

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

JANE DOE,
on behalf of herself and others similarly situated,

Plaintiff,

-against-

DARREN K. INDYKE and RICHARD D. KAHN,
as EXECUTORS OF THE ESTATE OF JEFFREY E.
EPSTEIN, and LESLEY GROFF,

Defendants.

x

Case No. 21 Civ. 8469

**CLASS ACTION
COMPLAINT
AND JURY DEMAND**

x

Plaintiff Jane Doe¹, by and through her attorneys, Cuti Hecker Wang LLP and Allred, Maroko & Goldberg, for her class action Complaint on behalf of herself and others similarly situated, alleges as follows:

NATURE OF THE ACTION

1. In 2017, Jane was in her early 20s and living in Moscow, finishing her education and trying to launch her career, when Jeffrey Epstein targeted and lured her into his world, falsely advertising a job, then promising career and other opportunities and buying and making travel arrangements to fly her to France and the United States.

¹ Plaintiff is using the pseudonym “Jane Doe” in this Complaint in place of her real name. “Jane” is not her real first name. Plaintiff intends to file a motion to proceed under a pseudonym on the basis of her privacy because her allegations concern sexual abuse, and the disclosure of her name in connection with the allegations would cause her further harm. Plaintiff notes that a number of judges in this District have permitted plaintiffs to proceed under pseudonyms in suits against Epstein’s estate.

2. After trafficking Jane to New York, France, Florida, and the U.S. Virgin Islands with the experienced assistance of Lesley Groff, Epstein brutally raped and sexually assaulted her numerous times at his homes in Paris, Palm Beach, and the U.S. Virgin Islands.

3. Epstein directed Jane to massage him, then proceeded, without consent, to grope her genitals with his hands and a vibrator and to masturbate himself to completion. Epstein forced her to perform oral sex on him, pushing her down onto her knees after she tried to resist doing so. Epstein forcibly had sexual intercourse with Jane. He did all this after repeatedly flouting his power and wealth, and telling her that it was her fault if she did not see the advantages and opportunities that he could give her, all after luring her with and promising her repeated work opportunities.

4. For the next two years – presumably in the middle of his being investigated by federal law enforcement officials and up until his widely-reported arrest in July 2019 – Epstein, with Groff’s assistance, repeatedly trafficked Jane for his personal sexual use and abuse, fraudulently promising her assistance with her work and career to further lure her to Paris, Florida, and the Virgin Islands, including through New York. Epstein continued to use Jane as an object for his sexual gratification.

5. Groff, Epstein’s longtime New York-based right hand, facilitated Epstein’s trafficking and sexual abuse of Jane, including by purchasing plane tickets, sending money, making appointments, and sending various communications from New York.

6. Epstein’s abuse has caused Jane physical and emotional pain and suffering, including severe, permanent emotional harm, anxiety, and depression, and physical pain including exacerbating the symptoms of an underlying disease. Even after Epstein’s death,

Jane still experiences nightmares and unwanted flashbacks to Epstein's conduct and remains fearful every day as a result of his abuse.

7. The statements and conduct of Epstein's that Jane witnessed made clear that she was not the only young woman from Russia and Europe whom Epstein preyed upon in this manner, but that, on information and belief, Epstein fraudulently lured dozens and dozens of women from Russia and elsewhere in Europe into his orbit using false promises of career opportunities for purposes of subjecting them to commercial sex acts.

8. Jane brings this lawsuit, on behalf of herself and a putative class of similarly situated women, seeking some measure of justice for the abuse Epstein inflicted on her and many others, which left her, and undoubtedly many others, irreparably scarred.

PARTIES

9. Plaintiff Jane Doe is an individual who is a citizen and resident of Russia.

10. Defendants Darren K. Indyke and Richard D. Kahn are the Executors of the Estate of Jeffrey E. Epstein (the "Estate"). As Executors of the Estate, Defendants Indyke and Kahn are liable for the acts and omissions of Epstein and his agents. For purposes of 28 U.S.C. § 1332, Defendants Indyke and Kahn are deemed to be citizens of the United States Virgin Islands, where Epstein was domiciled at the time of his death.

11. Defendant Lesley Groff is an individual who at all relevant times worked as Epstein's assistant in New York. Groff played an integral role in Epstein's fraudulent sex trafficking of Jane and, upon information and belief, of numerous other young women and girls. Upon information and belief, Groff is currently a resident of Connecticut.

JURISDICTION AND VENUE

12. This Court has subject-matter jurisdiction pursuant to the Trafficking Victims Protection Act, 18 U.S.C. § 1589 *et seq.* This Court has supplemental jurisdiction over Plaintiff's other claims pursuant to 28 U.S.C. § 1367.

13. This Court also has subject-matter jurisdiction pursuant to 28 U.S.C. § 1332 because the amount in controversy exceeds \$75,000, Plaintiff is a citizen of a foreign state, and Defendants are citizens of different states.

14. Venue is proper in this District pursuant to 28 U.S.C. § 1391(b)(2) because a substantial part of the events or omissions giving rise to the claims occurred in this District.

15. This Court has personal jurisdiction over Defendants. As Executors of the Estate, Defendants Indyke and Kahn are subject to personal jurisdiction in this Court because Epstein was subject to personal jurisdiction at the time of his death.

16. This Court had both general and specific personal jurisdiction over Epstein at the time of his death.

17. A substantial portion of the acts and omissions giving rise to Plaintiff's claims took place in New York State.

18. Epstein and/or his agents used force, fraud, and/or coercion to traffic Jane to New York for "commercial" sex purposes, falsely offering her assistance with her career to induce her to travel across borders and then force her to engage in coerced sexual acts for which they gave Jane money.

19. Upon information and belief, Epstein and/or his agents, including Groff, also took many actions in New York specifically to traffic and facilitate the trafficking of Jane to France,

Florida, the U.S. Virgin Islands, and New York to perform sexual acts for Epstein which constitute “commercial” sexual acts under governing law.

20. Epstein resided in the Metropolitan Correctional Center in Manhattan at the time of his death.

21. Epstein conducted substantial business operations in New York.

22. Epstein owned and/or controlled numerous companies with principal places of business in New York.

23. Epstein owned substantial real property assets in New York, including the townhouse located at 9 East 71st Street in Manhattan, which recently sold for \$51 million.

