

would be performed nude or partially nude, would become increasingly sexual in nature, and would typically include one or more sex acts.” *Id.* at ¶ 7. As will be described hereafter, the foregoing modus operandi closely matched the tactic Epstein employed against the Plaintiff herein.

40. Epstein abused numerous victims by causing these victims to be recruited to engage in paid sex acts with him. *Id.*

41. In addition to the specific allegations in the S.D.N.Y. Indictment, Epstein also utilized a similar, if not the same, scheme many years before the time period that was charged and many years after, as well as in additional geographical locations nationally and internationally.

B. Epstein’s Rape, Sexual Assault, and Mutilation of Plaintiff

42. In or about late 2006 or early 2007, Plaintiff, who was residing in Broward County, was employed as a real estate broker showing homes, villas, and townhouses for rent or purchase in the Palm Beach vicinity.

43. Sometime thereafter, she was introduced to Epstein and Epstein’s associate, agent, servant, and/or employee, who was introduced and known to Plaintiff as “G-Max”, but whose actual name was Ghislaine Maxwell (“Maxwell”), at a barbeque hosted by Plaintiff’s employer, who, upon information and belief, knew Epstein well.

44. Plaintiff was told by her employer that Epstein was interested in renting or purchasing real property from him. However, she was instructed not to process Epstein’s ID or other information and to proceed only on a cash basis. Thereafter, a transaction occurred relating to property that rented at a rate in excess of ten thousand (\$10,000) dollars per month. The cash was provided directly to Plaintiff, as a real estate broker, in exchange for Epstein’s right to use the property as he saw fit.

45. At about this time, Maxwell provided Plaintiff with her personal telephone number and suggested to Plaintiff that Epstein would like to hire her. Initially, Plaintiff was not interested in this offer.

46. Nevertheless, over the course of the year 2007, Maxwell began an extended effort of inducement, persuasion, and grooming of the Plaintiff to have her work for Epstein.

47. This effort included, *inter alia*, the purchasing of expensive gifts for Plaintiff and promises that Epstein could get her highly placed employment.

48. Ultimately, in or about the middle of the year 2007, Maxwell took the Plaintiff's passport from her for "safekeeping." Plaintiff later learned that her passport was held by Epstein in a locked box in his Palm Beach Estate. The passport was not returned to Plaintiff until May 2008.

49. In early 2008, Plaintiff, persuaded by the persistent efforts of Maxwell, agreed to consider the prospect of working for Epstein.

50. Shortly thereafter, it was arranged that Plaintiff, who was a skilled hairdresser, would go to Epstein's Palm Beach Estate to cut his hair and discuss employment opportunities.

51. Plaintiff thereafter drove to Epstein's Palm Beach Estate in early to mid-January 2008.

52. When ushered into his presence, Epstein was completely naked, and he proceeded, with Maxwell's assistance, to brutally rape Plaintiff and otherwise sexually abuse Plaintiff.

53. At that time and thereafter, Epstein had firearms in his possession which were in full view and displayed to Plaintiff for the purpose of frightening and intimidating her.

54. At the conclusion of this initial rape and sexual assault, Epstein forced Plaintiff to accept roughly two hundred (\$200) dollars in cash as "compensation."

55. At this time, Plaintiff, in a traumatized condition, attempted to leave and stated her intention to report this crime to the police.

56. In response, Maxwell purported to call the police herself, and shortly thereafter, two individuals, who claimed to be police officers, arrived and threatened to arrest Plaintiff and charge her with prostitution. They also threatened to take her young son away, and have Plaintiff and/or her son deported.

57. Crediting and fearing these threats, and further crediting that these two individuals were in fact police officers, Plaintiff refrained thereafter from contacting law enforcement or commencing civil litigation out of fear for herself and her family.

58. Immediately after this initial rape at Epstein's Palm Beach home, Maxwell and Epstein forced Plaintiff to drive with them, in Plaintiff's vehicle, where they picked up her young son and proceeded to a hotel in Naples, Florida, approximately two hours away.

59. During this travel, Plaintiff was visibly and uncontrollably crying. For the purposes of threatening and persuading Plaintiff from reporting Epstein's criminal acts against her, Epstein and Maxwell stopped the car at a large body of water that was infested with alligators.

60. Epstein then ushered the Plaintiff to the body of water and told her in explicit detail that, as had happened to other girls in the past, she would end up in this body of water and be devoured by the alligators, should she ever reveal what Epstein had done to her.

61. Plaintiff credited this threat, and, until she learned of his death, she feared that Epstein would follow through on this explicit death threat.

62. After leaving the alligator lake, Epstein and Maxwell proceeded to take Plaintiff and her young son to a hotel in Naples, Florida.

63. There, over a period of several days, Epstein and Maxwell repeatedly raped and sexually abused Plaintiff, all in the presence of her son.

64. During and through the next five months, until May 2008, Epstein and Maxwell initiated a “carrot and stick” approach to ensuring Plaintiff’s silence and obtaining her further services.

