filing this Complaint. *See* N.Y. C.P.L.R. § 213-C.

52. A criminal action against Epstein with respect to the same sex trafficking enterprise from which Plaintiff’s first cause of action arises was terminated on August 29, 2019, less than one year prior to the filing of this Complaint. *See* N.Y. C.P.L.R. § 215(8)(a).

53. As a direct and proximate result of Epstein’s conduct, Plaintiff has in the past and will in the future continue to suffer extreme emotional distress, humiliation, fear, psychological trauma, loss of dignity and self-esteem, and invasion of her privacy.

SECOND CAUSE OF ACTION

(Intentional Infliction of Emotional Distress)

54. Plaintiff repeats and re-alleges the allegations stated above in paragraphs 1–48 as if fully set forth herein.

55. As a direct result of these allegations as stated, Epstein committed intentional infliction of emotional distress against Plaintiff.

56. Epstein's actions, described above, constitute extreme and outrageous conduct that shocks the conscience. Epstein's plan to recruit, entice, and assault Plaintiff on multiple occasions goes beyond all possible bounds of decency and is intolerable in a civilized community.

57. Epstein knew or disregarded the substantial likelihood that these actions would cause Plaintiff severe emotional distress.

58. A criminal action against Epstein with respect to the same sex trafficking enterprise from which Plaintiff's second cause of action arises was terminated on August 29, 2019, less than one year prior to the filing of this Complaint. *See* N.Y. C.P.L.R. § 215(8)(a).

59. As a direct and proximate result of Epstein's conduct, Plaintiff has in the past and will in the future continue to suffer extreme emotional distress, humiliation, fear, psychological trauma, loss of dignity and self-esteem, and invasion of her privacy.

PRAYER FOR RELIEF

WHEREFORE, Plaintiff respectfully requests judgment against Defendants, awarding compensatory, consequential, exemplary, and punitive damages in an amount to be determined at trial; costs of suit; attorneys' fees; and such other and further relief as the Court may deem just and proper.

JURY DEMAND

Plaintiff hereby demands a trial by jury on all causes of action asserted within this pleading.

Dated: November 14, 2019.

/s/ Joshua I. Schiller

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