

IN THE CIRCUIT COURT OF THE
ELEVENTH JUDICIAL CIRCUIT IN AND
FOR MIAMI-DADE COUNTY, FLORIDA

COURTNEY WILD and HALEY ROBSON,

CASE NO.

Plaintiffs,

v.

JULIE K. BROWN,

Defendant.

COMPLAINT

Plaintiffs Courtney Wild and Haley Robson sue Defendant Julie K. Brown for knowingly publishing false and defamatory statements in her book, *Perversion of Justice: The Jeffrey Epstein Story* (“*Perversion of Justice*”). In particular, Brown falsely stated that Ms. Wild was raped by Epstein and then had sex with Epstein multiple times after the rape. Neither is true. More egregiously, when Robson refused to sit for an interview for the book, Brown threatened her, saying her refusal would be the “biggest mistake of your life.” Fulfilling her threat, Brown then portrayed Robson not as the teenage victim she was, no different than dozens of other victims, but rather as a mini-Ghislaine Maxwell and a member of Epstein’s inner circle, despite knowing that to be a false narrative. Brown’s libelous attacks on these two victims will have lasting effects as both have children and family members who will suffer regular attacks by those in the community who read or hear of these defamatory statements.

PARTIES, JURISDICTION & VENUE

1. Plaintiffs Courtney Wild and Haley Robson are Florida citizens.
2. Defendant Julie K. Brown is also Florida citizen.
3. Plaintiffs seek damages in excess of thirty thousand dollars.
4. This Court has personal jurisdiction over Brown and has proper venue because Brown resides in and the cause of action accrued in Miami-Dade County.

FACTUAL BACKGROUND

5. Through her book *Perversion of Justice*, Brown has sought to take credit away from the victims of Jeffrey Epstein, particularly Ms. Wild, who fought for years to a) expose the improper deal given by the federal government to Epstein, b) obtain the arrest of Jeffrey Epstein, c) establish the Epstein Victim Compensation Program, d) assist victims in obtaining settlements, and e) changing the laws for crime victims. In fact, because of Ms. Wild's efforts, Congressional Democrats and Republicans came together to introduce the bipartisan "Courtney Wild Crime Victims' Rights Reform Act."

6. Knowing Ms. Wild had spearheaded each of these major achievements, and not Ms. Brown as she claimed in her book, Ms. Brown sought to debase and defame Ms. Wild by writing that Ms. Wild "told the FBI the times that she had sex with him when she was underage," that she could not "remember the exact time he raped me," and that, at a certain point thereafter, she "didn't have to do the sex anymore."

7. In fact, Ms. Wild never had sexual intercourse with Epstein and was never raped by Epstein.

8. As part of her effort to break new ground, as opposed to merely reporting what had already been known, Ms. Brown also sought to interview Ms. Robson for her book.

9. The new ground Ms. Brown sought to address was Ms. Robson's true role as a victim as her name and personal information previously had been improperly released to the public in connection with the Palm Beach Police Department's investigation and, as a result, Ms. Robson had been wrongfully vilified by the media for years.

10. Brown sought to interview Ms. Robson under the guise of helping Ms. Robson restore her reputation and tell her true story as one of Epstein's victims. When Ms. Robson declined to participate, however, Brown warned Ms. Robson that she was "making the biggest mistake of your life" by refusing to cooperate.

11. Ms. Robson was so shocked by the threat that she immediately reported it to her lawyer.

12. With the publication of *Perversion of Justice*, Ms. Brown carried out her threat by characterizing Ms. Robson not as a victim but rather as an eager participant and co-conspirator in Epstein's crimes.

13. She wrote repeatedly that Robson was "working" for Epstein, that Robson viewed Epstein as her "boss" and was a member of Epstein's inner circle of associates who was "giddy with excitement" to participate in his scheme.

14. Brown knew that these statements about Ms. Wild and Ms. Robson were false and defamatory when she published them in *Perversion of Justice*, based on her previous on-the-record interview with Ms. Wild and off-the-record interview with Ms. Robson, and based on her investigation and research for her book as well as for her newspaper article.

15. Because of these statements, Ms. Wild and Ms. Robson's mental anguish and suffering were exacerbated, and their mental health was affected as a result of being re-victimized by Defendant after years of trauma due to Epstein's abuse and collusion with the government that

ultimately failed to bring him to justice.

16. Furthermore, Defendant's defamatory statements have harmed and will continue to harm Ms. Wild and Ms. Robson's veracity by undermining the narrative that they have fought so hard to reclaim despite the efforts of Epstein and the government to cover them up.

17. In addition, Defendant's defamatory statements have damaged and will continue to damage Ms. Wild and Ms. Robson's reputation in the community, including in their role as advocates and champions for victims of sexual abuse.

18. Defendant knew that these statements and omissions conveyed an expressly and impliedly defamatory meaning when she published them in *Perversion of Justice*, which she published with the primary intention of harming Ms. Wild and Ms. Robson for vindictive and other malicious reasons.

COUNT I: DEFAMATION

19. Plaintiff Courtney Wild re-alleges the allegations contained in Paragraphs 1 through 18 as though fully set forth herein.

20. Defendant published statements purported to be facts in an intentionally false, malicious, or otherwise defamatory manner, with knowledge that her statements were false or with reckless disregard of the truth, and distributed the same in Florida and throughout the world.

