

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

CASE NO. 17 Civ 616 (JGK)

JANE DOE 43,

Plaintiff,

vs.

JEFFREY EPSTEIN, GHISLAINE
MAXWELL, SARAH KELLEN, LESLEY
GROFF, AND NATALYA MALYSHEV

Defendants.

ANSWER OF LESLEY GROFF

Defendant Lesley Groff (“Groff”), by and through her counsel, answers and responds to Plaintiff Sarah Ransome’s (“Plaintiff” or “Ransome”) First Amended Complaint (the “Complaint”).

PRELIMINARY STATEMENT¹

Groff enjoys the same protections of the self-incrimination clause of the Fifth Amendment to the United States Constitution (the “Fifth Amendment”) as do all other persons who are potentially subject to criminal prosecution in a jurisdiction in which the Fifth Amendment applies. It is Groff’s express intent in this Answer to claim the fullest possible protection of the United States Constitution in responding to the Complaint. Groff does not intend by any of her responses to waive such protection and requests that, in cases of any doubt or ambiguity, her response be construed as an assertion rather than a waiver of such privilege. Groff also reserves her right to amend her responses without compromising her rights under the Fifth Amendment.

¹ Groff is not required to respond to the headings set forth in the Complaint since they are not factual allegations.

RESPONSE TO SPECIFIC ALLEGATIONS

1. Groff admits that the Plaintiff purports to bring this lawsuit pursuant to the statutes described in Paragraph 1.

2. In response to the allegations in Paragraph 2, Groff admits that the Plaintiff filed this lawsuit under a pseudonym purportedly for the reasons stated therein.

3. It appears that the allegations in Paragraph 3 are directed to an individual other than Groff, to which no responsive pleading is required. To the extent a response is required, Groff asserts her rights under the Fifth Amendment and declines to answer.

4. It appears that the allegations in Paragraph 4 are directed to an individual other than Groff, to which no responsive pleading is required. To the extent a response is required, Groff asserts her rights under the Fifth Amendment and declines to answer.

5. It appears that the allegations in Paragraph 5 are directed to an individual other than Groff, to which no responsive pleading is required. To the extent a response is required, Groff asserts her rights under the Fifth Amendment and declines to answer.

6. It appears that the allegations in Paragraph 6 are directed to an individual other than Groff, to which no responsive pleading is required. To the extent a response is required, Groff asserts her rights under the Fifth Amendment and declines to answer.

7. It appears that the allegations in Paragraph 7 are directed to an individual other than Groff, to which no responsive pleading is required. To the extent a response is required, Groff asserts her rights under the Fifth Amendment and declines to answer.

8. Groff admits that she is a citizen of the United States. In response to the other allegations in Paragraph 8, Groff asserts her rights under the Fifth Amendment and declines to answer.

9. It appears that the allegations in Paragraph 9 state conclusions of law, to which no responsive pleading is required. To the extent a response is required, Groff asserts her rights under the Fifth Amendment and declines to answer.

10. It appears that the allegations in Paragraph 10 state conclusions of law, as to which no responsive pleading is required. To the extent a response is required, Groff asserts her rights under the Fifth Amendment and declines to answer.

11. To the extent the allegations in Paragraph 11 concern Groff's conduct, Groff asserts her rights under the Fifth Amendment and declines to answer. In so far as the allegations are directed to individuals other than Groff and/or state conclusions of law, no responsive pleading is required. To the extent a response is required, Groff asserts her rights under the Fifth Amendment and declines to answer.

12. It appears that the allegations in Paragraph 12 are directed to an individual other than Groff, to which no responsive pleading is required. To the extent a response is required, Groff asserts her rights under the Fifth Amendment and declines to answer.

13. It appears that the allegations in Paragraph 13 are directed to an individual other than Groff, to which no responsive pleading is required. To the extent a response is required, Groff asserts her rights under the Fifth Amendment and declines to answer.

14. To the extent the allegations in Paragraph 14 concern Groff's conduct, Groff asserts her rights under the Fifth Amendment and declines to answer. In so far as the allegations are directed to individuals other than Groff and/or state conclusions of law, no responsive pleading is required. To the extent a response is required, Groff asserts her rights under the Fifth Amendment and declines to answer.