24. New York was the epicenter of Epstein’s criminal sex-trafficking enterprise. For years, Epstein and his agents, including Groff, took actions in New York in order to arrange for young women and girls to be trafficked to his homes throughout the country in order to perform sexual acts for him. Epstein’s trafficking and abuse of Jane was part of that New York-based criminal enterprise.

25. From his Manhattan townhouse, Epstein directed a vast network of agents, including Groff and others, in recruiting young women and girls to be brought to him for his sexual use. Epstein frequently turned those trafficked girls into recruiters themselves, paying them to find new young women and girls for him to use as sexual objects.

26. Epstein sexually abused many young women and girls in his Manhattan townhouse.

27. On many occasions, Epstein and his agents made phone and video calls and sent messages from New York to schedule appointments for young women and girls to come to

Epstein's residences outside of New York in order to perform commercial sexual acts for Epstein.

28. On information and belief, Epstein maintained and held numerous bank accounts and funds in New York, which were used to pay girls and women directly in cash and to pay for plane and other transportation tickets for girls and women to be brought to and/or trafficked to him.

29. In August 2010, the New York Board of Examiners of Sex Offenders recommended placing Epstein in the highest category of offenders deemed at the highest risk of committing another crime.

30. Beginning in approximately December 2010 or January 2011, Epstein was a registered sex offender in New York State.

31. Epstein contacted Jane numerous times from New York, communicating through Skype to make his false promises and lure/continue to lure her into being trafficked to countries and locations where he would be to sexually abuse her and ultimately pay her.

32. Upon information and belief, Epstein's agents, including, Groff, Bella Klein, "Woman 1", "Woman 2," and "Woman 3" (whose real names are not being used in this Complaint), and others, were present in New York when they took actions to facilitate Jane traveling to France, Florida, the U.S. Virgin Islands, and New York under false pretenses in order to perform commercial sex acts for Epstein, including without limitation by making phone calls, sending emails and other messages, sending money, and booking airline tickets.

33. On information and belief, Epstein used funds and/or financial accounts based in New York to pay Jane and/or to pay for trafficking Jane to him.

34. In the course of taking actions to facilitate Epstein's trafficking of Jane, including in representing to Jane that there were lucrative career opportunities available with Epstein, Woman 1 told Jane on multiple occasions that Epstein's main office was located in New York.

35. Upon information and belief, Epstein and/or his agents brought or sent money from New York to Russia, France, Florida, and/or the U.S. Virgin Islands in order to pay Jane for the sexual acts described below.

36. On or about September 20, 2017, Epstein's assistant Bella Klein wired 2,000 Euros from New York to Jane's bank account so Jane could apply for a U.S. visa to come to Epstein's Florida home.

37. This Court has personal jurisdiction over Groff because the acts and omissions giving rise to Plaintiff's claims against her took place in New York State. Upon information and belief, Groff was a resident of and worked full-time in New York State at the time of the acts and omissions giving rise to Plaintiff's claims.

JURY DEMAND

38. Plaintiff hereby demands a trial by jury on all claims in this action.

FACTUAL ALLEGATIONS

39. Jane Doe's early childhood was in a small city. She lived in Moscow from her teenage years until recently. In 2017, she was attending a university in Moscow and working part-time as an interpreter. She often used a Russian job posting website to find postings for part-time jobs working as an interpreter at conferences and other events.

40. In or around August 2017, Jane saw a job posting on that website for a financial company seeking a personal assistant. The requirements for the job seemed standard: the candidate had to speak multiple languages, have good organizational skills, and be willing to

travel abroad. To Jane, this sounded like a good job and a real opportunity for her, so she applied.

Epstein and His Agents Lure and Traffic Jane to Paris Under the Fraudulent Guise of a Job Interview

41. Shortly after she applied for that job, Jane received a message on WhatsApp from an unknown number that connected Jane to a Russian woman who worked for Jeffrey Epstein. That woman asked Jane to send her résumé and photographs of herself, and then to send her Instagram handle.

42. The Russian woman set up a Skype call with another Russian woman who worked for Epstein, Woman 1. Woman 1 interviewed Jane over Skype, in Russian. Woman 1 emphasized in the interview that it was not merely a job, but an “investment” in herself, and an opportunity to build a successful career. Woman 1 told Jane that it was a financial company and that a man was looking for a personal assistant, but she did not tell Jane the name of the company or the full name of the man she would be working for. When Jane asked for more information, such as the name of the company or the identity of the CEO, Woman 1 told her that information was confidential.

43. A day or two later, Jane was invited to meet with Woman 1 in person at a coffee shop in Moscow. Woman 1 was with her mother during the meeting, which reassured Jane that there was nothing to be concerned about. During that meeting, Woman 1 told Jane about the great opportunities the job would provide her, such as traveling around the world and having her education paid for. Jane felt inspired by what the woman said, and eager to pursue this once-in-a-lifetime opportunity.

44. A few days later, Woman 1 invited Jane to come to Paris for another in-person interview.

45. Another employee of Epstein's who was based in New York, Woman 2, emailed Jane the airline ticket. The email chain indicated that the ticket had been sent to Woman 2 by another of Epstein's associates working out of New York, Lesley Groff.

46. Groff knew or recklessly disregarded the facts and information that made clear that Epstein was trafficking Jane to Paris for commercial sex purposes, and that Epstein was doing so by means of force, threats of force, fraud, coercion, and/or a combination of such means.

Epstein Traffics Jane to Paris and Sexually Assaults Her

47. Jane arrived in Paris from a flight paid for by Epstein and arranged by his New York-based employees/agents on or about September 9, 2017. On information and belief, Epstein used funds and/or financial institutions based in New York to arrange for Jane's flight.

48. Epstein had arranged for a driver to pick Jane up at the airport and drive her to his third-floor flat. Jane marveled at how large Epstein's home was: it appeared to have at least ten rooms, a gym, a huge living room, a huge office with a library on one side, and at least five guest bedrooms. Each of the guest rooms was stocked with pajamas, hygiene products, and other amenities. The flat was decorated in what Jane viewed as a "wealthy classical" style. Jane also noticed that there were photos of girls on the walls throughout the apartment, including of Woman 1 (the woman Jane had met in Moscow). Most of the girls in the photos looked quite young.

