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Epstein Accusers Bring New Suits Against Banks, Leon Black

By **Katryna Perera**

Law360 (November 28, 2022, 10:18 PM EST) -- Deutsche Bank AG, JPMorgan Chase & Co. and former Apollo Global Management CEO Leon Black have been hit with separate lawsuits related to the late Jeffrey Epstein's decadeslong sex trafficking scheme, with the financial institutions being accused of aiding and profiting from Epstein's illegal activities and Black being accused of rape.

The woman suing the banks is only identified as Jane Doe in the court filings. She filed **separate complaints** in New York federal court on Nov. 24 against each bank, asserting violations of the Trafficking Victims Protection Act and the New York Adult Survivors Act.

Doe claims that both banks financially benefited from Epstein's sex trafficking scheme. The complaints say the banks provided Epstein with financial support and continuously ignored red flags about his banking activity.

"Knowing that they would earn millions of dollars from facilitating Epstein's sex abuse and trafficking, [the banks] chose profits over following the law," the complaints state.

The **complaint** against Black was filed Monday by Cheri Pierson under the New York Adult Survivors Act in New York state court. Pierson says Epstein arranged for her to give Black a massage at Epstein's mansion and that Black sexually assaulted her during the meeting.

The three suits come after the New York Assembly passed the Adult Survivors Act in **May**. The legislation, which went into effect on Thursday, provides a one-year window for adult survivors of sexual assault and abuse to file suits regardless of whether the statute of limitations on their claims has expired.

"Thanks to the passage of the Adult Survivor's Act, survivors of sexual violence like our client Ms. Pierson can seek the justice they deserve no matter how many years ago their trauma was suffered," Pierson's attorney Jeanne Christensen of Wigdor LLP said in a statement on Monday. "We look forward to holding Black and Epstein's estate accountable for their appalling unlawful conduct as alleged in the complaint by our client."

The suit against JPMorgan and Deutsche Bank alleges the financial institutions allowed Epstein to withdraw large amounts of cash to pay women who either participated in or recruited others into Epstein's sex trafficking ring; did not follow anti-money laundering or reporting laws; and failed to conduct due diligence on Epstein and his operations.

The banks were fully aware of Epstein's sex trafficking ring due to the manner in which Epstein managed his accounts and that he pled guilty to felony sex offenses and registered as a lifetime sex offender in 2008, the complaint alleges.

"[The banks] knew [Epstein's] accounts were being used for this trafficking based on a number of factors, including but not limited to, the identity of the individuals making the withdrawals and wire transfers, the identity of the recipients, the account opening activity, the pattern of the financial activity, and Epstein's well documented criminal history and involvement in trafficking," the complaints state.

The complaints allege that Epstein held accounts with JPMorgan from 2000 to 2013, and that

Deutsche Bank began holding his accounts in 2013 after JPMorgan dropped Epstein as a client due to the "extensive publicity" about his illegal conduct. Epstein died in federal custody in 2019 while awaiting trial on federal sex-trafficking charges.

Doe, who alleges Epstein's sex trafficking scheme would not have been possible without the support of JPMorgan and Deutsche Bank, is suing on behalf of two proposed classes. The proposed class definition in the JPMorgan complaint includes all women who Epstein sexually trafficked while he maintained bank accounts at JPMorgan from 2000 to 2013.

The proposed class for the suit against Deutsche Bank includes all women who were sexually trafficked by Epstein while he maintained accounts at Deutsche Bank from Aug. 19, 2013, to Dec. 31, 2018.

Doe is seeking damages, attorney fees and a jury trial.

In a statement to Law360 on Monday, counsel for Doe said of the lawsuits that "while they are big steps, they are not the last step."

"We will not stop fighting for the survivors until everyone is held responsible," said Brad Edwards of Edwards Pottinger LLC. "The time has come for the real enablers to be held responsible, especially [Epstein's] wealthy friends and the financial institutions that played an integral role."

"These victims were wronged by many, not just Epstein. He did not act alone," Edwards added. "If you were an enabler, we already know who you are. You know who you are. Hiding and hoping we will go away will not work. We are coming for you."

Brittany Henderson of Edwards Pottinger also encouraged accusers and others involved in the scheme to reach out to her and other members of Doe's legal team.

"If you were ever victimized by Jeffrey Epstein or any of his friends, call us. If you were around Epstein, unwittingly helped him in any way, or have any information that can help us bring those accountable to justice, it is never too late to do the right thing," she said. "We need your help to do right by these courageous survivors."

JPMorgan declined to comment on Monday. A spokesperson for Deutsche Bank told Law360 that the bank believes the claim lacks merit and plans to respond in court.

Doe's suit is not the first Deutsche Bank has faced over its ties to Epstein.

The bank's investors sued in July 2020 over a drop in share prices after the Federal Reserve reported it had identified problems with the bank's internal controls, including those aimed at preventing money laundering. The investors pointed in their suit to a \$150 million fine imposed on Deutsche Bank in 2020 by New York state's financial regulator over the bank's failure to flag questionable transactions associated with Epstein and others.

In October, a New York federal judge gave preliminary approval to a proposed **\$26.3 million deal** that would end the investors' claims.

Black is also facing a sexual misconduct suit from a former model. The day before Pierson filed her suit against Black, a New York state judge **declined to disqualify** Perry Guha LLP from defending Black in the former suit.

Black, 71, has been under fire for his relationship with Epstein and left Apollo last year after those ties came to light, citing his own health and his wife's.

The women in the suit against JPMorgan and Deutsche Bank are represented by Bradley J. Edwards and Brittany N. Henderson of Edwards Pottinger LLC, by David Boies and Sigrid McCawley of Boies Schiller Flexner LLP and by Paul G. Cassell of S.J. Quinney College of Law at the University of Utah.

Pierson is represented by Jeanne M. Christensen and Renan F. Varghese of Wigdor LLP.

Counsel information for JPMorgan, Deutsche Bank, Black and the Estate of Jeffrey Epstein was not immediately available.

The cases are Doe 1 v. JP Morgan Chase & Co., case number 1:22-cv-10019 and Doe 1 v. Deutsche Bank Aktiengesellschaft et al., case number 1:22-cv-10018, in the U.S. District Court for the Southern District of New York; and Cheri Pierson v. Leon Black et al., in the Supreme Court of the State of New York, County of New York. A case number for Pierson's case was not immediately available.

--Additional reporting by Emilie Ruscoe and Hannah Albarazi. Editing by Alanna Weissman.

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