

**SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF NEW YORK**

----- X

WIGDOR LLP,

Plaintiff,

SUMMONS

- against -

Plaintiff designates NEW YORK COUNTY as the place of trial.

LEON D. BLACK

Defendant.

The basis of venue is: Residence of Plaintiff and a substantial part of the events giving rise to Plaintiff's claims took place in New York County.

----- X

To the above-named Defendant:

YOU ARE HEREBY SUMMONED to answer the complaint in this action and to serve a copy of your answer, or, if the complaint is not served with this summons, to serve a notice of appearance on the Plaintiff's attorney within twenty (20) days after service of this summons, exclusive of the day of service (or within thirty (30) days after the service is complete if this summons is not personally delivered to you within the State of New York); and in case of your failure to appear or answer, judgment will be taken against you by default for the relief demanded in the complaint.

Dated: New York, New York
March 2, 2026

GISKAN SOLOTAROFF & ANDERSON LLP

By: 

Raymond Audain
1 Rockefeller Plaza, 8th Floor
New York, New York 10020
raudain@gslawny.com
Tel: 212-847-8315

Attorneys for Plaintiff

**SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF NEW YORK**

----- X

WIGDOR LLP,

Plaintiff,

- against -

COMPLAINT

LEON D. BLACK

Jury Trial Demanded

Defendant.

----- X

Plaintiff, Wigdor LLP (“Wigdor” or “Plaintiff”), as and for its Complaint against Leon D. Black (“Black” or “Defendant”), alleges as follows upon information and belief, except as to facts and matters that relate directly to Plaintiff, which are alleged upon knowledge:

PRELIMINARY STATEMENT

1. A century ago, Judge Learned Hand, a fierce defender of civil liberties, wrote that “the administration of justice is a good test of civilization of the people where it exists; it shows their interest in equity . . . and their courage in protecting the weak and controlling the rapacious.”¹

2. Judge Hand’s words were prophetic in many senses and are as true today as they were when they were first written.

3. Leon D. Black, the co-founder and former Chairman and CEO of Apollo Global Management, is trying to use his billions to buy his own form of justice. Like other powerful men with much to hide, Black is attempting to weaponize the civil justice system to silence and destroy those who seek to hold him to account for alleged sexual assault and rape.

¹ Learned Hand, *The Deficiencies of Trials to Reach the Heart of the Matter*, in 3 LECTURES ON LEGAL TOPICS, ASSOCIATION OF THE BAR OF THE CITY OF NEW YORK 105 (1926).

4. Historically, wealthy men like Black could bring retaliatory lawsuits with impunity. They often filed frivolous counterclaims against their accusers, meant only to intimidate, bully, and punish their victims. These vindictive lawsuits are known as “SLAPPs,” or “Strategic Lawsuits Against Public Participation.” As one New York legislator explained, “[t]hese lawsuits are started not because they have a chance of ultimate success—they don’t—but to make sure that others don’t speak out publicly, for fear of being sued.”

5. Here, however, Black has not stopped with retaliatory litigation against his accusers. Rather, Black has used his immense wealth to hire scores of lawyers to assert SLAPP litigation against Wigdor, a law firm that has represented women who have accused Black of violent sexual assault and rape publicly and in various legal proceedings, one of which was entitled *Ganieva v. Black*, Index No. 155262/2021, New York Supreme Court (“Ganieva Lawsuit”) and another of which was entitled *Pierson v. Black*, Index No. 952002/2022, New York Supreme Court (“Pierson Lawsuit”).

6. Punishing lawyers for the clients they represent subverts not only the administration of justice but also the principle of equality under the law, and, thus, the American legal system. It also risks subverting American democracy. As Justice John Paul Stevens wrote:

The citizen’s right to consult an independent lawyer and to retain that lawyer to speak on his or her behalf is an aspect of liberty that is priceless.²

7. In an effort to compromise that liberty right, Black has brought three SLAPP suits against Wigdor for filing the Ganieva and Pierson Lawsuits.³

² *Walters v. National Association of Radiation Survivors*, 473 U.S. 305, 371 (1985) (Stevens, J. dissenting).

³ Prior to filing these three SLAPP lawsuits, Black filed frivolous claims against Wigdor within the Ganieva Lawsuit. He subsequently dismissed these claims voluntarily.

8. The **first SLAPP** was a 2021 lawsuit filed in the Southern District of New York that preposterously alleged that Wigdor engaged in a Racketeering Influenced Corrupt Organization (“RICO”) conspiracy with its client, Guzel Ganieva (“Ganieva”), and initially unidentified third parties with whom Wigdor had never met or spoken and, in doing so, committed defamation against Black. In June 2022, U.S. District Judge Paul A. Engelmayer characterized the RICO allegations as “more creative writing than factual averment” and “glaringly deficient in fundamental respects,” and he dismissed the case, including the defamation claim, in its entirety.⁴ Black’s attempts to appeal this dismissal were rejected by the Second Circuit in a decision dated March 2, 2023.

9. The **second SLAPP** was brought in New York State Supreme Court in 2022 and alleged that Wigdor engaged in tortious interference in connection with its representation of Ganieva. Although the cause of action was different, the alleged facts were nothing more than a repackaging of the failed defamation lawsuit. Wigdor’s motion to dismiss the second SLAPP suit is pending.