49. After Jane arrived at the flat, she was introduced to Epstein and informed he was the man she would be working for. Epstein brought Jane, along with approximately three other young women/girls, including Woman 1, to a restaurant adjoining the Louvre Museum, for what Jane understood to be a job interview.

50. Jane introduced herself to Epstein, and he asked her some basic, normal questions about herself and about the job she was being interviewed for.

51. Epstein gave her approximately 500 euros in cash, and when Jane asked why he was giving that to her when she had just come for an interview, he said it was to pay her for coming. In fact, this money was payment for his own use of her for his sexual gratification, as she would later brutally learn.

52. After the meal, they returned to Epstein's flat. Woman 1 was present, as was another one of Epstein's assistants, Woman 3.

53. Woman 1 showed Jane to a bedroom where she would be staying, and told Jane she should change into the pajamas that were in her bedroom. Jane saw that the other girls had changed into similar pajamas as well. Jane found it strange and surprising that everyone had to put those pajamas on and could not just keep wearing their own clothes they had brought for themselves. Jane asked Woman 1 if she could stay in her room and sleep, as they had just had the interview and she had traveled that day. But Woman 1 said that Jane should stay awake and available outside her room because Epstein might want to talk to her.

54. A short time later, Epstein told his assistant Woman 1 to bring Jane to the massage room. Jane was led to that room, which she recalls being on one side, just past the gym and next to two of the bedrooms. The massage room was mostly dark. There was a shelf with what appeared to be facial-treatment masks, creams, and oil, and there were photos of naked females on the walls. Jane had the impression that they were girls and women whom Epstein knew.

55. In the massage room, Epstein told Woman 3 to instruct Jane how to massage him, starting with his legs, and Woman 3 did that. After Jane and Woman 3 massaged his legs,

Epstein directed Jane to take off her clothes, explaining that he would demonstrate how properly to conduct a massage using her body. Jane was afraid, and demurred, so Epstein instead directed Woman 3 to undress. Woman 3 stripped down to her underwear and laid down on the massage table. Epstein showed Jane various places to massage on Woman 3's body, and demonstrated how to massage her, saying things like, "You should do it this way," and, "You see? This is normal."

56. After approximately 20 minutes, Woman 3 left, leaving Jane alone with Epstein in the massage room. Epstein instructed Jane to continue to massage him. Epstein then told Jane to take off the top half of her pajamas, but Jane refused. Jane felt frozen, confused and scared about what was happening. Epstein clearly noticed, and asked Jane why she was so embarrassed, and said in substance – both cajoling and shaming her – "You need to be more open, or you won't get anywhere in life. Just relax." Epstein made all this strange behavior seem normal and made Jane feel like it was her fault that she did not want to comply. Epstein then again directed Jane to strip down to just her bra and underwear and to lie down on the massage table. This time, Jane complied.

57. Epstein critiqued Jane's body, telling her that she had more weight on her hips than she should, and told Jane that she needed to lose weight (although she was not remotely overweight).

58. Without warning, Epstein then took out a vibrator and pressed it against Jane's genitals, which were covered only with her underwear. In the middle of the incident, he told her to take her underwear off, then touched the outside of Jane's genitals while he masturbated to completion.

59. Jane still felt frozen with enormous fear and confusion. Minutes earlier, everyone in this man's luxurious house had seemed so happy, and suddenly she was in a room where the man who owned and dictated the entire atmosphere and had bought her plane tickets, paid for her housing and food and flown her here was forcing unwanted sexual acts on her. Jane felt utterly frozen and powerless. She was in a foreign country, she did not know anyone in the apartment, and Epstein had insisted to her that this was all normal and that she was at fault for failing to be "open." Epstein continued masturbating until he ejaculated. Without missing a beat, and again acting as if everything were normal, he then told Jane to change her clothes and to meet him in his office.

60. Epstein then spoke with Jane in his office. Epstein mostly lectured Jane about her mentality and critically asked why she was so "closed." He said that if she wanted to achieve anything, she should do what he told her to do, implying that the wealth and power he had were the result of his own genius and she could be part of it if she just followed his directions. Jane expressed that she had a college degree and was not looking for this kind of job, that this was not something she could ever imagine herself doing. She told him, in substance, "I thought this was a normal job. I did not think this sex part was involved," but Epstein did not respond to that.

61. During the conversation, Jane asked if Epstein was American, and asked why he did not want to find someone from the United States to work for him. Epstein explained that, in his view, girls from former Soviet countries such as Russia, Ukraine, and Belarus were unhappy because their parents raised them with many limits and few opportunities, but that inside they were more motivated than American girls. Epstein further said that American girls lacked passion for career opportunities because they had grown up with easy access to those prospects, but girls from former Soviet countries did not grow up with those types of opportunities, so they

were more motivated. Epstein purported to focus on Jane's safety and security, telling her that he believed that she did not feel safe in the world and that she would need or want more financial stability. Then he stressed that working for him was a great opportunity and that she should take it.

62. During the above conversations, Epstein effectively laid out his twisted thinking as to why he had focused on recruiting young women from former Soviet countries to be trafficked.

63. Jane was scheduled to return to Moscow the next day. Around 11:00 the following morning, Epstein told Jane to come to the massage room. He condescendingly asked if Jane had learned anything from their conversation the previous day, and urged her to change her mind and work for him. Epstein then instructed Jane to give him a massage, and she obeyed, feeling she had no choice. Epstein ordered Jane to take off her clothes, and she obeyed, leaving only her underwear on. Epstein ordered Jane to massage his chest and touch his nipples, and she obeyed. The massage went on for approximately 20 minutes. Partway through, Epstein began to masturbate with one hand. He ordered Jane to take her underwear off, and touched Jane's genitals with the other hand, without her consent, while he masturbated. Throughout this encounter, Jane just kept thinking that she wanted to leave as soon as possible, while trying to keep a neutral facial expression and not show outwardly the fear, shame, and turmoil inside her. It was apparent to her that Epstein was angry with her because he thought she was too "closed" and did not do what he wanted. Eventually, Epstein ejaculated. He told her to change, pack for her flight, and come talk to him in his office before she left.

