

UNITED STATES DISTRICT COURT
DISTRICT OF COLUMBIA

JANE DOE 1, JANE DOE 2, JANE DOE 3, LAURA
NEWMAN, JANE DOE 4, JANE DOE 5, JANE DOE 6
and SANDRA WARD

1:24-cv-02743

Plaintiffs,

v.

UNITED STATES OF AMERICA

Defendant.

COMPLAINT

Plaintiffs, Jane Doe 1, Jane Doe 2, Jane Doe 3, Laura Newman, Jane Doe 4, Jane Doe 5, Jane Doe 6 and Sandra Ward bring this action against defendant United States of America and allege, upon information and belief:

NATURE OF THE ACTION

1. Jeffrey Epstein (“Epstein”) and his wealthy and well-connected associates sex trafficked hundreds of underage and young women for two decades. The Federal Bureau of Investigation (“FBI”) which is the primary investigative agency of the United States Department of Justice ignored the victims and allowed Epstein and co-conspirators to get away with child rape and sex trafficking for years.

2. This firm represents 33 women (see ¶ 26) with claims against the FBI who negligently and recklessly ignored reports, tips, and notice that Jeffrey Epstein was sexually abusing girls and young women yet did nothing to stop it.

3. Very recently, in July 2024, Judge Luis Delgado of the 15th Judicial Circuit of Florida signed an Order releasing and making public the previously sealed testimony and related evidence presented to the Palm Beach County Grand Jury from the 2006 Epstein sex abuse investigation. Grand jury proceedings are generally kept secret and closed to the public. Judge Delgado ruled that the testimony should be unsealed to the public: “The testimony taken by the Grand Jury concerns activity ranging from grossly unacceptable to rape- all of the conduct at issue is sexually deviant, disgusting and criminal.” Judge Delgado stated “[t]ragically, the record reveals that Epstein used children to find more victims” and the **“Court also notes that the testimony was previously disclosed to law enforcement agencies.”** *CA Florida Holdings, LLC Publisher of the Palm Beach Post v. Joseph Abruzzo, as Clerk and Comptroller of Palm Beach County*, Florida Case No. 50-2109-CA-014681-AG.

4. For Epstein to have abused and sex trafficked hundreds of women and children across two decades, with the FBI ‘s knowledge but without the FBI’s intervention or prosecution is a reckless and negligent abuse of authority. The FBI had received credible tips as early as 1996 that Epstein sex trafficked young women and girls, yet failed to interview victims, respond to tips or arrest the pedophile billionaire. Epstein had a well-publicized reputation related to sex trafficking and abuse of children and young women, which began appearing in the press as early as March 2005 when he sexually abused and molested a 14-year-old-girl and countless more. During that police investigation in Palm Beach, child pornography was obtained and numerous interviews revealed Epstein’s underage sex trafficking operation, which were turned over to the FBI.

5. In 2006, the FBI opened its own “investigation” into Epstein’s child prostitution and sex trafficking operation, which went nowhere despite hard evidence of underage sex

trafficking, child pornography, sexual assault and rape. The FBI and its agents deviated from its own rules and regulations required: to timely investigate the reports, tips, and evidence it had of rampant sexual abuse and sex trafficking by Epstein and others and to protect the young women and children who fell victim to him for 20+ years.

6. As a result of the continued failures of the FBI, Department of Justice, and agents and affiliates, Plaintiffs bring this lawsuit in the District of Columbia where the FBI and Department of Justice are headquartered and where these failures occurred. Plaintiffs seek to finally hold the FBI accountable.

7. The Plaintiffs were sexually abused across the country, including in United States Virgin Islands, New Mexico, New York, Florida and California. The women this firm represents were sex trafficked to Paris, New Mexico, Virgin Islands, and all over the world.

8. In January of this year, Senator Blackburn told FBI Director Wray “we have these survivors who say ‘Oh, there is so much more, and they swept it under the rug,’ and that is wrong, and you need to right that wrong.”

9. While Senator Blackburn told Director Wray that he would “need to right that wrong,” Director Wray and the FBI have done nothing to “right that wrong.” The FBI has again turned its back on survivor-victims of Epstein’s sex trafficking ring.

10. Even worse, Plaintiffs and numerous other women have filed the requisite documents as a pre-condition with the FBI to further their path for justice. Not only have the victims been ignored, but they have also been shunned by the judicial system that is supposed to protect them. It has been made abundantly clear that the rich and powerful are above the law.