65. Between January and May 2008, Epstein repeatedly continued to threaten that he would (a) have Plaintiff arrested for prostitution, (b) have Plaintiff’s son taken from her, (c) have Plaintiff deported, (d) have Plaintiff murdered or assaulted, (e) keep Plaintiff’s passport from her, and (f) otherwise harm Plaintiff and her family. These criminal practices and techniques subjecting Plaintiff to force, fraud, and coercion precisely fit the findings in Florida’s human trafficking statute (Fla. Stat. Ann §787.06(c)) delineating the panoply of practices and techniques commonly employed by traffickers to coerce and instill fear in their victims.

66. While making these threats, Epstein emphasized his personal connections to many powerful actors within the legal system and elsewhere whom he asserted would not hesitate to act on his behalf. For example, he claimed to have influence over the Federal Bureau of Investigation, the United States Department of Homeland Security’s Department of Immigration and Customs Enforcement (“ICE”), and Florida state and local law enforcement.

67. In one instance, Maxwell threatened Plaintiff that she would end up in the pond to be consumed by the alligators if she told anyone about the crimes committed against her. These death threats terrified Plaintiff, especially given Epstein’s claimed extensive network of powerful allies.

68. In addition, at that time, as an alternative inducement for her silence and/or cooperation, Epstein and Maxwell purported to dangle the possibility of future employment

opportunities for the Plaintiff and/or her then husband with the FBI, which they falsely and fraudulently represented they were able to obtain.

69. During this same time period in 2008, Plaintiff was trafficked by Epstein to a number of other men and forced by him to have unwanted sexual relations with such men. Among these other rapists was a heavy set older man who was introduced to Plaintiff as “Walter” and another older man who was identified to Plaintiff as a local judge.

70. By compelling and forcing the Plaintiff to engage in unwanted commercial sex acts with other men for his personal benefit, Epstein violated numerous provisions of the TVPA as well as of Florida’s human trafficking statute.

71. Throughout these five harrowing months of rape, assault, and being sex trafficked to other men against her will, Plaintiff, who was of youthful appearance, had been admonished by Epstein to lie about her age and claim to be seventeen years old.

72. In approximately early May 2008, in a particularly appalling act of savagery, Epstein forced Plaintiff to submit to unwanted and unnecessary vaginal surgery, performed, as best Plaintiff can recall, in a wealthy person’s home by a man with a Russian accent, for the ostensible purpose of tightening her vagina and creating the false impression that she was a virgin for a “high profile” client.

73. This violent and illegal procedure was botched, leaving Plaintiff mutilated, in pain, disabled, and permanently sexually dysfunctional.

74. In addition, Plaintiff, who was and is a talented artist, was forced by Epstein to paint a nude picture of herself, which Epstein then sold and/or provided to a man in Mexico. Plaintiff suffers emotional distress daily from this fact, knowing that a revealing painting of her may well hang in the home of a total stranger.

75. During this same time period in 2008, Epstein repeatedly photographed and videotaped Plaintiff naked and/or performing lewd activities. Among these films were ones which depicted Plaintiff playing golf while naked. This too continues to cause Plaintiff enormous mental anguish and distress.

C. Epstein's Coercion of Plaintiff

76. Commencing prior to May 2008, as described above, and continuing to the present day, Epstein's coercive and explicit threats compelled the Plaintiff's silence.

77. In furtherance of Epstein's unlawful enterprise, Epstein coerced the Plaintiff to conduct specific tasks and threatened her to remain silent. These tasks included driving young women, some of whom were believed to be minors, to various locations where, upon information and belief, Epstein's sex trafficking misconduct was perpetrated.

78. Further, in or about April 2008, Epstein, through his associate, agent, servant, and/or employee Maxwell, also compelled Plaintiff to keep in her house a locked box with property that Epstein purportedly owned. Plaintiff was instructed that if she ever touched or opened that box she would be killed. She was also left with burner phones, wires, and other electronic devices that Epstein was seeking to conceal from discovery by law enforcement authorities.

79. Eventually this box and the other materials were retrieved by Maxwell, without explanation or discussion, in or about May 2008.

80. Plaintiff understood then, through the explicit and implicit repeated threats of Epstein and others working on behalf of and/or in concert with him, and continued to believe after last encountering Epstein, that if she ever publicly revealed any aspect of his rape, assault, sex trafficking, and other misconduct, to law enforcement, or by commencing a lawsuit, she would be murdered, physically harmed, or subjected to arrest, deportation, or loss of her child.

