

**SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF NEW YORK**

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JENNIFER DANIELLE ARAOZ,

Plaintiff,

-against-

THE ESTATE OF JEFFREY EDWARD EPSTEIN,
GHISLAINE MAXWELL, and JANE DOES 1-3,

Defendants.

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Index No.

COMPLAINT

Plaintiff, Jennifer Danielle Araoz, by her attorneys Kaiser Saurborn & Mair, P.C., in accordance with CPLR § 214-g, as and for her complaint against defendants, alleges as follows:

I.

PARTIES, JURISDICTION, AND NATURE OF ACTION

1. Plaintiff, Jennifer Danielle Araoz (“Plaintiff” or “Ms. Araoz”), is a citizen of Queens, New York.
2. Defendant, The Estate of Jeffrey Edward Epstein (“Defendant Epstein” or “Epstein”), includes a residence in New York, New York, previously owned and occupied by Jeffrey Edward Epstein, who is recently deceased.
3. Upon information and belief, Defendant, Ghislaine Maxwell (“Defendant Maxwell” or “Maxwell”), was employed by and/or conspired with Defendant Epstein during the period of time he sexually assaulted Ms. Araoz in order to facilitate the sexual assaults.
4. Defendant, Jane Doe 1, referred to in this Complaint as the “Recruiter,” was a brunette woman believed to be in her early 20s, who worked for Defendant Epstein

in New York, New York.

5. Defendant, Jane Doe 2, referred to in this Complaint as the “Secretary,” was an adult female, who worked for Defendant Epstein in New York, NY.

6. Defendant, Jane Doe 3, referred to in this Complaint as the “Maid,” was an adult female, who worked for Defendant Epstein in New York, NY.

7. Defendant Epstein committed repeated sexual assault and battery upon Ms. Araoz while Ms. Araoz was a 14-15 year old high school student, including forcibly raping Ms. Araoz. As such, Defendant Epstein has committed sexual assault, sexual battery, intentional infliction of emotional distress and negligent infliction of emotional distress pursuant to New York common law. The damage Defendant Epstein inflicted upon Plaintiff has been severe and lasting.

8. According to court records, Defendant Maxwell participated with and assisted Epstein in maintaining and protecting his sex trafficking ring, ensuring that approximately three girls a day were made available to him for his sexual pleasure. According to court records, Maxwell provided organizational support to Epstein’s sex trafficking ring, identifying and hiring the recruiters of underage girls for Epstein’s sexual pleasure, scheduling appointments with these underage girls for Epstein’s sexual pleasure, intimidating potential witnesses to Epstein’s sex trafficking operation, and generally providing administrative oversight of his sex trafficking operation and ensuring it remained secret. Upon information and belief, Maxwell conspired with Epstein in the implementation and maintenance of his criminal enterprise which, in turn, victimized Ms. Araoz.

9. Venue is proper in that all of the illegal conduct described herein occurred

within New York County.

II.

ARAOZ AND THE RECRUITER

10. Ms. Araoz was born in Saint John's Hospital in Queens on February 5, 1987.

11. She grew up poor and largely raised by her mother, a single parent, in Middle Village, Queens.

12. The loss of her father at age 12 caused emotional vulnerability and issues surrounding the lack of having a father figure in her life.

13. Ms. Araoz was a prime target for grooming by a pedophile like Defendant Epstein.

14. In September of 2001, at age 14, Ms. Araoz entered high school. She attended a special public high school for performing arts called Talent Unlimited High School, where she majored in musical theater (*i.e.*, singing, dancing, acting).

15. Its campus is within the Julia Richman Education Complex along with five other schools: Urban Academy, Vanguard High School, P226M Junior High Annex, Ella Baker Elementary School, and Manhattan International High School.

16. Because Talent Unlimited High School is a special high school for the performing arts, students audition to be accepted. The School had approximately 500 students.

17. During the first semester of Ms. Araoz's freshman year of high school, while she was 14 years old, after school one day, she was approached by a brunette

woman, who appeared to be in her early 20s, on the sidewalk in front of her school. The woman, who we shall refer to as “the Recruiter,” tried to befriend her.