11. Epstein and his associates, mostly men of extreme wealth and power, committed sex crimes which of which the FBI was blatantly aware. It is well known the sex crimes on

underage girls and young women occurred in open secret in the high society of Palm Beach, Florida and the Upper East Side of Manhattan. The FBI had knowledge of “Pedophile Isle” and evidence of international sex trafficking and did absolutely nothing until 2019, at which point it was too late. Epstein had already abused, sex trafficked, and violated hundreds of underage girls and young women.

12. Court papers filed in Epstein’s much-delayed child sex trafficking case in 2019 had evidence of CDs containing child pornography with handwritten labels including “Young [Name] + [Name],” “Misc nudes 1” and “Girl pics nude.” The massage table, where many of the victims were abused and raped by Epstein and his friends, was still in his Upper East side mansion in 2019 when raided.

13. Epstein was aided by others who helped him create a vast network of underage victims between Manhattan, Palm Beach, and the United States Virgin Islands. Co-conspirator Ghislaine Maxwell was sentenced to 20 years in federal prison for carrying out a years-long scheme to groom and sexually abuse underage girls for Epstein and others. On September 17, 2024, Ghislaine Maxwell’s sex-trafficking conviction was upheld by the Court of Appeals, Second Circuit. Writing for the panel, Judge Jose Cabranes agreed with the trial judge’s assessment that Maxwell played a “pivotal role in facilitating the abuse of the underaged girls through a series of deceptive tactics” and the “significant and lasting harm it inflicted.” The FBI and Department of Justice were aware of these heinous acts as early as 1996 but chose to do nothing until 2019.

14. Epstein orchestrated an illegal sex trafficking ring for the elite and the FBI delayed and failed to timely investigate the abuse, failed to interview the victims, failed to investigate the crimes, and did not follow routine procedure or offer victim assistance notwithstanding credible reports and tips. The FBI sat back while Epstein and his co-conspirators trafficked and raped

teenagers and young women for twenty years. The gross negligence and reckless indifference committed by the FBI promoted the continued sexual abuse of the victims at the hands of Epstein and his associates.

15. The FBI failed to comply with FBI protocols and missed reports of bank involvement and government elites as co-conspirators. It was not until the recent case, *U.S. Virgin Islands v. JP Morgan Chase Bank NA*, U.S. District Court, S.D.N.Y, No. 22-10904 where it was discovered that JP Morgan Chase & Co. (“JP Morgan Chase”) reached out to the federal government on numerous occasions between 2006 to 2008 and via numerous avenues regarding Epstein’s transactions with the bank and concern for sex trafficking.

16. Epstein flew from Newark to the U.S Virgin Islands to judge a beauty pageant in 2007 during the FBI investigation. The FBI allowed Epstein to travel knowing that he was having sex with children, trafficking children and may have been in possession of child erotica. Epstein continued to fly between New York, Florida, the U.S. Virgin Islands and elsewhere and was a known flight risk. Plaintiffs continued to be sexually abused, raped and tormented as a result.

17. In September of 2008, Epstein reached a suspicious deal with the United States Attorney’s Office where Epstein only pleaded guilty to solicitation of a minor in exchange for non-prosecution that negligently shielded him from federal sex charges. Epstein served 13 months in “jail,” during which time he was allowed to leave for “work release.” During that release, Epstein continued to sexually abuse and sex traffic victims even while he was supposed to be serving time.

18. The Department of Justice later examined the actions of the United States Attorney’s Office and concluded that the victims were not treated with the forthrightness and sensitivity expected by the Department. The Office of Professional Responsibility also concluded

that the former U.S. Attorney exercised poor judgment by deciding to resolve the federal investigation through the non-prosecution agreement.

19. After Epstein's unusual 2008 plea deal, more reports, tips and complaints were received by the FBI concerning sex with teenagers, minors, sex trafficking, and abuse. The FBI was aware of Epstein's sex trafficking ring between New York, Palm Beach, New Mexico, Paris, and the U.S. Virgin Islands, which continued after Epstein was a registered sex offender.

20. It was not until July 6, 2019 that Epstein was charged with sex trafficking of minors and conspiracy. Unfortunately, Epstein died in jail when he, again, was supposed to have been monitored by authorities. The Department of Justice recently determined that there was misconduct and job failures that enabled Epstein to evade justice yet again.