10. The **third SLAPP** was also brought in New York State Supreme Court, in 2023. Although it made, in sum and substance, allegations identical to those set forth in the first and second SLAPP suits, it was repackaged as a malicious prosecution claim. Wigdor moved to dismiss the third SLAPP suit pursuant to New York Civil Rights Law § 76-a and CPLR 3211(g)(1), both of which require a plaintiff in a SLAPP suit to demonstrate a substantial basis for the claim to avoid dismissal and the payment of attorneys’ fees to the defendant. Black did not even bother to attempt to meet the standards under the law—which would have required him to submit

⁴ *Black v. Ganieva*, 619 F. Supp. 3d 309, 335 & 351 n.24 (S.D.N.Y. 2022).

evidence that his suit had a substantial basis. As a result, it was dismissed by the Appellate Division, First Department, on March 6, 2025.

11. By suing not just his accusers but also *their attorneys*, Black has taken SLAPP suits to a new level. Targeting law firms for zealously advocating for clients in this manner is unprecedented and designed to cow the plaintiffs' bar by sending the message that, if they agree to represent his accusers, lawyers are hazarding potentially catastrophic financial damage by having to defend themselves against lawsuits that are as protracted as they are meritless. With his series of SLAPP suits against Wigdor, Black clearly hopes to make it hard for potential accusers to even find representation.

12. Whom Black blames for his downfall depends on which version of events suits him in the moment. In confidential arbitration proceedings, Black blames his former business partner for his ruination. In public filings, on the other hand, he blames his accusers and Wigdor, and he is leveraging his unfathomable wealth to bankroll costly, meritless and vindictive lawsuits against them. As Black's former business partner explains (whom Black also sued), Black has reacted to accusations against him by embarking "on a series of ill-fated lawsuits that seek to blame others for his downfall."

13. Thankfully, New York has adopted robust anti-SLAPP legislation to protect against the menace of retaliatory lawsuits.⁵ New York's anti-SLAPP statute seeks to provide the utmost protection for the exercise of speech and petition rights. It also expressly seeks to protect

⁵ New York State's anti-SLAPP statute is codified in N.Y. Civil Rights Laws § 76-a and § 70-a. It is comprised of three provisions: N.Y. Civil Rights Law § 76-a (defining claims to which law applies and requiring SLAPP suit plaintiffs to establish actual malice by clear and convincing evidence); New York Civil Practice Law and Rules ("CPLR") § 3211(g) (shifting motion to dismiss burden to plaintiffs); and N.Y. Civil Rights Law § 70 (providing attorney's fees).

“survivors of sexual abuse and others [from] being dragged through the courts on retaliatory legal challenges solely intended to silence them.”⁶ It embodies new consciousness about and increased attention to the pervasiveness of sexual abuse and harassment, which was brought to light by the #MeToo movement. Senator Brad Hoylman-Sigal, who co-sponsored recent amendments to strengthen the statute, emphasized that the legislation seeks to “prevent the rich and powerful from abusing our legal system to silence their critics.” “That ends today,” he declared. “With the signing of this bill, New York will have one of the strongest anti-SLAPP suit laws in the nation, protecting New Yorkers’ free speech from vindictive bullies.”

14. The bill’s legislative press release explained the purposes behind the amendments. It noted that SLAPP lawsuits that are “employed to discourage free speech threaten our democracy and work against the people of New York” by threatening an individual or entity with liability for personal damages, as well as having to hire a lawyer themselves. It warned that “New Yorkers’ voices must not be silenced by powerful interests and the super wealthy.” One senator noted that “billionaire[s] ... large corporations and other powerful forces have abused our legal system by attempting to harass, intimidate and impoverish their critics with strategic lawsuits against public participation, or ‘SLAPP’ suits. This broken system has led to journalists, consumer advocates, survivors of sexual abuse and others being dragged through the courts on retaliatory legal challenges solely intended to silence them.” One of the Assembly bill sponsors said, “[t]he dangerous message that these lawsuits send is that criticism will cost you,” and “[r]ecent experience has shown that there are an increasing number of deep pocketed individuals who have outrageously used New York’s court system as a means to harass New Yorkers who have publicly

⁶ N.Y. Bill Jacket, 2020 A.B. 5991, Ch. 250; *see also* Press Release, “Senate and Assembly Majorities Advance Anti-SLAPP Legislation to Protect Free Speech,” (July 22, 2020), available at <https://nyassembly.gov/Press/files/20200722a.php>.

disagreed with them It is clear that the best remedy for this problem is to require those who bring these lawsuits to pay the legal fees and costs of those who they have wrongfully sued, along with an expedited means for the courts to toss these cases into the dustbin of history.”

15. It is no accident that Black seeks to make an example of Wigdor. It is difficult to overstate the impact of Wigdor’s work. The firm has, for decades, fought aggressively and successfully for victims of sexual assault by bringing civil lawsuits against some of the world’s most powerful men who have abused their power to prey on women, including Dominique Strauss-Kahn, who, at the time, headed the International Monetary Fund; convicted sex offender Harvey Weinstein; various executives and on-air personalities at Fox News; Sean “Diddy” Combs; and many, many others.

16. However, while Black wants to assign blame to anyone other than himself for his many problems, the reality is that his problems are of his own making and start with his lengthy association with notorious sex predator Jeffrey E. Epstein (“Epstein”).