15. It appears that the allegations in Paragraph 15 are directed to individuals other than Groff, to which no responsive pleading is required. To the extent a response is required, Groff asserts her rights under the Fifth Amendment and declines to answer.

16. It appears that the allegations in Paragraph 16 are directed to individuals other than Groff, to which no responsive pleading is required. To the extent a response is required, Groff asserts her rights under the Fifth Amendment and declines to answer.

17. In response to the allegations in Paragraph 17, Groff asserts her rights under the Fifth Amendment and declines to answer.

18. To the extent the allegations in Paragraph 18 concern Groff, Groff asserts her rights under the Fifth Amendment and declines to answer. In so far as the allegations are directed to individuals other than Groff and/or state conclusions of law, no responsive pleading is required. To the extent a response is required, Groff asserts her rights under the Fifth Amendment and declines to answer.

19. To the extent the allegations in Paragraph 19 concern Groff's conduct, Groff asserts her rights under the Fifth Amendment and declines to answer. In so far as the allegations are directed to individuals other than Groff and/or state conclusions of law, no responsive pleading is required. To the extent a response is required, Groff asserts her rights under the Fifth Amendment and declines to answer.

20. To the extent the allegations in Paragraph 20 concern Groff's conduct, Groff asserts her rights under the Fifth Amendment and declines to answer. In so far as the allegations are directed to individuals other than Groff and/or state conclusions of law, no responsive pleading is required. To the extent a response is required, Groff asserts her rights under the Fifth Amendment and declines to answer.

21. To the extent the allegations in Paragraph 21 concern Groff's conduct, Groff asserts her rights under the Fifth Amendment and declines to answer. In so far as the allegations are directed to individuals other than Groff and/or state conclusions of law, no responsive pleading is required. To the extent a response is required, Groff asserts her rights under the Fifth Amendment and declines to answer.

22. To the extent the allegations in Paragraph 22 concern Groff's conduct, Groff asserts her rights under the Fifth Amendment and declines to answer. In so far as the allegations are directed to individuals other than Groff and/or state conclusions of law, no responsive pleading is required. To the extent a response is required, Groff asserts her rights under the Fifth Amendment and declines to answer.

23. It appears that the allegations in Paragraph 23 are directed to individuals other than Groff, to which no responsive pleading is required. To the extent a response is required, Groff asserts her rights under the Fifth Amendment and declines to answer.

24. To the extent the allegations in Paragraph 24 concern Groff's conduct, Groff asserts her rights under the Fifth Amendment and declines to answer. In so far as the allegations are directed to individuals other than Groff and/or state conclusions of law, no responsive pleading is required. To the extent a response is required, Groff asserts her rights under the Fifth Amendment and declines to answer.

25. To the extent the allegations in Paragraph 25 concern Groff's conduct, Groff asserts her rights under the Fifth Amendment and declines to answer. In so far as the allegations are directed to individuals other than Groff and/or state conclusions of law, no responsive pleading is required. To the extent a response is required, Groff asserts her rights under the Fifth Amendment and declines to answer.

26. To the extent the allegations in Paragraph 26 concern Groff's conduct, Groff asserts her rights under the Fifth Amendment and declines to answer. In so far as the allegations are directed to individuals other than Groff and/or state conclusions of law, no responsive pleading is required. To the extent a response is required, Groff asserts her rights under the Fifth Amendment and declines to answer.

27. It appears that the allegations in Paragraph 27 are directed to individuals other than Groff, to which no responsive pleading is required. To the extent a response is required, Groff asserts her rights under the Fifth Amendment and declines to answer.

28. To the extent the allegations in Paragraph 28 concern Groff's conduct, Groff asserts her rights under the Fifth Amendment and declines to answer. In so far as the allegations are directed to individuals other than Groff and/or state conclusions of law, no responsive pleading is required. To the extent a response is required, Groff asserts her rights under the Fifth Amendment and declines to answer.

29. It appears that the allegations in Paragraph 29 are directed to an individual other than Groff, to which no responsive pleading is required. To the extent a response is required, Groff asserts her rights under the Fifth Amendment and declines to answer.