21. The FBI had a non-discretionary obligation, governed by established policies, procedures, rules, and protocols, to handle and timely investigate tips concerning potential and ongoing underage child erotica, rape, sex with minors, and sex trafficking in a reasonable manner and to act against Epstein and to prevent him from committing repeated crimes. Yet, contrary to its own established rules, the FBI failed to take timely and appropriate action and botched and covered up investigations for years. If the FBI had complied with its mandatory obligations to investigate and intervene, Epstein would not have been able to continue to commit heinous crimes and sexually abuse and traffic victims including Plaintiffs and hundreds more who have been scared to join the lawsuit. The FBI's repeated and continued failures, delays, and inaction allowed Epstein and others to continue their sex trafficking conspiracy for twenty-five years. Not only did the FBI fail to act promptly, but they also negligently delayed acting on the allegations which led to further and ongoing harm to hundreds of women.

22. The FBI made fundamental errors when it did not timely respond to the allegations, failed to notify the appropriate FBI field office or state or local authorities of the allegations, and failed to take other steps to mitigate the ongoing threat posed by Epstein his associates. The inaction of the FBI and their omissions, having been alerted by victims and other law enforcement agencies of Jeffrey Epstein's abuse, failed to pursue, delayed, and allowed his abuse and trafficking to continue for over twenty years.

JURISDICTION, VENUE, AND TIMELINESS

23. This Court has jurisdiction over this action pursuant to 28 U.S.C. § 1331. Plaintiffs Jane Doe 1, Jane Doe 2, Jane Doe 3, Laura Newman, Jane Doe 4, Jane Doe 5, Jane Doe 6, and Sandra Ward proceed herein under the Federal Tort Claims Act.

24. This action in part arises under the Federal Tort Claims Act. This Court is vested with jurisdiction pursuant to 28 U.S.C. 1346(b). Jurisdiction is appropriate in this Court insofar as a Federal Question is presented under the Federal Tort Claims Act.

25. If the defendant United States of America were a private individual, based on the facts alleged herein, it would be liable to Plaintiffs in accordance with the laws of the District of Columbia. The Defendant owed a duty to Plaintiffs, breached that duty, and caused injury to the Plaintiffs.

26. The claims set forth herein were presented to the FBI by mailing a Standard Form 95 to the FBI on behalf of Plaintiffs as required by 28 C.F.R 14.2. More than six months have elapsed, and the FBI remains unwilling to attempt to resolve these claims. There are additional SF-95s which have been filed; however the waiting period has not expired, and it is anticipated that these women will be included in the complaint or alternatively will file their own separate lawsuit.

27. All conditions precedent to Plaintiffs' filing this action have been satisfied. Specifically, each Plaintiff served proper notice on Defendant, and more than six months has elapsed with neither denial, nor resolution from Defendant.

28. As stated in 42 U.S.C. 233(g)(1)(A), at all times herein mentioned, the Federal Tort Claims Act is the exclusive remedy for injuries caused by all agents, servants and/or employees of the FBI.

29. This Court also has supplemental jurisdiction of the state law claims recounted below pursuant to 28 U.S.C. § 1367(a), because all claims alleged herein are part of a uniform pattern and practice and form part of the same case or controversy.

30. Venue is proper in the United States District Court of the District of Columbia, pursuant to 28 USC 1391(b)(2), because the Federal Bureau of Investigation and the Department of Justice is headquartered in Washington, D.C., where the negligence occurred.

31. This action has been timely filed pursuant to Federal Tort Claims Act, 28 U.S.C. §§ 1346 and 2671-80 and the discovery rule. The information regarding Defendant's culpability—which is the predicate for Plaintiff's timely claims against Defendant—has only been partially revealed to the public. Such revelations occurred after years of Defendant's willful suppression and concealment of same. Plaintiffs only became aware of Defendant's negligence, their injuries, and the cause of their injuries after the case against J.P. Morgan Chase & Co., recent congressional hearings and document dumps, and other recent media announcements as recent as July of 2024.

PARTIES

32. Jane Doe 1 is a U.S. citizen and was, at all relevant times, a resident of and domiciled in the State of New York and was sexually abused as a minor in New York and sex trafficked to the United States Virgin Islands on various dates between 2007 - 2017. Jane Doe 1

was forcibly coerced to marry an Eastern European woman to further Epstein's international sex trafficking ring.

33. Jane Doe 2 is a U.S. citizen and was, at all relevant times, a resident of and domiciled in New York and sexually abused in the State of New York and sex trafficked to the United States Virgin Islands on various dates between 2005-2017.

34. Jane Doe 3 is a U.S. citizen and was, at all relevant times, a resident of and domiciled and sexually abused in the State of New York in between 2004-2005.

35. Laura Newman is a U.S. citizen and was, at all relevant times, a resident of and domiciled and sexually abused in the State of New York at various times between 2004-2016.