17. Black and Epstein enjoyed a decades-long personal and professional relationship. And, for reasons that remain largely unclear and are the subject of an ongoing Senate investigation, Black paid Epstein a total of at least \$170 million during their relationship.

18. In an effort to help Black, Epstein and Brad Karp, the former chair of Paul, Weiss, one of the world’s most powerful law firms, spent considerable time devising ways to surveil and retaliate against Ganieva after she confronted Black as far back as 2015, and Black began to record his conversations with Ganieva.

- In a July 2015, email, Epstein asked a former Russian cabinet minister for a “favor” dealing with a “russian girl” who was “attempting to blackmail a group of powerful businessman [sic] in New York.” Epstein revealed the exact location of the “russian girl,” and he ended the email by asking for “suggestions.”

EFTA0697997.⁷ The name of the person Epstein is referring to seems to be redacted from the email, but it has been reported to be Ganieva and the context and timing of this email suggests it is Ganieva. As such, upon information and belief, Epstein is referring to Ganieva.

- Soon thereafter, on August 13, 2015, Karp received the transcript of a recorded conversation that had occurred the day before between Black (identified as “JD” or “John Doe”) and Ganieva (identified as “GG”) at the Four Seasons Restaurant. The transcript notes that the “recording was made with the consent of JD.” EFTA01128746-8771.
- The next day, on August 14, 2015, Black met with Ganieva at the restaurant Le Bernadin. Black recorded their conversation surreptitiously. At one point in the conversation, Black told Ganieva that if she sued him, he would “go to the authorities” and she would “likely end up in jail.” The transcript of this conversation was sent to Karp. EFTA00590667-79.
- Two days later, on August 16, 2015, Epstein told Karp that Ganieva had not responded to an email from Black, and he asked Karp to confirm whether, “if leon decides enough is enough” that Karp “can have her arrested.!! . . . [for] extortion, high bail . . maybe deportation?” Karp responded, “*my strong belief is that the answer is yes. Especially with the referral coming from the most recent head of the sdney usao.*” (Emphasis added.) The reference to the most recent head of the S.D.N.Y. U.S. Attorney’s Office (“USAO”) is Lorin Reisner, a partner of Karp’s, who served as the head of the Criminal Division until June 2014 and who also appears in the EFTA documents. Epstein followed up to ask how “quiet” a criminal prosecution could be kept, and whether a “john doe” could be the complainant.” This shows that Epstein and Karp, for Black’s benefit, were trying to weaponize the USAO to prevent Ganieva from bringing claims against Black. EFTA02493136-3140; EFTA02492997.
- Also on August 16, 2015, Epstein and Karp discussed the surveillance of, upon information and belief, Ganieva. In this email and others, Karp shares that “she was snuck out through the garage, in a car with tinted windows, and we have license plate numbers” of the car used, “she’s returning to the Gansevoort hotel,” and “GG is in Moscow.” As noted above, Ganieva is referred to as “GG” in

⁷ Citations to “EFTA” documents refer to the documents recently released by the Department of Justice pursuant to the Epstein Files Transparency Act (“EFTA”).

publicly available documents in the Epstein files. EFTA02347668; EFTA02488634-8636.

- In another email exchange with Karp, Epstein suggested that Karp get the current visa status and try to revoke her visa, to which Karp responded “both good ideas; will work on this.” EFTA02353940. In the same timeframe as this email, Ganieva’s immigration and VISA status were a regular topic of conversation between Black and Ganieva. Upon information and belief, Karp and Epstein were referring to Ganeiva.
- In September 2015, Epstein asked Karp if “she [is] still being surveilled,” and noted that “leon wants to nail down the fact that she is a pro.” Karp responded that “we stopped the surveillance on Friday,” and offered to “follow up on the prostitution front” although he shared that “we haven’t found any evidence yet.” In response, Epstein asked Karp to look into bringing a “real case against her in either london or new york” and stated that “leon thinks a case is viable in london.” EFTA02486513-6515.
- In 2018, Epstein emailed his belief that Black owed him “a min of 20 million,” and shared that “my thoughts are that if guzel needs a guarantee, he can use payments to me so that his office is kept unaware.” Epstein, it seems, was offering to funnel payments from Black to Ganieva to keep the payments to Black’s former mistress a secret. EFTA01018783.
- In another 2018 email from Epstein to Karp discussing issues with business deals with Black, Epstein stated, “I would of course never do anything to endanger my friend” and then expressed frustration that he would have to “put [his] ass on the line.[sic] for his personal goofiness.” In response, Karp shared that he “genuinely believe[d] that the two of us [i.e., Epstein and Karp] are the two people on the planet who he [Black] most trusts and who he understands try to protect him at all times.” EFTA02523037-3038.

19. These emails demonstrate that Black’s SLAPP litigation against Wigdor was not only frivolous and without substantial—or any—basis, but is yet another instance of retaliation in a decade-long campaign of intimidation and retribution against anyone who dares hold him to account.

20. Later on, after Ganieva commenced her action against Black on June 1, 2021, Karp sought to pressure the Manhattan District Attorney's ("DA") office to criminally prosecute Ganieva for extortion. Black and his army of lawyers undertook such efforts while knowing that Ganieva had voluntarily agreed to be questioned by federal and state prosecutors about the sexual violence to which she alleged Black had subjected her. No charges were brought.