30. To the extent the allegations in Paragraph 30 concern Groff's conduct, Groff asserts her rights under the Fifth Amendment and declines to answer. In so far as the allegations are directed to individuals other than Groff and/or state conclusions of law, no responsive pleading is required. To the extent a response is required, Groff asserts her rights under the Fifth Amendment and declines to answer.

31. To the extent the allegations in Paragraph 31 concern Groff's conduct, Groff asserts her rights under the Fifth Amendment and declines to answer. In so far as the allegations

are directed to individuals other than Groff and/or state conclusions of law, no responsive pleading is required. To the extent a response is required, Groff asserts her rights under the Fifth Amendment and declines to answer.

32. To the extent the allegations in Paragraph 32 concern Groff's conduct, Groff asserts her rights under the Fifth Amendment and declines to answer. In so far as the allegations are directed to individuals other than Groff and/or state conclusions of law, no responsive pleading is required. To the extent a response is required, Groff asserts her rights under the Fifth Amendment and declines to answer.

33. To the extent the allegations in Paragraph 33 concern Groff's conduct, Groff asserts her rights under the Fifth Amendment and declines to answer. In so far as the allegations are directed to individuals other than Groff and/or state conclusions of law, no responsive pleading is required. To the extent a response is required, Groff asserts her rights under the Fifth Amendment and declines to answer.

34. To the extent the allegations in Paragraph 34 concern Groff's conduct, Groff asserts her rights under the Fifth Amendment and declines to answer. In so far as the allegations are directed to individuals other than Groff and/or state conclusions of law, no responsive pleading is required. To the extent a response is required, Groff asserts her rights under the Fifth Amendment and declines to answer.

35. It appears that the allegations in Paragraph 35 are directed to an individual other than Groff, to which no responsive pleading is required. To the extent a response is required, Groff asserts her rights under the Fifth Amendment and declines to answer.

36. It appears that the allegations in Paragraph 36 are directed to individuals other than Groff, to which no responsive pleading is required. To the extent a response is required, Groff asserts her rights under the Fifth Amendment and declines to answer.

37. To the extent the allegations in Paragraph 37 concern Groff's conduct, Groff asserts her rights under the Fifth Amendment and declines to answer. In so far as the allegations are directed to individuals other than Groff and/or state conclusions of law, no responsive pleading is required. To the extent a response is required, Groff asserts her rights under the Fifth Amendment and declines to answer.

38. To the extent the allegations in Paragraph 38 concern Groff's conduct, Groff asserts her rights under the Fifth Amendment and declines to answer. In so far as the allegations are directed to individuals other than Groff and/or state conclusions of law, no responsive pleading is required. To the extent a response is required, Groff asserts her rights under the Fifth Amendment and declines to answer.

39. It appears that the allegations in Paragraph 39 are directed to individuals other than Groff, to which no responsive pleading is required. To the extent a response is required, Groff asserts her rights under the Fifth Amendment and declines to answer.

40. To the extent the allegations in Paragraph 40 concern Groff's conduct, Groff asserts her rights under the Fifth Amendment and declines to answer. In so far as the allegations are directed to individuals other than Groff and/or state conclusions of law, no responsive pleading is required. To the extent a response is required, Groff asserts her rights under the Fifth Amendment and declines to answer.

41. To the extent the allegations in Paragraph 41 concern Groff's conduct, Groff asserts her rights under the Fifth Amendment and declines to answer. In so far as the allegations

are directed to individuals other than Groff and/or state conclusions of law, no responsive pleading is required. To the extent a response is required, Groff asserts her rights under the Fifth Amendment and declines to answer.

42. To the extent the allegations in Paragraph 42 concern Groff's conduct, Groff asserts her rights under the Fifth Amendment and declines to answer. In so far as the allegations are directed to individuals other than Groff and/or state conclusions of law, no responsive pleading is required. To the extent a response is required, Groff asserts her rights under the Fifth Amendment and declines to answer.

43. To the extent the allegations in Paragraph 43 concern Groff's conduct, Groff asserts her rights under the Fifth Amendment and declines to answer. In so far as the allegations are directed to individuals other than Groff and/or state conclusions of law, no responsive pleading is required. To the extent a response is required, Groff asserts her rights under the Fifth Amendment and declines to answer.

