

September 15, 2026

The Honorable Robert Garcia
Ranking Member, Committee on Oversight and Government Reform
U.S. House of Representatives
2157 Rayburn House Office Building
Washington, DC 20515-6143

Re: The Wigdor Firm and the Committee's Investigation of Mr. Leon Black

Dear Ranking Member Garcia:

We write on behalf of Leon D. Black, the founder of Apollo Global Management, who served as its chairman and CEO for 31 years. Mr. Black has been cooperating with the House Oversight and Government Reform Committee's inquiry into Jeffrey Epstein. Mr. Black appeared voluntarily for a transcribed interview before the Committee on June 26, 2026 (the "June 26 TI"). At that time, Chairman James Comer issued two subpoenas to Mr. Black: 1) a document subpoena (the "June 26 Document Subpoena") and 2) a deposition subpoena (the "June 26 Deposition Subpoena"). The June 26 Deposition Subpoena demanded that Mr. Black sit for a deposition before the Committee on September 3, 2026. As counsel informed the Committee on September 3rd, Mr. Black declined to appear for a deposition scheduled for that date and elected to file suit against the Committee due to the deficiencies of the June 26 Subpoenas.¹

Members of Mr. Black's legal team have met with both the Majority and Minority staff. On August 13, 2026, we met with members of your staff. Based on that meeting, and subsequent media statements made by you,² we are concerned that the Minority has formed an incorrect or distorted view of Mr. Black based on false information generated or provided by Wigdor LLP ("Wigdor"). Of paramount concern, on September 11, 2026, you issued a press release regarding the Committee's intent to hold Mr. Black in contempt in which you asserted that Mr. Black "has been credibly accused of sexual assault by multiple women."³

¹ See Letter from Leon Black to H. Comm. on Oversight and Gov't Reform (Sept. 3, 2026).

² See, e.g., *On the Line with Alicia Menendez*, "Growing backlash to slashing polling places," MS NOW (Sept. 2, 2026), available at <https://podcasts.apple.com/gb/podcast/growing-backlash-to-slashing-polling-places/id1896895832?i=1000787469132>.

³ Press Release, Ranking Member Robert Garcia, H. Comm. on Oversight & Gov't Reform, *Ranking Member Robert Garcia Statement After Oversight Committee Moves to Hold Leon Black in Contempt of Congress* (Sept. 11, 2026),

Before addressing the falsity of this statement—and it is indeed false—you should understand that the Committee’s actions have created a serious risk to Mr. Black’s personal safety. By repeatedly and publicly associating Mr. Black with Epstein’s crimes, the Committee has exposed Mr. Black to a foreseeable risk of harassment and violence. Mr. Black has received escalating death threats and has been compelled to employ security measures while traveling as a result of the Committee’s public attacks. These harms are not incidental. They are a result of the Committee’s efforts to portray Mr. Black as connected to criminal conduct involving Epstein, despite Mr. Black’s consistent denial that he participated in or had any knowledge of Epstein’s crimes.

Statements alleging that Mr. Black abused Epstein survivors are categorically false, and mirror the same language that has been pushed by Wigdor. In fact, Wigdor was sanctioned earlier this year by a federal judge for lying to the Court and for instructing its client to destroy evidence in the Black case. To the extent that Wigdor is providing any information to you or your staff regarding Mr. Black, these efforts are being fueled by baseless claims by a law firm that’s desperate to slander Mr. Black at any cost.⁴

