

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

Case No.: 08-CIV-80893 – MARRA/JOHNSON

JANE DOE,

Plaintiff,

v.

JEFFREY EPSTEIN,

Defendant.

PLAINTIFF'S FIRST AMENDED COMPLAINT

Parties, Jurisdiction and Venue

Plaintiff, Jane Doe, hereby brings this First Amended Complaint against Defendant, Jeffrey Epstein, and states as follows:

1. This is an action for damages in an amount in excess of \$50,000,000.00, exclusive of interest and costs.
2. This First Amended Complaint is brought under a fictitious name in order to protect the identity of Plaintiff, Jane Doe, because this Complaint makes allegations of sexual assault and child abuse of a then minor.
3. At all times material to this cause of action, Plaintiff, Jane Doe, was a resident of Palm Beach County, Florida.
4. At all times material to this cause of action, Defendant, Jeffrey Epstein, was a resident of the State of New York.
5. At all times material to this cause of action, Defendant, Jeffrey Epstein, had a residence located in Palm Beach County, Florida.

6. At all times material to this cause of action, Defendant, Jeffrey Epstein, was an adult male born in 1953.

7. This Court has jurisdiction of this action and the claim set forth herein pursuant to 28 U.S.C. §1332(a) as the matter in controversy exceeds \$75,000.00, exclusive of interest and costs and is between citizens of different states.

8. This Court has venue of this action pursuant to 28 U.S.C. §1391(a) as a substantial part of the events or omissions giving rise to the claim occurred in this district.

9. At all times material, Defendant, Jeffrey Epstein, owed a duty unto Plaintiff, Jane Doe, to treat her in a non-negligent manner and to not commit intentional or tortious or illegal acts against her.

Factual Allegations

10. Upon information and belief, Defendant, Jeffrey Epstein, has demonstrated a sexual preference and obsession for minor girls. He engaged in a plan, scheme, and enterprise in which he gained access to economically disadvantaged minor girls, such as Plaintiff, Jane Doe, and sexually battered these girls, and/or coerced them to engage in prostitution.

11. Defendant's plan, scheme, and enterprise included an elaborate system wherein the then minor Plaintiff, and other minor girls, were contacted by telephone by Defendant Epstein, Sarah Kellen or other unknown employees or assistants working for Defendant Epstein, and Epstein's assistants would persuade the minor girls, including Jane Doe, to come over to defendant Epstein's house for the purpose of engaging in prostitution.

12. Plaintiff Jane Doe was contacted by Defendant Jeffrey Epstein himself or Sarah Kellen or other unknown employees or assistants of Defendant Epstein on numerous occasions, and she was often times brought to Defendant Epstein's residence with the assistance of Defendant Epstein's assistants.

13. Sarah Kellen or other employees/assistants of Defendant Epstein would often arrange with the Yellow Cab cab company to take minor girls, including Jane Doe, to Defendant Epstein's house.

14. Once the then minor girl, including Plaintiff Jane Doe, arrived at Epstein's house, the assistants and employees left the then minor Plaintiff and other minor girls alone in a room at the defendant's mansion. Subsequently, Defendant, Jeffrey Epstein, himself would appear, remove his clothing, and direct the then minor Plaintiff to remove her clothing. He would then perform one or more lewd, lascivious, and sexual acts, including, but not limited to, masturbation, touching of the then minor Plaintiff's sexual organs, using vibrators or sexual toys on the then minor Plaintiff, and digitally penetrating the then minor Plaintiff.

15. Defendant Epstein traveled to his mansion in Palm Beach for the purpose of luring minor girls to his mansion to sexually abuse or batter them; he used the telephone to contact these minor girls for the purpose of coercing them into acts of prostitution and to enable himself to commit sexual battery against them and acts of lewdness in their presence, and he conspired with others, including his assistants Sarah Kellen and Nadia Marcinkova, to further commit these acts and to avoid police detection.

16. Plaintiff, Jane Doe, was first brought to Defendant Epstein's mansion in early 2003, when she was a fourteen-year old in middle school.

17. Defendant, Jeffrey Epstein, a wealthy financier with a lavish home, significant wealth, and a network of assistants and employees, used his resources and his influence over a vulnerable minor child to engage in a systematic pattern of sexually exploitive behavior.

18. Beginning in approximately February 2003 and continuing until approximately June 2005, the defendant coerced and enticed the impressionable, vulnerable, and economically deprived then minor Plaintiff in order to commit various acts of sexual misconduct against her. These acts included, but were not limited to, fondling and inappropriate and illegal sexual touching of the then minor Plaintiff, sexual misconduct and masturbation of Defendant, Jeffrey Epstein, in the presence of the then minor Plaintiff, and encouraging and coercing the then minor Plaintiff to become involved in prostitution.

19. Defendant, Jeffrey Epstein, used his money, wealth and power to unduly and improperly manipulate and influence the then minor Plaintiff into a deviant and delinquent lifestyle.

20. The above-described sexual acts took place in Palm Beach County, Florida at the residence of Defendant, Jeffrey Epstein. Any assertions by Defendant, Jeffrey Epstein, that he was unaware of the age of the then minor Plaintiff are belied by his actions and rendered irrelevant by the provisions of applicable Florida Statutes concerning the sexual exploitation, sexual battery, and abuse of a minor child.

Defendant, Jeffrey Epstein, at all times material to this cause of action, knew and should have known of the plaintiff, Jane Doe's minority.

21. The above-described acts were perpetrated upon the person of the then minor Plaintiff regularly and on dozens of occasions.

22. In June 2008, in the Fifteenth Judicial Circuit in Palm Beach County, Florida, Defendant, Jeffrey Epstein, entered pleas of "guilty" to various Florida state crimes involving the solicitation of minors for prostitution and the procurement of minors for the purposes of prostitution, for which Defendant Epstein was sentenced to 18 months incarceration in Palm Beach County jail to be followed by 12 months community control (house arrest).

COUNT I

Sexual Battery upon a Minor

23. The Plaintiff, Jane Doe, repeats and realleges paragraphs 1 through 21 above.

24. On numerous occasions, Defendant Epstein did in fact intentionally touch Plaintiff, Jane Doe, on her person against her will and/or without her legal consent.

25. Defendant Epstein battered her sexually, in that he touched her in intimate areas of her body and person in an offensive manner while she was a minor child, and therefore the touchings were without legal consent.