64. When Jane went back to Epstein's office, Epstein continued to dangle the job prospect before her, talking about all of the possibilities that working for him would provide, and

told her about several women who worked for him who had achieved their career goals. He told her that she should go home and think about everything.

65. Jane went home shocked and confused. She still did not understand what the “job” was. She knew that she could not tell anyone about what had occurred in Paris, and did not know what to do. She also thought more and more about the fact that perhaps Epstein was right, that she was the one who was closed off and unable to see the opportunities he was offering her.

66. In the ensuing weeks, Epstein began communicating with Jane frequently by text and by Skype video chat. Epstein plainly was communicating to Jane from New York during some or all of these conversations. Epstein offered to send Jane money, and he asked her to send him nude photos of herself. Jane refused to do so, which angered Epstein. Jane explained to Epstein that she did not understand what the job he was offering her entailed, and asked him to explain. In response, Epstein gave her two “tasks” to do: to come up with an idea for a Christmas gift for Epstein to give all of his employees, and to design furniture for a new house of Epstein’s on his island. Jane thoughtfully and diligently prepared those tasks and emailed them to Epstein, but Epstein just ignored her work, giving the plain impression that those were not real assignments but simply attempts to get Jane to stop asking questions.

Epstein Again Traffics Jane to Paris and Sexually Assaults Her

67. On or about October 9, 2017, Epstein’s assistant Woman 3 contacted Jane and suggested she come to Paris again. Jane still convinced herself, based on Epstein’s enormous wealth and all the trappings he had used to lure her the first time and the “tasks” he had assigned her, that she had the prospect of a real job with Epstein’s business that would provide her with

significant future opportunities. She felt she had no choice but to go and that her instincts not to were wrong and part of her own limitations.

68. Upon information and belief, Groff, working from Epstein's townhouse in New York City, took one or more actions to traffic and/or to facilitate the trafficking of Jane to Paris on this second occasion.

69. Once again, Epstein had a driver pick Jane up at the airport and take her to his flat. When Jane arrived at the apartment, the only people there were Epstein, Woman 3, and another driver of Epstein's.

70. Soon after Jane arrived, Epstein told her it was time for a massage and sent her to the massage room. Epstein then came into the massage room, laid on the massage table, and ordered her to start massaging him. Partway through the massage, Epstein began to masturbate while Jane massaged him. He once again ordered Jane to take her underwear off, and began once again to touch and rub Jane's genitals while he masturbated. Eventually, Epstein ejaculated. He then told Jane to change her clothes and meet him in his office, once again normalizing the sexual assault as part of some kind of business opportunity, albeit a fraudulent one.

71. Epstein then had Jane come to his office, where he again lectured her in a largely similar way as he had during her first visit. Epstein told her that everything that happened when she was there was confidential and that she should not talk to anyone about it. Epstein asked her some personal and sexual questions, including inquiring whether she had a boyfriend. Epstein asked her why she was so "closed," and he told her about a number of his assistants who were very successful due to working for him, such as an assistant who was in Hong Kong learning Chinese and another in Tokyo whose education Epstein was paying for. Epstein made clear to

Jane that there were no limitations to how much he could help her, that she could choose any university and do whatever she wanted in life, but that first she needed to be more “open” with him, and more attentive to what he wanted. For example, Epstein told Jane that she should always ask him, “Would you like anything else?” Epstein explained that he had many offices, including in New York and in the Caribbean, and that if Jane wanted to be hired, she would need to behave better.

72. Jane flew back to Moscow the next day. Before she went to the airport, Epstein again criticized her for not being more attentive to what he wanted, specifically telling her she should have asked his driver how Epstein likes his coffee prepared so she could make it for him without being asked. Jane then traveled back to Moscow.

Epstein Fraudulently Traffics Jane to Florida Under the Guise of a Job and Rapes Her

73. After Jane returned to Moscow, Epstein told her that he had work for her to do, and that she should come to his home in Florida. Jane was still under the impression that a lucrative job and opportunities with Epstein’s business were being offered to her, and Epstein had groomed her to believe that she had no choice but to obey – that in fact it was her own limitations that made her question this opportunity.

74. On or about September 20, 2017, Epstein’s assistant Bella Klein, who worked out of New York City, wired Jane 2,000 Euros so she could apply for a U.S. visa to come to Epstein’s Florida home. Jane obtained the visa in early November. She was flown to Palm Beach and entered the United States from Russia on or about November 17, 2017.

75. Upon information and belief, Groff took one or more actions to facilitate the trafficking of Jane to the United States from Russia, while she was based out of Epstein’s New York City townhouse, utilizing New York-based bank accounts and/or banks.

76. When Jane arrived at the airport in Palm Beach, Epstein's employees Woman 3 and a driver took Jane from the airport and drove her to Epstein's mansion.

77. Epstein's Palm Beach estate was as impressive as his Paris home. The palatial home had a pool, a poolhouse, a number of bedrooms, and there were two Cadillacs there. Before one entered the mansion, there was a small building that housed approximately three of Epstein's employees, who appeared to be Southeast Asian, perhaps Filipino. There was another small house on the property with Epstein's office, a gym, and a bathroom in it. Inside, the mansion was largely white, including the sofas and two end tables. There were books on the living room table, photos on the wall, and a decorative wooden bicycle. At one point during the visit, Epstein showed Jane a broken guitar on display and said that it had been a gift from Woody Allen.

78. The evening that Jane arrived, Epstein told the driver to show her into Epstein's office. Epstein questioned her about her life in Moscow and what she was doing. Jane tried, tentatively, to assert herself, telling Epstein during the conversation that she was not able to have much stress in her life because of an underlying long-term disease which was exacerbated by stress. Epstein did not react emotionally to that, but told her that she did not need to worry because no one had stress in his house. At one point, Woman 3 came into the office. Epstein put on some current pop music and Woman 3 began dancing. Epstein suggested that Jane dance too, but Jane explained that she was very tired because she had been traveling all day. At that point, Jane went to her room for the night. Jane's room, which was on the second floor of the mansion, looked like a typical hotel room. It had a private bathroom, and was stocked with pajamas and various personal hygiene items.

