

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

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

Plaintiffs,

vs.

JEFFREY EPSTEIN, HALEY ROBSON,  
and SARAH KELLEN,

Defendants.

CASE NO:  
50 2008 CA 006596 XXXX MB

COPY  
RECEIVED FOR FILING

MAR 06 2008

SHARON R. BOCK  
CLERK & COMPTROLLER  
CIRCUIT CIVIL DIVISION

COMPLAINT

Plaintiffs, JANE DOE, by and through JANE DOE'S MOTHER as parent and natural guardian of JANE DOE, bring this Complaint against Defendants JEFFREY EPSTEIN, HALEY ROBSON, and SARAH KELLEN, and state as follows:

Parties, Jurisdiction and Venue

1. Jane Doe is a citizen and resident of the State of Florida. She is a minor under the age of 18 years.
2. Jane Doe's Mother brings this action as parent and natural guardian of Jane Doe.
3. This Complaint is brought under fictitious names to protect the identity of the Minor Plaintiff because this Complaint makes sensitive allegations of sexual assault and abuse upon a minor.
4. Defendant Jeffrey Epstein is a citizen and resident of the State of New York.
5. Defendant Haley Robson is a citizen and resident of Palm Beach County, Florida.
6. Defendant Sarah Kellen is a citizen and resident of the State of New York.

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

8. Venue is proper in this Court under section 47.011, Florida Statutes, because the causes of action brought herein accrued in Palm Beach County, Florida and one or more Defendants resides in Palm Beach County, Florida.

### **Factual Allegations**

9. At all relevant times, Defendant Jeffrey Epstein was an adult male. Epstein is a financier and money manager with a secret clientele limited exclusively to billionaires. He is a man of tremendous wealth, power and influence. He maintains his principal home in New York and also owns residences in New Mexico, St. Thomas and Palm Beach, Florida. The allegations herein concern Epstein's conduct while at his lavish estate in Palm Beach.

10. Upon information and belief, Epstein has a sexual preference and obsession for minor girls. He engaged in a plan, scheme, and/or enterprise in which he gained access to primarily economically disadvantaged minor girls in his home, sexually assaulted these girls or coerced them to engage in prostitution, and then gave them money. In or about 2005, Jane Doe, then 14 years old, fell into Epstein's trap and became one of his victims.

11. Upon information and belief, Jeffrey Epstein carried out this scheme/enterprise and assaulted girls in Florida, New York and on his private island, known as Little St. James, in St. Thomas.

12. An integral player in Epstein's Florida scheme was Sarah Kellen, an assistant of Epstein's from New York, New York and Haley Robson, a Palm Beach Community College student from Loxahatchee, Florida. They recruited girls ostensibly to give a wealthy man a massage for monetary compensation in his Palm Beach mansion. Under Epstein's plan/enterprise, Ms. Robson was contacted shortly before or soon after Epstein was at his Palm Beach residence. Epstein, Kellen or someone on their behalf directed Ms. Robson to bring one or more underage girls to the residence.

Ms. Robson, upon information and belief, generally sought out economically disadvantaged underage girls from Loxahatchee and surrounding areas who would be enticed by the money being offered - generally \$200 to \$300 per "massage" session – and who were perceived as less likely to complain to authorities or have credibility if allegations of improper conduct were made. This was an important element of Epstein's plan/enterprise.

13. Epstein's plan, scheme, and/or enterprise reflected a particular pattern and method. Upon arrival at Epstein's mansion, Mr. Robson would introduce each victim to Sarah Kellen, Epstein's assistant, who gathered the girl's personal information, including her name and telephone number. Ms. Kellen would then bring the girl up a flight of stairs to a bedroom that contained a massage table in addition to other furnishings. There were photographs of nude women lining the stairway hall and in the bedroom. Ms. Kellen would then leave the girl alone in this room, whereupon Epstein would enter wearing only a towel. He would then remove his towel, lay down naked on the massage table, and direct the girl to remove her clothes. He then would perform one or more lewd, lascivious and sexual acts, including masturbation, touching the girl's vagina with a vibrator, or digitally penetrating the girl's vagina.

