

RESOLUTION RECOMMENDING THAT THE HOUSE OF REPRESENTATIVES FIND
LEON D. BLACK IN CONTEMPT OF CONGRESS FOR REFUSAL TO COMPLY WITH
SUBPOENAS DULY ISSUED BY THE COMMITTEE ON OVERSIGHT AND
GOVERNMENT REFORM

September __, 2026. Referred to the House Calendar and ordered to be printed

MR. COMER, from the Committee on Oversight and Government Reform, submitted the
following

R E P O R T

together with

VIEWS

The Committee on Oversight and Government Reform, having considered this Report, reports favorably thereon and recommends that the Report be approved.

The form of the Resolution that the Committee on Oversight and Government Reform would recommend to the House of Representatives citing Leon David Black for contempt of Congress pursuant to this Report is as follows:

Resolved, That Leon D. Black shall be found to be in contempt of Congress for failure to comply with a congressional deposition subpoena issued to him on June 26, 2026.

Resolved, That Leon D. Black shall be found in contempt of Congress for failure to comply with a congressional subpoena for production of documents issued to him on June 26, 2026.

Resolved, That pursuant to 2 U.S.C. §§ 192 and 194, the Speaker of the House of Representatives shall certify the report of the Committee on Oversight and Government Reform, detailing the refusal of Leon D. Black to appear for a deposition before the Committee on Oversight and Government Reform and produce documents to the Committee on Oversight and Government Reform as directed by these subpoenas, to the United States Attorney for the District of Columbia, to the end that Leon D. Black be proceeded against in the manner and form provided by law.

Resolved, That the Speaker of the House shall otherwise take all appropriate action to enforce these subpoenas.

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EXECUTIVE SUMMARY

Leon D. Black willfully failed to comply with a deposition subpoena and a document production subpoena issued by the Committee on Oversight and Government Reform (Oversight Committee) relating to its investigation of (i) the alleged mismanagement of the federal government's investigation into Jeffrey Epstein and Ghislaine Maxwell, (ii) the circumstances and subsequent investigations of Epstein's death, (iii) the operation of sex-trafficking rings and ways for the federal government to effectively combat them, (iv) ways in which Epstein and Maxwell sought to curry favor and exercise influence to protect their illegal activities, and (v) potential violations of ethics rules related to elected officials.

After more than two months of negotiations, Mr. Black refused to appear for his scheduled deposition on September 3, 2026 and failed to turn over all responsive documents pursuant to the subpoenas issued by the Oversight Committee. On June 26, 2026, Mr. Black was issued two subpoenas by Chairman James Comer: one compelling Mr. Black to appear for a deposition (hereinafter "deposition subpoena"); and another requiring the production of (1) all non-disclosure agreements to which Leon David Black is a party, (2) all non-disclosure agreements to which Jeffrey Epstein or Ghislaine Maxwell is or was a party, and (3) all non-disclosure agreements to which Jeffrey Epstein or Ghislaine Maxwell are referenced or were involved in the preparation, execution, or enforcement thereof (hereinafter "subpoena for production of documents or document subpoena").¹ Mr. Black's unwillingness to comply with the subpoenas, even after the Oversight Committee agreed to his request to postpone both his deposition date for nearly two months, and his document production date by two additional weeks, is unacceptable. Indeed, notwithstanding the Oversight Committee's efforts to engage in good faith accommodations, Mr. Black chose to provide just one document responsive to the Oversight Committee's documents subpoena.

The testimony and documents sought by the subpoenas are relevant to the Oversight Committee's investigation. Mr. Black maintained a close personal relationship with Epstein for years during the time when Epstein was engaged in sex trafficking. Further, Black and Epstein had a significant financial relationship, with Black making payments to Epstein totaling over \$158 million dollars, and potentially exceeding \$170 million dollars.² As a result of his extensive dealings with Epstein, Mr. Black possesses firsthand information regarding the activities of Epstein and Maxwell and their efforts to establish relationships and curry favor with influential individuals while engaged in sex trafficking. His testimony may inform the Oversight Committee's consideration of legislative reforms designed to combat the operation of sex-trafficking rings and efforts to shield such activities from scrutiny.

Mr. Black invoked no valid reason for refusing to appear for a deposition and refusing to produce all non-disclosure agreements (NDAs) referencing Epstein or Maxwell as well as all NDAs to which he is a party, and the Oversight Committee's efforts to persuade him to testify

¹ Deposition Subpoena to Leon D. Black (June 26, 2026); Subpoena for Production of Documents to Leon D. Black (June 26, 2026).

² Dechert LLP, *Investigation of Epstein/Black Relationship and Any Relationship Between Epstein and Apollo Global Management, Inc.* (Jan. 22, 2021), filed as Exhibit 99.1 to Apollo Global Management, Inc., Current Report (Form 8-K) (Jan. 25, 2021).

and produce documents have reached an impasse. Moreover, Mr. Black’s failure to fully comply with the Oversight Committee’s subpoenas has hindered its investigation. Accordingly, the Oversight Committee recommends that the House of Representatives find Leon D. Black in contempt for his failure to comply with the subpoenas duly issued to him to provide testimony at a deposition and produce documents to the Oversight Committee.

AUTHORITY AND PURPOSE

Congress holds an essential responsibility, through powers granted by the Constitution, to conduct legislative oversight. That authority, affirmed by the Supreme Court of the United States, has been recognized on numerous occasions. The Supreme Court held in *McGrain v. Daugherty* that “the power of inquiry—with process to enforce it—is an essential and appropriate auxiliary to the legislative function.”³ The Supreme Court explained that “[a] legislative body cannot legislate wisely or effectively in the absence of information respecting the conditions which the legislation is intended to affect or change.”⁴ “The power of the Congress to conduct investigations is inherent in the legislative process. That power is broad.”⁵ If a witness refuses to comply with a duly issued congressional subpoena, Congress is entitled to combat such refusal with a certified contempt citation, to be referred to the Executive Branch for the criminal prosecution of the contempt.⁶

The Oversight Committee is a standing committee of the House of Representatives, duly established pursuant to the Rules of the House of Representatives, which are adopted pursuant to the Rulemaking Clause of the U.S. Constitution.⁷ House Rule X grants to the Oversight Committee broad jurisdiction over federal “[g]overnment management” and reform, including the “[o]verall economy, efficiency, and management of government operations and activities.”⁸ House Rule X further grants the Oversight Committee broad oversight jurisdiction, including authority to “conduct investigations *of any matter*” notwithstanding any rule provisions “conferring jurisdiction over the matter to another standing committee.”⁹

House Rule XI authorizes the Oversight Committee “to require, by subpoena or otherwise, the attendance and testimony of such witnesses and the production of such books, records, correspondence, memoranda, papers, and documents as it considers necessary.”¹⁰ House Rule X provides the authority for the Oversight Committee to create its own “rule[s] authorizing and regulating the taking of deposition by a member or counsel of the committee, including pursuant to subpoena under clause 2(m) of rule XI.”¹¹ House Rules further provide that the “power to authorize and issue subpoenas” may be delegated to the Committee chairman.¹² The

³ *McGrain v. Daugherty*, 273 U.S. 135, 174 (1927).

⁴ *Id.* at 175.

⁵ *Watkins v. United States*, 354 U.S. 178, 1887 (1957).

⁶ 2 U.S.C. §§ 192, 194.

⁷ U.S. CONST. art. I, § 2, cl. 5.

⁸ Rule X, cl. 1(n), Rules of the U.S. House of Representatives, 119th Cong. (Jan. 16, 2025).

⁹ Rule X, cl. 4(c)(2), Rules of the U.S. House of Representatives, 119th Cong. (Jan. 16, 2025) (emphasis added).

¹⁰ Rule XI, cl. 2(m)(1)(B), Rules of the U.S. Representatives, 119th Cong. (Jan. 16, 2025).

¹¹ *Id.*; Rule X, cl. 4(c)(3), Rules of the U.S. House of Representatives, 119th Cong. (Jan. 16, 2025).

¹² Rule XI, cl. 2(m)(3)(A)(1), Rules of the U.S. House of Representatives, 119th Cong. (Jan. 16, 2025).

subpoenas discussed in this report were issued pursuant to this authority by Chairman James Comer.

The deposition subpoena and document subpoena issued to Mr. Black are part of the Oversight Committee's review into the possible mismanagement of the federal government's investigation of Epstein and Maxwell, the circumstances and subsequent investigations of Epstein's death, the operation of sex-trafficking rings and ways for the federal government to effectively combat them, ways in which Epstein and Maxwell sought to curry favor and exercise influence to protect their activities, and potential violations of ethics rules related to elected officials. As explained in detail below, the requested testimony and subpoenaed documents would further the Oversight Committee's investigation into these issues and the consideration of possible legislative reforms. Mr. Black's refusal to comply with the Oversight Committee's deposition subpoena and document subpoena is therefore hindering the Oversight Committee's investigation.

BACKGROUND ON THE INVESTIGATION

On July 6, 2019, federal authorities arrested Jeffrey Epstein and, two days later, an indictment was unsealed in the U.S. District Court for the Southern District for New York charging him with sex trafficking of minors and conspiracy to engage in sex trafficking of minors.¹³ According to the indictment, Epstein sexually exploited and abused dozens of minor girls at his homes in Manhattan, Palm Beach, and other locations.¹⁴ Among other things, the indictment alleged that Epstein solicited girls as young as fourteen years old to engage in sex acts with him in exchange for money.¹⁵ This was not the first time that Epstein had been investigated for committing sex crimes. In 2008, he pleaded guilty in Florida state court to two prostitution offenses and entered into a non-prosecution agreement providing that he and his co-conspirators were immune from federal prosecution in the Southern District of Florida.¹⁶

On August 10, 2019, while in federal custody at the Metropolitan Correctional Center in New York, New York, Epstein died.¹⁷ The Chief Medical Examiner of New York City ruled his death a suicide.¹⁸ Subsequently, on June 28, 2022, Maxwell was sentenced to 20 years in prison for conspiring with Epstein to sexually abuse minors.¹⁹

The facts and circumstances surrounding both Epstein's and Maxwell's cases have received immense public interest and scrutiny. On February 11, 2025, the Oversight Committee

¹³ Press Release, U.S. Dep't of Just., Jeffrey Epstein Charged In Manhattan Federal Court With Sex Trafficking Of Minors (July 8, 2019).