36. Jane Doe 4 is a U.S. citizen and was, at all relevant times, a resident of and domiciled and sexually abused in the State of New York at various times between 2002 and 2008.

37. Jane Doe 5 is a U.S. citizen and was, at all relevant times, a resident of and domiciled and sexually abused in the State of New York at various times between 2006 and 2008.

38. Jane Doe 6 is a U.S. citizen and was, at all relevant times, a resident of and domiciled in New York and sexually abused in the United States Virgin Islands in 2004.

39. Sandra Ward is a U.S. citizen and was, at all relevant times, a resident of and domiciled in California and sexually abused in the State of California in 2003.

40. The Jane Doe Plaintiffs are using pseudonyms to protect their identities because of the sensitive and highly personal nature of this matter, which involves sexual assault. Furthermore, some of the Jane Does were minors at the time. Several of the Jane Does have already been threatened by individuals associated with Epstein if they pursue litigation.

41. The Jane Doe Plaintiffs are also at serious risk of retaliatory harm because the co-conspirators who participated in the Epstein sex-trafficking venture had—and continue to

possess—tremendous wealth and power and have demonstrated a clear ability to cause serious harm. Jane Doe 2 was recently threatened by an Epstein affiliate if she pursued litigation.

42. The Jane Doe Plaintiffs’ safety, right to privacy, and security outweigh the public interest in their identification.

43. The Jane Doe Plaintiffs’ legitimate concerns outweigh any prejudice to Defendant by allowing them to proceed anonymously.

44. Some of the Jane Doe plaintiffs were afforded similar protections in other lawsuits, and anonymity has been ordered in other child sex trafficking cases involving Epstein. *See e.g.: Jane Doe v. Government of the United States Virgin Islands*, 23-cv-10301 [SDNY]; *Jane Doe v. JP Morgan Chase Bank, N.A.* 22-cv-10019 [SDNY].

45. The United States of America is a defendant in this action pursuant to the Federal Tort Claims Act, 28 U.S.C § 1346 and 2671-80 et. seq. The liability of the United States arises from the acts and/or omissions of employees and agents of the Federal Bureau of Investigation, an agency of the defendant.

46. At all times mentioned, defendant United States of America controlled, funded, managed, operated, and/or owned the FBI.

47. At all times mentioned, the FBI was funded by defendant United States of America and was acting within its mandate and authority.

48. It was the duty of the defendant United States of America and/or FBI and/or the Department of Justice to investigate reports of sex crimes and child sex trafficking claims, to prevent the crimes from repeatedly occurring, and protect Plaintiffs and many others from being repeatedly sexually abused, in addition to enforcing anti-sex trafficking laws, rape, child pornography, and child sex trafficking laws.

49. The Federal Bureau of Investigation is a federal law enforcement agency empowered by the United States Congress to enforce and investigate certain alleged violations of the United States Criminal Code. The FBI is part of the United States Department of Justice (“Department of Justice”) and formally subject to oversight and direction by the Attorney General, an employee of the United States of America.

50. Agents, servants and employees of the FBI are agents, servants, and employees of the defendant United States of America, headquartered in Washington, D.C.

FACTS

A. The FBI was notified of child prostitution and sex abuse as early as 1996 and did nothing in response.

51. The FBI was aware of Epstein and his co-conspirators, including Ghislane Maxwell who is currently in jail.

52. In 1996, Maria Farmer reported to the New York Police Department and FBI that Jeffrey Epstein and Ghislaine Maxwell had sexually abused her and her sister Annie and that they, together with others, were committing multiple illegal sexual abuse crimes, including crimes against minors and vulnerable young women. In response to the call by Maria Farmer, the FBI “hung up” on her and did nothing to investigate the report.

B. The FBI was aware of Epstein’s years-long repeated child sex abuse and sex trafficking and failed to investigate.

53. Between 1996 and 2005, the FBI continued to receive direct reports, complaints, and tips concerning the illegal sex trafficking of women and underage minors, sex abuse, and human rights violations committed by Jeffrey Epstein and his associates. In response, the FBI failed to act upon and investigate the complaints and tips and failed to comply with protocol and guidelines notwithstanding credible reports of solicitation of child prostitution and sex trafficking.

54. In 2002, secret service clearance was given for travel on Epstein's private Boeing 727 to Africa. Epstein travelled with a former president of the United States of America, comedian, actor, and several very young women.