14. Consistent with the foregoing plan, scheme, and/or enterprise, Ms. Robson recruited Jane Doe to give Epstein a massage for monetary compensation. Ms. Robson brought Jane Doe to Epstein's mansion in Palm Beach. Jane was introduced to Sarah Kellen, who led her up the flight of stairs to the room with the massage table. Ms. Kellen set up the message table and laid out message oils and told Jane Doe that Epstein would be in shortly and then left the room. Jane Doe was alone in the room when Epstein arrived. Epstein told her to remove her clothes and left the room. When Epstein returned he was wearing only a towel. He removed his towel, and laid down on his stomach on the message table. Epstein again told Jane Doe remove her clothes. In shock, fear and trepidation, Jane Doe complied, removing her clothes except for her panties and bra. Shortly

after starting to rub Epstein's back, Epstein told Jane Doe to sit on his back. Jane Doe, out of fear and trepidation, complied. After a period of time Epstein got up from the table and went behind the door. For several minutes Jane Doe heard loud noises and moans and believes that Epstein was masturbating. Thereafter Epstein, naked, returned to the message table and laid face up on the table. Epstein then told Jane Doe to continue with the massage and told her to sit on top of him. Out of fear and trepidation she complied. As Jane Doe rubbed Epstein's chest Epstein began to use a vibrator on Jane Doe's vagina. Thereafter Epstein began to digitally stimulate and attempt to penetrate Jane's vagina. At this same time Epstein was masturbating. Upon reaching orgasm Epstein got up from the message table and told Jane Doe to write down her name and phone number and then left the room.

15. Jane Doe was then able to get dressed, leave the room and go back down the stairs and into the kitchen. Epstein, Robson and Kellen were waiting for Jane Doe. Epstein paid Jane Doe \$300. Ms. Robson was paid \$200 by Epstein for bringing Jane to him. Ms. Robson brought Jane Doe home.

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

**COUNT I**  
**Sexual Assault against Defendant Epstein**

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

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

19. This sexual assault was in violation of Chapter 800 of the Florida Statutes, which recognizes as a crime the lewd and lascivious acts committed by Epstein upon Jane Doe.

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

WHEREFORE, Plaintiff Jane Doe, by and through her Mother, as parent and natural guardian, demands judgment against Defendant Jeffrey Epstein for compensatory damages, costs, attorney's fees, and such other and further relief as this Court deems just and proper. Further, Plaintiff reserves the right to amend this Complaint to add a claim for punitive damages pursuant to Florida Law.

## **COUNT II**

### **Civil Conspiracy against Defendants Epstein, Robson and Kellen**

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

22. Defendants Epstein, Robson and Kellen conspired to subject Jane Doe to the sexual assault of Defendant Epstein.

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

24. As a direct and proximate result of Defendants' civil conspiracy, Jane Doe has suffered and will continue to suffer severe and permanent traumatic injuries, including mental, psychological and emotional damages.

WHEREFORE, Plaintiff Jane Doe, by and through her Mother, as parent and natural guardian, demands judgment against Defendants Jeffrey Epstein, Haley Robson, and Sarah Kellen for compensatory damages, costs, attorney's fees, and such other and further relief as this Court deems just and proper. Further, Plaintiff reserves the right to amend this Complaint to add a claim for punitive damages pursuant to Florida Law.

**COUNT III**  
**Intentional Infliction of Emotional Distress against Defendant Epstein**

25. Plaintiffs Jane Doe by and through her Mother, as parent and natural guardian, repeat and reallege paragraphs 1 through 16 above.

26. Epstein's conduct was intentional or reckless.

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

28. Epstein's conduct caused severe emotional distress not only to Jane Doe. Epstein knew or had reason to know that his intentional and outrageous conduct would cause emotional trauma and damage to Jane Doe and her mother.

