

March 13, 2026

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Via E-Mail

Honorable Robert Garcia
Ranking Member
United States Congress
House of Representatives
Committee on Oversight & Government Reform
2157 Rayburn House Office Building
Washington, DC 20515-6143

Honorable Ro Khanna
Member of Congress
United States Congress
House of Representatives
Committee on Oversight & Government Reform
2157 Rayburn House Office Building
Washington, DC 20515-6143

Re: Testimony of Richard D. Kahn

Dear Ranking Member Garcia and Representative Khanna:

I write in response to your letter from earlier this afternoon, seeking clarification of what you inaccurately reference as “multiple contradictory and concerning statements offered by [me] and [my] client, Mr. Richard Kahn, regarding a woman identified as ‘Jane Doe 4,’ who previously made allegations against both Donald Trump and Jeffrey Epstein.”

To the extent there is any confusion or apparent contradiction in the record, it is the direct result of deposition questioning using pseudonyms that have been employed and re-employed in multiple federal litigations, and the limitations that Mr. Kahn and I are under due to Court orders intended to protect the identities of victims of sexual abuse. Specifically, during Mr. Kahn’s March 11, 2026 testimony, Representative Khanna inquired whether a woman whom he identified by the pseudonym “Jane Doe 4” had reached a settlement with the Estate and suggested that this “Jane Doe 4” had raised allegations against President Trump. Representative Khanna did not identify the woman with her actual name, leaving Mr. Kahn and me to speculate as to the woman’s true identity. The reality is that more than one woman has brought claims against the Estate of Jeffrey Epstein using the pseudonym “Jane Doe 4.” *See, e.g., Jane Doe 4 v. Indyke, et al.*, No. 25 Civ. 07570 (JGK) (S.D.N.Y. 2025) (the “2025 Action”); *Jane Doe 1-8 v. Indyke, et al.*,

19 Civ. 7673 (GBD) (S.D.N.Y. 2019) (the “2019 Action”). And the Courts in both actions have entered orders requiring the parties to adhere to strict confidentiality as to the plaintiffs’ identities. *See* Nov. 12, 2025 Protective Order, 25 Civ. 7570 (S.D.N.Y.), Dkt. No. 36; Dec. 18, 2019 Order on Plaintiffs’ Anonymity, 19 Civ. 7675 (S.D.N.Y.), Dkt. No. 31 (the “2019 Anonymity Order”). After a brief conversation with me, Mr. Kahn answered Representative Khanna’s question to the best of his recollection.

Later in the deposition, an Oversight Democratic staff attorney asked Mr. Kahn a follow-up question about the woman identified earlier in the deposition as “Jane Doe 4.” When we inquired as to woman’s actual identity, in an off-the-record exchange, Mr. Kahn was told a name that did not match the identity of the woman whom we associate with the pseudonym “Jane Doe 4”—specifically, the plaintiff in the 2025 Action. With over more than sixty woman who have claims against the Epstein Estate outside of the Epstein Victims’ Compensation Program (“EVCP”) and more than 130 women who resolved claims through the EVCP, neither Mr. Kahn nor I have a perfect recollection of every woman who has asserted a claim against the Estate or resolved claims with the Estate. I informed the Democratic staff attorneys on the record that we did not recognize the name because the name mentioned did not match the woman we associate with “Jane Doe 4.” Again, the information provided was completely truthful.

Yesterday, Oversight Democratic staff attorneys Giancarlo Pellegrini and Daniel Yim reached out and asked for a conversation to clear up a few questions about the woman referred to in Mr. Kahn’s deposition as “Jane Doe 4.” In a Teams call yesterday afternoon, Mr. Pellegrini and Mr. Yim explained that they had reviewed the complaint in the 2019 Action and believed that the allegations of one of eight plaintiffs—the plaintiff identified using the pseudonym “Jane Doe 4”—align closely with allegations documented in an FBI FD-302 report referencing President Trump. I informed the Oversight Democratic staff attorneys that we do not have access to unredacted copies of the FBI reports and therefore cannot comment as to whether the “Jane Doe 4” in the 2019 Action is the same individual referenced in the FBI report. The Oversight Democratic staff attorneys revealed the name of the woman whom they believe to be the “Jane Doe 4” in the 2019 Action, but I reminded them that I could not confirm or deny that identification in light of the 2019 Anonymity Order. Finally, Mr. Pellegrini and Mr. Yim asked if the Epstein Estate had reached a settlement with the woman they identified, and I mentioned that I did not believe there was a settlement with that individual. Later in the afternoon, however, in a subsequent call, I retracted that statement and informed Mr. Pellegrini and Mr. Yim that I could not confirm whether or not the Estate settled with the woman they identified in light of confidentiality obligations. Contrary to expressing “concern[.]” about my statements and without any suggestion they were “contradictory,” Mr. Pellegrini and Mr. Yim expressed gratitude for our cooperation and efforts to provide information while still adhering to our Court-ordered obligations.

Both Mr. Kahn and the Epstein Estate consider the Committee’s work on the Epstein matter to be very important. Through the Estate’s massive document productions and the

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dozens of informal conversations that we have had with the Oversight staff attorneys of both parties, the Epstein Estate has fully cooperated with the Committee's investigation. We were pleased that Mr. Kahn had the opportunity this week to testify before the Committee and to answer questions from Members and staff. Mr. Kahn truthfully and completely answered all questions posed to him at his deposition to the best of his recollection. We look forward to continuing to cooperate with the Committee's investigation in a complete and transparent manner, and doing so in a manner that is consistent with all Court-imposed obligations.

Respectfully submitted,



Daniel S. Ruzumna

Cc. Hon. James Comer
Chairman, Committee on Oversight & Government Reform