26. Defendant Epstein touched her in intimate areas of her body on dozens of occasions between approximately February 2003 and approximately June 2005.

27. The conduct described in this count constitutes battery against the person of the then minor Plaintiff.

28. As a direct and proximate result of Defendant, Jeffrey Epstein's sexual battery on Plaintiff, Jane Doe, Plaintiff has in the past suffered, and will in the future suffer, physical injury, pain and suffering, emotional distress, psychological trauma, mental anguish, humiliation, embarrassment, loss of self-esteem, loss of her childhood, loss of dignity, invasion of her privacy and other damages associated with Defendant, Jeffrey Epstein, controlling, manipulating and coercing her into a perverse and unconventional way of life for a minor. The then minor Plaintiff incurred medical and psychological expenses and Plaintiff, Jane Doe, will in the future suffer additional medical and psychological expenses. Plaintiff, Jane Doe, has suffered a loss of income, a loss of the capacity to earn income in the future, and a loss of the capacity to enjoy life. These injuries are permanent in nature and Plaintiff, Jane Doe, will continue to suffer these losses in the future.

WHEREFORE, Plaintiff, Jane Doe, demands judgment against Defendant, Jeffrey Epstein, for compensatory damages, punitive damages, and such other and further relief as this Court deems just and proper, and hereby demands trial by jury on all issues triable as of right by a jury.

COUNT II

Cause of Action Pursuant to 18 USC §2255

29. Plaintiff, Jane Doe, adopts and realleges paragraphs 1 through 22 above.

30. The allegations contained herein in Count II are a separate and distinct legal remedy.

31. As a condition of Defendant, Jeffrey Epstein's criminal plea, and in exchange for the Federal Government not prosecuting the Defendant for numerous

federal offenses, the Defendant, Jeffrey Epstein, entered into a Non-Prosecution Agreement with the Federal Government, wherein he acknowledged Plaintiff Jane Doe as a victim of certain criminal offenses he committed against Jane Doe.

32. The Plaintiff, Jane Doe, was in fact a victim of one or more offenses enumerated in Title 18, United States Code, Section 2255, and as such asserts a cause of action against the Defendant, Jeffrey Epstein, pursuant to this Section of the United States Code and the agreement between the Defendant, Jeffrey Epstein, and the United States Government.

33. Specifically, Defendant Epstein:

(a) knowingly conspired with others known and unknown to use a facility or means of interstate commerce to knowingly persuade, induce, or entice minor females, including Plaintiff Jane Doe, to engage in prostitution, in violation of title 18, United States Code, Section 2422(b).

(b) knowingly and willfully conspired with others known (such as Sarah Kellen) and unknown to travel in interstate commerce for the purpose of engaging in illicit sexual conduct with minors, including Plaintiff Jane Doe, as defined in 18 U.S.C. § 2423(f), with minor females, in violation of Title 18, United States Code, Section 2423(b); all in violation of Title 18, United States Code, Section 2423(e);

(c) used a facility or means of interstate or foreign commerce to knowingly persuade, induce, or entice minor females, including Plaintiff Jane Doe, to engage in prostitution; in violation of Title 18, United States Code, Section 2422(b);

(d) traveled in interstate commerce for the purpose of engaging in illicit sexual conduct, as defined in 18 U.S.C. § 2423(f), with minor females, including Plaintiff Jane Doe; in violation of Title 18, United States Code, Section 2423(b).

34. As a direct and proximate result of the aforementioned criminal offenses enumerated in Title 18, United States Code, Section 2255, being committed against the then minor Plaintiff, the Plaintiff Jane Doe has in the past suffered, and will in the future suffer, physical injury, pain and suffering, emotional distress, psychological trauma, mental anguish, humiliation, embarrassment, loss of self-esteem, loss of dignity, invasion of her privacy and other damages associated with Defendant, Jeffrey Epstein, controlling, manipulating and coercing her into a perverse and unconventional way of life for a minor. The then minor Plaintiff incurred medical and psychological expenses and the Plaintiff, Jane Doe, will in the future suffer additional medical and psychological expenses. The Plaintiff, Jane Doe, has suffered a loss of income, a loss of the capacity to earn income in the future, and a loss of the capacity to enjoy life. These injuries are permanent in nature and the Plaintiff, Jane Doe, will continue to suffer these losses in the future.

WHEREFORE, Plaintiff, Jane Doe, demands judgment against Defendant, Jeffrey Epstein, for compensatory damages, punitive damages, attorney's fees, and such other and further relief as this Court deems just and proper, and hereby demands trial by jury on all issues triable as of right by a jury.

COUNT III

Intentional Infliction of Emotional Distress

35. Plaintiff, Jane Doe, adopts and realleges paragraphs 1 through 22 above.

36. Defendant Jeffrey Epstein's inappropriate sexual conduct towards the then minor Plaintiff was extreme and outrageous; under the circumstances, his conduct was outrageous and so extreme in degree that it should not be tolerated in a civilized community.

37. Defendant Jeffrey Epstein acted with the intent to cause severe emotional distress or with reckless disregard of the high probability of causing severe emotional distress upon the then minor Plaintiff.

38. Defendant Jeffrey Epstein was well aware that Plaintiff was a minor child, and yet he continued to sexually abuse her, intentionally and recklessly causing Plaintiff to suffer extreme emotional distress.

39. Defendant Jeffrey Epstein's intentional, deliberate and reckless conduct caused severe emotional distress to the Plaintiff, Jane Doe. Defendant, at the time he committed these numerous sexual assaults on Plaintiff, Jane Doe, had a specific intent to harm the then minor Plaintiff, and his conduct did so harm the Plaintiff.

40. As a direct and proximate result of Defendant, Jeffrey Epstein's intentional and reckless conduct, Plaintiff, Jane Doe, has in the past suffered and in the future will continue to suffer severe emotional distress, physical injury, pain and suffering, psychological trauma, mental anguish, humiliation, embarrassment, loss of self-esteem, loss of dignity, invasion of her privacy and other damages associated with Defendant, Jeffrey Epstein, controlling, manipulating and coercing her into a perverse and

unconventional way of life for a minor. The then minor Plaintiff incurred medical and psychological expenses and Plaintiff, Jane Doe, will in the future suffer additional medical and psychological expenses. Plaintiff, Jane Doe, has suffered a loss of income, a loss of the capacity to earn income in the future, and a loss of the capacity to enjoy life. These injuries are permanent in nature and Plaintiff, Jane Doe, will continue to suffer these losses in the future.

