

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

-----X
ELIZABETH STEIN,

Plaintiff,

- against -

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

Defendants.

-----X
To the above-named Defendants:

Index No.

Plaintiff designates NEW YORK
COUNTY as the place of trial.

The basis of venue is Defendant's
Estate

Summons

YOU ARE HEREBY SUMMONED to answer the Verified Complaint in this action and to serve a copy of your Verified Answer on the undersigned attorneys, Marsh Law Firm PLLC, representing Plaintiff, within twenty (20) days after the service of this Summons, exclusive of the day of service or within 30 days after the service is complete if this Summons is not personally delivered to you within the State of New York.

Please take notice that this action is based on a tort cause of action, that plaintiff seeks money damages for personal injuries and that incase of your failure to appear or answer, judgment will be taken against you by default for the relief demanded in the Verified Complaint.

Defendants' addresses:

Darren K. Indyke and Richard D. Kahn
As Executors of the Estate of Jeffrey Edward Epstein
875 Third Avenue
New York, NY 10022

Ghislaine Maxwell
Federal Correctional Institution Tallahassee
501 Capital Cir NE
Tallahassee, FL 32301

Dated: New York, New York
November 22, 2023

Respectfully Submitted,

MARSH LAW FIRM PLLC



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**VERIFIED COMPLAINT JURY
TRIAL DEMANDED**

Plaintiff, by and through her attorneys, MARSH LAW FIRM PLLC, bringing this Verified Complaint against Defendants Darren K Indyke and Richard D. Kahn in their capacities as the executors of the estate of Jeffery Edward Epstein (hereinafter “Epstein”), and against Ghislaine Maxwell (hereinafter “Maxwell”) (hereinafter Epstein and Maxwell together “Defendants”), alleges as follows:

PRELIMINARY STATEMENT

1. Plaintiff was one of many victims trafficked by Epstein and Maxwell during their decades-long organized scheme to procure young females for their own sexual pleasure and that of their friends and acquaintances, many of them high government officials and corporate titans.

2. For approximately three years, between the years of approximately 1994 to approximately 1997, when Plaintiff was in her early 20s, Epstein and Maxwell recruited her into their sex trafficking scheme. The pair first groomed Plaintiff with flattery, gifts, feigned interest in

her future, and false promises of advancing her career and personal life. They shamed her when she refused their favors and overtures and stalked her with the malicious and malevolent purpose of turning her into sexual meat for consumption by themselves and others.

3. Plaintiff was subsequently hospitalized numerous times for nervous breakdowns and underwent multiple medical procedures to rid herself of the horrific psychological damage Epstein and Maxwell foisted upon her in her formative years.

4. Epstein and Maxwell's actions, as alleged in each cause of action herein constitute one or more of the sexual offenses defined in the New York Penal Law Article 130, including but not limited to sexual misconduct in violation of Penal Law 130.20; rape in the third degree in violation of Penal Law 130.25; rape in the second degree in violation of Penal Law 130.30; rape in the first degree in violation of Penal Law PL 130.35; criminal sexual act in the third degree in violation of Penal Law PL 130.40; criminal Sexual act in the second degree in violation of Penal Law 130.45; criminal sexual act in the first degree in violation of Penal Law 130.50; forcible touching in violation of Penal Law 130.52; sexual abuse in the third degree in violation of Penal Law 130.55; sexual abuse in the second degree in violation of Penal Law 130.60; sexual abuse in the first degree in violation of Penal Law 130.65; aggravated sexual abuse in the fourth degree in violation of Penal Law 130.65-a; aggravated sexual abuse in the third degree in violation of Penal Law 130.6; aggravated sexual abuse in the second degree in violation of Penal Law 130.67; and aggravated sexual abuse in the first degree in violation of Penal Law 130.70.

5. Accordingly, and pursuant to New York State's Adult Survivor's Act, this action, filed within the one-year window set forth in C.P.L.R. §214-g, is timely.