For five years, Wigdor has waged a vicious campaign against Mr. Black in the courts and the media. Wigdor has sued Mr. Black on behalf of three women claiming ties to Jeffrey Epstein. These lawsuits have made horrific false allegations about Mr. Black, which Wigdor publicized even though Wigdor knew, or should have known, them to be false. As Mr. Black told the Committee when he voluntarily appeared for the June 26 TI, “those lawsuits were demonstrably baseless, and those allegations were entirely fabricated.”⁵ Each of those three lawsuits has failed. The first two were dismissed with prejudice. In the first, the Appellate Division ordered that Wigdor’s false Epstein allegations should be disregarded as “scandalous and prejudicial.”⁶ In the third, on April 23, 2026, a federal judge appointed by President Biden issued a scathing 76-page opinion finding that Wigdor lied to the court repeatedly, that evidence central to the case submitted by Wigdor was fabricated, and that other key evidence was destroyed at Wigdor’s direction (the “Sanctions Opinion”).⁷

Wigdor’s vendetta against Mr. Black is boundless. Defeated repeatedly in court, and now sanctioned for its deceptive conduct and for spreading outright lies, Wigdor seeks to accomplish through this Committee what it could not accomplish before a judge. Neither the Committee nor its staff should believe any representations—public or otherwise—made by the Wigdor firm regarding Mr. Black.

available at <https://oversightdemocrats.house.gov/news/press-releases/ranking-member-robert-garcia-statement-after-oversight-committee-moves-to-hold-leon-black-in-contempt-of-congress>.

⁴ See, e.g., House Committee on Oversight Democrats (@OversightDems), X Post (Sept. 3, 2026, 11:11 AM), available at <https://x.com/OversightDems/status/2095530070232240303> (video of remarks by Ranking Member Robert Garcia in which he states, “We have had survivors tell our Committee that Leon Black was involved in the abuse of women. That’s been noted by survivors directly, both publicly and directly to our Committee.”).

⁵ *Official Transcript of Transcribed Interview of Leon Black*, U.S. House Committee on Oversight and Government Reform (June 26, 2026), at 16 (lines 17–18).

⁶ *Ganieva v. Black*, 216 A.D.3d 424, 425 (1st Dep’t 2023).

⁷ Ex. A, Opinion and Order, *Doe v. Black*, No. 1:23-cv-06418 (JGLC) (S.D.N.Y. Apr. 23, 2026), ECF No. 388 (hereinafter the “Sanctions Opinion”).

The public record of Wigdor’s misconduct is set forth below.

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I. The Ganieva Action: Wigdor Disregarded Exculpatory Evidence Disproving Its Claims.

In June 2021, Wigdor filed the first of its baseless lawsuits against Mr. Black, on behalf of Guzel Ganieva, an adult woman with whom Mr. Black had a sporadic, consensual relationship between 2008 and 2014. The suit was brought in the face of a 2015 release and confidentiality agreement that Ms. Ganieva had voluntarily negotiated and signed.

Mr. Black had recorded his conversations leading up to his agreement with Ms. Ganieva because he understood himself to be the victim of extortion. Those recordings, and contemporaneous text messages between the parties⁸ proved the falsity of Ms. Ganieva’s allegations. Early in the case, Mr. Black’s counsel offered to make the recordings, the messages, and the 2015 agreement itself available to Wigdor for the firm’s inspection. Wigdor declined.

Notably, the initial *Ganieva* complaint contained no allegations concerning Jeffrey Epstein—because Ms. Ganieva never even met Epstein (a fact she conceded during a recorded meeting). Likely in an effort to exploit the Epstein media frenzy, Wigdor thereafter amended the complaint two more times to add new sensational (and demonstrably false) Epstein allegations (involving “drugging” and “kidnapping” and other similarly lurid lies) with each iteration. The New York Appellate Division ordered these allegations stricken from the amended complaint, holding that they “were scandalous and prejudicial, and not necessary to establish any element of plaintiff’s causes of action.”⁹ And the second amended complaint in the *Ganieva* action was dismissed as barred by the release and confidentiality agreement; the First Department affirmed, and leave to appeal was denied.¹⁰ The case was closed, in favor of Mr. Black.

