

Congress of the United States

House of Representatives

COMMITTEE ON OVERSIGHT AND GOVERNMENT REFORM

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March 13, 2026

Mr. Daniel S. Ruzumna
Patterson Belknap Webb & Tyler LLP
1133 Avenue of the Americas
New York, NY 10036

Mr. Ruzumna:

We write to clarify multiple contradictory and concerning statements offered by you and your client, Mr. Richard Kahn, regarding a woman identified as “Jane Doe 4,” who previously made allegations against both Donald Trump and Jeffrey Epstein.¹

On March 11, 2026, your client Mr. Kahn testified in response to a question by Representative Ro Khanna that “Jane Doe 4”—whom Rep. Khanna represented as a woman who made allegations against President Trump—had received a settlement from the Epstein estate.

Later in the deposition, when Oversight Democratic staff attorneys again asked about settlements with “Jane Doe 4,” you sought clarification to confirm the identity of the individual. After consultation with your client, you said on the record that Mr. Kahn’s prior statement regarding “Jane Doe 4” was mistaken and that neither you nor Mr. Kahn recognized the name as someone who had brought a claim against Epstein’s estate.

On March 12, 2026, you represented to Oversight Democratic staff attorneys that, contrary to your prior statement during the deposition, the individual identified as “Jane Doe 4” *did in fact* file a claim against the estate, but the claim was denied and no settlement was reached.

In a second call on March 12, 2026, you represented to Oversight Democratic staff attorneys that you could *no longer stand by your assertion* that no settlement was reached with “Jane Doe 4.” Instead, you stated on this second call that you could neither confirm nor deny whether a settlement was reached with “Jane Doe 4.”

¹ *Jane Doe 1 v. Indyke*, No. 1:19-cv-07675 GBD (S.D. NY. Dec. 20, 2019); *Justice Department Posts FBI Interview Memos Related to Trump Sex Abuse Allegation*, CNN (Mar. 5, 2026) (online at www.cnn.com/2026/03/05/politics/justice-department-fbi-interview-related-trump-abuse-allegation-and-other-missing-epstein-files).

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Your inconsistent and shifting statements are extremely concerning. Mr. Kahn has both served in Mr. Epstein's inner circle or as a co-executor of Epstein's estate for more than 20 years. Any confusion regarding the deposition testimony is profoundly troubling to our Committee and demands immediate clarification.

We therefore demand you confirm, in writing, whether "Jane Doe 4" filed a claim against the Epstein estate, and whether she received any settlement from the estate.

The Committee on Oversight and Government Reform is the principal oversight committee of the House of Representatives and has broad authority to investigate "any matter" at "any time" under House Rule X. If you have any questions about this request, please contact Committee Democratic staff at (202) 225-5051. Thank you for your prompt attention to this request.

Sincerely,



Robert Garcia
Ranking Member



Ro Khanna
Member of Congress

cc: The Honorable James Comer, Chairman