¹⁴ See Indictment, *United States v. Epstein*, 19 Crim. 490 (S.D.N.Y. 2019), at ¶ 1.

¹⁵ *Id.* at ¶¶ 2-3.

¹⁶ See *In re Wild*, 994 F.3d 1244 (11th Cir. 2021) (en banc).

¹⁷ William K. Rashbaum, *et al.*, *Jeffrey Epstein Dead in Suicide at Jail, Spurring Inquiries*, THE N.Y. TIMES (Aug. 10, 2019); see also Press Release, U.S. Dep't of Just., Statement from Attorney General William P. Barr on the Death of Jeffrey Epstein (Aug. 10, 2019).

¹⁸ Memorandum from U.S. Dep't of Just. and Fed. Bureau of Investigation on Review of Investigative Holdings Relating to Jeffrey Epstein (July 7, 2025), available at <https://www.justice.gov/opa/media/1407001/dl?inline>.

¹⁹ Press Release, U.S. Dep't of Just., Ghislaine Maxwell Sentenced To 20 Years In Prison For Conspiring With Jeffrey Epstein To Sexually Abuse Minors (June 28, 2022).

and its Task Force on the Declassification of Federal Secrets (Task Force) sent a letter to the Department of Justice (DOJ) requesting a briefing regarding documents in the Department's possession concerning "the investigation into and prosecution of Jeffrey Epstein."²⁰ On May 8, 2025, the Task Force sent another letter to the Department requesting the public release of "the entirety of the Epstein files" and a briefing regarding the release of these files.²¹

A. The Oversight Committee Seeks Information from Witnesses and Entities as Part of Its Investigation.

The Oversight Committee is using its congressional oversight authority to investigate matters associated with Epstein and Maxwell, and since August 2025, the Oversight Committee has interviewed or deposed 18 witnesses, who possessed information relevant to the activities of, or investigations into, Epstein and Maxwell.

On August 18, 2025, the Oversight Committee conducted a deposition with former Attorney General William P. Barr in accordance with the subpoena transmitted to him on August 5, 2025.²² Barr testified regarding the information he possessed related to the crimes perpetrated by Epstein and the federal government's investigation into Epstein and Maxwell.²³

On August 25, 2025, the Oversight Committee issued a subpoena to the Estate of Jeffrey Epstein (Estate) requesting unredacted versions of cash ledgers, message logs, calendars, and flight logs.²⁴ In response, the Estate has, to date, produced thousands of documents pertaining to the investigation.²⁵ The documents included flight logs from Epstein's private plane, a birthday book gifted to Epstein by Maxwell, and photographs of many individuals with Epstein and Maxwell.²⁶

Then, on September 19, 2025, R. Alexander Acosta, former U.S. Attorney for the Southern District of Florida and former Secretary of the U.S. Department of Labor, appeared voluntarily for a transcribed interview before the Oversight Committee.²⁷ He testified about his

²⁰ Letter from James Comer, Chairman, H. Comm. on Oversight and Gov't Reform, Anna Paulina Luna, Chairwoman, H. Comm. on Oversight and Gov't Reform, Task Force on the Declassification of Fed. Secrets, to Pamela Bondi, U.S. Att'y Gen., Dep't of Just. (Feb. 11, 2025).

²¹ Letter from James Comer, Chairman, H. Comm. on Oversight and Gov't Reform, Anna Paulina Luna, Chairwoman, H. Comm. on Oversight and Gov't Reform, Task Force on the Declassification of Fed. Secrets, to Pamela Bondi, U.S. Att'y Gen., Dep't of Just. (May 8, 2025).

²² Press Release, H. Comm. on Oversight and Gov't Reform, Chairman Comer Announces New Actions in Oversight Committee's Investigation of Federal Government's Handling of Epstein and Maxwell (Sept. 16, 2025).

²³ Deposition of William P. Barr, Former U.S. Att'y Gen. (Aug. 18, 2025).

²⁴ Subpoena to the Estate of Jeffrey Epstein (Aug. 25, 2025).

²⁵ Press Release, H. Comm. on Oversight and Gov't Reform, Oversight Committee Releases Records Provided by the Epstein Estate, Chairman Comer Provides Statement (Sept. 8, 2025); Press Release, H. Comm. on Oversight and Gov't Reform, Oversight Committee Releases Additional Epstein Estate Documents (Nov. 12, 2025).

²⁶ Press Release, H. Comm. on Oversight and Gov't Reform, Oversight Committee Releases Additional Epstein Estate Documents (Nov. 12, 2025).

²⁷ Press Release, H. Comm. on Oversight and Gov't Reform, Chairman Comer Statement on Transcribed Interview with R. Alexander Acosta (Sept. 19, 2025).

involvement in the Department's investigation of and non-prosecution agreement with Epstein when he was U.S. Attorney.²⁸

On January 7, 2026, the Oversight Committee moved, by voice vote, to subpoena Leslie Wexner, Darren Indyke, and Richard Kahn,²⁹ all of whom had personal or business relationships with Epstein. Each of these individuals testified before the Oversight Committee about their knowledge of and involvement with Epstein, his network, and financial and business dealings.

On February 9, 2026, the Oversight Committee conducted a virtual deposition with Ghislaine Maxwell, in which she and her counsel called in from Federal Prison Camp Bryan in Bryan, Texas, where Maxwell is incarcerated.³⁰ Maxwell pleaded the Fifth Amendment right against self-incrimination in each of her responses and provided no substantive testimony.³¹

On February 19, 2026, the Oversight Committee conducted the deposition of Leslie Wexner.³² Wexner testified about his long-time professional relationship with Epstein and his knowledge about Epstein's connections with prominent individuals.³³

On February 26 and 27, 2026, the Oversight Committee conducted depositions with former Secretary of State Hillary R. Clinton and former President William J. Clinton, respectively.³⁴ They testified to their relationship and travel with Epstein and Maxwell, as well as their knowledge of Epstein's attempts to curry favor with prominent individuals.³⁵

On March 11, 2026, the Oversight Committee conducted the deposition of Richard Kahn.³⁶ Kahn, Epstein's long-time personal accountant, testified to his knowledge of Epstein's financial matters and connections with wealthy and prominent individuals.³⁷

On March 19, 2026, the Oversight Committee conducted the deposition of Darren Indyke.³⁸ Indyke, one of Epstein's long-time personal attorneys, testified to his knowledge of Epstein's personal entanglements, legal and financial affairs, and connections with prominent individuals.³⁹

²⁸ Transcribed Interview of R. Alexander Acosta, former U.S. Att'y for the S. Dist. of Fla. (Sept. 19, 2025).

²⁹ *Oversight of Fraud and Misuse of Federal Funds in Minnesota: Part I*, 119th Cong. 2. (Jan. 7, 2026) (Voice Vote on Motion to Direct the Committee to Authorize and Issue Subpoenas for Leslie H. Wexner, Darren K. Indyke, and Richard D. Kahn to Appear for a Deposition).

³⁰ See generally Deposition of Ghislaine Maxwell (Feb. 9, 2026); see also Patrick Davis, *Ghislaine Maxwell was transferred to a Texas prison. Here's what life is like there*, NPR (Sept. 3, 2025).

³¹ See generally Deposition of Ghislaine Maxwell (Feb. 9, 2026).

³² See generally Deposition of Leslie H. Wexner (Feb. 19, 2026).

³³ See generally Deposition of Leslie H. Wexner (Feb. 19, 2026).

³⁴ See generally Deposition of Hillary Clinton, Former Sec'y, U.S. Dep't of State (Feb. 26, 2026); and Deposition of William Clinton, President of U.S. (Feb. 27, 2026).

³⁵ See generally Deposition of Hillary Clinton, Former Sec'y, U.S. Dep't of State (Feb. 26, 2026); and Deposition of William Clinton, President of U.S. (Feb. 27, 2026).

³⁶ See generally Deposition of Richard D. Kahn (Mar. 11, 2026).

³⁷ See generally Deposition of Richard D. Kahn (Mar. 11, 2026).

³⁸ See generally Deposition of Darren K. Indyke (Mar. 19, 2026).

³⁹ See generally Deposition of Darren K. Indyke (Mar. 19, 2026).

Between March 2026 and July 2026, the Oversight Committee requested and conducted voluntary transcribed interviews with ten more individuals: Ted Waitt, U.S. Department of Commerce Secretary Howard Lutnick, Tova Noel, Sarah Kellen, former Attorney General Pam Bondi, Lesley Groff, Bill Gates, Doug Band, Kathryn Ruemmler, and James “Jes” Staley.⁴⁰ Each of these individuals testified before the Oversight Committee regarding their involvement in or knowledge of the actions, crimes, and efforts to curry favor of Epstein and Maxwell.⁴¹

On June 12, 2026, the Oversight Committee sent a letter to Alan Dershowitz requesting his presence for a transcribed interview following his public statements expressing his desire to testify before the Oversight Committee.⁴² Only five days before he was scheduled to appear for his interview, Dershowitz informed the Oversight Committee that he would no longer be able to provide testimony. The Oversight Committee remains in correspondence with Dershowitz and counsel to reschedule his transcribed interview.