18. Upon information and belief, Defendant Maxwell identified and hired the Recruiter on behalf of Defendant Epstein to procure underage girls from Talented Unlimited High School and other schools, and oversaw the process that lead to the recruitment and grooming of Ms. Araoz.

19. The Recruiter asked Ms. Araoz where she lived, where her parents were, if they were together, where she was born and where her parents worked.

20. The Recruiter approached Ms. Araoz repeatedly over the course of a week or two, offering to take her for lunches close by the school, and during the meals, would continue to ask personal questions about her.

21. At some point during this approximate two-week period, the Recruiter began to speak about Defendant Epstein, almost as if he was her uncle or a family friend.

22. The Recruiter said that Epstein was a “nice guy,” and that he takes care of her and her family. The Recruiter spoke glowingly of Epstein, stating he is very wealthy, and “you have to see his house.”

23. The Recruiter eventually said that she told Epstein about Ms. Araoz, about how pretty and smart she is and about how she recently lost her father to AIDS.

24. The Recruiter then told Ms. Araoz that Epstein felt horrible about the loss of her father and said that he wanted to help her. The Recruiter said that Epstein is a “caring guy,” that he said she “should not be struggling,” and that he wanted “to be there for her.”

25. The Recruiter then said that she wanted Ms. Araoz to meet Epstein, that he knows a lot of people in the acting/modeling world and that he could possibly help her and introduce her to the right people for her career; the Recruiter said Epstein wanted to “guide her.”

26. The Recruiter said that he was “very caring, very wealthy, very successful, and someone good to know.”

27. The Recruiter said that if Ms. Araoz did not want to meet Epstein, she did not have to, but doing so could “benefit her.” The Recruiter also enticed Ms. Araoz by repeatedly saying how Epstein’s home is so beautiful, and that it was “right here” by Ms. Araoz’s high school.

28. The Recruiter said that they could go by Epstein’s house together.

29. One day, the Recruiter made plans with Ms. Araoz to meet after school to visit Epstein’s home and meet him.

III.

EPSTEIN’S SEXUAL ASSAULT, BATTERY AND RAPE OF MS. ARAOZ

30. Upon arrival at Epstein’s home at 9 East 71st Street, New York, NY 10021, Epstein appeared very welcoming, even humble.

31. Inside the front door, there were many security cameras pointing in all directions. On the little TVs, Ms. Araoz could actually see herself on the camera walking inside.

32. Epstein gave Ms. Araoz a tour of the first floor of the house, but he did not show her the massage room – not in the beginning.

33. Instead, during her first time at the 71st Street home, he showed her a trophy room, as she entered, filled with taxidermied animals he had allegedly hunted over the years.

34. The room had marble floors with extremely high ceilings, mahogany wood with deep reds, and was filled with exotic, even endangered animals, including a giraffe and other rare specimens. There were skins covering parts of the floor with more exotic animals.

35. As one might expect, Epstein's home was massive. When one walked in, the huge entry door was in the middle of the city block and, upon entry, there was a set of a couple marble stairs in the entryway.

36. To the left there was Epstein's Secretary's office with a waiting room, couches and chairs. To the right there was the trophy room filled with hunted animals. There was also a kitchen on the same floor. As one kept walking forward, there was a spiral staircase with a self-portrait of Epstein on the wall with a young girl, who Epstein said he considered like a daughter.

37. On Ms. Araoz's first visit, she recalls her and the Recruiter waiting for Epstein in the Secretary's office (with the Secretary present behind her desk) until being offered cheese, crackers and wine in the kitchen by other staff.

38. At this point, Epstein showed up to greet the girls and showed Ms. Araoz the trophy room, which he appeared to be very proud of.

39. At the end of this first visit, Ms. Araoz recalls Epstein giving the Recruiter a gift – a digital camera. The Recruiter then said to Ms. Araoz, "You see what I mean, he's such a nice guy."