II. The Pierson Action: A Complaint Filed Without Any Diligence.

In November 2022, Wigdor filed a second lawsuit against Mr. Black, this time on behalf of an individual named Cheri Pierson, alleging that Mr. Black assaulted her in a massage room at Jeffrey Epstein’s townhouse. Mr. Black never met Ms. Pierson. If Mr. Black had been permitted to finish his testimony during the June 26 TI, the Committee would also have heard that Mr. Black has never even been in an “Epstein massage room.”

⁸ On June 28, 2014, Ms. Ganieva had written to Mr. Black: “Baby.... I’m all alone. Let’s get together soon. I miss you. Xoxo[.]” Then, on July 6—the date Wigdor alleged Mr. Black assaulted Ms. Ganieva—Ms. Ganieva wrote to Mr. Black, unsolicited: “This is love. I need you....” In response to these entreaties, Mr. Black said that he would be driving back to the city that evening and inquired if he should come over. Ms. Ganieva agreed, asking if Mr. Black could “please bring a bottle of wine if you can?” The next day after the supposed assault, she texted him: “Good morning. It was very nice to see you last night. I already feel better.... I love you and thank you!!! Xoxoxoxoxo and more love[.]” *Ganieva v. Black* (155262/2021, NYSCEF Doc. No. 4 ¶¶49–52).

⁹ *Ganieva*, 216 A.D.3d at 425.

¹⁰ *Ganieva v. Black*, 234 A.D.3d 543, 544 (1st Dep’t 2025), *leave to appeal denied*, 44 N.Y.3d 903 (2025).

In that action, Mr. Black moved for sanctions.¹¹ The motion set out, among other things, that Ms. Pierson had faced multiple criminal charges, had been accused on multiple occasions of harassing and threatening her neighbors, and was a serial litigant.¹² Every document cited in that motion was publicly available before Wigdor filed its complaint. The firm did not need discovery, a subpoena, or Mr. Black’s cooperation to find any of it. It needed only to look. Once again, it did not. The *Pierson* action was ultimately withdrawn and dismissed with prejudice following a legal settlement between the parties.¹³

III. The Doe Action: A Federal Court Finds That Wigdor Engaged in a Pattern of Repeated Lies and Destroyed Exculpatory Evidence.

In July 2023, Wigdor filed a third action against Mr. Black, in the Southern District of New York, on behalf of a plaintiff proceeding as Jane Doe. The complaint alleged a series of lurid, vile, and preposterous claims that were contradicted by evidence and common sense. Mr. Black’s counsel shared evidence that Ms. Doe was lying about her claims—including statements from her own friends and family denying her account—and class counsel representing dozens of Epstein victims *warned* Wigdor that Ms. Doe was not a real Epstein victim. True to form, Wigdor pressed on anyway and widely publicized these knowingly false and reprehensible allegations.

On April 23, 2026, the Honorable Jessica G. L. Clarke awarded severe sanctions against Wigdor in a 76-page opinion. Judge Clarke found that Wigdor engaged in “serious, sanctionable misconduct” and “lied repeatedly to the Court and to opposing counsel in the litigation.”¹⁴ The Court found that Wigdor directed Ms. Doe to delete a social media account that likely contained information relevant to the case.¹⁵ It found that evidence central to the plaintiff’s account had been falsified, and barred her from relying on it.¹⁶ It found that Wigdor failed for nine months to correct allegations in its complaint after learning they were false, and that a Wigdor partner “lied when she represented her reasons for amending this Complaint.”¹⁷

Much of this misconduct concerned a separate proceeding before Judge Jed S. Rakoff regarding Ms. Doe’s claim that she should receive funds from the JPMorgan (“JPMC”) Epstein victims’ settlement. Wigdor likewise represented Ms. Doe in the JPMC proceedings, where she gave outrageous and false sworn testimony (elicited by Wigdor) that she gave birth to four of Epstein’s children, three of them were kidnapped at birth, and she was trafficked as a teenager to dozens of prominent men¹⁸ in less than three years—all while she attended high school and made the honor roll. Judge Rakoff ultimately denied Ms. Doe’s claim after observing her and Wigdor’s lack of credibility firsthand. Ms. Doe later settled with the claims administrator for a minuscule fraction of her initial award. In February 2024, class counsel sent Judge Rakoff a sealed letter

¹¹ *Pierson v. Black*, Index No. 952002/2022, NYSCEF Doc. Nos. 10–20 (Sup. Ct. N.Y. Cnty.).