21. The ridiculous premise of Black's lawsuits—that Wigdor is somehow factually or legally responsible for the harm he has caused to his own reputation—is illustrated by the fact that he has been accused by multiple women of sexual assault and rape. These accusations piqued the interest of federal and state law enforcement before Wigdor even represented anyone against Black.

- A December 19, 2019, DOJ Investigative Memorandum concerning "Potential Co-Conspirators of Jeffrey Epstein" states the following: "[Redacted] recalled two instances in which Epstein directed her to provide massages to other men, both of which occurred in around 2011 or 2012. First Epstein instructed [Redacted] to massage Leon Black at Epstein's New York residence. [Redacted] attempted to give Black an ordinary massage, but Black began initiating sexual contact, at which point [Redacted] ran out of the room. [Redacted] complained to Epstein, who laughed it off as a funny incident. [Redacted] also recalled a woman named [Redacted] being directed to massage Black, and afterwards, [Redacted] told [Redacted] that she had provided Black with oral sex during the massage." EFTA02731083-1167 at 1114.
- The same memorandum later references one victim who "recalled Epstein asking her to massage Leon Black and Jes Staley, both of whom engaged in sexual contact with her against her will during the massages." Id. at 1140.
- As early as 2021, the Manhattan DA's office was emailing with the DOJ concerning "allegations of sexual abuse against Leon Black" and was aware that the U.S. Attorney's Office was in the midst of "handling [an investigation] involving Mr. Black." EFTA02731757-1761 at 1760.

- Emails between the DOJ and the Manhattan DA's office state, "there were multiple women who reported victimization by Black/GM/JE a while ago," and a third victim (not represented by the attorney who represented the other two victims) existed. EFTA02731486-1487.
- Black is prominently included on a recent PowerPoint presentation concerning the Jeffrey Epstein investigations and bearing the emblems of the F.B.I. and NYC Joint Bank Robbery / Violent Crime Task Force, which states:
 - "[Redacted] stated Epstein told her to give Black a massage while Black was naked [Redacted] stated another female gave Black a massage and he made her perform oral sex. Epstein made jokes about Black's penis size."
 - "[Redacted] stated Black raped her numerous times and sex trafficked her (including at Epstein's). Black threatened to destroy her life and stated he [sic] connections with the police."

EFTA01656152-6171 at 6169.

22. Ninety-one years after Judge Hand articulated his above-referenced observations about the legal system, Alexandra Devorah Lahav, a scholar and professor of law, wrote that affording individuals recourse to litigation "enables people to protect and promote core democratic values in the course of bringing a lawsuit. Lawsuits enforce the law by forcing wrongdoers to answer for their conduct; they increase transparency by eliciting information from their adversaries that often benefits the public; and in so doing, they help people participate in self-government."⁸

23. The integrity of the civil justice system and the prospect of equal justice under the law require that lawyers remain free to zealously represent their clients and defend "the right of every individual to claim the protection of the laws" without fear of retribution.⁹

⁸ Alexandra Lahav, preface (p. vii), IN PRAISE OF LITIGATION (Oxford Univ. Press 2017).

⁹ *Marbury v. Madison*, 5 U.S. 137, 163 (1803).

24. Of late, these foundational principles have been under assault by people like Black. Fueled by his billions of dollars, Black's multiple SLAPPs and retaliatory filings represent blatant attempts to abuse the civil justice system to punish and intimidate lawyers who represent sexual assault victims.

25. Had his SLAPP suits succeeded, Black would have helped to usher in a separate justice system for millionaires and billionaires.

26. He has thus far failed at every turn.

27. Thankfully, New York law also affords victims of Black's unlawful litigious conduct a remedy: the anti-SLAPP statute.

28. New York's anti-SLAPP statute was originally enacted in 1992 to address lawsuits against individuals who spoke out against proposed land use development and other activities requiring approval of public boards.

29. That same year, the New York Court of Appeals acknowledged "a rising concern about the use of civil litigation . . . to intimidate or silence" individuals addressing issues of public concern.¹⁰ "[S]uch actions," it explained, "are characterized as having little legal merit but are filed nonetheless to burden opponents with legal defense costs and the threat of liability and to discourage those who might wish to speak out in the future."¹¹ SLAPP suits were rightly understood to be nothing but "instruments of harassment and coercion inimical to the exercise of First Amendment rights."¹²

¹⁰ *600 W. 115th St. v. Van Gutfeld*, 80 N.Y.2d 130, 137 n.1 (N.Y. 1992).

¹¹ *Id.*

¹² *Immuno AG v. Moor-Jankowski*, 537 N.Y.S.2d 129, 137 (1st Dep't 1989), *vacated on other grounds*, 497 U.S. 1021 (1990).

30. Because his abuse of the legal system violates New York's anti-SLAPP statute, as amended, the time has now come for Black to be held to account.

31. Black must be held liable for all harm, monetary and/or non-monetary losses, compensatory and reputational damages that he has caused to Wigdor, including its attorneys' fees, as well as for punitive damages to deter similar abuses of the civil justice system.

JURISDICTION AND VENUE

32. The Court has personal jurisdiction pursuant to CPLR § 301, and venue is proper in this County pursuant to CPLR § 503(a) because Black commenced the SLAPP lawsuits in New York County and litigated the actions herein, and because Wigdor's principal place of business is in New York County.