40. Epstein then gave Ms. Araoz \$300 in cash on this first visit, and said, “Here’s a little something to help you out. I take care of the people I care about.”

41. He also told Ms. Araoz that he was “a big AIDS activist,” which meant a lot to Ms. Araoz at the time, because her father had recently passed away from the disease.

42. After an hour or two, Ms. Araoz and the Recruiter left together.

43. Within a couple days, the Recruiter reached out to Ms. Araoz and said that she made a great impression on Epstein and that he wanted to see her again.

44. At the time, Ms. Araoz figured there was no harm as Epstein’s house was only a couple blocks from her high school and, at this point, he had done nothing to her to give her pause or cause her concern.

45. So, again, the Recruiter brought Araoz back to Epstein’s 71st Street home after school.

46. The second time Ms. Araoz went to Epstein’s house, he gave Ms. Araoz the same camera that he had previously given the Recruiter on Ms. Araoz’s first visit to his home.

47. Ms. Araoz visited Epstein’s home with the Recruiter about once or twice a week for the first month. Each time, Ms. Araoz stayed between 1-2 hours, and at the end of the stay, Epstein would direct his Secretary to give her \$300 in cash and just say that he “wanted to help her out,” while she and the Recruiter would be served cheese, crackers and wine by the Maid.

48. Ms. Araoz repeatedly discussed with Epstein that she was a freshman at a performing arts high school right down the street and that her dream was to be an actress and singer.

49. After about a month of making these visits with the Recruiter, Epstein's Secretary and, upon information and belief, Defendant Maxwell, began contacting Ms. Araoz directly and scheduling arrangements for her to visit Epstein's home alone.

50. At this point, during Araoz's first visit *alone*, Epstein took Araoz on the elevator for the first time and showed her his massage room on one of the upper floors.

51. The ceilings of most of the rooms of the house were painted with ornate murals to look like ancient Rome, Greece, and even the Sistine Chapel.

52. Upon showing Ms. Araoz his massage room for the first time, Epstein said, "I want to show you something now. I love this room. It's my favorite room in the house."

53. The massage room was on the smaller side compared to the other rooms in the house. The ceiling was painted to look like a blue sky with clouds and angels to give the appearance that you were in heaven.

54. Epstein showed Ms. Araoz the artwork in the room and the massage table, stating that "not many people know about this room." He then stated, "You really should be a model," "You're beautiful," "I'll bet your body is incredible," and "In order to help you with your modeling career, I will need to see your body."

55. Epstein had a lot of paintings of nude women on the walls. He even commented on one painting of a nude woman with small breasts and brunette hair, but you couldn't see her face clearly because she was partially turned. That painting was

right behind the massage table, and he said how much the woman in the picture looked like Ms. Araoz, then 14 years old.

56. He said he liked “girls with small breasts” because they were “natural and real.” He then complimented Ms. Araoz repeatedly about her breasts.

57. He then told Ms. Araoz again that she would “do great” in the modeling industry, and said that he had a lot of connections in the modeling industry and could help her.

58. Still in the massage room, Epstein asked Ms. Araoz to take her top off so he could see her body and frame, which he insinuated he needed to see if he was going to help her with modeling. He was very complimentary.

59. Feeling uncomfortable and confused, Ms. Araoz did as Epstein instructed. Epstein then immediately started feeling Ms. Araoz’s breasts and rubbing her nude shoulders.

60. He then asked her if she was good at giving massages and, considering all of the financial help he had been giving her family over the past month, insinuated that he would like one. Epstein then walked out of the room and returned in a bathrobe. He instructed Ms. Araoz to remove everything but her bottom underwear, and laid down on the massage table (with only a towel on) instructing Ms. Araoz to proceed with a back massage. Ms. Araoz recalls Epstein having a lot of birth marks and/or freckles on his back.

61. After massaging Epstein’s back for about 20 to 25 minutes, Epstein suddenly turned over, removed his towel and began masturbating.