On March 3, 2026, Chairman James Comer of the Oversight Committee requested that Mr. Black appear voluntarily for an in-person transcribed interview on May 13, 2026, as part of the Oversight Committee’s investigation into matters associated with Epstein and Maxwell.⁴³ Chairman Comer made this request due to the longstanding personal and business relationship between Mr. Black and Epstein, which spanned over two decades. As a result of this relationship, Mr. Black could give testimony about any knowledge he had of the activities of Epstein and Maxwell, specifically the massages Epstein received, including whether Mr. Black himself received any, given that Epstein was known to arrange massages for his guests. Mr. Black could also potentially testify about the ways in which Mr. Black and Epstein may have sought to shield themselves from scrutiny through the use of NDAs, as well as the extent to which Mr. Black financially supported or otherwise funded Epstein’s activities. On March 12, 2026, counsel for Mr. Black confirmed receipt of the Oversight Committee’s March 3, 2026, letter and subsequently, on March 24, the Oversight Committee learned that Mr. Black retained different counsel and agreed “in principle” to sit for a transcribed interview.⁴⁴

⁴⁰ See generally Transcribed Interview of Theodore Waitt (Apr. 30, 2026); Transcribed Interview of Howard Lutnick, Sec’y, U.S. Dep’t of Commerce (May 6, 2026); Transcribed Interview of Tova Noel (May 18, 2026); Transcribed Interview of Sarah Kellen (May 21, 2026); Transcribed Interview of Pam Bondi, Former Att’y Gen., U.S. Dep’t of Justice (May 29, 2026); Transcribed Interview of Lesley Groff (June 9, 2026); Transcribed Interview of Bill Gates (June 10, 2026); Transcribed Interview of Doug Band (June 30, 2026); Transcribed Interview of Kathryn Ruemmler (July 15, 2026); and Transcribed Interview of James Edward “Jes” Staley (July 23, 2026).

⁴¹ See generally Transcribed Interview of Theodore Waitt (Apr. 30, 2026); Transcribed Interview of Howard Lutnick, Sec’y, U.S. Dep’t of Commerce (May 6, 2026); Transcribed Interview of Tova Noel (May 18, 2026); Transcribed Interview of Sarah Kellen (May 21, 2026); Transcribed Interview of Pamela J. Bondi, Former Att’y Gen., U.S. Dep’t of Justice (May 29, 2026); Transcribed Interview of Lesley Groff (June 9, 2026); Transcribed Interview of Bill Gates (June 10, 2026); Transcribed Interview of Doug Band (June 30, 2026); Transcribed Interview of Kathryn Ruemmler (July 15, 2026); and Transcribed Interview of James Edward “Jes” Staley (July 23, 2026).

⁴² Letter from James Comer, Chairman, H. Comm. on Oversight and Gov’t Reform, to Alan Dershowitz (July 21, 2026).

⁴³ Letter from James Comer, Chairman, H. Comm. on Oversight and Gov’t Reform, to Leon Black (Mar. 3, 2026).

⁴⁴ Email from Jennifer J. Barrett to Committee Counsel (Mar. 12, 2026, at 1:12PM); Email from Aaron Cutler & Ari Fridman to Committee Counsel (Mar. 17, 2026, at 9:34PM).

Mr. Black is one of the individuals most closely connected to Epstein that the Oversight Committee has sought to interview to date. Mr. Black first met Epstein in the mid-1990s, and their relationship continued for over two decades.⁴⁵ Starting in 2013—years after Epstein served jail time for solicitation of prostitution of a minor—Mr. Black began to pay Epstein vast sums of money, purportedly for various financial services.⁴⁶ In total, Mr. Black paid Epstein no less than \$158 million over a five-year period.⁴⁷ Mr. Black’s various foundations and entities, including his Leon Black Family Foundation, donated, loaned, or sent money to numerous entities owned by Epstein or those associated with him.⁴⁸ Epstein used the millions he was paid from Black to partially fund his illegal activities.⁴⁹

In addition to monetary connections, Mr. Black regularly met, socialized with, and ran in the same circles as Epstein and Maxwell. Mr. Black even went to Epstein for legal assistance with a foreign mistress.⁵⁰ Indeed, the Oversight Committee’s review of documents released by the Department of Justice revealed evidence suggesting that Mr. Black was involved not only with his foreign mistress, but also other women known to be associated with Epstein.⁵¹ Based on evidence reviewed by the Committee, it appears Mr. Black worked with Epstein and attorneys associated with Epstein to surveil whereabouts to collect evidence to bring a criminal case against a woman who accused him of wrongdoing.⁵² Furthermore, the Committee has evidence alluding to the existence of various NDAs to which Mr. Black was party that involved or were connected to Epstein in some way. As a result, Mr. Black may have relevant insight and information regarding the ways in which Epstein sought to cover up his activities and crimes. Ample evidence exists that justifies the Oversight Committee issuing subpoenas to Mr. Black for his compelled, sworn testimony and the production of documents.

B. By Failing To Appear for His Deposition, Leon Black Defies the Subpoena.

Following Mr. Black’s retention of new counsel, negotiations between the Oversight Committee and his counsel continued, including through meetings held on the following dates: April 8, 2026; April 28, 2026; May 12, 2026; and June 22, 2026. During the April 8 meeting, the Oversight Committee and counsel for Mr. Black mutually agreed to reschedule the date of Mr. Black’s transcribed interview from May 13, 2026, to June 26, 2026.

⁴⁵ Transcribed Interview of Leon D. Black, at 11:14-16 (June 26, 2026).

⁴⁶ Transcribed Interview of Leon D. Black, at 11:21-12:5 (June 26, 2026).

⁴⁷ Transcribed Interview of Leon D. Black, at 15:3-6 (June 26, 2026).

⁴⁸ Transcribed Interview of Leon D. Black, at 31-33 (June 26, 2026).

⁴⁹ Press Release, U.S. Senate Comm. On Fin., Wyden Releases New Information on Financing of Jeffrey Epstein’s Operations by Billionaire Leon Black... (Mar. 12, 2025)

⁵⁰ Matthew Goldstein, *et al.*, *How Epstein Helped Solve a Billionaire’s Problems With Women*, N.Y. TIMES (Mar. 23, 2026).

⁵¹ Epstein Files Transparency Act, Pub. L. No. 119-38, 139 Stat. 656 (2025), *available at* <https://www.justice.gov/epstein/files/DataSet%2011/EFTA02357246.pdf> (Jan. 30, 2026).

⁵² Epstein Files Transparency Act, Pub. L. No. 119-38, 139 Stat. 656 (2025), *available at* <https://www.justice.gov/epstein/files/DataSet%2011/EFTA02486513.pdf> (Jan. 30, 2026); Epstein Files Transparency Act, Pub. L. No. 119-38, 139 Stat. 656 (2025), *available at* <https://www.justice.gov/epstein/files/DataSet%209/EFTA01128746.pdf> (Jan. 30, 2026); and Epstein Files Transparency Act, Pub. L. No. 119-38, 139 Stat. 656 (2025), *available at* <https://www.justice.gov/epstein/files/DataSet%2011/EFTA02493136.pdf> (Jan. 30, 2026).

On June 26, 2026, Mr. Black appeared voluntarily for his in-person transcribed interview before the Oversight Committee.⁵³ Over the course of the interview, Mr. Black declined to answer certain questions concerning NDAs.⁵⁴ Chairman Comer therefore issued two subpoenas to Mr. Black: one compelling Mr. Black to appear for a deposition and another requiring the production of documents that will be discussed in more detail in the next subsection of this report.⁵⁵ Upon accepting service of the subpoenas, Mr. Black and his counsel terminated the transcribed interview and proceeded to leave.⁵⁶ In short, Mr. Black would not answer any additional questions from the Oversight Committee on any topic. The deposition subpoena initially required Mr. Black to appear on July 16, 2026. That deposition was subsequently rescheduled, at Mr. Black's request, and Mr. Black was required to appear before the Oversight Committee for a deposition on September 3, 2026, at 10:00 a.m.

On July 24, 2026, counsel for Mr. Black transmitted a letter to the Oversight Committee.⁵⁷ In the letter, counsel for Mr. Black conveyed that they did not anticipate the line of questioning by the Majority staff on NDAs.⁵⁸ Counsel for Mr. Black also claimed that “[d]uring discussions that occurred over the span of several months preceding the June 26th TI, the issue of confidentiality agreements or NDAs had never been discussed between the parties as an area of focus for the Oversight Committee.”⁵⁹ Counsel went even so far as to say that they were “assured that the Majority’s questioning of Mr. Black would focus on publicly available documents;”⁶⁰ however, these arguments lacked context and entirely misrepresented statements made by Majority staff.

As stated in its August 18, 2026 response to Mr. Black and his counsel, the Oversight Committee was not required to articulate, in advance of the transcribed interview, every item that is potentially pertinent to or within the scope of its investigation.⁶¹ In fact, the Oversight Committee informed Mr. Black’s counsel that the Oversight Committee “would cover any topic and use any document relevant to its investigation during the transcribed interview—as has been the practice during the totality of this investigation.”⁶² The mere fact that a topic was not brought up during good-faith discussions among counsel does not mean it falls outside the scope of the interview because such discussions are inherently non-exhaustive, and there was no agreed-upon limitation on scope for Mr. Black’s interview.

Additionally, the Oversight Committee remained well within its rights to question a witness about any document—whether publicly disclosed or not—relevant to its investigation, just as the Oversight Committee has done through investigations not only in the current

⁵³ See generally Transcribed Interview of Leon D. Black (June 26, 2026).

⁵⁴ Transcribed Interview of Leon D. Black, at 43-46 (June 26, 2026).