55. Jeffrey Epstein's name and suspicious travels were published in magazines. On October 28, 2002, a New York magazine article was published and distributed. The article entitled "*Jeffrey Epstein: International Moneyman of Mystery*" by Landon Thomas Jr., noted that "[h]e comes with cash to burn, a fleet of airplanes and a keen eye for the ladies." Further, "[i]t's a life full of question marks, Epstein is said to run \$15 billion for wealthy clients, yet aside from Limited founder Leslie Wexner, his client list is a closely held secret." "Epstein is frequently seen around town with a bevy of comely young women." The article discussed Epstein's travels and connections with high profile men and "he has a trip to Brazil coming up in the next few weeks and on all of these trips, he flies *alone* in his commercial jet size 727."

56. The FBI was aware that Epstein did not fly alone. In November of 2002, a sex abuse survivor was issued a visa to Brazil to travel with Epstein on his jet. Scores of girls were issued visas and passports to lure them to travel on his private jet and the FBI did nothing to investigate these red flags.

57. Epstein's office initiated passports on behalf of a sex abuse survivor represented by this firm to travel to Paris with Epstein and associates. The issuance of the passports and visas would have required a background check, which was not conducted pursuant to the usual channels. In fact, recently it was disclosed to the public that Epstein's office initiated passports and visas for other women and underage girls for the purpose of sex trafficking them. The FBI failed to investigate the red flags and failed to conduct appropriate background tracks.

58. Epstein frequently requested new passports, reported lost passports, and would use multiple passports for traveling. Of late, it was discovered that the FBI seized Epstein's passports and he would use different addresses and names on the passports. Had the FBI done its job, it would have been discovered that Epstein was operating a years-long international sex trafficking ring.

C. From 2006 to 2008, the FBI opened an investigation into Epstein, yet did nothing despite evidence of sex abuse of minors and sex trafficking.

59. In March 2005, a woman contacted Florida's Palm Beach Police Department to report that a 14-year-old girl was recruited to Epstein's mansion for a sexual massage in exchange for money.

60. The Palm Beach Police Department alerted the FBI of child prostitution, however the FBI did not open a case until July 24, 2006.

FEDERAL BUREAU OF INVESTIGATION

Precedence: ROUTINE Date: 07/24/2006

To: Miami Attn: SSA [redacted]

From: Miami
Squad PB-2, EBCRA
Contact: SA [redacted]

Approved By: [redacted] *an*

Drafted By: [redacted] *ink*

Case ID #: 31E-MM [redacted]

Title: JEFFREY EPSTEIN
[redacted]
WSTA - CHILD PROSTITUTION

Synopsis: To request case be opened and assigned. *JA SA* [redacted]

Details: From March 2005 through February 2006, the Palm Beach County Police Department conducted an investigation involving the Subjects, Jeffrey Epstein, DOB [redacted]
[redacted] DOB [redacted]
[redacted]
[redacted] Epstein's [redacted]
[redacted]
[redacted]

31E-MM-108062-1

03956-17

61. The file number assigned was 31E-MM-108062-1A98. The date “received” on another FBI document indicates “various.”

FD-340 (Rev. 4-11-03)

File Number 31E-MM-108062-1A98

Field Office Acquiring Evidence MM/PBCRA

Serial # of Originating Document _____

Date Received Various

From _____
(Name of Contributor/Interviewee)

(Address)

(City and State)

By SA

To Be Returned ☐ Yes ☒ No

Receipt Given ☐ Yes ☒ No

Grand Jury Material - Disseminate Only Pursuant to Rule 6 (e)
Federal Rules of Criminal Procedure ☐ Yes ☒ No

Federal Taxpayer Information (FTI) ☐ Yes ☒ No

Title: _____

Reference: _____
(Communication Enclosing Material)

Description: ☐ Original notes re interview of
Biographical file for

62. A search warrant was executed to raid Epstein’s mansion by the Florida Palm Beach County Police Department in 2005, before the FBI case was opened. During the search, messages were handed over to the FBI. The “important message” sheets were appointments for massages with minors and young women.

63. As referenced by investigative journalist Julie Brown in *“Perversion of Justice,”* “[d]uring the 2005-2006 police investigation, police found phone messages...one of them in which... it was hinted that he had twelve-year-old twins to send him.”

64. Numerous reports and tips were received by the FBI; however, these reports were concealed from the public. It was not until the recent case, *U.S. Virgin Islands v. JP Morgan Chase Bank NA*, U.S. District Court, S.D.N.Y, No. 22-10904, where it was discovered that JP Morgan Chase contacted the federal government on occasions between 2006-2008 regarding Epstein’s suspicious transactions with the bank.