79. Jane woke up early the next day – around 5 or 6 a.m. – due to jet lag. She went to

the pool area and Epstein approached her there once he woke up. Epstein continued to hold out his fraudulent promises of valuable career opportunities. Epstein pointed to a woman who was cleaning the house. He said that the woman had worked for him for 30 years, that it was her last day, and that Epstein was buying her a house. Epstein then invited Jane to his office, where Epstein proceeded to work on his computer and occasionally asked Jane a question. Epstein then told Jane that she could walk to the beach if she wanted, and instructed her to come back by 11 a.m. As Epstein had suggested, Jane walked to the beach, then returned to Epstein's office. When she returned, Epstein ordered her to go to the massage room and prepare the massage table.

80. Epstein entered the massage room and closed all of the windows and doors to that room. He directed Jane to massage him starting with his legs and told her which oil to use. Epstein then ordered Jane to massage his chest and touch his nipples. At one point during the massage, Epstein appeared to notice that Jane appeared unhappy, and he got angry that she was not more enthusiastic and playful about what she was doing. Epstein angrily halted the massage and told Jane to take off her shorts and underwear. Jane declined to do so, and told Epstein, truthfully, that she had her period. Epstein said he did not care, and again ordered her to do so. Frightened and confused, Jane finally obeyed his order and took her underwear off. Epstein then physically turned Jane around and proceeded to have sex with her while standing behind her. This forcible rape went on for approximately five minutes, and Epstein ejaculated inside of Jane.

81. During this rape, Jane felt worse than she had ever felt in her life. It felt psychologically overwhelming, like she could not even understand what was happening to her. It felt like the rock bottom of her life.

82. Afterwards, Jane could not even speak. Epstein brusquely told her to clean up the

massage room. Some of Jane's menstrual blood had gotten on the floor, and Epstein ordered her to clean it up. Epstein went to the adjoining shower and asked Jane to help him clean his back. When he was finished showering, he told Jane that she could shower, and he left. Jane, still in shock, took a shower and then proceeded to clean up the bloody carpet and put the massage table away. She felt outside her own body, and could not comprehend what had just happened.

83. Jane had traveled to Florida under the impression that she would meet some of Epstein's employees in Florida so they could show her the work she was to do. But she was never given any specific work to do. Instead, when Epstein was not raping or otherwise forcing sexual acts on her, Jane found herself just sitting around, not understanding what she was supposed to be doing.

84. At one point while Jane was in Palm Beach, Epstein directed her to come to his office. She arrived, and Epstein was watching pornographic videos on a website. He began to show them to Jane. Epstein told her, in substance, "You should watch this and see how they do it." At one point, Woman 3 came into the office while the pornographic videos were on, but she did not visibly react, once again messaging to Jane that this was "normal" behavior. With Woman 3 present, Epstein told Jane that she needed to learn to massage his penis better. He told her that Woman 3 had gone to Turkey and learned how to massage a man, and similarly referred to another girl, whose photo was on the table, who he said had done so as well.

85. That evening, Epstein directed Jane to give him oral sex. When Jane was unwilling to do so, Epstein physically pushed her down, onto her knees. Epstein took his pants off and forced her to give him oral sex. Jane felt like she could not move or say anything, and she started crying. Epstein did not like that she was crying and said, in substance, "If you're not

in the mood, then don't show up, don't come back." Epstein was clearly angry at Jane, and he told her to go back to her room.

86. The next morning, Epstein asked Jane, in substance, "Why don't you do anything I want you to?" He told her she was not attentive to what he wanted. Once again, he criticized her for not asking one of his employees how to prepare his coffee so she could make it for him. He told Jane that she had bad energy, and he became brusque and rude towards her. His angry behavior made Jane afraid.

87. Before Jane left Palm Beach, Woman 3 approached her and said that Epstein was mad at Jane and that she should be more "open." She said that Jane should consider herself lucky because she was able to see Epstein on three occasions, whereas most girls never came back after one visit. She told Jane, in substance, "If you want to make him happy, go back to his office and give him [oral sex]" to remedy that. Jane did not do that. Instead, she did her best to hide from Epstein for the final day she was in Florida. She left to walk on the beach when she could. When Epstein told her to go to the massage room once again, she made up an excuse and said that she was feeling sick because of something she ate. The next day, after spending three or four days in Florida, Jane flew back to Moscow.

Epstein and His Associates Continue to Pressure Jane to Return

88. After Jane returned to Moscow in November 2017, Epstein continued to text her and to call her on Skype, often from New York. He again asked her to send nude photos of herself, and threatened that there would be negative consequences if she did not. Jane was afraid of Epstein and felt that she had no choice, so she eventually sent him two nude photos.

89. Epstein continued to use his fraudulent promises of career assistance to lure her back for his use as a sexual object. Epstein told Jane to return to the United States, saying he

would give her a job and telling her she did not understand what she was doing if she gave up this great opportunity to build her career. Jane spoke with Epstein on a Skype video call in December 2017, and explained to him bluntly that she was not interested and that she was not going to communicate with him anymore.

90. Jane was trying desperately to assert herself, but at the same time continued to think that perhaps she was wrong and this incredibly wealthy and successful man must be right, and that his paying attention to her made her special.

91. Epstein continued to contact Jane, including sending her a text in February 2018 wishing her “Happy Valentine’s Day” and sometimes sending photos to her. In the summer of 2018, when the World Cup was taking place in Russia, Epstein’s assistant Woman 3 called Jane, explained she was in Moscow, and asked if Jane would meet her. Jane agreed to meet her in a public place. Woman 3 took a picture with Jane, which she clearly intended to send to Epstein. Woman 3 again tried to convince Jane to see Epstein again, but Jane refused. In September 2018, Jane was in France for a conference. Woman 3 contacted her again, saying she had learned from Instagram that Jane was in France and asking if she would see Epstein again. Once again, Jane refused.

Epstein Traffics Jane to New York Under the Pretense of Assisting Her Business

92. In 2018, Jane tried starting a new business in Russia, which put her under enormous pressure to succeed. She was working long hours for the company and participating in high-pressure programs and opportunities to bring the company a higher profile and investors.

93. In late 2018, Jane’s business was badly in need of investment funds. She very much needed to travel to New York City to pursue meetings with funders who might be interested in investing in the company. The company had no revenue at that point, and she

believed she could succeed if only she could get herself to New York.