⁵⁵ Deposition Subpoena to Leon D. Black (June 26, 2026); Subpoena for Production of Documents to Leon D. Black (June 26, 2026).

⁵⁶ Transcribed Interview of Leon D. Black, at 46:10-48:15 (June 26, 2026).

⁵⁷ Letter from Aaron Cutler to James Comer, Chairman, H. Comm. on Oversight and Gov’t Reform (July 24, 2026).

⁵⁸ *Id.*

⁵⁹ *Id.*

⁶⁰ *Id.*

⁶¹ Letter from James Comer, Chairman, H. Comm. on Oversight and Gov’t Reform, to Aaron Cutler (Aug. 18, 2026).

⁶² *Id.*

Congress, but also in past Congresses. Mr. Black and his counsel should have been aware of the likelihood that the Oversight Committee would inquire about NDAs considering that the Oversight Committee also inquired about NDAs related to Epstein, Maxwell, and their associates in the transcribed interview of another witness—the transcript of which was made public—prior to Mr. Black’s transcribed interview.⁶³ Nonetheless, Mr. Black still refused to answer questions relating to the topic of NDAs during the June 26, 2026, transcribed interview. Therefore, Mr. Black was issued a subpoena to appear for a deposition. On August 31, 2026, the Oversight Committee issued a notice for the deposition of Mr. Black to occur on September 3, 2026.

On September 3, 2026, mere hours before the deposition was set to begin, Mr. Black, through his counsel, transmitted a letter to the Oversight Committee stating that “Mr. Black respectfully declines to provide deposition testimony on September 3, 2026.”⁶⁴ The letter from counsel outlining Mr. Black’s failure to appear for the deposition stated they believed that the “questioning and document demands [would be] untethered to Epstein, Maxwell, or any valid legislative purpose,” specifically related to the topic of NDAs.⁶⁵ Counsel for Mr. Black also indicated that Mr. Black had “decided to litigate this matter”⁶⁶ and he filed a lawsuit that day against the Oversight Committee and Chairman Comer in the United States District Court for the District of Columbia.

To reiterate, Mr. Black and his counsel do not have the discretion to determine the connection of his confidentiality agreements to the Oversight Committee’s investigation and legislative purpose. Furthermore, the Oversight Committee never agreed to any limitations on the scope of Mr. Black’s transcribed interview or deposition beyond those articulated in the Oversight Committee’s March 3 letter.⁶⁷ The Oversight Committee has many questions for Mr. Black regarding his relationship with Epstein and knowledge of Epstein’s activities that have nothing to do with confidentiality agreements. Nevertheless, Mr. Black elected to defy his subpoena and failed to appear to testify before the Oversight Committee. To date, neither Mr. Black nor his counsel have provided the Oversight Committee further offers for Mr. Black to testify pursuant to the Oversight Committee’s duly issued subpoena. Instead, Mr. Black’s counsel indicated that he would initiate litigation,⁶⁸ which Mr. Black has done.

C. Mr. Black Defies the Nondisclosure Agreement Subpoena.

On June 26, 2026, after refusing to answer questions posed to him by the Oversight Committee during his transcribed interview, Mr. Black was issued two subpoenas by Chairman Comer, one requiring his appearance at a deposition which is addressed above, and the second requiring the production of documents, specifically NDAs or other confidentiality agreements. The language of the document subpoena required Mr. Black to produce: (1) all non-disclosure agreements to which Leon David Black is a party; (2) all non-disclosure agreements to which Jeffrey Epstein or Ghislaine Maxwell is or was a party; and (3) all non-disclosure agreements to

⁶³ Transcribed Interview of William H. Gates, at 71:21-25, 72:1-3 (June 10, 2026).

⁶⁴ Letter from Aaron Cutler to James Comer, Chairman, H. Comm. on Oversight and Gov’t Reform (Sept. 3, 2026).

⁶⁵ Letter from Aaron Cutler to James Comer, Chairman, H. Comm. on Oversight and Gov’t Reform (Sept. 3, 2026).

⁶⁶ Email from Aaron Cutler to Committee Counsel (Sept. 3, 2026, at 7:44 AM).

⁶⁷ Letter from James Comer, Chairman, H. Comm. on Oversight and Gov’t Reform, to Leon D. Black (Mar. 3, 2026).

which Jeffrey Epstein or Ghislaine Maxwell are referenced or were involved in the preparation, execution, or enforcement thereof.⁶⁹

The cover letter accompanying the subpoena explained that the Oversight Committee believes that Mr. Black was party to NDAs or other confidentiality agreements related to Epstein or Maxwell, their associates, or their potential victims and detailed the Oversight Committee's rationale for issuing the subpoena to him.⁷⁰ The Oversight Committee explained that its "questions regarding the use of non-disclosure or other confidentiality agreements by individuals associated with Epstein and Maxwell are directly relevant to understanding the operation of sex-trafficking rings, potential impediments to the federal government's investigations of sex-trafficking rings, and potential methods for Epstein and Maxwell to exercise influence over associates to protect their illegal activities."⁷¹ Based on public reporting and information obtained by the Oversight Committee, the Oversight Committee explained that it had reason to believe that Mr. Black was a party to NDAs or other confidentiality agreements related to Epstein or Maxwell, their associates, or their potential victims.⁷² The Oversight Committee sought these documents to inform legislative solutions to improve federal efforts to combat sex trafficking and prevent the future use of NDAs or other confidentiality agreements to cover-up potential criminal activities.

Request 2 of the document subpoena sought "[a]ll non-disclosure agreements to which Jeffrey Epstein or Ghislaine Maxwell is or was a party."⁷³ In response, counsel for Mr. Black "submits that [Mr. Black] does not possess or maintain any records responsive to this request."⁷⁴

Request 3 of the document subpoena sought in part "[a]ll non-disclosure agreements to which Jeffrey Epstein or Ghislaine Maxwell ... were involved in the preparation, execution, or enforcement thereof."⁷⁵ In response to this request, Mr. Black submitted to the Oversight Committee "that he does not possess or maintain any records responsive to this request as it pertains to Maxwell" and that "Epstein did not play a role with respect to the *preparation, execution, or enforcement* of any confidentiality agreements to which Mr. Black was a party—except arguably Epstein's consulting role in discussions...as to demands made by Ms. Ganieva."⁷⁶ Accordingly, Mr. Black produced a singular confidentiality agreement that Mr. Black's counsel maintains is "the only confidentiality agreement that remotely meets [the Oversight Committee's] definition of relevance."⁷⁷ This is Mr. Black's NDA with Ms. Ganieva. This assertion is patently false, as this singular confidentiality agreement does not even include the terms outlined by Mr. Black in his transcribed interview on June 26, 2026 to include an NDA

⁶⁹ Subpoena for Production of Documents to Leon D. Black (June 26, 2026).

⁷⁰ Subpoena Cover Letter from James Comer, Chairman, H. Comm. on Oversight and Gov't Reform, to Leon D. Black. (June 26, 2026).

⁷¹ Subpoena Cover Letter from James Comer, Chairman, H. Comm. on Oversight and Gov't Reform, to Leon D. Black. (June 26, 2026).

⁷² *Id.*

⁷³ Document Subpoena to Leon D. Black (June 26, 2026).

⁷⁴ Letter from Aaron Cutler to James Comer, Chairman, H. Comm. on Oversight and Gov't Reform (July 24, 2026).

⁷⁵ Subpoena for Production of Documents to Leon D. Black (June 26, 2026).

⁷⁶ Letter from Aaron Cutler to James Comer, Chairman, H. Comm. on Oversight and Gov't Reform (July 24, 2026) [Emphasis added].

⁷⁷ Letter from Aaron Cutler to James Comer, Chairman, H. Comm. on Oversight and Gov't Reform (July 24, 2026).

that was signed in 2015 for \$100,000 per month for 15 years, \$1 million in loan forgiveness, and \$2 million in British pounds for purposes of obtaining a United Kingdom visa.⁷⁸ Mr. Black failed to furnish an agreement that addresses these terms, even after testifying that Epstein was privy to the NDA.⁷⁹

However, Mr. Black willfully refused to comply with Request 3 as it relates to “[a]ll non-disclosure agreements to which Jeffrey Epstein or Ghislaine Maxwell are *referenced*.”⁸⁰ Moreover, Mr. Black has refused to comply with Request 1 of the document subpoena to produce “[a]ll non-disclosure documents to which Leon David Black is a party.” According to counsel for Mr. Black, in a letter transmitted to the Oversight Committee on July 24, 2026 both of these requests called “for information beyond the scope of this Committee’s investigation.”⁸¹

The Committee has rejected that argument.⁸² To begin with, Chairman Comer issued a document subpoena to Mr. Black that explicitly demands all non-disclosure agreements that reference Epstein or Maxwell under Request 3. Contrary to claims made by Mr. Black’s counsel, any non-disclosure agreement possessed by Mr. Black that relates to or references Epstein or Maxwell would be directly relevant to the Committee’s investigation into Epstein or Maxwell.

As it relates to Request 1, Chairman Comer issued a subpoena for “[a]ll non-disclosure agreements to which Leon D. Black is a party” to assess whether Epstein was involved in the creation or drafting of the NDAs, if he was involved in awarding funds to women who signed NDAs, to what extent NDAs may have been used to cover-up funds provided to Epstein or Maxwell or cover-up sexual abuse facilitated by Epstein or Maxwell, or if the NDAs were created with parties related to Epstein or Maxwell.⁸³ Similarly, the Oversight Committee must assess whether Epstein paid women who signed NDAs, even if the NDAs did not address those payments. The only way to assess Epstein and Maxwell’s involvement in or knowledge of these agreements is for the Oversight Committee to have the opportunity to review the agreements. As discussed in detail below, it is the Oversight Committee—not Mr. Black and his counsel—that maintains the right to determine the value and relevance of information Mr. Black has regarding the Oversight Committee’s investigation. Indeed, in a previous transcribed interview before this Oversight Committee, a witness was hesitant to answer questions about the identity of an individual with whom the witness was associated.⁸⁴ Upon disclosure of this individual’s identity, the Oversight Committee immediately became aware of an existing connection between that individual and Mr. Epstein, of which the witness was not personally aware.⁸⁵ The Oversight Committee must inquire about the details of such agreements to conduct a complete and thorough investigation.