62. Ms. Araoz, feeling uncomfortable and intimidated, stood frozen to the side of the massage table as Epstein ejaculated on himself.

63. Ms. Araoz recalls Epstein also having a lot of birth marks and/or freckles around his genitalia area.

64. Epstein's exposing his penis made Ms. Araoz extremely nervous and uncomfortable, but she felt intimidated, so she did as she was told.

65. Also, Epstein insinuated that because of the money he gave her, she owed him. Epstein said, "I take care of you, you take care of me."

66. He was giving Ms. Araoz instructions and telling her what to do the entire time. Epstein ultimately ejaculated on himself, and then it ended.

67. He said, "This was amazing, you're beautiful, I can't wait to see you again. I will give you a call during the week and we'll see each other again."

68. He also warned Ms. Araoz not to tell anyone what had occurred or about her visits to his home, something he would consistently repeat to her and insist upon throughout the more than one year of abusive sexual assaults and battery, and eventual forcible rape.

69. Ms. Araoz remembers after the first sexual encounter with Epstein, he showed her a room on the same floor as the massage room that he said was designed to look like his favorite room at the White House, which he called the Blue Room. It was blue and had a distinct oval shape. He then he showed her some more artwork, his master bedroom with a large jacuzzi and prosthetic breasts on the wall in a bathroom that he could look at or play with while in the bathtub.

70. Going forward, sometimes Epstein would call Ms. Araoz directly, and other times he would have the Secretary email or page Ms. Araoz.

71. These sexual encounters with Epstein, which of course were horribly abusive sexual assaults of a child, became more aggressive and escalated. For example, the second time it occurred, while Epstein started to masturbate, he grabbed Ms. Araoz's breasts hard without asking and, this time, insisted that Ms. Araoz rub his chest, arms and legs, and pinch his nipples, which he said was one of the main things that turned him on sexually.

72. These encounters would continue on a weekly basis, once or twice a week, throughout the first and second semester of Ms. Araoz's freshman year of high school and through the beginning of the first semester of her sophomore year of high school.

73. A maid would leave \$300 in cash for Ms. Araoz in a drawer in the massage room (the same drawer each time), and as Epstein left the room, he would state that he had left something for her to help her family. At the time, this was a lot of money to Ms. Araoz.

74. Later on, this became routine where Epstein would have his maid send Ms. Araoz upstairs to the massage room. The maid would put towels and lotions out and tell Araoz to get changed in the bathroom.

75. When one walked in the massage room, there was the painting of a nude woman, previously mentioned. To the right, there was the massage table, and to the right of the massage table, there was a bathroom, which is where Araoz would be directed to get changed.

76. Finally, one day, during the fall of her sophomore year of high school (while she was still 15 years old), she was giving Epstein a massage in her underwear, as she had routinely been instructed to do, but this time instead of turning over to masturbate and fondle her breasts, while she stood off to the side of the massage table, Epstein became more aggressive with her and started touching her vaginal area.

77. He said, “Why don’t we do it where you’re on top of me massaging me and take your underwear off.”

78. Ms. Araoz said to Epstein that this made her uncomfortable and she wanted to stick to what they were doing before.

79. Epstein responded that he “loved her and cared for her,” was going to “look out for her,” that it “was okay” and that she should just climb on top of him and “try something different.”

80. Ms. Araoz felt completely intimidated and did not know what to do, so she just did as she was told and got on top of him.

81. Epstein masturbated, as she rubbed his chest.

82. Then, suddenly, without giving Ms. Araoz any notice, Epstein forced his penis (which already had massage oils on it) inside her vagina and proceeded to have sex with her.

83. Araoz was petrified, felt trapped and didn’t know what to do, so she just did as she was told. Epstein held her tightly and forcibly raped her.

84. On top of this brutal rape, Epstein did not use a condom, which substantially contributed to extreme emotional distress and the development of a panic

disorder, which was exacerbated by the fact that Ms. Araoz had recently lost her father to AIDS.