44. To the extent the allegations in Paragraph 44 concern Groff's conduct, Groff asserts her rights under the Fifth Amendment and declines to answer. In so far as the allegations are directed to individuals other than Groff and/or state conclusions of law, no responsive pleading is required. To the extent a response is required, Groff asserts her rights under the Fifth Amendment and declines to answer.

45. To the extent the allegations in Paragraph 45 concern Groff's conduct, Groff asserts her rights under the Fifth Amendment and declines to answer. In so far as the allegations are directed to individuals other than Groff and/or state conclusions of law, no responsive pleading is required. To the extent a response is required, Groff asserts her rights under the Fifth Amendment and declines to answer.

46. It appears that the allegations in Paragraph 46 are directed to individuals other than Groff, to which no responsive pleading is required. To the extent a response is required, Groff asserts her rights under the Fifth Amendment and declines to answer.

47. It appears that the allegations in Paragraph 47 are directed to individuals other than Groff, to which no responsive pleading is required. To the extent a response is required, Groff asserts her rights under the Fifth Amendment and declines to answer.

48. To the extent the allegations in Paragraph 48 concern Groff's conduct, Groff asserts her rights under the Fifth Amendment and declines to answer. In so far as the allegations are directed to individuals other than Groff and/or state conclusions of law, no responsive pleading is required. To the extent a response is required, Groff asserts her rights under the Fifth Amendment and declines to answer.

49. To the extent the allegations in Paragraph 49 concern Groff's conduct, Groff asserts her rights under the Fifth Amendment and declines to answer. In so far as the allegations are directed to individuals other than Groff and/or state conclusions of law, no responsive pleading is required. To the extent a response is required, Groff asserts her rights under the Fifth Amendment and declines to answer.

50. To the extent the allegations in Paragraph 50 concern Groff's conduct, Groff asserts her rights under the Fifth Amendment and declines to answer. In so far as the allegations are directed to individuals other than Groff and/or state conclusions of law, no responsive pleading is required. To the extent a response is required, Groff asserts her rights under the Fifth Amendment and declines to answer.

51. To the extent the allegations in Paragraph 51 concern Groff's conduct, Groff asserts her rights under the Fifth Amendment and declines to answer. In so far as the allegations

are directed to individuals other than Groff and/or state conclusions of law, no responsive pleading is required. To the extent a response is required, Groff asserts her rights under the Fifth Amendment and declines to answer.

52. To the extent the allegations in Paragraph 52 concern Groff's conduct, Groff asserts her rights under the Fifth Amendment and declines to answer. In so far as the allegations are directed to individuals other than Groff and/or state conclusions of law, no responsive pleading is required. To the extent a response is required, Groff asserts her rights under the Fifth Amendment and declines to answer.

53. To the extent the allegations in Paragraph 53 concern Groff's conduct, Groff asserts her rights under the Fifth Amendment and declines to answer. In so far as the allegations are directed to individuals other than Groff and/or state conclusions of law, no responsive pleading is required. To the extent a response is required, Groff asserts her rights under the Fifth Amendment and declines to answer.

54. To the extent the allegations in Paragraph 54 concern Groff's conduct, Groff asserts her rights under the Fifth Amendment and declines to answer. In so far as the allegations are directed to individuals other than Groff and/or state conclusions of law, no responsive pleading is required. To the extent a response is required, Groff asserts her rights under the Fifth Amendment and declines to answer.

55. To the extent the allegations in Paragraph 55 concern Groff's conduct, Groff asserts her rights under the Fifth Amendment and declines to answer. In so far as the allegations are directed to individuals other than Groff and/or state conclusions of law, no responsive pleading is required. To the extent a response is required, Groff asserts her rights under the Fifth Amendment and declines to answer.

56. To the extent the allegations in Paragraph 56 concern Groff's conduct, Groff asserts her rights under the Fifth Amendment and declines to answer. In so far as the allegations are directed to individuals other than Groff and/or state conclusions of law, no responsive pleading is required. To the extent a response is required, Groff asserts her rights under the Fifth Amendment and declines to answer.