⁷⁸ Transcribed Interview of Leon D. Black at 41:17-24. (June 26, 2026).

⁷⁹ *Id.* at 42:16-17.

⁸⁰ Letter from Aaron Cutler to James Comer, Chairman, H. Comm. on Oversight and Gov’t Reform (July 24, 2026) [emphasis added].

⁸¹ Letter from Aaron Cutler to James Comer, Chairman, H. Comm. on Oversight and Gov’t Reform (July 24, 2026).

⁸² Letter from James Comer, Chairman, H. Comm. on Oversight and Gov’t Reform, to Aaron Cutler (Aug. 18, 2026).

⁸³ Subpoena for Production of Documents to Leon D. Black (June 26, 2026).

⁸⁴ Transcribed Interview of William H. Gates, at 34:22-25, 35:1-11 (June 10, 2026).

⁸⁵ *Id.* At 76:17-24, 77:2-6 (June 10, 2026).

The Oversight Committee issued Mr. Black a duly authorized lawful subpoena requiring him to produce all confidentiality agreements within in his “possession, custody, or control.”⁸⁶ Mr. Black produced only one NDA to the Oversight Committee and indicated there were no additional NDAs relevant to the Committee’s investigation, notwithstanding his refusal to comply with Request 1 and part of Request 3 set forth in the documents subpoena. However, during the August 18, 2026 meeting, counsel stated that Mr. Black would be willing to provide one additional NDA – the existence of which is publicly known due to litigation – in exchange for an agreement that the Committee: (1) agree not to hold Mr. Black in contempt related to either subpoena; (2) change the deposition subpoena to a voluntary transcribed interview; (3) limit the scope of the transcribed interview regarding confidentiality agreements to only the two NDAs Mr. Black was willing to provide; (4) delay the transcribed interview until late September or early October; and (5) not video record the transcribed interview. This offer is unreasonable, and if accepted, would result in responsive documents not being provided to the Committee and limits being placed on the Committee’s ability to ask questions directly relevant to the Committee’s investigation. Counsel for Mr. Black has also repeatedly alluded to the existence of other confidentiality agreements, and stated that hypothetical counterparties are “abundantly clear”⁸⁷ that Mr. Black should not produce those agreements to the Oversight Committee. It is clear there are more documents in Mr. Black’s possession responsive to the Committee’s subpoena and vital to the Committee’s investigation. Therefore, by failing to produce the remaining confidentiality agreements, Mr. Black has intentionally defied another duly issued, lawful congressional subpoena.

D. Mr. Black’s Purported Reasons for Non-Compliance with the Subpoenas Are Without Merit.

Mr. Black, through counsel, offered several reasons for his defiance of the Oversight Committee’s subpoenas.⁸⁸ Mr. Black contends he has already “substantially complied”⁸⁹ with the Oversight Committee’s document subpoena since: (i) he produced the only confidentiality agreement he feels “remotely meets” what he and his attorneys have determined is the Oversight Committee’s “definition of relevance,”⁹⁰ (ii) full compliance with the subpoena would harm the privacy of the other parties involved in his NDAs,⁹¹ (iii) certain requests within the subpoena fall outside the scope of the Oversight Committee’s investigation,⁹² and (iv) the Oversight Committee’s purpose in seeking said NDAs is nothing but a “political stunt and premeditated plan to sabotage the proceedings” to “prevent Mr. Black from providing important context around his dealings with Mr. Epstein.”⁹³

⁸⁶ Subpoena for Production of Documents to Leon D. Black (June 26, 2026).

⁸⁷ Microsoft Teams Call from Aaron Cutler, et al., to Daniel Ashworth, Gen. Counsel, H. Comm. on Oversight and Gov’t Reform (Aug. 8, 2026, at 9:30AM).

⁸⁸ See generally Letter from Aaron Cutler to James Comer, Chairman, H. Comm. on Oversight and Gov’t Reform (July 24, 2026); and Letter from Aaron Cutler to James Comer, Chairman, H. Comm. on Oversight and Gov’t Reform (Sept. 3, 2026).

⁸⁹ Letter from Aaron Cutler to James Comer, Chairman, H. Comm. on Oversight and Gov’t Reform (Sept. 3, 2026).

⁹⁰ Letter from Aaron Cutler to James Comer, Chairman, H. Comm. on Oversight and Gov’t Reform (July 24, 2026).

⁹¹ *Id.*

⁹² *Id.*

⁹³ Letter from Aaron Cutler to James Comer, Chairman, H. Comm. on Oversight and Gov’t Reform (July 24, 2026); Letter from Aaron Cutler to James Comer, Chairman, H. Comm. on Oversight and Gov’t Reform (Sept. 3, 2026).

Mr. Black’s refusal to testify in compliance with the deposition subpoena testimony is based on these same contentions and objections to potential inquiries he feels are “untethered to Epstein, Maxwell, or any valid legislative purpose.”⁹⁴ These excuses, most of which were recycled from communications that took place throughout the months of negotiation outlined above, are unpersuasive and therefore rejected by the Oversight Committee.

i. The subpoenas seek testimony and documents within the scope of the Oversight Committee’s legislative purpose.

Mr. Black refused to (1) appear for his deposition scheduled on September 3, 2026, pursuant to the subpoena issued by the Oversight Committee, and (2) provide the Oversight Committee with all documents requested pursuant to the document subpoena issued to Mr. Black. Counsel for Mr. Black contends that questions posed by the Oversight Committee regarding Mr. Black’s NDAs—and the subsequent production of such NDAs—is a topic “untethered to Epstein, Maxwell, or any valid legislative purpose.”⁹⁵ Before engaging with this argument, it is necessary to establish the breadth of the Oversight Committee’s oversight authority.

The Supreme Court has recognized that rigorous oversight is essential to Congress’s constitutional responsibilities,⁹⁶ stating that “[a] legislative body cannot legislate wisely or effectively in the absence of information respecting the conditions which the legislation is intended to affect or change.”⁹⁷ The House of Representatives, as part of determining its rules of proceedings, has, through the adoption of House Rule X, delegated to the Oversight Committee *broad oversight jurisdiction*, including authority to “conduct investigations of any matter” at “any time.”⁹⁸ The Oversight Committee is specifically tasked with the review of “any condition or circumstances that may indicate the necessity or desirability of enacting new or additional legislation addressing subjects within its jurisdiction.”⁹⁹ To carry out these functions, the Oversight Committee, as a standing House Committee, is authorized to require by subpoena “the attendance and testimony of such witnesses and the production of such books, records, correspondence, memoranda, papers, and documents as it considers necessary.”¹⁰⁰

The Oversight Committee has questions for Mr. Black relevant to its investigation. Among other topics, the Oversight Committee plans at the deposition to ask Mr. Black questions about his financial dealings with Epstein, whether Mr. Black received massages from women associated with Mr. Epstein, and Mr. Black’s knowledge of the conduct and activities of Epstein and Maxwell. These questions are directly relevant and would provide the Committee with information that would assist the Committee in assessing the need for and shape of potential legislative reforms. While Mr. Black is concerned that he may be asked *some* questions at the

⁹⁴ Letter from Aaron Cutler to James Comer, Chairman, H. Comm. on Oversight and Gov’t Reform (Sept. 3, 2026).

⁹⁵ Letter from Aaron Cutler to James Comer, Chairman, H. Comm. on Oversight and Gov’t Reform (Sept. 3, 2026).

⁹⁶ See generally *McGrain*, 273 U.S. at 174; and *Watkins*, 354 U.S. at 178.

⁹⁷ *McGrain*, 273 U.S. at 174.

⁹⁸ Rule X, cl. 4(c)(2), Rules of the U.S. House of Representatives, 119th Cong. (Jan. 16, 2025); Rule X(A)(n)(4, 10), Rules of the H. Comm. on Oversight and Gov’t Reform, 119th Cong. (2025) (emphasis added).

⁹⁹ Rule X, cl. 2(b)(1)(C), Rules of the U.S. House of Representatives, 119th Cong. (Jan. 16, 2025).

¹⁰⁰ Rule XI, cl. 2(m)(1)(B), Rules of the U.S. House of Representatives, 119th Cong. (Jan. 16, 2025).

deposition that he feels are beyond the scope of the investigation, such as those about NDAs, even if his view of the relevance of those questions was accurate, it would not give him the right to defy the deposition subpoena. Rather, he is legally obliged to appear for the deposition and make any relevant objections on a question-by-question basis.¹⁰¹ Indeed, Mr. Black nowhere argues that every single question that the Committee might ask him at the deposition would not be relevant to its investigation.

That alone is enough to dispose of Mr. Black's argument that his concerns about the scope of the Committee's questioning permit him to defy the deposition subpoena. But it is also worth correcting the record with respect to the topic of NDAs. Counsel for Mr. Black argued in their September 3, 2026 letter that, in discussions with counsel that preceded Mr. Black's June 26, 2026 transcribed interview, the Oversight Committee mischaracterized the scope of questions to be asked.¹⁰² Specifically, counsel for Mr. Black argued that questions related to non-disclosure and confidentiality agreements were outside the scope of Mr. Black's June 26 interview.¹⁰³ As explained above, these assertions are without merit.