WHEREFORE, Plaintiff, Jane Doe, demands judgment against Defendant, Jeffrey Epstein, for compensatory damages, punitive damages, and such other and further relief as this Court deems just and proper, and hereby demands trial by jury on all issues triable as of right by a jury.

COUNT IV

Civil Remedy for Criminal Practices

41. Plaintiff realleges paragraphs 1 through 22 above and for the purposes of this count incorporates and alleges the RICO Statement that has been contemporaneously herewith as Exhibit "A."

42. The allegations contained herein in Count IV are a separate and distinct legal remedy brought pursuant to Florida Statute 772.104(1) and (2).

43. Defendant, Jeffrey Epstein, was associated with an enterprise, a group of individuals associated in fact although not a legal entity, which was comprised of at least Defendant Jeffrey Epstein, Sarah Kellen, and Nadia Marcinkova (and likely many other yet unknown persons); Defendant Epstein participated in this enterprise, or conspired or endeavored to so participate, through a pattern of criminal activity in

violation of Florida Statutes §772.103(3)-(4), as further outlined in detail in the RICO statement filed with this court.

44. This enterprise was separate and distinct from Epstein himself and had a definite hierarchical structure. Epstein served informally but effectively as the leader, C.E.O, or “boss” of this organization, directing his underlings how to recruit and procure young girls for his sexual activities and when to bring the girls to his mansion. Epstein’s key “lieutenant” in the organization was Kellen, who served as both his scheduler and a recruiter/procurer of the girls. Marcinkova also served as a recruiter and helped Epstein satisfy his criminal sexual desires by, on occasion, directly participating in sexual abuse and prostitution of the minor girls. Epstein also used otherwise-legitimate business activities to help further the purpose of the criminal enterprise. These apparently legitimate activities provided “cover” for Epstein and his associates to commit the crimes. Epstein and his associates maintained the appearance of running an upstanding investment business, as well as other legitimate businesses with connections to modeling agencies and other powerful business and political people, to discourage the minor girls from reporting the abuse to law enforcement.

45. Defendant Jeffrey Epstein participated in this enterprise through a pattern of criminal activity in that he engaged in at least two incidents of criminal activity, as defined in Florida Statute 772.102 and as described below, that have the same or similar intents, results, accomplices, victims, or methods of commission and are not isolated incidents.

46. Defendant Jeffrey Epstein engaged in criminal activity by committing, attempting to commit, conspiring to commit or soliciting, coercing or intimidating another

person to commit one or more of the following predicate acts as outlined and defined in Florida Statute 772.102:

(a) Procuring for prostitution, or causing to be prostituted, any person who is under the age of 18 years in violation of Florida Statutes Chapter 796.03;

(b) Acts of battery in violation of Florida Statutes Chapter 784;

(c) Forcing, compelling or coercing another to become a prostitute in violation of Florida Statutes Chapter 796.04;

(d) knowingly recruiting, enticing, harboring, transporting, providing or otherwise obtaining by any means a person, knowing that coercion would be used to cause that person to engage in prostitution in violation of Florida Statutes Chapter 796.045;

(e) tampering with a witness in violation of Florida Statutes Chapter 914.22;

(f) altering, destroying, removing, or concealing records or documents or other evidence with the purpose to impair its verity or availability in violation of Florida Statutes Chapter 918.13;

(g) maintaining a place for the purpose of lewdness or prostitution; offering or securing another for the purpose of prostitution or for some other lewd or indecent act; receiving persons into his Palm Beach mansion for the purpose of prostitution or lewdness; directing, taking or transporting or agreeing to direct take or transport persons to his Palm Beach mansion with knowledge or reasonable belief that the purpose of such directing, taking or transporting was prostitution or lewdness; all in violation of Florida Statutes Chapter 796.07.

47. The criminal acts of Defendant Epstein occurred repeatedly over a substantial period of time and were not isolated events.

48. Under Defendant, Jeffrey Epstein's plan, scheme, and enterprise, Defendant, Jeffrey Epstein, paid employees and underlings, including but not limited to Sarah Kellen, to bring him minor girls to his Palm Beach mansion in order for the Defendant to solicit, induce, coerce, entice, compel or force such girls to engage in acts of prostitution and sexual misconduct with Defendant Epstein and sometimes Nadia Marcinkova, and to otherwise commit acts of sexual battery thereon.

49. Plaintiff, Jane Doe, was the victim of Defendant, Jeffrey Epstein's plan, scheme, and enterprise and was so injured by reason of his violations of the provisions of s. 772.104. Plaintiff, Jane Doe, was called on the telephone by Defendant Epstein and other employees of his, including Sarah Kellen, and transported to the Defendant, Jeffrey Epstein's residence, where she was placed in a room along with the Defendant, enticed to commit acts of prostitution, and had acts of sexual battery and sexual exploitation committed against her. Defendant, Jeffrey Epstein, conspired with his assistants and employees in order to accomplish their common motive or intent of seeking out, gaining access to, and exploiting minor children such as the Plaintiff, Jane Doe, in the aforementioned ways, and he further conspired with his employees, assistants and underlings to ensure that the crimes of this criminal enterprise were concealed or undetected by law enforcement.

50. After law enforcement began to detect the criminal activities of Defendant Epstein and the other persons involved in the criminal enterprise, the enterprise used resources and information to conceal the illegal activities of the enterprise, threaten the

victims of the crimes of the enterprise if they revealed the full scope of the enterprise to law enforcement, and concealed or destroyed documents relevant to the prosecution of the various members of the enterprise. The enterprise also made various efforts to discourage the victims from cooperating with law enforcement and from filing civil lawsuits to vindicate their rights. Epstein and other members of the enterprise made cash payments and gave gifts to the victims of the enterprise in order to discourage them from reporting crimes to law enforcement and other authorities.

51. The evidence clearly and convincingly establishes that Plaintiff Jane Doe was injured by reason of violations of the provisions of 772.103, and as such is entitled to threefold the actual damages sustained and a minimum of \$200, and reasonable attorney's fees and court costs.

52. In the alternative, and pursuant to s. 772.104, Plaintiff Jane Doe was injured due to sex trafficking committed in violation of s. 772.103 and is thus entitled to threefold the amount gained from the sex trafficking and to a minimum amount of damages not less than \$200, reasonable attorney's fees and court costs.