PARTIES

33. Plaintiff, Wigdor LLP, is a limited liability partnership formed in the State of New York. Its principal office is in New York, NY. Wigdor LLP is among the nation's premier law firms representing victims of sexual assault and sexual harassment.

34. Defendant, Leon D. Black, resides in New York, NY.

FACTS

Black's Relationship With Jeffrey Epstein

35. Black once was a preeminent Wall Street executive. He co-founded Apollo Global Management ("Apollo") in 1990, and he helped grow it into one of the world's largest alternative asset managers, earning billions of dollars in the process. Black's tenure at Apollo ended abruptly on January 25, 2021, when he resigned following revelations about his longstanding relationship with Epstein.

36. Epstein's appalling history is well-known.

37. Epstein began abusing dozens of girls starting as early as 2002, and for many years he used his considerable wealth and influence to cultivate a cohort of vulnerable young women to sexually exploit.

38. Epstein's criminal legal problems began in 2005, when Palm Beach police investigated him for allegedly molesting a 14-year-old at his Florida mansion.

39. Within months, police had identified at least 21 possible victims.

40. Following a series of questionable prosecutorial decisions highly favorable to Epstein, in 2008, he pleaded guilty to state charges of solicitation of prostitution with a minor.

41. He spent more than a year in jail and was required to register as a sex offender.

42. By the time he was released, in July 2009, several of Epstein's victims had filed civil lawsuits alleging that Epstein molested or abused them when they were underage.

43. In July 2019, Epstein was re-arrested and charged with sex trafficking.

44. In August 2019, Epstein was found dead in his jail cell in the Metropolitan Correctional Center in New York City.

45. In October 2020, the *New York Times* reported that Black had known Epstein for decades.¹³

46. Indeed, from approximately the mid-1990s to 2018, Black had a social relationship with Epstein, and from 2012-2017, Epstein provided "professional services" to Black as well.

47. According to the *Times*, Epstein frequently hosted Black at his New York City mansion.

¹³ Matthew Goldstein, Steve Eder & David Enrich, *The Billionaire Who Stood by Jeffrey Epstein*, THE NEW YORK TIMES (2020).

48. Black also visited Epstein at his residences in Paris, Santa Fe, and Florida, and he visited Epstein's island in the Caribbean on at least two occasions.

49. Black also paid Epstein more than \$170 million over the years.

50. Despite being aware of Epstein's 2008 guilty plea to charges of solicitation of prostitution with a minor, Black wired Epstein at least \$50 million in subsequent years. The transfers included consulting fees that were so strange that they drew the scrutiny of Epstein's bank. "It was not clear," the *Times* wrote, "what kind of services Mr. Epstein provided to Mr. Black."¹⁴

51. Senator Ron Wyden ("Senator Wyden") of the United States Senate Finance Committee ("Finance Committee") has also investigated Black's "extensive and unexplained financial ties with Jeffrey Epstein."

52. In 2022, Senator Wyden described the "extraordinary compensation" Black paid Epstein for tax advice despite not being a certified public accountant or tax attorney.

53. "It appears," Senator Wyden said, "that Epstein was paid an amount that far exceeded what Black paid other professional advisors, including some of the most high-priced legal counsel in the nation."

54. "[T]he majority of payments from Black to Epstein, approximately \$100 million," Senator Wyden explained, "were made on an 'ad hoc' basis without any form of written contract or business services agreement."

¹⁴ *Id.*

55. At every stage of the Finance Committee's investigation, Black has refused to answer questions or provide any documents that could demonstrate how Epstein's compensation was determined or justified.

56. "The idea that a prominent Wall Street billionaire would simply cough up \$100 million to Jeffrey Epstein without any supporting documentation is suspect," Senator Wyden said, and raises questions about whether "Black felt obligated to make these payments to Epstein for unstated reasons."

57. Members of Senator Wyden's staff held several meetings with Black's counsel at Paul, Weiss and Brownstein Hyatt Farber Schreck LLP to discuss Black's cooperation with the Finance Committee's investigation.

58. In those meetings, Black's attorneys indicated that Black was unwilling to answer questions regarding details of payments to Epstein.

59. In a July 24, 2023, letter to Black, Senator Wyden explained that

The Committee also remains concerned by your continued refusal to answer questions related to payments to Epstein and how such amounts were calculated in relation to services provided. To date, the Committee has not received a sufficient explanation as to why Epstein was paid amounts vastly exceeding that paid to other attorneys and accountants involved in these transactions, and why you were willing to pay Epstein over \$100 million without a written services agreement or contract.

60. Notwithstanding Black's refusal to cooperate, in a March 11, 2025 letter to US Attorney General Pam Bondi, FBI Director Kash Patel, and Treasury Secretary Scott Bessent, Senator Wyden reported that the Finance Committee investigation "uncovered new evidence, including through review of federal government records, indicating that money paid by Black to Epstein was used to finance Epstein's sex trafficking operations and that the true amount Black paid Epstein is actually significantly higher than previously known."

61. Senator Wyden's March 11, 2025, letter referenced a January 2023 \$62.5 million settlement between Black and the Attorney General of the United States Virgin Islands ("USVI").

62. The agreement entered into in connection with the settlement: (i) secured Black (and his attorneys) immunity from criminal prosecution for his financial support of Epstein; (ii) noted that Black paid \$158 million over approximately five years to Epstein's Virgin Islands company, Southern Trust, which Black without explanation contends was for "services rendered and value received;" and (iii) acknowledged that "Jeffrey Epstein used the money Black paid him to partially fund his operations in the Virgin Islands."

