

Name: KATIE JOHNSON

Address: [REDACTED]

Phone: [REDACTED]

Fax: NO FAX OR E-MAIL

In Pro Per

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

KATIE JOHNSON

ED CV 16-00797
Plaintiff

v.

DONALD J. TRUMP and
JEFFREY E. EPSTEIN

Defendant(s).

CASE NUMBER:

To be supplied by the Clerk
The United States District C

COMPLAINT FOR CLAIM

1. SEXUAL ABUSE UNDER
2. CONSPIRACY TO DEF

Plaintiff Katie Johnson, for causes of actions against Defendants Donald
Jeffrey E. Epstein, alleges as follows:

JURISDICTION

1. Jurisdiction is pursuant to the law of Diversity, 28 U.S.C. ; 1332, as plaintiff is a resident of California while defendants reside in the state of New York and the action exceeds \$75,000.

VENUE

2. The venue is established as the Eastern Division of the United States Court of California because the plaintiff resides in [REDACTED]

IN THE UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

JANE DOE, proceeding under a pseudonym,

Plaintiff,

v.

DONALD J. TRUMP and
JEFFREY E. EPSTEIN,

Defendants.

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) Case No.:
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) JURY TRIAL
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**COMPLAINT FOR RAPE, SEXUAL MISCONDUCT, CRIMINAL
SEXUAL ABUSE, FORCIBLE TOUCHING, ASSAULT, BATTERY,
AND RECKLESS INFLICTION OF EMOTIONAL DISTRESS,
IMPRISONMENT, AND DEFAMATION**

Plaintiff Jane Doe, proceeding under a pseudonym, brings this action
against Donald J. Trump and Jeffrey E. Epstein, and alleges that:

PARTIES

1. Plaintiff is an individual residing in and a citizen of the State of California.
2. Upon information and belief, Defendants Donald J. Trump and Jeffrey E. Epstein
each reside in this District and are citizens of the State of New York.

JURISDICTION AND VENUE

3. Plaintiff is a citizen of the State of California for purposes of federal jurisdiction
under 28 U.S.C. § 1332.
4. Defendants are citizens of the State of New York for purposes of federal
jurisdiction under 28 U.S.C. § 1332.

MATERIAL WITNESSES

18. Tiffany Doe, a former trusted employee of the Defendant, Jeffrey E. Epstein, provide sworn testimony in this civil case and any other future civil or criminal verifying the authenticity of the claims of the Plaintiff, Katie Johnson. Witness employed by the Defendant, Jeffrey E. Epstein, for more than 10 years as a party underage sex parties. Despite being subject to constant terroristic threats by Defendant Trump to never reveal the details of these underage sex parties at which scores of and pre-teen girls were used as sex slaves by Defendant Epstein and Defendant Trump, Tiffany Doe refuses to be silent any longer. She has agreed to fully reveal the exact perversion and physical cruelty that she personally witnessed at these parties by Defendant Trump and Trump.

19. Material witness Tiffany Doe fully confirms all of Plaintiff Katie Johnson physical and sexual abuse by Defendants Donald J. Trump and Jeffrey E. Epstein physically present at each of the four occasions of sexual abuse by Defendant Trump person of Plaintiff Johnson, as it was her job to witness all of the sexual escapades of Epstein's guests at these underage sex parties and later reveal all of the sordid details to Defendant Epstein. Defendant Epstein also demanded that Tiffany Doe tell him everything she had overheard at these parties explaining to her that "knowledge is power in the financial world. As a result of these underage sex parties, Defendant Epstein was privy to inside business knowledge that he otherwise would never have been privy to in his huge personal fortune.

20. Material witness Tiffany Doe will testify that she was also present or had knowledge of each of the three instances on which Defendant Jeffrey E. Epstein physically abused the Plaintiff, Katie Johnson. Tiffany Doe will testify to the fact that the Plaintiff was extremely fortunate to have survived all of the physical and sexual horrors inflicted by Defendants Epstein and Trump.

get attractive adolescent women to attend these parties.

4. I was hired by and paid directly by Mr. Epstein from the years of 1991-2000 to attract adolescent women to attend these parties, most of which were held at what is known as the Wexner Mansion located at 9 E. 71st St. in New York City.

5. In June, 1994 while performing my duties as a recruiter of adolescent women to attend Mr. Epstein's parties, I met a 13-year-old adolescent woman, the Plaintiff in this matter, at the Port Authority in New York City who said that she had come to New York City in the hope of starting a modeling career.

6. I persuaded the Plaintiff to attend a series of parties of Mr. Epstein that took place during the summer of 1994. I told her that, if she would join me at the parties, she would be introduced to people who could get her into the modeling profession and she would be paid for attending.

7. It was at these series of parties that I personally witnessed the Plaintiff being forced to perform various sexual acts with Donald J. Trump and Mr. Epstein. Both Mr. Trump and Mr. Epstein were advised that she was 13 years old.

8. I personally witnessed four sexual encounters that the Plaintiff was forced to have with Mr. Trump during this period, including the fourth of these encounters where Mr. Trump forcibly raped her despite her pleas to stop.