WHEREFORE, under the provisions of Florida Statutes Chapter 772, Plaintiff, Jane Doe, demands judgment against Defendant, Jeffrey Epstein, for any minimum damages authorized by law, all actual damages sustained (to be trebled as authorized by law), court costs and attorneys' fees, and such other and further relief as this Court deems just and proper, and hereby demands trial by jury on all issues triable as of right by a jury.

COUNT V

Cause of Action Pursuant to Florida Statute 796.09 Against Defendant, Jeffrey Epstein

54. Plaintiff adopts and realleges paragraphs 1 through 22 above.

55. The allegations contained herein in Count II are a separate and distinct legal remedy.

56. Defendant, Jeffrey Epstein, was a wealthy and powerful man, and Plaintiff was an economically disadvantaged and impressionable minor.

57. Defendant, Jeffrey Epstein, used his vast wealth and power to coerce Plaintiff into prostitution and/or coerced her to remain in prostitution.

58. Defendant, Jeffrey Epstein, coerced Plaintiff into prostitution in one or more of the following ways:

- A. Domination of her mind and body through exploitive techniques;
- B. Inducement;
- C. Promise of greater financial rewards;
- D. Exploitation of a condition of developmental disability, cognitive limitation, affective disorder, and/or substance dependency;
- E. Exploitation of human needs for food, shelter or affection;
- F. Exploitation of underprivileged and vulnerable economic condition or situation;
- G. Use of a system of recruiting other similarly situated minor girls to further coerce and induce Plaintiff into the lifestyle of prostitution; and

H. Exploitation through demonstration of abundant wealth and power to impress a young and vulnerable then minor Plaintiff and to coerce her into prostitution.

59. As a direct and proximate result of the offenses committed by Defendant, Jeffrey Epstein, against Plaintiff pursuant to Florida Statutes §796.09, the Plaintiff has in the past suffered, and will in the future suffer, physical injury, pain and suffering, emotional distress, psychological trauma, mental anguish, humiliation, embarrassment, loss of self-esteem, loss of dignity, invasion of her privacy and other damages associated with Defendant, Jeffrey Epstein, controlling, manipulating and coercing her into a perverse and unconventional way of life for a minor. The then minor Plaintiff incurred medical and psychological expenses and Plaintiff will in the future suffer additional medical and psychological expenses. Plaintiff has suffered a loss of income, a loss of the capacity to earn income in the future, and a loss of the capacity to enjoy life. These injuries are permanent in nature and the Plaintiff will continue to suffer these losses in the future.

WHEREFORE, Plaintiff, Jane Doe, demands judgment against the Defendant, Jeffrey Epstein, for compensatory damages, attorney's fees, and such other and further relief as this Court deems just and proper, and hereby demands trial by jury on all issues triable as of right by a jury.

DATED: April 17, 2009

Respectfully Submitted,
Plaintiff, by One of Her Counsel,

s/ Bradley J. Edwards
Bradley J. Edwards
ROTHSTEIN ROSENFELDT ADLER
Las Olas City Centre
401 East Las Olas Blvd., Suite 1650
Fort Lauderdale, Florida 33301
Telephone (954) 522-3456
Facsimile (954) 527-8663
Florida Bar No.: 542075
E-mail: bedwards@rra-law.com

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on April 17, 2009, I electronically filed the foregoing document with the Clerk of Court using CM/ECF. I also certify that the foregoing is being served this day upon all counsel of record identified on the attached Service List in the manner specified, either via transmission of Notices of Electronic Filing generated by CM/ECF or in some other authorized manner for those counsel or parties who are not authorized to receive electronically Notices of Electronic Filing.

s/ Bradley J. Edwards
Bradley J. Edwards

SERVICE LIST

Case No.: 08-CIV-80893 – MARRA/JOHNSON

Attorneys for Defendant

Robert Deweese Critton, Jr.

rcrit@bclclaw.com

Michael James Pike

MPike@bclclaw.com

Burman Critton Luttier & Coleman

515 N Flagler Drive

Suite 400

West Palm Beach, FL 33401-2918

561-842-2820

561-515-3148 (fax)

Lead Counsel

Jack Alan Goldberger

Atterbury Goldberger & Weiss, P.A.

250 Australian Avenue South

Suite 1400

West Palm Beach, FL 33401-5012

561-659-8300

835-8691 (fax)

jagesq@bellsouth.net

Co-Counsel

Attorneys for Plaintiff

Bradley James Edwards

Rothstein Rosenfeldt Adler

401 East Las Olas Blvd

Suite 1650

Ft. Lauderdale, FL 33301

954-522-3456

954-527-8663 (fax)

bedwards@rra-law.com

Lead Counsel

Paul G. Cassell

332 South 1400 E, Room 101

Salt Lake City, UT 84112

801-585-5202

801-585-6833 (fax)

cassellp@law.utah.edu

Pro Hac Vice

Jay C. Howell

Jay Howell & Associates PA

644 Cesery Boulevard

Suite 250

Jacksonville, FL 32211

jay@jayhowell.com

JANE DOE v. JEFFREY EPSTEIN

Case No.: 08-CIV-80893 – MARRA/JOHNSON

EXHIBIT “A”

**CIVIL RICO CASE STATEMENT
PURSUANT TO LOCAL RULE 12.1**

1. Plaintiff Jane Doe alleges a violation of Florida Statutes §§ 772.103(3) (participation in an enterprise through a criminal activity) and 772.103(4) (conspiracy to do so). The following information describes both the § 772.103(3) claim and the § 772.103(4) conspiracy claim, with the additional note that the conspiracy was between defendant Jeffrey Epstein, Sarah Kellen, Nadia Marcinkova, and numerous other persons whose identity is, at this time, unknown to Jane Doe. Epstein, Kellen, Marcinkova and others all conspired together to violate the provisions of § 772.103(3), doing so willfully and with full knowledge of the criminal activities that were planned as part of the criminal enterprise. For convenience in this statement, Florida Statutes §§ 772.103(3) and (4) will be referred to as the “Florida Civil RICO provisions.”

2. While others (including Kellen and Marcinkova) were involved in the plan, scheme, and enterprise, the sole defendant alleged in this complaint at this time is defendant Jeffrey Epstein. Epstein served as the leader and informal “C.E.O.” of the criminal enterprise. He also criminally sexually abused and prostituted Jane Doe and other minor girls who were victims of the criminal enterprise. He also paid for Kellen and Marcinkova to be a part of the enterprise and conspired with them to commit criminal acts of sexual abuse and prostitution of minors. The basis for Epstein’s liability is also described in Jane Doe’s complaint.