6. This case falls within one or more of the exceptions to the CPLR's limitation on liability of persons jointly liable pursuant to CPLR §1601, including those exceptions set forth at CPLR §§1602.5, 1602.8, and 1602.11.

PARTIES

7. Plaintiff is an individual residing in New Jersey. At all times relevant hereto, Plaintiff was a resident of New York County, New York and/or Burlington County, New Jersey.

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

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

10. Defendant Ghislaine Maxwell is a New York citizen and is domiciled in the Southern District of New York. She is currently in a federal detention facility in the state of Florida, serving her criminal sentence for sexual trafficking of girls with Epstein.

11. Defendant Jeffrey Epstein is a deceased individual who at all relevant times was a New York citizen domiciled in the Southern District of New York.

JURISDICTION AND VENUE

12. This Court has personal jurisdiction over Defendants pursuant to C.P.L.R. §302 because Epstein and Maxwell committed acts within the state against Plaintiff on which this action is based.

13. This Court has jurisdiction over this action because the amount of damages Plaintiff seeks exceeds the jurisdictional limits of all lower courts which would otherwise have jurisdiction.

14. The dollar amount of damages sought far exceeds the jurisdictional limits of all lower courts which would otherwise have jurisdiction.

15. Venue for this action is proper in the County of New York pursuant to C.P.L.R. §503 because during the period of abuse, Epstein and Maxwell resided in New York County where a substantial part of the events giving rise to the causes of action occurred.

FACTS COMMON TO ALL CAUSES OF ACTION

16. This suit arises out of Epstein and Maxwell's sexual assault of Plaintiff and their sex trafficking of Plaintiff to their friends and associates.

17. Upon information and belief, Epstein and Maxwell's trafficking scheme involved recruiting young females by ingratiating themselves to them with feigned interest in their personal lives, education and careers, giving them gifts, making false promises, impressing them with their wealth and social status, and threatening them with financial or social ruin, all for the purpose of compelling them to submit to their sexual entreaties and demands.

18. Upon information and belief, this highly organized scheme was employed numerous times with numerous young women over a period of several decades from the 1990s forward.

19. As United States District Judge Kenneth Marra has found, "From between about 1999 and 2007, Jeffrey Epstein sexually abused more than 30 minor girls ... at his mansion in Palm Beach Florida, and elsewhere in the United States and overseas ... In addition to his own sexual abuse of the victims, Epstein directed other persons to abuse the girls sexually. Epstein used paid employees to find and bring minor girls to him. Epstein worked in concert with others to obtain minors not only for his own sexual gratification, but also for the sexual gratification of others." *Doe 1 v. United States*, 359 F. Supp. 3d 1201, 1204 (S.D. Fla. 2019) (internal citations omitted).

PLAINTIFF'S ABUSE BY EPSTEIN, MAXWELL, AND THEIR ASSOCIATES

20. In or about the late summer of 1991, at the approximate age of 18, Plaintiff moved to New York, New York from her home in Pennsylvania to pursue a fashion buying and merchandising degree at the Fashion Institute of Technology (“FIT”) in Manhattan. She viewed this as an avenue to make a new start in life.

21. Plaintiff attended FIT determined to perform well there and matriculate at a law school after graduating from FIT, her parents’ wishes notwithstanding.

22. On or about the Winter of 1992, Plaintiff and several other FIT students began working at Henri Bendel’s as interns. At the time, New York socialites frequented the Henri Bendel store which was owned by Lex Wexner of Limited Brands.

23. At the end of the Christmas season, Henri Bendel offered Plaintiff a job. Plaintiff worked at Henri Bendel until approximately 1995 while continuing to pursue her degree at FIT.

24. In or about the fall of 1993 or 1994, when Plaintiff was 21, Maxwell came to Henri Bendel as a customer and asked Plaintiff to assist her.

25. Maxwell and Plaintiff had a friendly conversation wherein Maxwell told Plaintiff that her colleague was in very close relations with Les Wexner, the owner of Henri Bendel. As Maxwell paid for several items, she asked Plaintiff to deliver her packages to the St. Regis on Fifth Avenue in Manhattan, which she did.