65. In August 2007, the United States Attorney’s Office for the Southern District of Florida issued a subpoena to Bear Stearns regarding transactions out of Epstein’s accounts in the amounts of either \$1,000 or \$100,000.

66. The FBI received notices and tips of suspicious banking activity linking the accounts to funding sex trafficking. The FBI was notified that JP Morgan Chase handled more than \$1.1 million in payments from Epstein to girls or women, many with Eastern European surnames. Again, nothing was done by the FBI to investigate and present evidence for prosecution until 2019.

67. When the FBI seized the messages, the FBI failed to interview all the appropriate potential victims and did not contact all the victims even though the FBI had their names and telephone numbers. A comprehensive investigation was not conducted in violation of FBI protocols despite cell phone numbers listed on the seized “important messages.”

68. The FBI was notified that victims were threatened by billionaire Epstein if they spoke to authorities during the 2006-2008 Palm Beach Police Department investigation, yet the FBI did nothing to assist the victims. Epstein said things like “You’re going to die; I’m going to

break your legs.” The FBI’s incompetence and negligence perpetuated the continued sex abuse of the victims and trafficking of teenagers and young women in his New York townhouse, Palm Beach mansion, his private island in the U.S. Virgin Islands, and elsewhere.

69. During the Palm Beach Police Department investigation, police documents included interviews with: (1) a Palm Beach Community College student who said she gave Epstein a massage in the nude, then brought him six girls aged 14 -16 years old for massage and sex-tinged sessions at his home; (2) a 27-year-old women who worked as Epstein’s personal assistant also facilitated the liaisons, phoning the Palm Beach Community College student to arrange for girls when Epstein was coming to town, and escorted the girls upstairs when they arrived, putting fresh sheets on a massage table and placing massage oils nearby; and (3) sworn statements from five alleged victims and seventeen witnesses who stated that on three occasions Epstein had sex with the girls.

70. Further, the Palm Beach Police Department investigation revealed that Haley Robson met Epstein at the age of 16. Robson brought six girls to Epstein and one of them was the 14-year-old girl who triggered the investigation by the Palm Beach Police Department. There was evidence of minors procuring other minors for sex abuse by Epstein. This information alone should have warranted FBI prosecution and felony conviction, but it did not. Instead, the FBI file was closed in 2008 and Epstein continued to sexually abuse minors and young women and sex trafficked them all over the world for another decade.

71. The FBI grossly delayed their investigation and failed to timely arrest Epstein despite credible evidence of a child sex traffic ring and prostitution that lasted 25 years. The FBI’s “The Vault” is largely sealed from the public; however, the unsealed Epstein file indicates that the

investigation was closed on September 18, 2008 and not re-opened until July 2019. The FBI breached its fiduciary duty to the victims and failed to comply with its protocols.

72. While Epstein did serve 13 months in “jail” in 2008 for child prostitution and sex trafficking, which is a felony crime, he was able to leave the jail on so called “work release.” The work release was a cover for him to leave jail and continue to sexually abuse teenagers and women while at his “office.” Epstein got away with sex trafficking even while under the control and custody of the law enforcement authorities.

73. The deal Epstein’s lawyer and the State Attorney struck did not go unnoticed. Palm Beach Police Chief Michael Reiter wrote a memo suggesting the county’s top prosecutor disqualify himself. “I must urge you to examine the unusual course that your office’s handling of this matter has taken and consider good and sufficient reason exists to require your disqualification from the prosecution of these cases.”



74. Epstein was able to continue his sexual assaults of underage girls after his release from jail in July 2009 until he was arrested on federal charges of sex trafficking of minors on July 8, 2019. From 2009 until 2019, the FBI was complicit in permitting the ongoing sex trafficking of minors and the rape and sexual abuse of girls and young women which occurred between New York, Paris, Palm Beach, the U.S. Virgin Islands, and many other locations.

75. On July 6, 2019, Epstein was arrested for sex trafficking of children and conspiracy. Epstein died in jail on August 10, 2019 from an apparent suicide before the case could be prosecuted for these heinous crimes. His co-conspirator Ghislaine Maxwell was convicted of sex trafficking, which felony conviction was affirmed on September 17, 2024.

D. The FBI violated its duty to the Plaintiffs and departed from FBI Protocol.

76. The FBI violated its duty to Plaintiffs and failed to comply with its own mission to “protect the American people and uphold the Constitution of the United States” from 1996 through 2019.