3. The other wrongdoers included Sarah Kellen and Nadia Marcinkova. (Jane Doe is uncertain as to the precise spelling of their names and their full legal names.) They assisted defendant Jeffrey Epstein in recruiting and procuring minor girls to satisfy Epstein’s criminal sexual purposes and for prostitution. For example, they

contacted the minor girls on the telephone to schedule times for each girl to “work” for Defendant Epstein at his house, and they helped to arrange for minor girls to travel to Epstein’s West Palm Beach mansion to satisfy his sexual desires for minor girls. Kellen and Marcinkova also conspired with Epstein to commit acts of sexual abuse and prostitution with minor girls and aided and abetted Epstein in the abuse and prostitution. Kellen and Marcinkova had full knowledge of the crimes of the enterprise; they knew full well that the girls who were coming to Epstein’s mansion were minors and that Epstein was sexually abusing and prostituting these minors, some of whom were 14 or younger. Kellen and Marcinkova willfully and knowingly participated in the activities of the enterprise and intended to make the criminal activities of the enterprise succeed. Among other things, Kellen helped arrange for recruiters of the minor girls, and assisted Epstein in converting minor girls into prostitutes for Epstein’s sexual gratification as well as encouraged and coerced these minor girls into recruiting additional minor girls for Epstein, and sometimes Marcinkova, to sexually batter and exploit, all in furtherance of the goal of the criminal enterprise. She also spoke personally to the recruiters as well as to the minor girls who were victims of Epstein sexual abuse. At Epstein’s specific direction, Kellen spoke to the recruiters about subjects such as finding more minor girls to satisfy Epstein’s criminal sexual appetite. Kellen also served as Epstein’s scheduler, scheduling appointments for the minor girls to ostensibly do “work” when in fact (as she well knew) she was scheduling them to be sexually abused and prostituted by Epstein. Kellen thus procured minor girls for prostitution and caused them to be prostituted. Marcinkova also directly participated in the sexual abuse of the minor girls by participating in unlawful sexual activities and prostitution with the girls. Both Kellen and

Marcinkova assisted Epstein in attempting to keep Epstein's criminal sexual abuse unknown to law enforcement and other authorities and in discouraging the minor girls from reporting the crimes to law enforcement and other authorities.

4. The names of all of the victims are unknown to the plaintiff at this time. However, they include Jane Doe herself as well as the victim in E.W. v. Jeffrey Epstein and L.M. v. Jeffrey Epstein. A list of more than 30 such minor female victims has previously been provided by the U.S. Attorney's Office for the Southern District of Florida to Epstein (but not to Jane Doe). The injuries to those victims resulted from criminal sexual activity and prostitution with Epstein and Marcinkova. The injuries they suffered are like those suffered by Jane Doe in this action, as described in paragraph 25 of her complaint. For example, Jane Doe and the other victims suffered grave emotional distress and financial injury from being forced to engage in unlawful sexual activities with him to which, as minors, they could not lawfully consent. They also suffered distress and financial injury from being prostituted by him.

5. The pattern of racketeering and/or criminal activity is also described in the complaint, which Jane Doe incorporates by reference into this statement here and at all other points in the statement. The criminal activity included Epstein using paid employees and underlings (including Kellen and Marcinkova) to repeatedly find, procure, and bring to him minor girls in order for Epstein to solicit, induce, coerce, entice, compel or force these minor girls to engage in unlawful sexual activity and acts of prostitution.

The criminal activity and specific statutes violated that are relevant to the RICO count include, but are not necessarily limited to: Procuring for prostitution, or causing to

be prostituted, any person who is under the age of 18 years in violation of Florida Statutes Chapter 796.03; Acts of battery in violation of Florida Statutes Chapter 784; Forcing, compelling or coercing another to become a prostitute in violation of Florida Statutes Chapter 796.04; knowingly recruiting, enticing, harboring, transporting, providing or otherwise obtaining by any means a person, knowing that coercion would be used to cause that person to engage in prostitution in violation of Florida Statutes Chapter 796.045; tampering with a witness in violation of Florida Statutes Chapter 914.22; altering, destroying, removing, or concealing records or documents or other evidence with the purpose to impair its verity or availability in violation of Florida Statutes Chapter 918.13; maintaining a place for the purpose of lewdness or prostitution; offering or securing another for the purpose of prostitution or for some other lewd or indecent act; receiving persons into his Palm Beach mansion for the purpose of prostitution or lewdness; directing, taking or transporting or agreeing to direct take or transport persons to his Palm Beach mansion with knowledge or reasonable belief that the purpose of such directing, taking or transporting was prostitution or lewdness; all in violation of Florida Statutes Chapter 796.07. Numerous other crimes were committed by the criminal enterprise against the minor victims; however, those numerous other crimes are not crimes enumerated in the "criminal activity" section of the civil RICO section.

a. The dates of the events are not fully known to Jane Doe at this time. However, at a minimum, Epstein obtained minor girls (including Jane Doe) for sexual purposes of the period of approximately June 2002 through November 2005. Epstein could better determine than Jane Doe the precise dates of his abuse of her by reviewing

his schedule for this period of time and looking for notations of days on which she performed "work" for him. Epstein has pled guilty to two such criminal offenses against minor girls, although the total number of indictable or chargeable offenses would easily number more than 100. On each of these occasions, as described in the complaint, Epstein would have his underlings (including Kellen) procure a minor girl to satisfy his sexual desires and then would satisfy his sexual desires through criminal sexual contact and conduct with the minor girls. Epstein would also watch Marcinkova sexually abuse the minor girls to satisfy his sexual desires. Epstein had a particular interest in minor girls, including girls as young as 14 or younger. On occasion, he would turn away girls who were 18 or over because of perverse and unlawful sexual interest in young girls. Epstein recruited and paid the girls for the sexual activities. In doing so, he procured for prostitution, and caused to be prostituted, many young girls under the age of 18, in violation of (among other statutes) Florida Statute § 796.03. The pattern of criminal and unlawful sexual activity extended from at least June 2002 through November 2005. Epstein committed unlawful sexual abuse against Jane Doe at least 20 times between February 2003 to June 2005 while she was a minor. Other criminal activities involving tampering with and harassing witnesses occurred from June 2002 through early 2008 (and perhaps later).