94. Under enormous stress, with little sleep and the sense that many people were relying on her, Jane ultimately decided to reach out to Epstein's employee, Woman 3, to ask her if she thought Epstein would help her with a ticket to New York and a place to stay while she was there. At that point, Jane convinced herself that she felt Epstein "owed" her for what he had done to her – the prior rape and assaults – and somehow also thought she could control these interactions in ways that would avoid or minimize further abuse. She also had echoes of Epstein telling her that she was special and believed he would provide her with the opportunity to take the meetings in New York to get the funding for her company that she desperately needed. Of course, she was wrong on all counts.

95. Woman 3 told Jane that Epstein would agree to help her, but wanted to talk to her first via Skype. On that call, Epstein began by expressing enormous anger, chastising Jane for having treated him poorly and having "run off" on him and "ignored" him. He belittled her, insulted her, and told her that she was a bad person, at the same time emphasizing that he was such a nice and good person that he would forgive her and still agree to help her. He made it clear that she was in debt to him for his magnanimity and forgiveness, and said she would have to do something for him.

96. Jane felt there was no turning back. She believed she could get the funding for her company and convinced herself that she could somehow "handle" the acts Epstein might potentially require of her in exchange; she said thank you to Epstein and accepted his help. She continued to simultaneously believe that somehow Epstein would in fact see her value and the importance of her company.

97. Epstein arranged for and purchased Jane's plane ticket to New York and told her

that she should stay in one of his apartments on East 66th Street in Manhattan. Upon information and belief, Lesley Groff again purchased the ticket and sent it to Jane.

98. Jane was trafficked by Epstein to New York in early December 2018. Upon landing in New York City, Jane got into a taxi and thought she would be taken to the Manhattan apartment where Epstein and/or his associates had said she would be staying. On that drive, while she was in the midst of planning her business meetings for the following days, Jane received a phone call from Epstein. He told her that instead, they would immediately pick up Woman 3 and the two of them would be driven directly to a different airport. Before she knew it, and before she could embark on any of her plans in New York – the entire reason she had reluctantly communicated with Epstein again – Jane was placed on a plane from New York to Palm Beach.

99. Woman 3, acting on Epstein's behalf, paid for the taxi.

100. Upon information and belief, Groff and/or another employee of Epstein's took actions in New York City to arrange for Jane's flight to Palm Beach.

101. Upon landing in Florida, Jane was again taken to Epstein's Palm Beach mansion, and stayed there for a few days. She recalls that Epstein told her to stay in the house when he went out, and to make sure that nobody saw her. During this trip, Epstein once again sexually abused Jane repeatedly in his massage room and in his office. Jane felt deep disgust at these interactions, but did her best to block them out of her mind; she felt she could simply hide them from herself and focus on her work.

102. When Jane returned to New York City, she stayed at Epstein's extra apartment at East 66th Street, and did not have to interact with Epstein. She threw herself into her business meetings and tried to block the sexual abuse out of her mind. She stayed in New York until just

before Christmas, and then returned to Moscow.

Epstein Continues to Coerce Jane into Sexual Acts

103. Epstein continued to demand “payment” for Jane’s purported poor treatment of him and in exchange for his “kindness” and his “help” with her career. Jane no longer felt she had the power to say no, now that she had repeatedly seen Epstein and while she presented herself as someone who was trying to build a business.

104. Throughout January and February 2019, Epstein repeatedly reached out to Jane, pressing her to recruit other girls and women on his behalf. Jane refused to connect Epstein to any girls or women, and aside from having a brief coffee with one 18- or 19-year-old woman at Epstein’s insistence, refused to meet with anyone else on his behalf.

105. In approximately March or April 2019, Epstein directed Jane to fly to Florida, telling her that she would be flying from there to his island in the Caribbean. Once again, Jane felt that she had no choice but to go, since she had accepted Epstein’s help and assistance. She believes she stayed in Palm Beach for a few days before flying to the island, and Epstein again subjected her to sexual acts in the massage room in both Florida and on the island, both times arranging for her flights through Lesley Groff and/or other employees and handing her cash after the sexual interactions.

106. When she was on Epstein’s private plane on the way to his island in the U.S. Virgin Islands, Jane was given strict instructions that she should never take any photographs at any time while on this trip, not even photographs of the view from the island, with no one depicted.

107. Jane was also told she must never take any photo with Epstein in it. She soon realized the seriousness of this rule, when she tried to take a selfie on the beach a few days later

and was reprimanded. She began to realize that Epstein was not only very powerful, but also very concerned about protecting himself and keeping his activities a secret.

108. Epstein summoned Jane to his massage room on the island on approximately three occasions during the trip, directing her to engage in sexual acts for his gratification, including on one occasion assaulting both Jane and another woman at the same time.

109. On the private plane trip back from the island, Epstein handed Jane either one or two thousand dollars in cash.

110. During those two trips in late 2018 and early 2019, Epstein subjected Jane to sexual acts, including penetrating her with his penis and with his fingers, forcing her to give him oral sex, using a vibrator on her, and telling her to touch his nipples while he masturbated. Jane felt deeply repulsed by these interactions, but once again felt that she had no choice but to allow Epstein to abuse her in these ways, having accepted his help.

111. Jane briefly saw Epstein one final time in Paris in 2019. Jane, who was living in London at the time to further her company, took a one-day trip to Paris for unrelated reasons.

112. Woman 3 contacted Jane after seeing that Jane was in Paris based on her Instagram account. Jane agreed to meet with Epstein and spoke briefly with him in the office in his flat. They had a brief conversation about a dental problem Jane was dealing with, and Epstein offered to help, giving her information for a doctor in the U.K.

113. Shortly after seeing Epstein in Paris, Jane tried to see the U.K. dentist, who turned out to be too expensive for her. Epstein then told her to be in touch with Lesley Groff to get help with arranging an appointment with a different dental doctor in New York.

114. Groff arranged for Jane to see the dental doctor in New York, and arranged for Jane to get a plane ticket from London to New York for the treatments. In or around early July

2019, Jane traveled to New York for the treatments, but did not see or communicate with Epstein.