26. When Plaintiff arrived at the St. Regis with the packages, the concierge directed her to the bar where Maxwell and a man later identified as Jeffrey Epstein were having drinks. Defendants invited Plaintiff to sit with them at the hotel bar for a drink and conversation, which she agreed to do.

27. The concierge then came over and told Maxwell and Epstein that their room was ready. Defendants then insisted that Plaintiff help bring the packages up to their hotel room. This

was a somewhat unusual request, but Plaintiff agreed to deliver the packages to their room because of their association with Mr. Wexner.

28. When Plaintiff got to the room with the packages, Epstein and Maxwell asked her to come inside their hotel room. Plaintiff reluctantly agreed.

29. Maxwell and Epstein began asking Plaintiff about herself, why she had come to New York, and what her career goals were. Plaintiff then explained that she saw many opportunities in New York and viewed her move as a chance to start over and live a new life. Maxwell commiserated, telling Plaintiff that she too saw New York as a place to leave her childhood behind and start over. Plaintiff told them that she grew up adoring New York fashion and she believed that she wanted to pursue a career in fashion or law.

30. Epstein removed himself from this introductory conversation and went into the bathroom.

31. Maxwell followed Epstein into the bathroom and then the pair came out of the bathroom together in monogrammed bathrobes.

32. Maxwell and Epstein then continued the conversation, turning it to the topic of Plaintiff's personal and sex life. Plaintiff began to feel uncomfortable but nonetheless continued with the conversation out of concern that leaving would be impolite and perhaps get back to her bosses.

33. As Plaintiff shared additional details about her life, including but not limited to her then-relationship with a boyfriend who was around her same age. In response, Maxwell and Epstein told Plaintiff they had a lot of male friends they could introduce her to, and that she would be sure to find a more appropriate match.

34. The drinking and conversation continued for some time and then at some point Maxwell and Epstein began kissing. Soon after, Maxwell began to touch and massage Defendant Epstein beneath his robe.

35. Epstein and Maxwell asked the Plaintiff if she had ever participated in a “threesome,” and she told them she had not.

36. Maxwell then encouraged Plaintiff to join them and assured her “it would be fun.” Plaintiff was hesitant and afraid of Epstein or Maxwell hurting her physically or professionally. Plaintiff reluctantly joined them, fearing retaliation at her job if she did not acquiesce.

37. Maxwell continued to kiss Plaintiff and then placed Plaintiff’s hand on Epstein’s penis, at which time Maxwell forcibly instructed Plaintiff to masturbate Epstein.

38. Maxwell then directed Plaintiff to “use her mouth,” and firmly instructed Plaintiff to copulate Epstein while Maxwell performed oral sex on Plaintiff.

39. Plaintiff was visibly uncomfortable and afraid. She asked to “stop,” but neither Defendant responded. When Plaintiff’s objection to any further sexual conduct was ignored, Plaintiff told Maxwell and Epstein that her boyfriend was on his way to her home and that she needed to leave immediately.

40. Epstein handed her cash and stated it was a “tip.” Plaintiff initially refused, but Epstein insisted she “take the money.” Plaintiff left feeling confused, betrayed, humiliated and completely violated.

41. This was the start of a three-year nightmare for Plaintiff, during which Maxwell and Epstein stalked Plaintiff, sexually abused her and trafficked her to their “friends” for more sexual abuse.

42. After the abuse at the St. Regis, Plaintiff went back to work at Henri Bendel feeling sick, confused, numb, and full of fear. Her academic performance suffered because of her emotional turmoil.

43. Maxwell and Epstein then came to the store repeatedly in the months that followed her abuse at the St. Regis.

44. In one instance, Maxwell bought some expensive designer jewelry Plaintiff had shown her.

45. Maxwell repeatedly asked Plaintiff's colleagues at Henri Bendel to speak to Plaintiff.

46. In the late fall of 1994, Plaintiff was surprised when Henri Bendel offered her a newly created job as an assistant manager of several departments. Although Plaintiff was flattered by the offer, she declined to focus on her academics.