Moreover, Mr. Black's counsel's complaints about any alleged agreement regarding the scope of the June 26 transcribed interview are not related to the Oversight Committee's deposition subpoena. Regardless of the substance of discussions that occurred before the transcribed interview, they are immaterial to the legal validity of the deposition subpoena. Even if the Committee had indicated to Mr. Black's counsel that it would not ask Mr. Black about NDAs at a transcribed interview, which it did not, that would not preclude the Committee from deciding to issue a deposition subpoena to Mr. Black and asking him some questions about NDAs at the deposition. Accordingly, counsel for Mr. Black has failed to provide any acceptable justification for his defiance of the deposition subpoena.

Regarding the topic of NDAs, the Oversight Committee seeks information about whether Epstein assisted Mr. Black in preparing or administering any NDAs, whether Epstein had any involvement in those agreements whatsoever, the identities of the women who were parties to the NDAs and the nature of their relationships with Epstein, and the extent of Epstein's involvement in handling or disbursing funds to individuals who signed the agreements. Accordingly, these NDAs and the circumstances surrounding them are directly relevant to the Oversight Committee's legislative purpose.

Turning to the documents subpoena as reviewed above, there is no doubt that Mr. Black has failed to comply with the Oversight Committee's document subpoena. While Mr. Black has asserted that he already "substantially complied" with the document subpoena by producing just *one* NDA,¹⁰⁴ that is not true. He has refused to produce *any* documents in response to Request 1 and the first part of Request 3. Further, the Oversight Committee granted a two-week extension

¹⁰¹ See, e.g., *Bragg v. Jordan*, 669 F.Supp.3d 257 (S.D. N.Y. 2023); *Comm. on Judiciary, U.S. House of Reps. v. Miers*, 558 F. Supp. 2d 53, 106 (D.D.C. 2008) ("[The former White House counsel] is not excused from compliance with the Committee's subpoena by virtue of a claim of executive privilege that may ultimately be made. Instead, she must appear before the Committee to provide testimony, and invoke executive privilege where appropriate.")

¹⁰² Letter from Aaron Cutler to James Comer, Chairman, H. Comm. on Oversight and Gov't Reform (Sept. 3, 2026).

¹⁰³ *Id.*

¹⁰⁴ Letter from Aaron Cutler to James Comer, Chairman, H. Comm. on Oversight and Gov't Reform (Sept. 3, 2026) (emphasis added).

from the original deadline of July 10, 2026, after Mr. Black’s counsel indicated during a meeting on July 8, 2026, with Committee staff, that there were a significant number of responsive documents that required review. But only one document was produced. In any event, recipients of Committee subpoenas must fully comply with them, not pick and choose what aspects they want to comply with. And by Mr. Black’s own admission, he has not fully complied with the Oversight Committee’s document subpoena.¹⁰⁵

Mr. Black attempted to argue his way out of full compliance with the document subpoena by claiming its scope exceeds the Oversight Committee’s legislative purpose and, therefore, is overbroad.¹⁰⁶ Specifically, Mr. Black objects to the scope of the two portions of the Oversight Committee’s document subpoena with which he has failed to comply: (1) Request 1; and (2) the first part of Request 3.

Starting with the relevant part of Request 3, the Oversight Committee is seeking “[a]ll non-disclosure agreements to which Jeffrey Epstein or Ghislaine Maxwell are referenced.”¹⁰⁷ While Mr. Black asserts that this request “call[s] for information beyond the scope of the investigation,”¹⁰⁸ this contention is nonsensical. Indeed, Mr. Black provides no specific explanation for why non-disclosure agreements in his possession that reference Epstein or Maxwell would not be within the scope of the Oversight Committee’s investigation of matters associated with Epstein or Maxwell. Rather, he groups his objection to the scope of this request with his objection to the scope of Oversight Committee’s broader request (Request 1), presumably in the hope of obscuring the self-evident defect with his scope argument as it pertains to agreements that reference Epstein or Maxwell. However, the Oversight Committee rejects Mr. Black’s attempt to conflate these two requests, and his failure to comply with this part of Request 3 alone justifies holding him in contempt for defying the Oversight Committee’s subpoena for production of documents.

Mr. Black’s claim that Request 1, which involves all non-disclosure agreements to which Mr. Black is a party, is not relevant to the Oversight Committee’s “stated investigative purpose”¹⁰⁹ also misses the mark.

As an initial matter, the Oversight Committee sets the terms of its oversight, including deciding which witnesses to interview, in what order to interview them, and whether or not to compel testimony in a time, place, and manner of its own choosing.¹¹⁰ Federal courts have consistently held that witnesses may not “impose [their] own conditions upon the manner of [congressional] inquiry.”¹¹¹ That is because “a witness does not have the legal right to dictate the conditions under which he will or will not testify”¹¹² or “to prescribe the conditions under which

¹⁰⁵ Letter from Aaron Cutler to James Comer, Chairman, H. Comm. on Oversight and Gov’t Reform (Sept. 3, 2026), *Black v. House Comm. on Oversight & Gov’t Reform*, No. 1:26-cv-03084 (D.D.C. filed Sept. 3, 2026).

¹⁰⁶ Letter from Aaron Cutler to James Comer, Chairman, H. Comm. on Oversight and Gov’t Reform (Sept. 3, 2026).

¹⁰⁷ Subpoena for Production of Documents to Leon D. Black (June 26, 2026).

¹⁰⁸ Letter from Aaron Cutler to James Comer, Chairman, H. Comm. on Oversight and Gov’t Reform (July 24, 2026).

¹⁰⁹ *Id.*

¹¹⁰ See, e.g., Todd Garvey, CONG. RESEARCH SERV., LSB11093, COMMITTEE DISCRETION IN OBTAINING WITNESS TESTIMONY (Dec. 22, 2023).

¹¹¹ *Eisler v. United States*, 170 F.2d 273, 280 (D.C. Cir. 1948).

¹¹² *United States v. Costello*, 198 F.2d 200, 205 (2d Cir. 1952); see also *United States v. Brewster*, 154 F.Supp. 126,

he may be interrogated by Congress.”¹¹³ Mr. Black is no exception. His view of whether particular documents are relevant to the Oversight Committee’s investigation is immaterial.

Rather, it is the Oversight Committee that determines the scope of its investigation and here it has reasonably determined that Request 1 is relevant to its investigation. The Oversight Committee is investigating the methods by which Epstein would conspire with his associates, clients, or friends—two categories Black has admitted include himself¹¹⁴—to abuse women and subsequently conceal their crimes by coercing the victims into silence through legal means like NDAs. Mr. Black already informed the Oversight Committee that he discussed with Epstein matters relevant to one NDA with a woman—the one NDA Mr. Black has produced.¹¹⁵ Though Mr. Black claims there are no other NDAs relevant to Epstein or his crimes, the Oversight Committee is concerned that Epstein’s extensive involvement in Mr. Black’s finances and personal life may have extended to agreements outside this one NDA, potentially even without Mr. Black’s knowledge.

This concern has already manifested with another witness, Bill Gates, who had a relationship with a woman Gates did not know had connections to Epstein until the Oversight Committee informed him of this fact during his transcribed interview.¹¹⁶ Prior to this, Gates had assured the Oversight Committee that there were no other women with whom he had prior relations that were associated with Epstein.¹¹⁷ The Oversight Committee has reason to believe this may be the case with Mr. Black because Mr. Black was a fee-paying client of Epstein’s and thus more involved with Epstein than Gates ever was.¹¹⁸ Epstein did in fact play a part in at least one of Mr. Black’s NDAs. Therefore, the Oversight Committee’s subpoena for Mr. Black’s NDAs is directly related to “a legitimate task of the Congress”¹¹⁹ to determine, and thereby prevent through legislative reform, sex trafficking methods, used by Epstein and Maxwell in furtherance of their crimes. The Oversight Committee cannot and will not accept Mr. Black’s mere words as a stipulated fact.

Additionally, while the Oversight Committee’s investigation primarily focuses on Epstein and Maxwell, it also seeks to use the information gleaned through this investigation to promote legislative reform to combat sex trafficking more broadly. The Oversight Committee recognizes that there is a general pattern of criminal behavior where confidentiality agreements are used to silence victims of sexual abuse or trafficking or allow the abuse to continue hidden from law enforcement and the public. As a result of this pattern, victims of sexual abuse or trafficking have been prohibited from coming forward and speaking about their abuse because they signed agreements with powerful individuals potentially under duress. The Oversight Committee believes that this is an area of the law that requires reform and is currently working on legislation to better protect victims of sexual abuse. This type of reform is essential to prevent perpetrators

134 (D.D.C. 1957) (finding a witness guilty of Contempt of Congress because “a witness has no right to set his own conditions for testifying”).

¹¹³ *United States v. Hintz*, 193 F.Supp. 325, 335 (N.D. Ill. 1961).

¹¹⁴ Transcribed Interview of Leon D. Black at 34:5-10 (June 26, 2026).

¹¹⁵ Letter from Aaron Cutler to James Comer, Chairman, H. Comm. on Oversight and Gov’t Reform (Sept. 3, 2026).

¹¹⁶ Transcribed Interview of William H. Gates at 34:22-35:11, 76:17-77:6 (June 10, 2026).

¹¹⁷ Transcribed Interview of William H. Gates at 34:22-35:2 (June 10, 2026).

¹¹⁸ Transcribed Interview of Leon D. Black, at 14:10-14 (June 26, 2026).

¹¹⁹ *Watkins*, 354 U.S. at 200.

from engaging in criminal conduct and avoiding prosecution for such conduct. And an examination of such confidentiality agreements is relevant to the Oversight Committee's work on such reform.