¹² *Pierson v. Black*, Index No. 952002/2022, NYSCEF Doc. No. 11 at 17–19.

¹³ *Pierson v. Black*, Index No. 952002/2022, NYSCEF Doc. No. 104 (Sup. Ct. N.Y. Cnty. Feb. 15, 2024).

¹⁴ Sanctions Opinion at 1–2, 36–41.

¹⁵ *Id.* at 41–42.

¹⁶ *Id.* at 64.

¹⁷ *Id.* at 56.

¹⁸ Documents Wigdor submitted to Judge Rakoff claimed that Ms. Doe was trafficked to former President Bill Clinton, former Secretary of the Treasury Larry Summers, former Senator George Mitchell, Prince Andrew, Harvey Weinstein, and Alan Dershowitz, among many others.

describing inconsistencies in Ms. Doe’s account of her treatment by Epstein.¹⁹ Class counsel shared his serious doubts that Ms. Doe was a veritable victim of Epstein and his associates, and his belief that Ms. Doe’s claims were not meritorious and her testimony unreliable.²⁰ The *Guardian* newspaper quoted class counsel as saying, “[n]ot one piece of [Ms. Doe’s] story could ever be corroborated and a lot of what she says just definitely could not have ever happened.”²¹

Wigdor engaged in misleading conduct in the JPMC case to the point where Judge Rakoff felt compelled to write to Judge Clarke that a letter submitted by Wigdor to Judge Clarke about the JPMC proceedings “contained ‘numerous material misrepresentations regarding the proceedings.’”²² Based on this letter, Judge Clarke found that a Wigdor partner “told several lies to this Court and opposing counsel about what occurred in the JPMC action.”²³ The Wigdor partner said in her defense of making misleading claims, “Your Honor, if every complaint that I have ever drafted as a plaintiff’s counsel had correctly alleged things, that unfortunately is not the case.”²⁴ Judge Clarke found that the Wigdor partner’s “comments are indicative of someone who does not take seriously their Rule 11 obligations.”²⁵

When Wigdor moved for reconsideration of the Sanctions Opinion, Judge Clarke denied the motion and addressed the firm’s asserted defenses one by one.²⁶ She rejected the claim that she had overlooked a letter from the firm’s professional responsibility counsel, holding the letter did not change “any of the Court’s conclusions about [the Wigdor partner’s] lies.”²⁷ She rejected the claim that Wigdor had not lied about Ms. Doe’s prior testimony, holding that Wigdor “did in fact misrepresent” that testimony and that arguments made to a different judge “do not bear on her duty of candor to this Court.”²⁸ And Judge Clarke rejected the claim that Wigdor had not consented to the procedure it later attacked, finding that Wigdor “expressly stated” the opposite of what had occurred and concluding that “[a]ny argument to the contrary is mere semantics.”²⁹

Judge Clarke imposed an extraordinary remedy to deal with this pattern of extraordinary deception. The Wigdor partner who signed Ms. Doe’s pleadings must provide the sanctions opinion to any federal court within the Second Circuit in which she is counsel of record for the next year, and for five years to any court in the Circuit where a sanctions motion has been filed against her, Wigdor, or Ms. Doe. Wigdor must also pay Mr. Black’s reasonable attorneys’ fees

¹⁹ *Id.* at 12.

²⁰ *Id.* at 12, 16.