77. The FBI instructs the public to report information about crimes. For example, on the “Contact Us” page of the FBI’s website, the FBI instructs concerned citizens to “submit a tip” to report suspected criminal activity. The website tells the public, “If you see something, say something.” The FBI website says, “We protect the American people and uphold the U.S. Constitution.”

78. The FBI website states that the FBI works a case by world class training, tactics, science and technology and intelligence.

79. The FBI’s guidebook explains tips “must all be taken seriously and thoroughly evaluated.”

80. Upon information and belief, the FBI received its first tip in 1996, as reported by Maria Farmer, of sex abuse of a minor and did not take the report seriously or investigate the report, in violation of FBI protocol. Epstein flew internationally with presidential members and young women, all under the nose of the FBI. The FBI continued to receive tips and complaints from 1996 until March 2005, when the Palm Beach Police Department notified the FBI of child prostitution and a sex traffic ring occurring in Palm Beach County.

81. When the Palm Beach County Police department notified the FBI, the FBI continued to violate FBI Protocol by delaying the investigation. The FBI received information from the Palm Beach County Police Department in March 2005 and did not open the investigation until July 24, 2006. The investigation was negligently, recklessly delayed and prematurely closed on September 18, 2008, after Epstein agreed to give unknown information to the FBI, according to the FBI vault. He pleaded guilty to a much lesser crime, served minimal time in jail, and then continued his sex abuse and trafficking operation. Thereafter, the FBI was aware of the issuance of visas, passports, and suspicious banking activity linked to payments for sex trafficking and nothing was done. The FBI even had hard evidence of child sexual abuse materials yet ignored this crime in violation of the Violence Against Women Act.

82. The FBI had non-discretionary obligations, governed by established protocols, to handle and investigate tips concerning potential and ongoing underage child erotica, rape, sex with minors, and human sex trafficking in a reasonable manner and to act against Epstein and to prevent him from committing repeated crimes. Yet, contrary to its own established rules, the FBI breached its duty, failed to take appropriate action and botched and covered up investigations for two decades. If the FBI had complied with its mandatory obligations to investigate and intervene and present evidence for prosecution, Epstein would not have been able to continue to commit heinous

crimes for all this time. The FBI's repeated and continued failures, delays and inaction allowed Epstein and others to continue their sex trafficking conspiracy for almost 25 years.

83. The FBI was negligent when it neither responded nor appropriately investigated the allegations, failed to notify the appropriate FBI field office or state or local authorities of the allegations, and failed to take other steps to mitigate the ongoing threat posed by Epstein and associates. The inaction of the FBI and the failure to prosecute the pedophile Epstein, allowed his abuse and trafficking to continue for over 20 years.

E. Department of Justice Questioned the handling of the investigation of prosecution of Epstein.

84. In a statement released in 2020, the Justice Department said that when Acosta let Epstein enter the non-prosecution agreement in 2008 that spared him from federal sex-trafficking charges, he "failed to make certain that the state of Florida intended to and would notify victims identified through the federal investigation about the state plea hearing."

85. During the probe by the Office of Professional Responsibility, Senator Ben Sasse of Nebraska stated **"letting a well-connected billionaire get away with child rape and international sex trafficking isn't poor judgment—it's a disgusting failure."** It's not just this failure; it's the ongoing failure on the part of the FBI to protect the victims and respond to reports of suspicious activity.

F. The FBI's negligence caused and contributed to the ongoing sexual abuse of minors and young women and sex trafficking, including Plaintiffs.

86. Epstein could not and would not have sexually trafficked, abused, assaulted, and battered plaintiffs in New York, Florida, New Mexico, the U.S. Virgin Islands, and elsewhere without the negligence of the FBI. The FBI failed to collaborate with federal, state, and local partners and did not share intelligence nor conduct adequate surveillance. The FBI did not

interview all the victims and failed to provide victim assistance and concealed reports of a sex trafficking venture. The FBI did not act on reports of crimes.

87. Epstein could not have sexually trafficked, abused, assaulted, and battered Plaintiffs without the FBI and its agents, servants, and employees' negligent investigation.

CAUSE OF ACTION

COUNT 1: NEGLIGENCE

88. Plaintiffs incorporate by reference the allegations contained in all preceding paragraphs.

89. **Duty:** The FBI owed a legal duty to the victims who were sex trafficked, raped, and sexually abused by Epstein under their watch. The FBI failed to follow its own procedures and protocols to stop and prevent sex trafficking.