b. On many of the occasions, the exact dates of which are not as yet determined by the Jane Doe, Epstein would represent that he was interested in a "massage" or legitimate "work" when in fact he was interested in unlawful sexual activity with the minor girls, including fondling the girls, masturbating in their presence, and vaginally penetrating them or causing them to be penetrated. Epstein and others acting

under his direction falsely represented to the minor girls that he was interested in a “massage” or “work” when in fact he was interested in procuring the girls for unlawful sexual activity and acts of prostitution. Epstein and others acting under his direction used means of interstate communications to make these false representations, including cellular telephones.

c. Epstein has pled guilty to two Florida criminal offenses against minor girls.

d. The relationship of the criminal activity to the enterprise is also described in the complaint. The Florida offenses to which Epstein pled guilty are but a few of the many instances of his plan succeeding. The acts are all related to each other, are arranged, and are part of a common plan for these reasons: they have the same intent (to gratify Epstein’s unlawful sexual interest in minor girls); the same results (the unlawful sexual abuse and prostitution of minor girls); the same accomplices (including Kellen and frequently Marcinkova); the same victims (Jane Doe was herself victimized more than 20 times, and many other girls were also victimized repeatedly); the same means (there was a standard payment of several hundred dollars for going to the mansion, and standard escalation feature depending on the nature of the sexual acts that Epstein performed); and the same methods of commission (Epstein obtained young, skinny, and attractive girls to satisfy his sexual desires while they were economically disadvantaged and lacked a stable family life and therefore, he perceived, would be interested in obtaining money and unlikely to report his crimes to law enforcement). The acts were also interrelated by common characteristics, namely the identity of the perpetrator (Epstein and often Marcinkova) and the common results of his crimes (sexual abuse and acts of prostitution with minor girls). The acts also constituted

a clear pattern of criminal activity.

6. The criminal acts of Epstein occurred repeatedly over a substantial period of time and were not isolated events. In particular, Epstein committed repeated (more than 20) criminal acts of sexual abuse against Jane Doe from approximately February 2003 to June 2005. He committed similar criminal acts of unlawful sexual activity and prostitution against other minor girls for a period of time exceeding more than three years, from approximately June 2002 through November 2005. The acts occurred frequently during this time, easily exceeding more than 100 instances of criminal sexual abuse. (Jane Doe does not know the exact number of acts, but intends to determine this during the discovery process. It is possible that the total number of acts could be several hundred or thousand.) The acts were part of Epstein's regular way of doing business (e.g., obtaining sexual gratification) during this period of time. Epstein and others acting at his direction (including Kellen) made hundreds of telephone calls in furtherance of these illegal activities. It is common belief that the sexual acts against minors temporarily ceased in approximately November 2005 when Epstein learned that law enforcement authorities were investigating his crimes. If, however, Epstein, through his criminal enterprise, is given the opportunity to commit similar acts in the future upon his release from jail, the enterprise will likely continue this illegal activity. In addition, Epstein committed criminal acts of tampering with witnesses in violation of Florida Statutes § 914.22. For example, Epstein paid the minor girls money not only with the intent to prostitute them but also with the specific intent of causing the minor girls not to communicate to law enforcement officers information about the sexual abuse committed against them. Epstein made bigger payments to the minor girls depending on the

degree of force he used towards them, making larger payments when he was more concerned about the fact they might report the crimes committed against them. These payments pose a continuing threat of misconduct, as they may interfere with the ability of law enforcement to discover and prosecute all of Epstein's crimes. Epstein or other members of his enterprise, paid for attorney's to represent several of his minor victims while he and his employees or assistants were being criminally investigated in an effort to influence the testimony of persons that had information otherwise valuable to law enforcement. Epstein and his enterprise may likewise interfere with the ability of Jane Doe to discover all of the information supporting her claim. Epstein also selected impoverished girls for his crimes, believing that the payments would be more effective in obtaining their silence and that their economic circumstances might make them less likely to report to law enforcement. If all else failed, after having unlawful sex with the minor girls, Epstein would tell them not to tell anyone about their unlawful encounter or "bad things" would happen. In addition, since November 2005 and through the early part of 2008 (and perhaps later), Epstein and others acting at his direction have attempted to discourage the victims of his crimes from reporting his crimes and cooperating with law enforcement. For example, persons acting at the direction of Epstein have aggressively attempted to "interview" the victims or to "tail" the victims in their cars. They also harassed a victim shortly before she was to testify at a grand jury investigating Epstein. These efforts have been made not for legitimate investigative reasons but rather for the purpose of discouraging the victims from cooperating with law enforcement (and, in at least one case, the investigating grand jury) and from filing civil lawsuits to vindicate their rights.

7. The enterprise included, at a minimum, a group of individuals associated in fact to assist Epstein in recruiting and procuring minor girls and obtaining criminal gratification of his illegal sexual interest in minor girls.

a. The persons constituting the enterprise included a group of individuals associated in fact. These individuals include Epstein, Sarah Kellen and Nadia Marcinkova, as well as other persons whose names Jane Doe intends to identify during the discovery phase of this case.

b. The criminal enterprise had a definite structure similar to a mafia-type family, although all the details of that structure are not currently known to Jane Doe. Through discovery, Jane Doe intends to ascertain the precise structure of the enterprise that enabled Epstein to commit sexual crimes against her. While Jane Doe does not currently know all of the details of the structure, she does know that the enterprise operated together on a continuing basis, with largely the same personnel for a common purpose. The shared purpose of the enterprise was to satisfy Epstein's illegal interest in having sexual activities with minor girls. The enterprise was not a mere informal conspiracy, but had a definite hierarchical structure. Epstein served informally but effectively as the leader, C.E.O. or "boss" of this organization, directing his underlings how to recruit and procure young girls for his sexual activities and when to bring the girls to his mansion. Epstein's key "lieutenant" in the organization was Kellen, who served as both his scheduler and a recruiter/procurer of the girls. This was an important function, as the recruiting was necessary to satisfy Epstein's desire to abuse a large number of different minor girls with different (albeit similar) physical attributes and the scheduling was necessary to insure that the minor girls would be brought to Epstein's