57. To the extent the allegations in Paragraph 57 concern Groff's conduct, Groff asserts her rights under the Fifth Amendment and declines to answer. In so far as the allegations are directed to individuals other than Groff and/or state conclusions of law, no responsive pleading is required. To the extent a response is required, Groff asserts her rights under the Fifth Amendment and declines to answer.

58. To the extent the allegations in Paragraph 58 concern Groff's conduct, Groff asserts her rights under the Fifth Amendment and declines to answer. In so far as the allegations are directed to individuals other than Groff and/or state conclusions of law, no responsive pleading is required. To the extent a response is required, Groff asserts her rights under the Fifth Amendment and declines to answer.

59. To the extent the allegations in Paragraph 59 concern Groff's conduct, Groff asserts her rights under the Fifth Amendment and declines to answer. In so far as the allegations are directed to individuals other than Groff and/or state conclusions of law, no responsive pleading is required. To the extent a response is required, Groff asserts her rights under the Fifth Amendment and declines to answer.

60. To the extent the allegations in paragraph 60 concern Groff's conduct, Groff asserts her rights under the Fifth Amendment and declines to answer. In so far as the allegations are directed to individuals other than Groff and/or state conclusions of law, no responsive

pleading is required. To the extent a response is required, Groff asserts her rights under the Fifth Amendment and declines to answer.

61. To the extent the allegations in Paragraph 61 concern Groff's conduct, Groff asserts her rights under the Fifth Amendment and declines to answer. In so far as the allegations are directed to individuals other than Groff and/or state conclusions of law, no responsive pleading is required. To the extent a response is required, Groff asserts her rights under the Fifth Amendment and declines to answer.

62. To the extent the allegations in Paragraph 62 concern Groff's conduct, Groff asserts her rights under the Fifth Amendment and declines to answer. In so far as the allegations are directed to individuals other than Groff and/or state conclusions of law, no responsive pleading is required. To the extent a response is required, Groff asserts her rights under the Fifth Amendment and declines to answer.

63. To the extent the allegations in Paragraph 63 concern Groff's conduct, Groff asserts her rights under the Fifth Amendment and declines to answer. In so far as the allegations are directed to individuals other than Groff and/or state conclusions of law, no responsive pleading is required. To the extent a response is required, Groff asserts her rights under the Fifth Amendment and declines to answer.

64. To the extent the allegations in Paragraph 64 concern Groff's conduct, Groff asserts her rights under the Fifth Amendment and declines to answer. In so far as the allegations are directed to individuals other than Groff and/or state conclusions of law, no responsive pleading is required. To the extent a response is required, Groff asserts her rights under the Fifth Amendment and declines to answer.

65. To the extent the allegations in Paragraph 65 concern Groff's conduct, Groff asserts her rights under the Fifth Amendment and declines to answer. In so far as the allegations are directed to individuals other than Groff and/or state conclusions of law, no responsive pleading is required. To the extent a response is required, Groff asserts her rights under the Fifth Amendment and declines to answer.

66. To the extent the allegations in Paragraph 66 concern Groff's conduct, Groff asserts her rights under the Fifth Amendment and declines to answer. In so far as the allegations are directed to individuals other than Groff and/or state conclusions of law, no responsive pleading is required. To the extent a response is required, Groff asserts her rights under the Fifth Amendment and declines to answer.

67. In response to Paragraph 67, Groff repeats and incorporates her responses to Paragraphs 1 through 66 of the Complaint.

68. To the extent the allegations in Paragraph 68 concern Groff's conduct, Groff asserts her rights under the Fifth Amendment and declines to answer. In so far as the allegations are directed to individuals other than Groff and/or state conclusions of law, no responsive pleading is required. To the extent a response is required, Groff asserts her rights under the Fifth Amendment and declines to answer.

69. To the extent the allegations in Paragraph 69 concern Groff's conduct, Groff asserts her rights under the Fifth Amendment and declines to answer. In so far as the allegations are directed to individuals other than Groff and/or state conclusions of law, no responsive pleading is required. To the extent a response is required, Groff asserts her rights under the Fifth Amendment and declines to answer.

70. To the extent the allegations in Paragraph 70 concern Groff's conduct, Groff asserts her rights under the Fifth Amendment and declines to answer. In so far as the allegations are directed to individuals other than Groff and/or state conclusions of law, no responsive pleading is required. To the extent a response is required, Groff asserts her rights under the Fifth Amendment and declines to answer.