If a confidentiality agreement were used to conceal such criminal conduct, it is reasonable to assume one would not voluntarily expose such an agreement. Counsel for Mr. Black informed the Oversight Committee that Mr. Black "interpreted the [document] subpoena in light of the Committee's stated investigative purpose and the Chairman's own public statements regarding NDAs allegedly connected to Epstein."¹²⁰ As already mentioned, it is the Oversight Committee's duty, not the witness's, to determine the value and relevance of the information the witness has regarding the Oversight Committee's investigation.

It is worth noting that the Oversight Committee has raised reasonable accommodations with Mr. Black in an effort to resolve the dispute over the document subpoena. Specifically, with respect to Request 1, the Oversight Committee has proposed to limit the scope of its requests to only NDAs which Mr. Black entered into after meeting Epstein, to first allow Mr. Black to produce a privilege log listing the NDAs to which he is a party, and/or to review the privilege log listing the parties to Mr. Black's NDAs *in camera*.¹²¹ Unfortunately, Mr. Black did not find these proposals sufficient and rejected them,¹²² although he subsequently and falsely claimed the Oversight Committee failed to negotiate limitations at all.¹²³ Regardless, Mr. Black's unwillingness to meaningfully engage with the Oversight Committee on potential accommodation further heightens the Committee's concerns regarding his continued withholding of responsive documents.

In sum, the Oversight Committee does not believe that Mr. Black disclosed all information relevant to the Oversight Committee's investigation. He refused to appear for a deposition where he would be asked questions relevant to the Oversight Committee's investigation. He has refused to produce NDAs that reference Epstein or Maxwell. And despite objecting to the scope of the Oversight Committee's request for all NDAs to which he is a party, he refused to cooperate with reasonable efforts by the Oversight Committee to narrow that request. This is not the conduct of someone attempting to cooperate in good-faith with the Oversight Committee's investigation. It is the conduct of someone attempting to shield relevant information from the Oversight Committee and hoping that the Oversight Committee simply stops pursuing it.

ii. *Congressional investigations are not limited by the confidential terms of a private NDA.*

Mr. Black contends that production of his other NDAs risks the privacy interests of third parties to those agreements and that the Oversight Committee has "done little to demonstrate that it is committed to protecting the privacy" of individuals whose names arise in connection with

¹²⁰ Letter from Aaron Cutler to James Comer, Chairman, H. Comm. on Oversight and Gov't Reform (Sept. 3, 2026).

¹²¹ Letter from James Comer, Chairman, H. Comm. on Oversight and Gov't Reform to Leon Black (Aug. 18, 2026).

¹²² *Id.*

¹²³ Letter from Aaron Cutler to James Comer, Chairman, H. Comm. on Oversight and Gov't Reform (Sept. 3, 2026).

the Epstein investigation.¹²⁴ But Mr. Black has not contended that production of the NDAs to the Oversight Committee would in fact violate the terms of any of the NDAs. This is not surprising given that most NDAs contain exceptions for legally compelled disclosures, such as those required by a subpoena. As a result, Mr. Black here is not actually making a legal argument for why he is unable to comply with the subpoenas or why the subpoenas are legally invalid.

But in any event, even if there were an actual conflict between any of his NDAs and the Committee's subpoenas, an NDA entered into by private parties does not restrict Congress's constitutional authority to obtain information through a legitimate legislative investigation or otherwise limit Congress's exercise of its legislative and investigatory powers—such as through a duly issued subpoena.¹²⁵ A lawful, duly issued congressional subpoena preempts any terms of confidentiality in an NDA and it is the prerogative of the Oversight Committee to consider or weigh privacy concerns against its investigative needs.

In 1927, the Supreme Court ruled that “the power of inquiry—with process to enforce it—is an essential and appropriate auxiliary to the legislative function.”¹²⁶ The legislative branch's subpoena power is an inherent constitutional power, while confidentiality agreements, specifically NDAs, are private civil contracts that do not supersede the Constitution or limit Congressional authority. Therefore, Mr. Black's privacy concerns with his NDAs cannot serve to override a legally binding subpoena from a Congressional committee.

Additionally, Mr. Black's assertion that any confidential information produced to the Oversight Committee is automatically put at risk is unfounded. Mr. Black's claim that the Oversight Committee has previously failed to protect the privacy of individuals involved in the Epstein investigation is patently untrue. Throughout its investigation, the Oversight Committee has been dedicated to reviewing and redacting names and other identifying information in its release of documents and transcripts before they reach the public. This same practice was applied to individuals and information in the transcript of Mr. Black's interview before it was released to the public on July 17, 2026,¹²⁷ and it would have been applied to any other documents produced by Mr. Black at the Oversight Committee's discretion had he deigned to fully comply with his subpoenas. Regardless of Mr. Black's views, the privacy of third parties is not within Mr. Black's purview, nor is it an acceptable reason to refuse to comply with the Oversight Committee's lawfully issued subpoenas. Again, it is for the Oversight Committee, not Mr. Black, to balance any third-party privacy interests with its investigative needs and then determine what documents to subpoena and what to do with those documents.

iii. *The Oversight Committee had every intention to conduct a complete and thorough transcribed interview with Mr. Black before he refused to answer its questions.*

With respect to the Oversight Committee's transcribed interview of Mr. Black, his counsel claimed that the Oversight Committee arranged a pre-planned political stunt in an effort

¹²⁴ *Id.*

¹²⁵ See *McGrain*, 273 U.S. at 174-75; *Trump v. Mazars USA, LLP*, 591 U.S. 848, 862-64 (2020).

¹²⁶ *McGrain*, 273 U.S. at 175.

¹²⁷ See generally Transcribed Interview of Leon D. Black (June 26, 2026).

to “sabotage the proceedings with the issuance of...[the] subpoenas.”¹²⁸ But that accusation has nothing to do with the validity of the Oversight Committee’s subpoenas or Mr. Black’s obligation to comply with them. It does not speak to whether the Oversight Committee has questions relevant to its investigation to ask Mr. Black at a deposition or whether the subpoenaed documents are relevant to its investigation. Moreover, his accusation is simply untrue. For the better part of an hour, Oversight Committee counsel asked Mr. Black about an array of topics related to Epstein, which Mr. Black answered.¹²⁹ Then, Mr. Black was asked legitimate and reasonable questions about his NDAs, and he refused to answer them.¹³⁰ The Oversight Committee, therefore, utilized the powers granted to it by Congress in issuing subpoenas for the exact information about which he refused to testify. Mr. Black was then welcome to remain at the table and continue to answer questions during his transcribed interview. He chose not to do so.

The Oversight Committee fully intended to exhaust all questions it had for Mr. Black during his transcribed interview. Oversight Committee staff prepared countless lines of questions and exhibits for Mr. Black and made every effort to continue the interview despite Mr. Black and his counsel breaking to discuss the questions raised before ultimately deciding to terminate the interview. To illustrate this, counsel for Mr. Black need not look any further than the eighteen other witnesses the Oversight Committee interviewed or deposed thus far in the course of this investigation. The Oversight Committee prepared for and subsequently asked every other witness multiple hours’ worth of questions.¹³¹ The same would have been true for Mr. Black had he chosen to continue with the interview or chosen to answer all questions posed by Oversight Committee staff.

Furthermore, the Oversight Committee issued eighteen other subpoenas before Mr. Black was ever even invited to testify.¹³² It was, at the time of Mr. Black’s transcribed interview, entirely plausible that the Oversight Committee could choose to issue a subpoena when confronted with an unwilling witness. During the Monday June 22, 2026 meeting between Oversight Committee staff and counsel for Mr. Black, Oversight Committee staff indicated the Chairman may choose to issue a subpoena if Mr. Black refused to answer certain questions as counsel indicated he might do.

¹²⁸ Letter from Aaron Cutler to James Comer, Chairman, H. Comm. on Oversight and Gov’t Reform (Sept. 3, 2026).

¹²⁹ *See generally* Transcribed Interview of Leon D. Black (June 26, 2026).

¹³⁰ *See generally* Transcribed Interview of Leon D. Black (June 26, 2026).

¹³¹ *See generally* Deposition of Ghislaine Maxwell, (Feb. 9, 2026) (Maxwell pleaded the Fifth Amendment; this deposition, therefore, was the only exception—besides Black—of a witness who did not testify for more than one hour.)

¹³² Subpoena to Alberto R. Gonzales, Former U.S. Att’y Gen., Dep’t of Just. (Aug. 5, 2025); Subpoena to Eric H. Holder, Former U.S. Att’y Gen., Dep’t of Just. (Aug. 5, 2025); Subpoena to Loretta E. Lynch, Former U.S. Att’y Gen., Dep’t of Just. (Aug. 5, 2025); Subpoena to Jefferson B. Sessions III, U.S. Former Att’y Gen., Dep’t of Just. (Aug. 5, 2025); Subpoena to William P. Barr, Former U.S. Att’y General, Dep’t of Just. (Aug. 5, 2025); Subpoena to Merrick B. Garland, Former U.S. Att’y Gen., Dep’t of Just. (Aug. 5, 2025); Subpoena to Robert S. Mueller III, Dir., Fed. Bureau of Investigation (Aug. 5, 2025); Subpoena to James B. Comey, Dir., Fed. Bureau of Investigation (Aug. 5, 2025); Subpoena to Hillary R. Clinton, Former Sec’y of State of the U.S. (Aug. 5, 2025); Subpoena to William J. Clinton, Former President of the U.S. (Aug. 5, 2025); Subpoena to Ghislaine Maxwell (Feb. 9, 2026); Subpoena to Leslie H. Wexner (Feb. 18, 2026); Subpoena to Richard D. Kahn (Mar. 11, 2026); Subpoena to Darren K. Indyke (Mar. 19, 2026); Subpoena to the Dep’t of Just. (Aug. 5, 2025); Subpoena to the Estate of Jeffrey Epstein (Aug. 25, 2025); Subpoena to JPMorgan Chase Bank (Nov. 18, 2025); and Subpoena to Deutsche Bank (Nov. 18, 2025).