21. All of the defamatory statements published by Defendant concerning Plaintiff Wild are false.

22. Defendant specifically and unambiguously stated that Plaintiff Wild was raped by and sexual intercourse with Jeffrey Epstein. This is false.

23. Defendant specifically and unambiguously minimized Plaintiff Wild's role in bringing about the amendment of the CVRA, the Epstein Victim Compensation Program, and the

arrest of Jeffrey Epstein, and instead falsely gave the credit for these accomplishments to herself.

24. Defendant caused the false and defamatory statements to be published with knowledge of the statements' falsity and/or with reckless disregard for the truth.

25. Defendant knew and/or intended that the defamatory statements would be widely disseminated in the United States and around the world.

26. Defendant's statements had, and continue to have, a defamatory effect, because they have resulted in damage to the reputation and community standing of Plaintiff Wild. In particular, Defendant's defamatory statements have damaged Plaintiff Wild's reputation and standing as an advocate for sexual trafficking victims' rights groups that Plaintiff Wild volunteered and collaborated with.

27. Furthermore, Plaintiff Wild has suffered, and will continue to suffer shame, humiliation, mental anguish, and hurt feelings as a result of Defendant's statements. In particular, Defendant's statements have affected Plaintiff Wild's mental health.

COUNT II: DEFAMATION *PER SE*

28. Plaintiff Courtney Wild re-alleges the allegations contained in Paragraphs 1 through 18 as though fully set forth herein.

29. Plaintiff Wild is informed and believes, and on that basis alleges, that Defendant published statements purported to be facts in an intentionally false, malicious, or otherwise defamatory manner, with knowledge that her statements were false or with reckless disregard of the truth, and distributed the same in Florida and throughout the world.

30. All of the defamatory statements published by Defendant concerning Plaintiff Wild are false.

31. All of the defamatory statements published by Defendant concerning Plaintiff Wild

are defamatory *per se*. Each false and defamatory statement tends to subject Plaintiff Wild to ridicule, contempt, and disgrace.

32. Defendant specifically and unambiguously stated that Plaintiff Wild was raped by and sexual intercourse with Jeffrey Epstein. This is false.

33. Defendant caused the false and defamatory statements to be published with knowledge of the statements' falsity and/or with reckless disregard for the truth.

34. Defendant knew and/or intended that the defamatory statements would be widely disseminated in the United States and around the world.

35. Defendant's statements had, and continue to have, a defamatory effect, because they have resulted in damage to the reputation and community standing of Plaintiff Wild. In particular, Defendant's defamatory statements have damaged Plaintiff Wild's reputation and standing as an advocate for sexual trafficking victims' rights groups that Plaintiff Wild volunteered and collaborated with.

36. Furthermore, Plaintiff Wild has suffered, and will continue to suffer shame, humiliation, mental anguish, and hurt feelings as a result of Defendant's statements. In particular, Defendant's statements have affected Plaintiff Wild's mental health.

COUNT III: DEFAMATION BY IMPLICATION

37. Plaintiff Haley Robson re-alleges the allegations contained in Paragraphs 1 through 18 as though fully set forth herein.

38. Plaintiff Robson is informed and believes, and on that basis alleges, that Defendant published statements purported to be facts in an intentionally malicious or otherwise defamatory manner, with knowledge of the defamatory manner in which her statements would portray Plaintiff Robson or with reckless disregard thereof, and distributed the same in Florida and throughout the

world.

39. Defendant's statements, and omission of certain facts, regarding Plaintiff Robson suggest or imply a defamatory connection to sexual offender Jeffrey Epstein by, among other things: (a) suggesting that Plaintiff Robson was directly employed by Epstein in a greater capacity than other victims in his pyramid scheme, (b) suggesting that Plaintiff Robson was part of Epstein's inner circle of co-conspirators that supported and facilitated his sexual offenses and the pyramid scheme, and (c) suggesting that Plaintiff Robson was not herself victimized and abused by Epstein prior to her participation in his pyramid scheme.

40. Such portrayal of Plaintiff Robson constitutes a gross misrepresentation of the sexual and mental abuse and manipulation suffered by Robson as one of Epstein's victims.

41. Such portrayal of Plaintiff Robson is highly offensive to her, would be highly offensive to a reasonable person, and prejudices Robson in the eyes of a substantial and respectable minority of the community.

42. Defendant's statements had, and continue to have, a defamatory effect, because they have resulted in damage to the reputation and community standing of Plaintiff Robson. In particular, Defendant's defamatory statements have damaged Plaintiff Robson's reputation and standing as an advocate for sexual trafficking victims' rights groups that Plaintiff Robson has volunteered and collaborated with.

43. Furthermore, Plaintiff Robson has suffered, and will continue to suffer shame, humiliation, mental anguish, and hurt feelings as a result of Defendant's statements. In particular, Defendant's statements have affected Plaintiff Robson's mental health.

PRAYER FOR RELIEF

Plaintiffs pray that this Court provide the following relief:

- (1) An order requiring Julie Brown to issue a public statement of apology to Plaintiffs, explaining that certain statements in her book *Perversion of Justice* were false and defamatory;
- (2) Compensatory and consequential damages;
- (3) Punitive damages to punish Defendant's reprehensible conduct and deter its future occurrence; and
- (4) Further relief as this Court shall deem just and proper.

JURY DEMAND

Plaintiffs respectfully request a trial by jury on all issues raised by this Complaint which are triable by right of a jury.

DATED: February 3, 2022

Respectfully submitted,

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