D. Epstein's Fraudulent Statements and Misrepresentations Directed to Plaintiff

81. Epstein, as well as other persons working on behalf of and/or in concert with him, made numerous and repeated false, fraudulent, and misleading statements and/or misrepresentations to Plaintiff to prevent or dissuade her from publicly revealing or commencing any action relating to Epstein's rape, sex assault, sex trafficking, and other misconduct victimizing Plaintiff. These statements and misrepresentations included the following:

- a. that Epstein possessed power or influence over the FBI, the Department of Homeland Security (including ICE), and Florida state and local law enforcement;
- b. that the nature of Epstein's influence was such that, at his direction, one or more of these authorities would:
 - i. arrest Plaintiff and charge her with prostitution;
 - ii. bring irreparable shame to Plaintiff by falsely asserting that she was a prostitute;
 - iii. cause Plaintiff's child to be taken from her; and/or
 - iv. have Plaintiff deported.
- c. that the individuals who arrived at Epstein's residence on the day of his initial rape of Plaintiff were in fact law enforcement officers who were prepared to take the above-described actions.
- d. that Epstein or other persons working on behalf of and/or in concert with him would cause one or more of the law enforcement or governmental authorities described above to act upon these threats if Plaintiff ever revealed the criminal and tortious acts by Epstein alleged herein .

- e. that Epstein would inflict or cause others to inflict serious physical or even lethal harm on Plaintiff if she ever revealed the criminal and tortious acts by Epstein alleged herein.

82. Given Epstein's wealth and apparent power, Plaintiff reasonably credited these claims and refrained from making complaints, filing charges, or seeking redress in a civil action as long as she believed Epstein was alive.

E. The Timeliness of Plaintiff's Claims (Equitable Tolling and Equitable Estoppel)

83. Each and every one of the false or misleading acts and statements set forth above was made by Epstein himself, or through other persons working on behalf of and/or in concert with him, for the express purpose, *inter alia*, of preventing Plaintiff from commencing any lawsuit or claim against Epstein or his associates.

84. Epstein intended to have Plaintiff rely upon these false and misleading acts and statements to her detriment.

85. Epstein repeatedly threatened Plaintiff and her family. Specifically, as alleged above, Epstein as well as other persons working on behalf of and/or in concert with him threatened that they would use their influence to have her deported, to have her child taken into state custody, to have her arrested, and to have her physically harmed or murdered.

86. Due to the severity of these threats, Plaintiff lived in constant fear until learning of Epstein's death in the summer of 2020, and even today maintains a certain level of apprehension about associates of Epstein carrying through on the threats Epstein had made.

87. Plaintiff, who reasonably was terrified by Epstein's threats and actions, credited and relied upon these false statements and conduct by refraining from filing any claim against Epstein or his associates.

88. Plaintiff reasonably understood the potential consequences of these false statements to be ongoing in the years that followed, when, to the best of her belief, Epstein and his associates were continuing their criminal conduct and were motivated (and continued to be motivated) to avoid investigations, claims, and prosecution.

89. Plaintiff did not learn about either Epstein's arrest or his death until the summer of 2020, when she learned that Maxwell had been arrested because Epstein's death was publicized in connection with that arrest.

F. Damages Sustained by Plaintiff as a Consequence of Epstein's Criminal and Tortious Misconduct

90. As a consequence of the above-described criminal and tortious force, fraud, and coercion against Plaintiff, Plaintiff has suffered substantial damages, including:

- a. conscious pain and suffering;
- b. mental anguish;
- c. shame and humiliation;
- d. the destruction of her marriage;
- e. mutilation;
- f. permanent disability;
- g. the inability to enjoy sexual intimacy;
- h. lost income and employment opportunities;
- i. loss of enjoyment of life's pleasures;

- j. sleep disorders; and
- k. emotional distress relating to her child.

COUNT I

CAUSE OF ACTION FOR DAMAGES PURSUANT TO 18 U.S.C. § 1595, BASED ON VIOLATIONS OF 18 U.S.C. § 1591

91. Plaintiff repeats and realleges all of the foregoing allegations as if set forth fully herein.

92. Epstein, within the special territorial jurisdiction of the United States, in interstate and foreign commerce, and/or affecting interstate and foreign commerce, knowingly recruited, enticed, harbored, transported, provided, obtained, maintained, patronized, solicited, threatened, forced, or coerced Plaintiff to engage in commercial sex acts.

93. Such actions were undertaken knowing that his use of force, threats of force, fraud, coercion, and/or combinations of such means would be used, and were in fact used, in order to cause Plaintiff to engage in commercial sex acts. In doing so, Epstein violated 18 U.S.C. §1591.

94. By virtue of Epstein's multiple violations of 18 U.S.C. § 1591, Defendants Indyke and Kahn, as co-executors of the Estate of Jeffrey E. Epstein, are subject to civil causes of action under 18 U.S.C. § 1595 by Plaintiff, who is a victim of the violations. As a direct and proximate result of Epstein's commission of the aforementioned criminal offenses enumerated in 18 U.S.C. §§ 1591, Plaintiff has suffered and will continue to suffer injury and pain; emotional distress; mutilation; disability; psychological and psychiatric trauma; mental anguish; humiliation; embarrassment; loss of self-esteem; loss of dignity; loss of enjoyment of life; loss of income; invasion of privacy; and other damages caused by Epstein's criminal actions.