47. In the spring of 1995, Maxwell called Plaintiff on the telephone completely enraged that Plaintiff would turn down the job offer because Maxwell and Epstein were involved in securing the position for Plaintiff as part of a manipulative grooming strategy to make Plaintiff become beholden and dependent on them.

48. Shortly after Maxwell's scolding of Plaintiff, Henri Brendel informed Plaintiff that she would not have a position at the store after graduation.

49. After her graduation, Plaintiff then left Henri Bendel to take a job at Bloomingdale's. Plaintiff was still struggling psychologically from her dealings with Maxwell and Epstein but was relieved to be out of Henri Bendel where they could find her.

50. Plaintiff was soon surprised and disappointed when, in the late summer of 1995, Maxwell came into the Bloomingdale's store just a few months after she had commenced work there.

51. Plaintiff asked Maxwell what she was doing there, and Maxwell said shopping for sweaters.

52. Plaintiff asked how Maxwell found her at Bloomingdale's and Maxwell said Plaintiff's former colleagues at Henri Bendel's had told Maxwell that Plaintiff had moved to Bloomingdales.

53. Maxwell began "befriending" Plaintiff again, coming frequently to the store. She repeatedly urged Plaintiff to come out socially for lunch or shopping just with her. By this time Plaintiff firmly believed Maxwell would interfere with her job if Plaintiff refused her requests. Reluctantly, Plaintiff agreed to join Maxwell.

54. Maxwell soon asked Plaintiff to come out dancing at the Limelight Club in Manhattan. Plaintiff reluctantly agreed. Maxwell continued to invite Plaintiff to social gatherings telling her that she would meet people and friends of theirs.

55. In or about the fall of 1995, Maxwell invited Plaintiff to a dinner party at Epstein's mansion in Manhattan.

56. The dinner party started on the ground floor of the mansion and later several people, including Epstein, Plaintiff and Maxwell, among others, migrated upstairs. They entered a room with a massage table where Maxwell and Epstein forced Plaintiff to engage in sexual acts with others in the room.

57. In or about December 1995, Maxwell invited Plaintiff to a New Years Eve party at the Waldorf Astoria and picked out an expensive ball gown for Plaintiff to wear. Maxwell indicated that she would be introducing Plaintiff to a date for the evening.

58. Plaintiff came to the Waldorf Astoria where she was introduced to her “date” by Maxwell and Epstein.

59. Plaintiff resisted Epstein and Maxwell’s instructions to begin having sex with them and the “date.”

60. Epstein and Maxwell became physically aggressive towards Plaintiff.

61. Epstein made fun of Plaintiff for taking the subway to the party and said they were “going to show her what a train is tonight.” Epstein then proceeded to vaginally, anally, and orally rape Plaintiff while Maxwell restrained her.

62. After Maxwell and Epstein raped Plaintiff together, they both restrained Plaintiff as another unknown man they identified as her “date” raped Plaintiff and penetrated her vagina. After the sexual assault, Maxwell instructed Plaintiff to get dressed and meet her and Epstein and the date downstairs in the ballroom.

63. The date left to make a phone call at midnight. Plaintiff asked where he had gone, and Epstein and Maxwell laughed, telling her that he had gone to call his wife. Plaintiff began to sob.

64. Maxwell urged Plaintiff back to the party, but Plaintiff began vomiting, which prompted Maxwell to leave her alone. Plaintiff took this opportunity to run out of the hotel, leaving the clothes she had worn into the hotel behind.

65. Maxwell told Plaintiff offered Plaintiff a vacation to Florida to make up for the New Years sexual assault. Afraid of retaliation, Plaintiff reluctantly accepted the Florida invitation.

66. Maxwell and Epstein sent a car that drove Plaintiff to Epstein's residence in Palm Beach. Upon arrival at the Palm Beach residence, about a dozen guests greeted Plaintiff as she walked to the pool area. Soon after, Maxwell and Epstein sexually assaulted Plaintiff by the pool as other guests watched. Soon after, several of their guests sexually assaulted Plaintiff as well.