mansion to be sexually abused and prostituted at a time when Epstein was there (but not at the same time, when they might learn of other girls' identities and possibly become emboldened to report his activities to law enforcement.) Scheduling was also necessary to ensure secrecy, so that as few persons as possible were aware that minor girls were coming at unusual hours to Epstein's mansion. Kellen also needed (directly or indirectly) to make transportation arrangements for many of the girls, as they were often too young to drive themselves to and from the mansion. Marcinkova also served as a recruiter and helped Epstein satisfy his criminal sexual desires by, on occasion, directly participating in sexual abuse and prostitution of the minor girls. Epstein, Kellen, and Marcinkova all took steps to conceal the existence of the enterprise and to discourage the girls from reporting the sexual abuse and prostitution to law enforcement or other authority figures. Epstein also used otherwise-legitimate business activities to help further the purpose of the criminal enterprise. These apparently legitimate activities provided "cover" for Epstein and his associates to commit the crimes. Epstein also maintained the appearance of an upstanding and prominent banker and investor to discourage the minor girls from reporting the abuse to law enforcement. By projecting an image of financial power (and strong political connections to prominent politicians and current and former government officials and personal connections to prominent scientists), Epstein hoped to discourage the minor girls from reporting what he was doing to them by making it appear that they would not be believed. These business activities helped Epstein secure the financial resources to commit the crimes against the minor girls and to pay for prostituting them. For example, the activities paid for maintaining the mansion where the girls were abused and paid for the cellular

telephones and other means of communications that were used to recruit and procure the girls. The business activities also helped to provide the funds to pay Kellen and Marcinkova large sums of money to participate in the illegal enterprise and make payments to the girls for performing sexual acts. In sum, Epstein and the persons under his direction associated in fact and functioned as a continuing unit. This enterprise produced a course of conduct that lead to a pattern of criminal activity involving hundreds of instances of sexual abuse and prostitution of minor girls. This enterprise was the vehicle for Epstein to commit his crimes against Jane Doe and other minor girls and operated on a continuing basis from June 2002 to November 2005 (and, in regard to witness tampering and harassment, through at least early 2008). The enterprise enabled Epstein to sexually abuse and prostitute Jane Doe in particular on more than 20 occasions from February 2003 through June 2005.

c. Epstein served as the informal but effective leader or "C.E.O." of the enterprise.

d. Epstein was associated with the enterprise as its informal but effective leader or "C.E.O."

e. Epstein directed the affairs of the enterprise and the others in the enterprise responded to his commands.

f. Based on the facts that she currently possesses, Jane Doe specifically alleges and intends to prove both that (i) Epstein was an individual separate from the enterprise and (ii) the defendant was a member of the enterprise, namely that he served as the effective leader of the enterprise. With regard to point (i), the illegal enterprise had a definite structure and operational function apart from Epstein. The structure is

described in greater detail in this statement in answer 5.b above. With regard to point (ii), the defendant was a member of the enterprise and served to execute many of the decisions and activities of the enterprise and to command the execution of others. Epstein personally engaged in sexual abuse of minor girls, including Jane Doe. Epstein also directed others to engage in sexual abuse of minor girls, including Marcinkova. Epstein also procured girls for prostitution and caused these girls to be prostituted. Epstein also served as the leader of the enterprise.

g. Epstein was a direct perpetrator of the racketeering activity. In particular, Epstein engaged in criminal acts of sexual abuse and prostitution with minor girls, as well as procuring girls for prostitution. He also directed others (i.e., Marcinkova) to engage in such criminal acts and served as the leader of the criminal enterprise.

8. The relationship between the pattern of criminal activity and the enterprise is not completely known to Jane Doe at this time. There was a criminal entity separate and apart from the pattern of activity in which it engaged. The pattern of criminal activity was the series of crimes committed by Epstein and others, and includes the specific crimes identified in part 5.a. above. These offenses were closely related and formed a clear pattern, as described in part 5.b above. These acts included acts of sexual abuse and procuring the prostitution of minors by Epstein personally and by Marcinkova acting at Epstein's direction. In contrast, the enterprise was the group of persons who associated together for the common purpose of engaging in the criminal course of conduct described at greater length elsewhere in this statement, including part 5.e above. The group of persons included Epstein, Kellen, and Marcinkova and numerous others whose identity is, at this time, unknown to Jane Doe.

9. In this part of the statement, Jane Doe will provide a description of the relationship between the otherwise-lawful activities of the enterprise and the criminal activities of the enterprise. The lawful and unlawful activities of the enterprise have been described in addition in the complaint and previous answers found in parts 5, 6 and 7 above (which Jane Doe expressly incorporates into her answer here). The usual and daily activities of the criminal enterprise included scheduling meetings, activities, and other events for Epstein – including scheduling “private time” in his mansion for Epstein to commit sexual crimes against minor girls. Kellen served as Epstein’s scheduler, scheduling both otherwise-lawful activities to provide “cover” for Epstein as well as the illegal sexual activities. The exact frequency with which the sexual crimes took place varied and is not known, at this time, to Jane Doe. However, when Epstein was in West Palm Beach, it often occurred on a weekly or daily basis (and, in some instances, took place on several times during a single day). The scheduling was designed to secure a private place in Epstein’s mansion when few other persons would be present at the mansion, so as to reduce the chance of detection of Epstein’s sexual abuse and prostitution as well as to make it more difficult for the minor girls to report his actions to law enforcement or other authorities. The usual activities of the enterprise also included maintaining the mansion and securing means of communication (i.e., cellular telephones) to recruit minor girls and procure them for prostitution. The activities further included arranging transportation for the girls to and from the mansion if it was necessary. The enterprise also attempted to make Epstein appear to be an upstanding and law-abiding member of community and a successful businessperson, for reasons described in paragraph 6.b above. The enterprise served as the usual way

in which Epstein would obtain sexual gratification.

10. Through his criminal enterprise, Epstein received perverse and unlawful sexual gratification from sexually abusing minor girls and engaging in acts of prostitution with them. He also received perverse sexual gratification from directing others (e.g., Marcinkova) to sexually abuse and prostitute minor girls. He could not have gained access to the great number of minor girls without a structured and organized enterprise promoting the same agenda and plan.

11. While Jane Doe's civil action alleges violations of the Florida Civil RICO statute rather than violations of the federal civil RICO statute, it should be noted that means of interstate communications were used to perpetrate the crimes against minor girls (including Jane Doe), including cellular and other telephones that Epstein used, or caused to be used, to arrange his illegal sexual activities and to recruit additional minor girls to participate in these activities. Through his recruitment and procuring of young girls, Epstein's activities directly affected interstate commerce.