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

WHEREFORE, Jane Doe, by and through her Mother, and Jane Doe's Mother, individually, demand judgment against Defendant Jeffrey Epstein for compensatory damages, costs, attorney's fees, and such other and further relief as this Court deems just and proper. Further, Plaintiff reserves the right to amend this Complaint to add a claim for punitive damages pursuant to Florida Law.

**COUNT IV**  
**Civil Remedy for Violation of Florida Statute Section 772.103 against**  
**Defendants Epstein, Robson and Kellen**

30. Plaintiffs Jane Doe by and through her Mother, as parent and natural guardian, repeat and reallege paragraphs 1 through 16 above.

31. Defendants participated in an enterprise, or conspired or endeavored to so participate, through a pattern of criminal activity in violation of Florida Statute section 772.103(3)-(4).

32. Defendants engaged in this pattern of criminal activity by engaging in at least two of the following incidents of criminal activity with the same or similar intents, results, accomplices, victims, and methods of commission within a 5 year period:

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

33. Under Defendants' plan, scheme and enterprise, Defendant Epstein paid Defendant Robson to repeatedly find and bring him underage girls, who were delivered to Epstein by

Defendants Robson and Kellen, in order for Epstein to solicit, induce, coerce, entice, compel or force such girls to engage in acts of prostitution and/or lewdness.

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

35. Jane Doe was then able to get dressed, leave the room and go back down the stairs and into the kitchen. Epstein, Robson and Kellen were waiting for Jane Doe. Epstein paid Jane Doe



\$300. Ms. Robson was paid \$200 by Epstein for bringing Jane to him. Ms. Robson brought Jane Doe home.

WHEREFORE, Plaintiff Jane Doe, by and through her Mother, as parent and natural guardian, demands judgment against Defendants Jeffrey Epstein, Haley Robson, and Sarah Kellen for compensatory damages, treble damages under Florida Statute section 772.104, costs and attorney's fees under Florida Statute section 772.104, and such other and further relief as this Court deems just and proper. Further, Plaintiff reserves the right to amend this Complaint to add a claim for punitive damages pursuant to Florida Law.

#### **JURY TRIAL DEMAND**

Plaintiffs demand a jury trial in this action.

Dated: March 6, 2008

Respectfully submitted,

RICCI-LEOPOLD, P.A.  
2925 PGA Blvd., Suite 200  
Palm Beach Gardens, FL 33410  
Phone: 561-684-6500  
Fax: 561-697-2383

By: \_\_\_\_\_

THEODORE J. LEOPOLD  
Florida Bar No. 705608

Civil Cover Sheet

Form 1.997 Civil Cover Sheet

The civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law. This form is required for the use of the Clerk of the Court for the purpose of reporting judicial workload data pursuant to Florida Statute 25.075.

1. CASE STYLE

CIRCUIT COURT

50 2008 CA 006596 XXXX

AB

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

v.

JEFFREY EPSTEIN, HALEY ROBSON and  
SARAH KELLEN,

COPY  
RECEIVED FOR FILING

MAR 06 2008

SHARON R. BOCK  
CLERK & COMPTROLLER  
CIRCUIT CIVIL DIVISION

2. TYPE OF CASE:

Torts:

Professional Malpractice

Products Liability

Auto Negligence

☒ Other Negligence

Other Civil:

Contracts

Condominium

Real Property/Mortgage Foreclosure

Eminent Domain

Other

3. IS JURY TRIAL DEMANDED IN COMPLAINT?

YES

NO

DATED THIS 6 day of March, 2008.

RICCI~LEOPOLD, P.A.  
2925 PGA Blvd.  
Suite 200  
Palm Beach Gardens, FL 33410  
Phone: (561) 684-6500  
Fax: (561) 697-2383

By. \_\_\_\_\_

THEODORE J. LEOPOLD  
Florida Bar No. 705608