63. Senator Wyden described this as "a clear admission that part of the extraordinary amounts of cash Black paid to Epstein was used to finance Epstein's sex trafficking activities and other crimes," and that it "merits immediate investigation by the DOJ and Treasury Department."

64. The settlement agreement also released Black's attorneys from any criminal or civil liability for claims by the USVI in connection with any of their conduct related to Epstein.

65. Understandably alarmed by his ties to Epstein, Apollo investors began asking Black tough questions about his knowledge of Epstein's crimes and the nature of their relationship.

66. To help salvage Black's reputation and that of the company he co-founded, Apollo hired Dechert LLP ("Dechert") to investigate Epstein's ties to Black and Apollo. Dechert did so and published its conclusions in an internal report (the "Dechert Report").

67. The Dechert Report pushed a narrative as favorable to Black and Apollo as possible.

68. Despite trying to appear like a genuinely independent investigation, the Dechert report is a transparently self-serving document designed to absolve its sponsors of wrongdoing.

69. Any “conclusions” contained in the Dechert Report were based on nothing more than voluntary statements provided by 20 willing individuals and documents given to Dechert by Apollo.

70. Moreover, \$12 million in wire transfers from Black to Epstein were not identified or explained in the Dechert report, and, according to Senator Wyden, he had “not received any explanation from Black’s attorneys as to why the Apollo Board’s investigation omitted or failed to identify these \$12 million payments or their purpose.”

71. In connection with the Dechert Report, there is no indication that anyone testified under oath or provided sworn statements under the penalty of perjury, and documents were not subpoenaed.

72. On January 22, 2021, Dechert, voluntarily and without any request for a report from a single governmental agency, filed the Dechert Report with the U.S. Securities and Exchange Commission.

73. Three days later, on January 25, 2021, Black announced he was stepping down as CEO of Apollo.

74. Recently, the closeness and nature of Black’s relationship with Epstein have been further revealed.

- The House Oversight Committee released a handwritten poem signed “Love and kisses” from Black to Epstein for his fiftieth birthday, noting “Blonde, Red, or Brunette, spread out geographically / With this net of fish, Jeff’s now ‘The Old Man and the Sea.’” House_Oversight_000118-119.
- In 2013, a woman in Epstein’s network emailed Epstein asking for Epstein to introduce her to “Mr. Big.” EFTA00657593.¹⁵

¹⁵ In other emails to Epstein, his associates refer to “Mr. Big” in relation to Black. EFTA01751488.

- A 2016 email from Epstein to Black referenced the two men's "unique relationship," with Epstein calling Black "my closest of friends." ETFA00816114-16.
- A 2016 email from Epstein to Black shows that Epstein considered himself Black's financial protector: "If you reflect on your financial life, you have been kept safe, had remarkable results and no disasters." EFTA02702704.
- Another 2016 email from longtime Epstein assistant Lesley Groff to Epstein asks whether "Leon Black" would be "going to Japan while the girls are there." EFTA01782679.
- In 2016, Karp looked into whether his firm could create an escrow fund for Black. When Karp learned that his firm's policy was not to act as an escrow agent, Karp forwarded that information to Epstein, to which Epstein responded, "I will pursue alternate." That Karp was ostensibly acting on behalf of his client—Black—but reporting his actions to Epstein underscores how much control Epstein exercised over Black's affairs. EFTA02470209-0211.
- In July 2018, Epstein exchanged text messages with someone named "Leon," with Epstein asking if Leon wanted to "stop by" because he and his guest were "having fun if you want." Leon responded that he was "at a rock concert w son Josh...thanks anyway..." and followed up with "...you don't even like big tits..." EFTA00783245-3247. Black has a son named Joshua.

Black's Relationship With Guzel Ganieva and the First SLAPP


75. On October 12, 2020, the day the *New York Times* disclosed Black's payment of tens of millions of dollars to Epstein, Black sent a letter to Apollo's limited partners, stating, *inter alia*, "I was completely unaware of, and continue to be appalled by, the reprehensible conduct that surfaced at the end of 2018 and led to the federal criminal charges brought against Epstein . . . There has never been an allegation by anyone, including the *New York Times*, that I engaged in any wrongdoing or inappropriate conduct."

76. On October 29, 2020, Black stated during an earnings call, *inter alia*, "there has never been an allegation by anyone that I engaged in any wrongdoing, because I did not. And any


suggestion of blackmail or any other connection to Epstein's reprehensible conduct is categorically untrue."

77. On January 29, 2021, Black issued a statement that, *inter alia*, "I was completely unaware of Mr. Epstein's abhorrent misconduct that came to light in late 2018," and repeated, "I did not engage in any wrongdoing or inappropriate conduct."

78. On March 17, 2021, Ganieva made the following posts on X (then, Twitter):


 **Guzel Ganieva** @GuzelGanieva3 · Mar 17 ...
 Although I am a private person, in light of the recent media coverage, I think I have an obligation to make a statement regarding Apollo Global Management's CEO and Chairman, Leon Black. I was sexually harassed and abused by him for years.