67. Plaintiff began to resist the sexual abuse by Epstein and his guests.

68. Plaintiff was violently punished and her anus was penetrated with a weapon for resisting sexual abuse at Epstein's Florida residence.

69. Maxwell refused to allow Plaintiff to leave Florida for multiple days. Plaintiff was then fired for missing her scheduled workdays when she eventually returned to New York. Without a job, Plaintiff became even more beholden to Epstein and Maxwell.

70. Maxwell and Epstein continued inviting Plaintiff to social events and on "dates" with various associates of theirs.

71. Plaintiff discovered shortly after she returned from Florida that one of her abusers had impregnated her. Plaintiff then became overwhelmed with fear and full of despair.

72. Plaintiff then called Maxwell for help.

73. Maxwell then insisted that Plaintiff have an abortion and subsequently arranged for a doctor's visit.

74. Plaintiff attended the doctor's visit where she was prescribed an abortion pill rather than a surgical procedure. Plaintiff consumed the abortion pill at Maxwell's direction.

75. Following her abortion, Plaintiff fell into a deep depression. She felt isolated and trapped. She wanted desperately to escape the clutches of Maxwell and Epstein and the sordid life into which they had led her. So desperate was she that she caused herself to crash her car.

76. Maxwell and Epstein did not let go of Plaintiff, however, and continued stalking her with repeated phone calls and cabled messages to her. Plaintiff changed her phone number to escape, but they found her again.

77. One day a person showed up at her apartment to install cable and delivered a message from Epstein and Maxwell to the effect that they were still watching her and would find her. Plaintiff believed that the lives of her loved ones were also in jeopardy.

78. Plaintiff has been hospitalized on several occasions since the horrific abuse she suffered at the hands of Epstein.

CAUSES OF ACTION

FIRST CAUSE OF ACTION - SEXUAL BATTERY **(AGAINST ALL DEFENDANTS)**

79. Plaintiff repeats and realleges each and every allegation set forth in all paragraphs of this Complaint as if fully set forth herein.

80. As alleged herein, Epstein and Maxwell repeatedly intended to and did make bodily contact with Plaintiff that was harmful and offensive in nature.

81. As a direct and proximate result of the aforementioned intentional tortious conduct, and as set forth in detail below, Plaintiff has and continues to suffer great emotional and physical injury and to incur substantial medical expenses.

SECOND CAUSE OF ACTION - ASSAULT **(AGAINST ALL DEFENDANTS)**

82. Plaintiff repeats and realleges each and every allegation set forth in all paragraphs of this complaint as if fully set forth herein.

83. As alleged herein, Epstein and Maxwell had the real and apparent ability to cause imminent harmful and offensive bodily contact with Plaintiff and intentionally performed violent and menacing acts which threatened such contact with Plaintiff.

84. These intentional acts caused Plaintiff to have an actual and reasonable apprehension that the bodily contact was imminent.

85. As a direct and proximate result of the aforementioned intentional tortious conduct, and as set forth in detail below, Plaintiff has and continues to suffer great physical and emotional injury and to incur substantial medical expenses.

**THIRD CAUSE OF ACTION - INTENTIONAL INFLICTION OF EMOTIONAL
DISTRESS**
(AGAINST ALL DEFENDANTS)

86. Plaintiff repeats and realleges each and every allegation set forth herein as if fully set forth for the third cause of action.

87. As set forth herein, Epstein and Maxwell engaged in outrageous conduct toward Plaintiff with the intention and for the purpose of causing, or with reckless disregard for the probability of causing Plaintiff severe emotional distress.

88. The conduct of Epstein and Maxwell toward Plaintiff was so shocking and outrageous that it exceeds all reasonable bounds of decency.

89. As a direct and proximate result of the aforementioned intentional tortious conduct, and as set forth in detail below, Plaintiff has and continues to suffer great physical and emotional injury and to incur substantial medical expenses.

