

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

JANE DOE 43,

Plaintiff,

vs.

JEFFREY EPSTEIN, GHISLAINE  
MAXWELL, [REDACTED]

Defendants.

**COMPLAINT**

**JURY TRIAL DEMANDED**

CASE NO.:

Plaintiff Jane Doe 43, by and through her undersigned counsel, for her claims against Defendants Jeffrey Epstein, Ghislaine Maxwell, [REDACTED], [REDACTED] alleges upon personal knowledge with respect to her own acts and status and upon information and belief as to all other matters, as follows:

1. This cause of action arises under federal statutes and jurisdiction is proper under 28 U.S.C. § 1331.
2. Plaintiff files this Complaint under a pseudonym in order to protect her identity because this Complaint makes allegations of a sensitive sexual nature and disclosure of Plaintiff's name publicly will cause further harm to her.
3. At all times material to the events alleged in this cause of action the Plaintiff was a citizen of South Africa residing in New York, New York.