1 56 136

 **Guzel Ganieva** @GuzelGanieva3 · Mar 17 ...
 It started in 2008 when I met with him to discuss work. While he understood my career aspirations, he could not understand me when I refused his sexual advances. I was bullied, manipulated, threatened, and coerced. Similarly, under duress, I was forced to sign an NDA in 2015.

1 16 48

Show this thread

 **Guzel Ganieva** @GuzelGanieva3 · Mar 17 ...
 I am breaking my silence now because I do not want this type of predatory behavior to continue happening to other women.
 #MeToo 🙋 #LeonBlack

17 59

Show this thread

79. Black responded to these Tweets by denying any impropriety, publicly accusing Ganieva of extortion and, “on advice from his counsel, [] ask[ing] criminal authorities . . . to investigate Ganieva.”¹⁶

80. On June 1, 2021, Ganieva filed suit against Black in New York State Supreme Court (again, the “Ganieva Lawsuit”). Wigdor, in its capacity as Ganieva’s legal counsel, signed and filed the Ganieva Lawsuit.

81. The Ganieva Lawsuit alleged that Black violently sexually assaulted Ganieva for years, and that he used his immense wealth and power, along with explicit threats of retaliation, to intimidate and force her into silence, including by having her sign a purported non-disclosure agreement (“NDA”). After she signed the purported NDA, Black deposited \$100,000 a month into her bank account until she published the Tweets described above, at which point he stopped remitting the payments.

82. The Ganieva Lawsuit alleged the following claims against Black: (i) defamation; (ii) defamation *per se*; (iii) intentional infliction of emotional distress; and (iv) gender motivated violence pursuant to New York City’s Gender Motivated Violence Act N.Y.C. Admin. Code § 8-903 (“GMVA”). Black responded to the complaint by filing baseless counterclaims against Ganieva for defamation, defamation *per se* and breach of the NDA. Ganieva subsequently amended her complaint to add, among other things, a claim for retaliation under the GMVA in relation to Black’s counterclaims. On September 8, 2021, Black voluntarily dismissed his meritless counterclaims.

¹⁶ Gillian Tan, Black Says He Paid to Hide Affair, Denies It Led to Apollo Exit, Bloomberg, (April 8, 2021, 10:04 PM), <https://www.bloomberg.com/news/articles/2021-04-09/black-says-hepaid-to-hide-affair-denies-it-led-to-apollo-exit>.

83. Then, on October 28, 2021, Black filed a separate lawsuit, in the Southern District of New York, against Wigdor, Ganieva and unnamed “John Does 1-3,” entitled *Leon Black v. Guzel Ganieva, Wigdor LLP, and John Does 1-3*, No. 21 Civ. 08824 (S.D.N.Y. 2021) (the “First SLAPP”).

84. Black was represented in the First SLAPP by a bevy of high-powered lawyers. The complaint was signed by John Quinn of Quinn Emanuel Urquhart & Sullivan, LLP (“Quinn Emanuel”). Michael Carlinsky, who is now Quinn Emanuel’s Co-Managing Partner, Jennifer Barrett, who is now Co-Managing Partner of Quinn Emanuel’s New York Office, and Ryan Rakower, who is now a Partner at Quinn Emanuel, were also signatories to the complaint, along with Susan Estrich, of Estrich Goldin LLP.

85. Black alleged *inter alia* that Ganieva, Wigdor and John Does 1-3 (two of which were later identified as Joshua Harris and Michael Rubenstein) (the “RICO defendants”) conspired to harm Black in violation of civil RICO laws, 18 U.S.C. § 1962(c) and (d).

86. Black also claimed that the RICO defendants, including Wigdor, defamed him.

87. Black knew that the allegations were false, especially since the lawyers at Wigdor whom Black targeted did not know and had never even spoken to or ever met the other RICO defendants.

88. The truth was not what Black cared about, however, and, as was his intent, Wigdor and Ganieva were forced to retain separate counsel and incur significant expense to defend themselves against Black’s meritless allegations.

89. Black’s core allegations were that the RICO defendants disseminated lies and falsehoods about Black, in a concerted effort to “destroy his reputation.” He elaborated on this theme and its parallel claim that his version of events were the “truth,” not with descriptions of

actual events or incidents, but rather with conclusory statements about what he *believed* the RICO

Defendants did and said. A sampling of such statements are:

Everything Black said to Bloomberg on April 8, 2021 about Ganieva **“was, and is, indisputably true.”** First SLAPP, ECF 46 at ¶ 67.

Ganieva’s allegations were **“completely fabricated.”** *Id.*

Black has **“been extorted by Ms. Ganieva for many years.”** *Id.*

Ganieva and Wigdor’s “next step” in smearing his good name “was litigation in New York State Court, with the accompanying presumptions of privilege from disclosure and defamation, privileges that should not withstand the rules governing crime-fraud and sham litigation.” *Id.* at ¶ 69.

“Ganieva’s counsel in that litigation, Wigdor, deployed an entirely new playbook to handle this case, one that is flatly at odds with its handling of its other cases.” *Id.* at ¶ 70.

“Seemingly without fail, Wigdor takes cases on contingency, makes demands, signs protective orders where appropriate to obtain information from its accused targets, and resolves most of its cases without so much as filing an initial complaint. As its website proudly proclaims, ‘Because we have a reputation for obtaining multi-million verdicts, we are able to settle the majority of our cases without the need for even filing complaints.’” *Id.* at ¶ 70.