FOURTH CAUSE OF ACTION – GROSS NEGLIGENCE
(AGAINST ALL DEFENDANTS)

90. Plaintiff repeats and re-alleges all of her allegations above and below.

91. Epstein and Maxwell acted wantonly and recklessly, that is, in such a way and under such circumstances as to show reckless or conscious indifference and utter disregard of its effect upon the safety and rights of Plaintiff.

92. Epstein and Maxwell acted maliciously, that is, deliberately with knowledge of Plaintiff's rights and with the intent to interfere with those rights.

93. Epstein and Maxwell intentionally abused Plaintiff showing an extreme departure from the standards of ordinary care to the extent that the danger to Plaintiff was known to them.

94. Epstein and Maxwell demonstrated an extreme departure from the standards of ordinary care to the extent that the danger to Plaintiff was known to them or so obvious that Epstein and Maxwell must have been aware of it.

95. Epstein and Maxwell knew that this conscious/reckless disregard, failure and departure would inflict severe emotional and psychological distress, including personal physical injury, on Plaintiff, and Plaintiff did in fact suffer severe emotional and psychological distress and personal physical injury as a result, including severe mental anguish, humiliation and emotional and physical distress.

DAMAGES

96. As a direct and proximate result of the aforementioned intentional torts, Plaintiff suffered and continues to suffer emotional distress, mental anguish, embarrassment, and humiliation. She has had several nervous breakdowns for which hospitalization was necessary. for years she was suicidal and attempted suicide several times. She has been diagnosed with post-traumatic stress disorder for which she has and continues to obtain medical treatment.

97. As a direct and proximate result of the aforementioned intentional torts, Plaintiff has incurred medical expenses and will continue to incur such expenses for years into the future as she seeks to fully recover from the injuries.

98. Epstein and Maxwell committed the acts alleged herein maliciously, fraudulently, and oppressively with wrongful intention of injuring Plaintiffs from an improper or evil motive

amounting to malice and in conscious disregard of Plaintiff's rights, entitling Plaintiff to recover punitive damages in such sums as a jury would find fair, just, and appropriate to deter Maxwell and others from future similar misconduct.

99. By reason of the foregoing, Defendants are liable to the Plaintiff for compensatory and punitive damages, together with interest and costs.

NO APPORTIONMENT OF LIABILITY

100. Pursuant to CPLR 1603, the foregoing causes of action are exempt from the operation of CPLR 1601 by reason of one or more of the exemptions provided in CPLR 1602, including but not limited to, CPLR 1602(2), CPLR 1602(5), 1602(7) and 1602(11), thus precluding defendants from limiting their liability by apportioning some portion of liability to any joint tortfeasor.

PRAYER FOR RELIEF

WHEREFORE, Plaintiff, demands judgment against each Defendant on each cause of action as follows:

- A. Awarding compensatory damages in an amount to be determined at trial, but in any event in an amount that exceeds the jurisdictional limits of all lower courts which would otherwise have jurisdiction;
- B. Awarding punitive damages;
- C. Awarding costs and fees of this action, including attorneys' fees;
- D. Awarding prejudgment interest;
- E. Awarding such other and further relief as to this Court may deem just and proper.

JURY DEMAND

Plaintiff demands a trial by jury on all issues so triable.

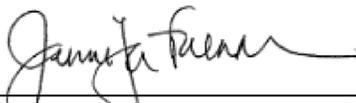
Dated: New York, New York
November 22, 2023

Respectfully Submitted,

MARSH LAW FIRM PLLC



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Attorneys for Plaintiff Elizabeth Stein

VERIFICATION

Elizabeth Stein, being duly sworn and deposed says:

I am the Plaintiff in the above-entitled action. I have read the foregoing and know the contents thereof. The same are true to my knowledge, except as to matters stated to be alleged on information and belief and as to those matters I believe them to be true.


Liz Stein (Nov 22, 2023 14:02 EST)

ELIZABETH STEIN

Sworn to before me this
22nd day of November, 2023


Cassandra Sorrentino (Nov 22, 2023 14:02 EST)

Notary Public