71. To the extent the allegations in Paragraph 71 concern Groff's conduct, Groff asserts her rights under the Fifth Amendment and declines to answer. In so far as the allegations are directed to individuals other than Groff and/or state conclusions of law, no responsive pleading is required. To the extent a response is required, Groff asserts her rights under the Fifth Amendment and declines to answer.

72. To the extent the allegations in Paragraph 72 concern Groff's conduct, Groff asserts her rights under the Fifth Amendment and declines to answer. In so far as the allegations are directed to individuals other than Groff and/or state conclusions of law, no responsive pleading is required. To the extent a response is required, Groff asserts her rights under the Fifth Amendment and declines to answer.

73. To the extent the allegations in Paragraph 73 concern Groff's conduct, Groff asserts her rights under the Fifth Amendment and declines to answer. In so far as the allegations are directed to individuals other than Groff and/or state conclusions of law, no responsive pleading is required. To the extent a response is required, Groff asserts her rights under the Fifth Amendment and declines to answer.

74. It appears the allegations in Paragraph 74 state conclusion of law, as to which no response is required. To the extent a response is required, Groff asserts her rights under the Fifth Amendment and declines to answer.

75. To the extent the allegations in Paragraph 75 concern Groff's conduct, Groff asserts her rights under the Fifth Amendment and declines to answer. In so far as the allegations are directed to individuals other than Groff and/or state conclusions of law, no responsive pleading is required. To the extent a response is required, Groff asserts her rights under the Fifth Amendment and declines to answer.

76. To the extent the allegations in Paragraph 76 concern Groff's conduct, Groff asserts her rights under the Fifth Amendment and declines to answer. In so far as the allegations are directed to individuals other than Groff and/or state conclusions of law, no responsive pleading is required. To the extent a response is required, Groff asserts her rights under the Fifth Amendment and declines to answer.

77. It appears the allegations in Paragraph 77 state conclusion of law, as to which no response is required. To the extent a response is required, Groff asserts her rights under the Fifth Amendment and declines to answer.

DEFENSES

By alleging the following defenses, Groff does not assume any burden of proof, persuasion, or production not otherwise legally assigned to him. Groff reserves all rights to assert other defenses as appropriate.

First Defense

The Complaint fails to state a claim upon which relief can be granted against Groff.

Second Defense

Plaintiff's claim is barred, in whole or in part, by the applicable statute of limitations and/or laches.

Third Defense

Plaintiff failed to mitigate damages in whole or in part.

Fourth Defense

Plaintiff's claim is barred, in whole or in part, by the doctrines of assumption of risk, estoppel, unclean hands, waiver, consent and/or ratification.

Fifth Defense

Plaintiff's damages, if any, resulted from the acts or omissions of Plaintiff or third parties other than Groff.

Sixth Defense

The damages, if any, alleged in the Complaint were directly and proximately caused, in whole or in part, by superseding or intervening conduct for which Groff cannot be held liable.

Seventh Defense

The conduct alleged does not constitute a violation, and is beyond the scope, of the federal criminal anti-sex trafficking statutes upon which this suit is based, none of which are meant to regulate voluntary private relationships.

Eighth Defense

Plaintiff's claim is barred because Plaintiff was an educated, experienced and sophisticated individual who was free to associate and form relationships with anyone and free to terminate her association and relationships with anyone.

Ninth Defense

Plaintiff's claim is barred because Plaintiff did not actually rely and did not detrimentally and/or reasonably rely upon any misrepresentations or omissions alleged in the Complaint.

Tenth Defense

This Court lacks personal jurisdiction over Groff.

Eleventh Defense

Groff presently has insufficient knowledge or information upon which to form a belief as to whether he may have other, unstated, defenses. Groff reserves the right to supplement this Answer and to assert other defenses, when and if they become appropriate in this action.

PRAYER FOR RELIEF

WHEREFORE, Groff respectfully requests:

- A. judgment dismissing the First Amended Complaint with prejudice; and
- B. such other and further relief as this Court may deem just and proper.

Dated: August 31, 2018
New York, New York

STEPTOE & JOHNSON LLP

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