90. The FBI had a non-discretionary obligation, governed by established protocols, to handle and investigate tips concerning potential and ongoing underage child erotica, rape, sex with minors, and human sex trafficking in a reasonable manner and to act against Epstein and to prevent him from committing repeated crimes. The FBI failed to take appropriate action in light of complaints made regarding Epstein and subsequently botched and covered up investigations for years. If the FBI had complied with its mandatory obligations to investigate and intervene based on the information it was receiving, Epstein would not have been able to continue to commit the heinous crimes he did against Plaintiffs. The FBI's repeated and continued failures, delays, and inaction allowed Epstein and others to continue their sex trafficking conspiracy for almost 25 years.

91. The FBI made fundamental errors and the inaction of the FBI and their omissions, having been alerted by victims and other law enforcement agencies, tips and banks of Jeffrey

Epstein's suspicious banking and abuse, failed to pursue, delayed, and allowed the sex trafficking to continue and sexual abuse of Plaintiffs and other victims.

92. **Breach:** The FBI failed to exercise reasonable care (a) in complying with mandatory investigative procedures that the FBI had adopted as the standard of conduct for handling information; (b) in complying with non-discretionary duties not to falsely assure people possessing credible information and evidence about ongoing sex trafficking; (c) in performing the task of investigating complaints and other information regarding Epstein's abuse of women and minors; and (d) in the way it handled information regarding Epstein's abuse of women and minors. The FBI failed to exercise reasonable care in in the following ways, among other negligent acts and omissions already known and to be revealed in discovery:

- a. Failing to properly respond to a report received from Maria Farmer in 1996 of sex abuse of a minor;
- b. Failing to properly respond to tips and reports regarding sex trafficking of minors and sexual abuse of minors from 1996 until 2005;
- c. Negligently investigating reports of a 14-year-old being sexually abused in Epstein's Palm Beach mansion;
- d. Negligently failing to investigate child sexual abuse material during the 2005 raid of Epstein's Palm Beach mansion;
- e. Negligently failing to interview and assist the victim whose names were on the "Important Messages" from 2001 to 2005;
- f. Negligently permitting Epstein to be a judge at a beauty pageant in the U.S. Virgin Islands in 2007 despite impending charges of sex trafficking of minors and sex abuse;

- g. Negligently permitting—via the clearing of background checks for passengers on Epstein’s private jet—Epstein to sex traffic minors and young women;
- h. Ignoring reports of violence and threats to victims if they cooperated with authorities;
- i. Ignoring reports of child sex trafficking;
- j. Ignoring evidence of minors procuring other minors for sex abuse;
- k. Prematurely closing an FBI file in the face of evidence of sex trafficking and minor sexual abuse;
- l. Ignoring reports of suspicious banking;
- m. Ignoring child sexual abuse material and child pornography; and
- n. Failing to follow up on improper issuing of passports and federal passport fraud.

93. **Causation:** As a direct and proximate cause of the FBI’s negligence, Plaintiffs would not have been and/or would not have continued to be sex trafficked, abused, raped tortured and threatened. The FBI’s failure to investigate the tips and information it had received, and failing to follow its mandatory, established protocols was a direct and substantial cause of the Plaintiffs’ damages.

94. **Damages:** As a direct and proximate case of Defendant’s negligence, Plaintiffs were sexually abused, raped, assaulted, tormented, violated, harassed, intimidated, and suffered permanent injuries, including but not limited to severe emotional and physical pain and suffering, post-traumatic stress disorder, insomnia, anxiety, shock, fear, nightmares, shame, embarrassment, lost earnings, flashbacks, need for future medical and psychiatric expenses, and other severe injuries.

REQUEST FOR RELIEF

95. Plaintiffs respectfully request that the Court enter judgment in their favor, and against the United States, as follows:

- a. That the Court award Plaintiffs compensatory, consequential, general, and nominal damages, as well as all other available damages, against Defendant in an amount to be determined at trial;
- b. That the Court award to Plaintiffs the costs and disbursements of the action, along with reasonable attorneys' fees, costs, and expenses;
- c. That the Court award pre- and post-judgment interest at the maximum legal rate; and
- d. That the Court grant all such other and further relief as it deems just and proper.

WHEREFORE, Plaintiffs pray the Court for judgment against Defendant for an amount in excess of \$100,000,000.00 (one hundred million) for compensatory damages, together with costs of this suit, legal interest, reasonable attorneys' fees, and such other relief as the Court may deem just and proper under the circumstances.

JURY DEMAND

Plaintiffs demand a trial by jury of all issues to triable.

Date: September 25, 2024

MERSON LAW, PLLC

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