12. Based on the information currently known to her, Jane Doe does not allege that Epstein, who is a billionaire banker, used the enterprise to personally make a financial profit or to obtain the collection of an unlawful debt. That being said, Plaintiff Jane Doe does not concede that the enterprise did not turn a profit. Discovery will reveal this information regarding profits appreciated by the criminal enterprise through various criminal activities of the enterprise. Epstein did, however, make payments to and prostitute the minor girls for the sexual gratification that he obtained from them and to discourage them from reporting his crimes to law enforcement and other authorities.

13. Based on the information currently known to her, Jane Doe does not

allege that Epstein, who is a billionaire banker, used the enterprise to obtain or maintain control of a business enterprise or real property. Epstein did, however, use his West Palm Beach mansion to perpetrate the crimes against the then-minor girls. He also used his financial success to provide "cover" for his crimes, as described in part 6.b above.

14. The criminal enterprise is described in the complaint and part 6 of this statement above, which description Jane Doe incorporates here.

a. The enterprise included persons unknown to Jane Doe, but at least included Epstein and his paid assistants Sarah Kellen and Nadia Marcinkova.

b. Under the direction of Epstein, Kellen, Marcinkova and others whose names are unknown to Jane Doe arranged for minor girls to come to Epstein's mansion where he could sexual abuse them and prostitute them to satisfy his perverse sexual desires. Kellen and Marcinkova were responsible for recruiting the girls and procuring them for prostitution. Kellen was also responsible for scheduling a time when both Epstein and the minor girl could meet together at Epstein's mansion for the sexual abuse and for making travel arrangements (if necessary) for the girls. Kellen was also responsible for ensuring the privacy of the room in Epstein's mansion where Epstein would sexually abuse the girls. Marcinkova would participate in abusing and prostituting the girls for Epstein's sexual gratification. Kellen and Marcinkova received payments and other forms of compensation from Epstein for performing these illegal activities and for participating in the enterprise. Epstein, Kellen, and Marcinkova also all took steps to discourage the girls from reporting these crimes to law enforcement, including making cash payments to the girls.

c. As a result of the criminal enterprise, Jane Doe (then a minor) suffered criminal sexual abuse at the hands of Epstein. As alleged in greater detail in the complaint, this abuse primarily lead to actual damages, namely loss of personal property, for which she is statutorily entitled to no less than \$200. The property lost in the form of lost income, loss of ability to earn income, and monies expended by her for medical and psychological treatment. Stated simply, she lost money (property) as a result of this sexual abuse she suffered at the hands of Epstein's criminal enterprise. The abuse also lead to significant past and future physical injury, pain and suffering, emotional distress, psychological trauma, mental anguish, humiliation, embarrassment, loss of self-esteem, loss of dignity, invasion of privacy, and other damages, including consequential damages from Epstein controlling, manipulating and coercing her into a perverse and unconventional way of life for a minor. In addition, the time involved in the abuse created lost opportunities to pursue other activities (including economic activities) and lead to past and future financial and proprietary losses to Jane Doe, as well as the need for psychiatric services. Jane Doe has also suffered a loss of income, a loss of capacity to earn income in the future, and a loss of the capacity to enjoy life. It has also lead to the need to file this civil suit, with consequent attorney's fees. All of these damages were caused by, and proximately caused by, the criminal enterprise and its criminal acts. All of these injuries were inflicted directly on Jane Doe and occurred by reason of the criminal acts of the enterprise, including the acts of sexual abuse by Epstein.

d. The defendant "person" in the Florida Civil RICO action is, at this time, only defendant Epstein. Defendant Epstein is associated with a criminal

enterprise that conducted and participated, both directly and indirectly, in a pattern of criminal activity in violation of both Florida and federal criminal law. The exact relationship between Epstein and the criminal enterprise is described in greater detail in parts 5 and 6 above.

15. The criminal conspiracy involving the enterprise is described above. Jane Doe expressly incorporates that information into her statement here. The conspiracy was formed of Epstein, Kellen, Marcinkova, and others, who agreed to arrange for illegal sexual gratification by Epstein through the sexual abuse and prostitution of minor girls both by Epstein personally and by others (i.e., Marcinkova) while he watched. The object and substance of the conspiracy was to obtain minor girls for Epstein so that he could satisfy his perverse sexual interest in minor girls, to recruit minor girls to be abused and prostituted for his gratification, to keep the existence of the sexual abuse from being learned by law enforcement and other authorities, and to discourage the victims from reporting the abuse to authorities. The conspiracy started no later than approximately June 2002 in West Palm Beach, Florida, and other locations. The sexual abuse of the minor girls appears to have, at least temporarily, ceased in approximately 2005. The conspiracy extended beyond November 2005 to early 2008 (and perhaps later) in its efforts to keep the criminal conspiracy unknown, as described in part 5.f above. The conspiracy committed numerous overt acts. For example, Kellen and Marcinkova arranged for minor girls to be brought to Epstein's West Palm Beach mansion so that he could sexually abuse the girls and obtain sexual gratification. Epstein sexually abused minor girls at his mansion and made payments to them and otherwise prostituted them there.

16. Jane Doe suffered actual damages, including financial and proprietary injuries, as described in part 13.C above.

17. The enterprise injured Jane Doe and the other minor girls by enabling Epstein to sexually abuse and prostitute the girls.

18. Defendant Epstein is liable for all the damages for his criminal activity and the activity of his criminal enterprise. (If additional defendants are added to the complaint, these other defendants may also be jointly and severable liable for the damages.) The damages for which Epstein is liable include compensatory damages (including damages for emotional distress as well as damages for financial and proprietary losses), attorney's fees, and such further relief as the Court deems just and proper. The amount of these damages is in excess of \$50,000,000. These damages recoverable under the Civil RICO count are trebled by operation of Florida Statutes 772.104. Jane Doe is aware of the provision in Florida Statutes 772.104(3) ("In no event shall punitive damages be awarded under this section"), but is nonetheless entitled to punitive damages by virtue of her complaint. She is seeking punitive damages for Epstein's outrageous and egregious conduct and crimes under other provisions of law in this lawsuit.

19. All of the above answers must be read in light of the complaint that has been filed in this case. Jane Doe expressly incorporates by reference her complaint as part of the answer to each of the above questions. Whenever the word "include" or its variations appears in this statement, the information that follows is not intended to be an exclusive listing.