85. In addition to constituting illicit sex with a minor, this was also a brutal rape.

86. Epstein's monstrous conduct cannot be understated.

87. Epstein, after raping Ms. Araoz, told her that "she was amazing, that she felt amazing, and that she did nothing wrong."

88. Ms. Araoz was disgusted with Epstein (and herself at the time) and left his home soon thereafter, never to return.

89. Afterward, Epstein tried to contact Ms. Araoz, but she ignored his calls.

90. Epstein also tried to reach out to Ms. Araoz in later years, but she did not take his calls.

91. Following the rape, Ms. Araoz refused to go back to Talent Unlimited High School out of fear of seeing Epstein, who lived just blocks away from her high school, or seeing the Recruiter again.

92. At the time, Ms. Araoz told her mom the reason was that she was being bullied at school concealing from her the truth involving Epstein, reflecting her extreme shame about what she experienced and the intimidation she felt from Epstein.

93. Ms. Araoz, still 15 years old at the time, transferred to Forest Hills High School in Queens by her home to avoid any continued contact with Epstein and the Recruiter.

94. Having left a special public high school for performing arts that she had to audition to get into, to instead go to a regular high school, caused Ms. Araoz to lose

interest in school, drop out, and give up on her career of being an actress, model and singer.

95. Defendants conduct continues to have impact in every aspect of Plaintiff's life today.

CAUSE OF ACTION I

96. Plaintiff repeats and reiterates the allegations contained in paragraphs "1" through "95" as if incorporated and realleged herein.

97. Defendant Epstein committed repeated sexual assaults upon Plaintiff.

98. By reason thereof, Plaintiff has suffered extreme emotional injuries.

CAUSE OF ACTION II

99. Plaintiff repeats and reiterates the allegations contained in paragraphs "1" through "95" and "98" as if incorporated and realleged herein.

100. Defendant Epstein committed repeated sexual battery of Plaintiff.

101. By reason thereof, Plaintiff has suffered extreme emotional injuries.

CAUSE OF ACTION III

102. Plaintiff repeats and reiterates the allegations contained in paragraphs "1" through "95", "98" and "101" as if incorporated and realleged herein.

103. By reason Defendant Epstein's outrageous and unconscionable conduct that violated all norms of decent and civil society, defendants have intentionally inflicted emotional distress upon Plaintiff.

104. By reason thereof, Plaintiff has suffered extreme emotional injuries.

CAUSE OF ACTION IV

105. Plaintiff repeats and reiterates the allegations contained in paragraphs

“1” through “95”, “98”, “101” and “104” as if incorporated and realleged herein.

106. By reason thereof, defendants have committed negligent infliction of emotional distress.

107. By reason thereof, Plaintiff has suffered extreme emotional injuries.

CAUSE OF ACTION V

108. Plaintiff repeats and reiterates the allegations contained in paragraphs “1” through “95”, “98”, “101”, “104” and “107” as if incorporated and realleged herein.

109. Defendants conspired with each other to make possible and otherwise facilitate the sexual abuse and rape of Plaintiff.

By reason thereof, Plaintiff has suffered extreme emotional injuries.

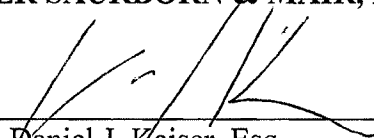
WHEREFORE, Plaintiff demands judgment against defendants as follows:

- (i) On the First Cause of Action assessing compensatory damages and punitive damages in an amount to be determined at trial;
- (ii) On the Second Cause of Action assessing compensatory damages and punitive damages in an amount to be determined at trial;
- (iii) On the Third Cause of Action assessing compensatory and punitive damages in an amount to be determined at trial;
- (iv) On the Fourth Cause of Action, compensatory damages in an amount to be determined at trial;
- (v) On the Fifth Cause of Action, compensatory and punitive damages to be determined at trial; and
- (vi) For such other relief as the Court deems just and proper.

Dated: New York, New York
August 14, 2019

KAISER SAURBORN & MAIR, P.C.

By: _____


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