²¹ Johanna Berkman, *Epstein-linked billionaire accused of rape privately reached out to federal judge to defend his ‘good name,’* THE GUARDIAN (May 6, 2026), available at <https://www.theguardian.com/us-news/ng-interactive/2026/may/06/jeffrey-epstein-leon-black>.

²² Sanctions Opinion at 21.

²³ *Id.* at 36.

²⁴ *Id.* at 55–56.

²⁵ *Id.* Federal Rule of Civil Procedure 11 requires a reasonable inquiry to ensure that pleadings filed with the court are, among other things, not being presented for an improper purpose and that factual contentions have or are likely to have evidentiary support. Sanctions are available to judges upon finding that an attorney violated this rule.

²⁶ Ex. B, Order, *Doe v. Black*, No. 1:23-cv-06418 (JGLC) (S.D.N.Y. June 2, 2026), ECF No. 439.

²⁷ *Id.* at 1–2.

²⁸ *Id.* at 3.

²⁹ *Id.* at 3–4.

and costs on the motion.³⁰ A federal judge, in other words, concluded that other courts must be warned about Wigdor’s ethical violations in advance.

Ultimately, after Mr. Black’s experts determined that Ms. Doe had tampered with and falsified critical evidence central to the case, Wigdor was forced to withdraw from the case. And after the Sanctions Opinion was entered against Wigdor and one of its partners individually, that partner resigned from the firm within weeks.

As an aside, Mr. Black is not the only victim of Wigdor’s unethical, extortionate tactics. On August 14, 2026, Judge Richard J. Sullivan of the Southern District of New York dismissed Wigdor’s nine-year-old case on behalf of Charles Oakley against Madison Square Garden for the third time,³¹ and MSG publicly announced that it is pursuing legal action against Douglas Wigdor and his firm, accusing them of years of frivolous litigation and abuse of the judicial system.³²

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Federal judges impose Rule 11 sanctions rarely. Yet that is what happened here. Many of us learned the maxim in law school: *falsus in uno, falsus in omnibus*—false in one thing, false in everything. Two federal judges have now had occasion to assess Wigdor’s candor and its former client’s credibility, and both found them wanting.

Mr. Black appeared before this Committee voluntarily and told the truth: he “never abused a woman, never was with an underage woman, never engaged in sex trafficking, never paid Epstein for access to women, never was blackmailed by Epstein, and had no knowledge of Epstein’s heinous conduct.”³³ He commissioned the only independent investigation any person in Epstein’s orbit has ever undertaken and he made those findings public. He answered the Committee’s questions until it served him with subpoenas that were prepared in advance.

Mr. Black supports this Committee’s effort to establish the facts about Jeffrey Epstein and to prevent human trafficking. That work is important, but it most assuredly is not served on the basis of any representations or allegations generated by a law firm whose representations a federal court has found to be false and whose evidence a federal court has found to be fabricated and fraudulent.

We are available at your convenience to discuss any of the foregoing, and to answer any questions the Minority staff may have.

³⁰ Sanctions Opinion at 63.

³¹ *Oakley v. MSG Networks, Inc.*, 2026 WL 2364632 (S.D.N.Y. Aug. 14, 2026).

³² See Andrew Crane, *Charles Oakley’s Case Against MSG Gets Dismissed for Third Time in Latest Twist To Years-Long Legal Drama*, N.Y. POST (Aug. 14, 2026), available at <https://nypost.com/2026/08/14/sports/charles-oakleys-case-against-msg-gets-dismissed-for-third-time/>.

³³ *Official Transcript of Transcribed Interview of Leon Black* at 12 (lines 15–18).

Sincerely,



Aaron Cutler
Peter Spivack
David Sharfstein
Adam J. Fridman

Counsel for Mr. Black
Hogan Lovells Cadwalader US LLP



Susan Estrich
Any Goldin

Counsel for Mr. Black
Estrich Goldin LLP

cc: The Honorable James Comer, Chairman
Committee on Oversight and Government Reform