E. Precedent Supports the Oversight Committee’s Position To Proceed with Holding Leon Black in Contempt.

The Supreme Court has repeatedly noted that “the power to investigate is inherent in the power to make laws because ‘[a] legislative body cannot legislate wisely or effectively in the absence of information respecting the conditions which the legislation is intended to affect or change.’”¹³³ Further, “[w]here the legislative body does not itself possess the requisite information—which not infrequently is true—recourse must be had to others who do possess it. Experience has taught that mere requests for such information often are unavailing, and also that information which is volunteered is not always accurate or complete; so some means of compulsion are essential to obtain what is needed.”¹³⁴ Accordingly, 2 U.S.C. § 192 provides that a witness summoned before Congress to give testimony or produce documents who defaults be “deemed guilty of a misdemeanor” punishable by a fine of up to \$100,000 and imprisonment for up to one year.¹³⁵ Like the “ordinary federal criminal statute,” 2 U.S.C. § 192 “requires a criminal intent—in this instance, a deliberate, intentional refusal to answer.”¹³⁶

Congress has previously held individuals in contempt for failing to comply with duly issued deposition and document subpoenas. In the 116th and 117th Congress, the Democrat-controlled House “approved six criminal contempt of Congress citations” for such misconduct.¹³⁷ In fact, after congressional Democrats held White House officials Stephen Bannon and Peter Navarro in contempt of Congress for failing to comply with deposition and document subpoenas, the Department of Justice successfully pursued criminal charges against them.¹³⁸ In the 118th Congress, under Republican control, the House voted to hold Attorney General Merrick Garland in contempt of Congress for failing to produce subpoenaed materials; however, the Biden Department of Justice—headed by Merrick Garland—declined to pursue criminal charges.¹³⁹ During the 118th Congress, the Oversight Committee adopted a resolution recommending that the House find Hunter Biden in contempt of Congress for his refusal to comply with a lawful deposition subpoena, but this resolution was not voted on by the full House because Hunter Biden ultimately agreed to testify before the Oversight Committee.¹⁴⁰ Additionally, earlier in the 119th Congress, the Oversight Committee adopted two resolutions recommending the House find Secretary Hillary Clinton and President William

¹³³ *Eastland v. United States Servicemen’s Fund*, 421 U.S. 491, 504 (1975) (quoting *McGrain*, 273 U.S. at 175).

¹³⁴ *Id.* at 504-05.

¹³⁵ The prison term for this offense makes it a Class A misdemeanor. 18 U.S.C. § 3559(a)(6). By that classification, the penalty for contempt of Congress specified in 2 U.S.C. § 192 increased from \$1,000 to \$100,000. 18 U.S.C. § 3571(b)(5).

¹³⁶ *Quinn v. United States*, 349 U.S. 155, 165 (1955).

¹³⁷ Todd Garvey, CONG. RSCH. SERV., LSB10974, CRIMINAL CONTEMPT OF CONGRESS: FREQUENTLY ASKED QUESTIONS, 3 (2023).

¹³⁸ Press Release, U.S. Dep’t of Just., Former White House Advisor Convicted of Contempt of Congress (Sept. 7, 2023); Press Release, U.S. Dep’t of Just., Stephen K. Bannon Found Guilty by Jury of Two Counts of Contempt of Congress (July 22, 2022).

¹³⁹ Rebecca Beitsch, *Republicans vote to hold Garland in contempt of Congress*, THE HILL (June 12, 2024).

¹⁴⁰ Press Release, H. Comm. on Oversight and Gov’t Reform, Oversight Committee Approves Resolution Recommending the House of Representatives Find Hunter Biden in Contempt of Congress (Jan. 10, 2024); H. COMM. ON OVERSIGHT AND GOV’T REFORM, RESOLUTION RECOMMENDING THAT THE HOUSE OF REPRESENTATIVES FIND ROBERT HUNTER BIDEN IN CONTEMPT OF CONGRESS FOR REFUSAL TO COMPLY WITH A SUBPOENA DULY ISSUED BY THE COMMITTEE ON OVERSIGHT AND ACCOUNTABILITY (Jan. 2024).

Clinton in contempt of Congress for their refusal to comply with lawful deposition subpoenas issued in this investigation, but this resolution was also not voted on by the full House due to the Clintons' ultimate compliance and agreement to testify before the Oversight Committee.

Mr. Black has not properly asserted any claims of privilege related to the subpoenaed documents, nor has he asserted any basis for immunity from answering questions at a deposition. In correspondence with his attorneys prior to the scheduled date of the deposition, the Oversight Committee addressed and rejected Mr. Black's justifications for not complying with the terms of both subpoenas.¹⁴¹ The Oversight Committee specifically notified Mr. Black, via his attorneys, that his failure to appear for the scheduled deposition or provide the Oversight Committee with responsive documents, as required by the subpoenas, would lead to the Oversight Committee initiating contempt of Congress proceedings.¹⁴² Mr. Black's failure to appear for the deposition and refusal to comply with the document subpoena in the face of this clear advisement and warning by the Oversight Committee constitutes a willful failure to comply with the subpoena under 2 U.S.C. § 192.

CONCLUSION

The Oversight Committee has been seeking Mr. Black's testimony for months on matters relevant to its investigation of Epstein and Maxwell. On June 26, 2026, Mr. Black appeared voluntarily before the Oversight Committee to testify. However, Mr. Black refused to answer questions relevant to the Oversight Committee's investigation within the first hour of questioning. Upon his refusal to answer questions, the Oversight Committee issued Mr. Black two subpoenas, one requiring Mr. Black's reappearance for a deposition ultimately scheduled for September 3, 2026, and the second requiring the production of documents. When the Oversight Committee served him with these subpoenas, he ended the voluntary interview, refusing to answer any additional questions from the Oversight Committee on any topic.

Since the issuance of these subpoenas, Mr. Black has produced a single NDA, arguing that the remaining subpoenaed agreements, including agreements that reference Epstein or Maxwell, are not relevant to the investigation, and refused to appear for his deposition before the Oversight Committee on September 3, 2026, pursuant to a lawfully issued subpoena. Mr. Black's actions have impeded the Oversight Committee's investigation and its ability to perform its Constitutional oversight duties. Mr. Black's willful refusal to comply with the Oversight Committee's subpoenas constitutes contempt of Congress and warrants referral to the U.S. Attorney for the District of Columbia for prosecution as prescribed by law.

COMMITTEE CONSIDERATION

On XX,XX, the Oversight Committee met in open session, and with a quorum being present, to consider this Report, and adopted by voice vote an amendment in the nature of a substitute

¹⁴¹ Letter from Aaron Cutler to James Comer, Chairman, H. Comm. on Oversight and Gov't Reform (July 24, 2026); Letter to Aaron Cutler from James Comer, Chairman, H. Comm. on Oversight and Gov't Reform (Aug. 18, 2026); Letter from Aaron Cutler to James Comer, Chairman, H. Comm. on Oversight and Gov't Reform (Sept. 3, 2026).

¹⁴² Letter to Aaron Cutler from James Comer, Chairman, H. Comm. on Oversight and Gov't Reform (Aug. 18, 2026).

offered by Chairman James Comer that made certain technical edits, and ordered the Report and the Resolution contained herein to be favorably reported, as amended, to the House by a recorded vote of ___ ayes to ___ noes.

ROLL CALL VOTES

In compliance with clause 3(b) of House Rule XIII, the Oversight Committee states that the following recorded votes occurred during the Oversight Committee's consideration of the Report:

[...]

STATEMENT OF OVERSIGHT FINDINGS AND RECOMMENDATIONS OF THE COMMITTEE

In compliance with clause 3(c)(1) of Rule XIII and clause (2)(b)(1) of Rule X of the Rules of the House of Representatives, the Oversight Committee's findings and recommendations are incorporated in the descriptive portions of this Report.

STATEMENT OF GENERAL PERFORMANCE GOALS AND OBJECTIVES

The Oversight Committee states that pursuant to clause 3(c)(4) of Rule XIII of the Rules of the House of Representatives, this Report is to enforce the Oversight Committee's authority to duly subpoena and obtain testimony and documents relevant to its investigation of (i) the alleged mismanagement of the federal government's investigation into Jeffrey Epstein and Ghislaine Maxwell, (ii) the circumstances and subsequent investigations of Epstein's death, (iii) the operation of sex-trafficking rings and ways for the federal government to effectively combat them, (iv) ways in which Epstein and Maxwell sought to curry favor and exercise influence to protect their illegal activities, and (v) potential violations of ethics rules related to elected officials.

DUPLICATION OF FEDERAL PROGRAMS

Pursuant to clause 3(c)(5) of House Rule XIII, no provision of this Report establishes or reauthorizes a program of the federal government known to be duplicative of another federal program.

EARMARK IDENTIFICATION

This Report does not contain any congressional earmarks, limited tax benefits, or limited tariff benefits as defined in clause 9 of Rule XXI of the House of Representatives.

NEW BUDGET AUTHORITY AND CONGRESSIONAL BUDGET OFFICE COST ESTIMATE

The Oversight Committee finds the requirements of clause 3(c)(2) of Rule XIII and section 308(a) of the *Congressional Budget Act of 1974*, and the requirements of clause 3(c)(3) of Rule XIII and section 402 of the *Congressional Budget Act of 1974*, to be inapplicable to this Report. Accordingly, the Oversight Committee did not request or receive a cost estimate from the Congressional Budget Office and makes no findings as to the budgetary impacts of this Report or costs incurred to carry out the Report.

_____ **VIEWS**

[INSERT MINORITY, SUPPLEMENTAL, OR ADDITIONAL VIEWS]