115. While Jane was in New York, she heard the news of Epstein's arrest in New York. She flew back to London without further contact with Epstein or his associates.

116. Back in London, Jane could not avoid the extensive news coverage. She saw Epstein's face and name everywhere, particularly because of the connection to Prince Andrew. She was deeply disturbed to learn the extent of his power and connections, and that he had preyed upon so many other girls and women for so long.

117. Even after Epstein's death was widely reported, Jane has had difficulty believing that he is really dead, and for a long time kept anxiously expecting him or someone connected to him to contact her.

Epstein's Abuse Has Caused Jane Deep and Lasting Harm

118. Jane has suffered severe, ongoing harm as a result of Epstein's abuse, including post-traumatic stress, anxiety, and depression.

119. Since 2012, Jane has been diagnosed with a disease, the symptoms of which become more pronounced with stress. Jane experienced flareups of her disease in 2017 and 2018, including clear physical symptoms, as a result of Epstein's assaults and the resulting trauma that she experienced, and was prescribed medication to help her recover.

120. Epstein's abuse has caused Jane to have low self-esteem, and has made it difficult for her to interact with men, both in business settings and in trying to have relationships. Since Epstein's abuse and comments about her weight, Jane has experienced significant anxiety about her body image and her weight.

121. Jane still experiences nightmares and unwanted flashbacks to Epstein's conduct.

Even though Epstein is dead, Jane remains fearful every day as a result of his abuse.

122. Despite Jane's significant education and language skills, she has avoided serious business opportunities and moved to a smaller city, focusing on yoga and smaller business opportunities rather than international or more high-pressure business dealings.

CLASS ALLEGATIONS

123. With respect to the claims brought pursuant to the Trafficking Victims Protection Act, 18 U.S.C. § 1589 *et seq.*, Jane brings this action on her own behalf and, pursuant to Federal Rules of Civil Procedure 23(a), 23(b)(1), and 23(b)(3), on behalf of:

All individuals who were trafficked by Jeffrey Epstein and/or his agents, using fraudulent and/or coercive offers of career opportunities, for purposes of engaging in commercial sex acts for Epstein or at his direction, during the time period from October 14, 2011 to Epstein's arrest in July 2019, and who have not otherwise released their claims.

124. Jane was not the only female whom Epstein preyed upon and unlawfully trafficked in this manner. Upon information and belief, in the time period from 2011 until his arrest in July 2019, Epstein trafficked scores of women for commercial sex purposes using fraudulent offers of career opportunities, including many women from Russia and elsewhere in Europe and the former Soviet Union.

125. Jane's interactions with Epstein and his agents made it clear to her that she was just one of dozens of women whom Epstein had targeted in a similar manner.

126. Jane's first interactions with Epstein's agents occurred after she responded to a job posting on a Russian website. Epstein and/or his agents first had one Russian woman who was acting on Epstein's behalf contact Jane, then set up a Skype call and an in-person meeting with another Russian woman who was acting on Epstein's behalf.

127. Upon information and belief, Epstein and his agents had, both before and after Jane responded to the job posting, recruited numerous other women from Russia and elsewhere

in Europe through fraudulent job postings.

128. Jane personally interacted with a number of women who had been brought into Epstein's orbit and who had apparently engaged in sexual acts with Epstein in exchange for compensation.

129. Epstein told Jane on several occasions about various women with whom he had provided career opportunities, with the clear implication that those women had all engaged in sexual acts with Epstein. Epstein specifically told Jane about various women who had worked as his assistants and then gone on to have educational and career opportunities. Epstein also told Jane that he had sent multiple women to Turkey to learn how to perform sexualized massages on men.

130. When Jane was at Epstein's flat in Paris in 2017, she personally observed that Epstein's Skype call log reflected a long list of recent calls with women, the majority of whom had common Russian first names.

131. When Jane was at Epstein's flat in Paris in 2017, she personally observed photos on the walls of numerous young women, including Woman 1 – the woman who had conducted the initial Skype interview with Jane. It is clear to Jane that the women in the photos were women whom Epstein had brought into his orbit and engaged in sexual acts.

132. When Epstein spoke to Jane in Paris after he first sexually assaulted her in September 2017, Epstein explained that, in his view, girls from the former Soviet countries such as Russia, Ukraine, and Belarus were unhappy because their parents had raised them with many limits and few opportunities, but that inside they were more motivated than American girls. Epstein further said that American girls lacked passion for career opportunities because they had grown up with those prospects, but girls from former Soviet countries did not grow up with those

types of opportunities, so they were more motivated. It was clear from Epstein's statements and the manner in which he made them that he had engaged in sexual acts with numerous young women from former Soviet countries such as Russia, Ukraine, Belarus, Latvia, and Lithuania in the recent past, and that he had had numerous discussions with those young women about their career ambitions. The clear implication was that Epstein had lured those young women with fraudulent offers of career assistance in a similar manner as he had with Jane.

133. Throughout January and February 2019, Epstein repeatedly reached out to Jane, pressing her to recruit other girls and women from Russia on his behalf. It was clear to Jane that this was the way Epstein typically operated, constantly taking steps to recruit new young women to be trafficked for his sexual use and using fraudulent offers of career advancement to do so.

134. When Jane traveled to Epstein's island in the U.S. Virgin Islands in 2019, another young woman who was from Latvia or Lithuania was present at well. It was clear to Jane that Epstein had trafficked that woman to the island to engage in sexual acts as well. Afterwards, that woman told Jane that Epstein had given her \$3,000 in cash.

135. Upon information and belief, Epstein, Groff, Klein, and other agents of Epstein's took actions in New York to facilitate the trafficking of numerous putative class members, including without limitation by transferring money, purchasing plane tickets, arranging for visas, and making written and verbal communications.

136. Jane's experience as a young woman in Russia has made clear that the prevailing cultural norms there are unsympathetic to survivors of sexual assault and trafficking. Jane's experience has been that young women are often blamed for the sexual assaults they experienced, not believed, and judged negatively because of the incidents. Domestic violence remains common in Russia, and violence against women is often not discouraged or taken

seriously.

137. Epstein's pattern of preying upon young women from Russia and Eastern Europe during the final years before his arrest inflicted particular damage because the women from those areas are less likely to feel safe coming forward about the trafficking and abuse due to cultural factors such as those described above. These circumstances also make individual lawsuits impracticable.

138. The class is so numerous that joinder of all members is impracticable. Upon information and belief, Epstein and his agents fraudulently trafficked well over forty women for commercial sex purposes, in violation of the Trafficking Victims Protection Act, during the time period from 2011 until his arrest in July 2019.

139. There are numerous questions of law and fact common to the women in the putative class, including without limitation the manner in which Epstein and his agents used fraudulent promises of career advancement in order to lure them into his orbit; the manner in which Epstein subjected them to sexual acts; Epstein's financial remuneration of the women; and any legal issues concerning the applicability of the Trafficking Victims Protection Act to this conduct.

140. Defendants are expected to raise common defenses to the claims of all class members herein.

141. Upon information and belief, Jane Doe's claims are typical of the claims of the putative class members.

142. Jane Doe and the undersigned counsel will fairly and adequately represent and protect the interests of the putative class.

143. Upon information and belief, the class members are identifiable using documents

and information in Defendants' possession that can readily be produced through discovery.

144. Judicial economy weighs in favor of avoiding multiple actions challenging the same pattern of conduct by Epstein, particularly where individual suits could lead to potentially inconsistent results.

FIRST CAUSE OF ACTION
(On behalf of Jane Doe individually and on behalf of the Putative Class)
(Trafficking Victims Protection Act)
(18 U.S.C. § 1589 *et seq.*)

145. Plaintiff hereby incorporates each of the foregoing paragraphs as if fully set forth herein.

146. Epstein and Groff knowingly recruited, enticed, harbored, transported, provided, obtained, maintained, patronized, and/or solicited Jane.

147. Epstein and Groff knew and/or recklessly disregarded the fact that Jane would be caused to engage in commercial sex acts.

148. Epstein and Groff knew and/or recklessly disregarded the fact that means of force, threats of force, fraud, coercion, and/or a combination of such means would be used to cause Jane to engage in commercial sex acts.

149. Epstein's and Groff's trafficking of Jane took place in and/or affected interstate and/or foreign commerce.

150. Jane has a civil cause of action for this misconduct pursuant to 18 U.S.C. § 1595.

151. This action is timely because less than 10 years have passed since the underlying events took place.

152. As a result of these actions, Plaintiff suffered damages in an amount to be determined at trial.

SECOND CAUSE OF ACTION
(On behalf of Jane Doe individually)
(Battery)
(Common Law of New York, Florida, U.S. Virgin Islands, and France)

153. Plaintiff hereby incorporates each of the foregoing paragraphs as if fully set forth herein.

154. In committing the acts described above, Epstein intentionally subjected Jane to bodily contact that was harmful and offensive in nature.

155. Groff is liable for aiding and abetting Epstein's actions.

156. Upon information and belief, Groff knowingly provided substantial assistance to Epstein in Epstein's tortious actions against Jane.

157. Upon information and belief, Groff was aware at the time that she was playing a role in overall illegal and/or tortious activity by Epstein.

158. As a result of Epstein's and Groff's actions, Jane suffered damages in an amount to be determined at trial.

THIRD CAUSE OF ACTION
(On behalf of Jane Doe individually)
(Assault)
(Common Law of New York, Florida, U.S. Virgin Islands, and France)

159. Plaintiff hereby incorporates each of the foregoing paragraphs as if fully set forth herein.

160. In committing the acts described above, Epstein engaged in physical conduct that placed Jane in imminent apprehension that he would harm her.

161. In committing the acts described above, Epstein made intentional, unlawful threats to Jane, with an apparent ability to carry out those threats, which caused Jane to have a well-founded fear that violence was imminent.

162. Groff is liable for aiding and abetting Epstein's actions.

163. Upon information and belief, Groff knowingly provided substantial assistance to Epstein in Epstein's tortious actions against Jane.

164. Upon information and belief, Groff was aware at the time that she was playing a role in overall illegal and/or tortious activity by Epstein.

165. As a result of Epstein's and Groff's actions, Jane suffered damages in an amount to be determined at trial.

FOURTH CAUSE OF ACTION
(On behalf of Jane Doe individually)
(Intentional Infliction of Emotional Distress)
(Common Law of New York, Florida, U.S. Virgin Islands, and France)

166. Plaintiff hereby incorporates each of the foregoing paragraphs as if fully set forth herein.

167. In committing the acts described above, Epstein and Groff engaged in extreme, outrageous, and reckless conduct.

168. Epstein's and Groff's conduct went beyond all bounds of decency, to be regarded as odious and utterly intolerable in a civilized community.

169. In doing so, Epstein and Groff acted with the intent to cause, and/or disregard of a substantial likelihood of causing Jane to suffer severe emotional distress.

170. As a direct result of Epstein's and Groff's actions, Jane suffered severe emotional distress.

171. Groff is likewise liable for aiding and abetting Epstein's actions.

172. Upon information and belief, Groff knowingly provided substantial assistance to Epstein in Epstein's tortious actions against Jane.

173. Upon information and belief, Groff was aware at the time that she was

playing a role in overall illegal and/or tortious activity by Epstein.

174. As a result of Epstein's and Groff's actions, Jane suffered damages in an amount to be determined at trial.

WHEREFORE, Plaintiff respectfully requests that judgment be entered against Defendants as follows:

- a. Declaring that the suit is maintainable as a class action pursuant to Federal Rules of Civil Procedure 23(a), (b)(1), and (b)(3);
- b. Awarding compensatory damages for all physical injuries, emotional distress, psychological harm, anxiety, humiliation, physical and emotional pain and suffering, family and social disruption, and other harm, in an amount to be determined at trial;
- c. Awarding punitive damages against Defendant Groff in an amount to be determined at trial;
- d. Awarding attorneys' fees and costs pursuant to 18 U.S.C. § 1595 and/or any other applicable statute or law;
- e. Awarding pre- and post-judgment interest on all such damages, fees and/or costs;
- f. Attaching all of Defendants' real property and other assets located in the State of New York pursuant to New York CPLR 6201 *et seq.* and Federal Rule of Civil Procedure 64; and
- g. Awarding such other and further relief as this Court may deem just and proper.

Dated: New York, New York
October 14, 2021

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