“Wigdor took on a client who had already extorted her target and was walking away from far more money than she could ordinarily hope to collect once she went public. Wigdor chose to file its complaints without making a single demand for settlement – sacrificing all its leverage by going public with lies that went far beyond the ‘tweets’ in scope and detail.” *Id.* at ¶ 71.

Wigdor filed a complaint for Ganieva full of “false accusations” . . . “[and] there is nothing magical about packaging lies in a court filing.” A “sham pleading” – a sham complaint, or answer, or other statement about litigation – does not protect the lies it contains from being actionable.” *Id.* at ¶ 74.

Ganieva’s complaint was defamatory because “Mr. Black never said anything of the sort” as she alleged, including, “If you do not take the money, I will put you in prison” and “If you do not take the money, I will destroy your life.” Black said that he has “recordings” to show these statements “were never said.” *Id.* at ¶ 80.

Regarding the allegations in Ganieva’s amended complaint about Cheri Pierson, Black wrote, “an impossible-to-defend against tale of an

anonymous massage at Jeffrey Epstein's house some two decades ago for which the woman was supposedly paid \$5,000. In 2001. Again, all lies." *Id.* at ¶ 89.

"The definition of a sham complaint is one that is brought solely to defame. These Jane Doe allegations have nothing whatsoever to do with Ganieva's claims, even such as they are: an alleged single encounter between strangers . . . [and] a supposed payoff of \$5,000 twenty years ago," all of which according to Black were "fabrications." *Id.* at ¶ 90.

Black said the allegations about he and Epstein were "offensive" and false: "[the Epstein] allegations have nothing whatsoever to do with anything else in the complaint, except in terms of its extra-judicial impacts, that is, attempting to use them as weapons of mass destruction." *Id.* at ¶ 91.

"What makes [Wigdor's] conduct so offensive is that they have attempted to capitalize and profit from the sympathies we rightly feel to extort Mr. Black and convict him in the court of public opinion long before a court of law will exonerate him. They have subverted the [#MeToo] movement they purport to represent. . . . This is not a case at the edge, a borderline fact pattern, a 'he said-she said,' a maybe yes or maybe no. The consensual sexual relationship ended years ago." *Id.* at ¶¶ 102-103.

90. After the RICO defendants filed motions to dismiss and Wigdor filed a Rule 11 motion for sanctions under the Federal Rules of Civil Procedure, at the last-minute Black amended his complaint to drop Wigdor as a RICO defendant, but he continued to pursue defamation claims against Wigdor.

91. Incredibly, just minutes before midnight on the eve of the deadline for Black to respond to Wigdor's Rule 11 sanctions motion, his lawyers from the firm Quinn Emanuel withdrew as counsel for Black, leaving Susan Estrich, who had appeared *pro hac vice* alone, to represent Black.

92. Nevertheless, Black forged ahead, accusing Wigdor of defamation based on nothing more than Ganieva's allegations against Black as set forth in the Ganieva Lawsuit and statements made about Ganieva's allegations in her Complaint.

93. Black's meritless defamation claims against Wigdor are the definition of a SLAPP. His defamation allegations amounted to nothing more than a series of denials that he did anything wrong.¹⁷

94. Black's allegations against Wigdor described no conduct that could possibly support a libel or slander claim. Instead, everything relating to Wigdor's purported defamatory conduct related to actions it took in representing Ganieva. As the excerpts above show, Black speculated that Wigdor "must have known" Ganieva's facts were "complete fiction," and the only explanation was that the law firm conspired with Ganieva to smear Black's reputation.

95. Black frivolously sought to turn conventional law firm advocacy into an actionable claim that Wigdor, according to him, knew Ganieva's claims were "false." For example, Black said the NDA, certain text messages and audio recordings "proved" his innocence. Incredibly, under Black's faulty logic, when Ganieva opposed Black's motion to dismiss her claims, and Wigdor, as her retained law firm, filed Ganieva's motion papers in opposition, Black said Wigdor's decision to credit its client's position over Black's was proof of Wigdor's intent to defame him. *E.g.*, First SLAPP, ECF 46 at ¶¶ 18-21.

96. Black's untenable claims are evidenced by the nonsense allegations in which he lumped the RICO defendants into a conspiracy group that he calls the "Enterprise." Rather than describe specific events or conduct engaged in by the Enterprise, Black's complaint made vague, conspiratorial allegations of defamation:

"Had there been physical abuse, harassment, or neglect, that would be the law's business. Instead, here, what is the law's business was blackmail, extortion, and fraud. Ms. Ganieva was caught red handed. And there is no way her co-Defendants did not know this before adopting and continuing her extortionate and fraudulent scheme. Ms. Ganieva has already profited from her extortion, and she hopes to increase these ill-gotten gains by

¹⁷ See First SLAPP, ECF 46 at ¶¶ 12, 15, 72, 82, 133-149.

pursuing Mr. Black through her escalating campaign of fraudulent litigation and publicity.” First SLAPP, ECF 46 at ¶ 104.

“Congress passed the Racketeer Influenced and Corrupt Organizations Act (‘RICO’) in 1970 because, as Attorney General Robert Kennedy had warned before his death, of the special danger posed when formal and informal groups agree to work together to do wrong. Groups are more likely to succeed, and to escalate, and to do more harm than an individual can acting alone. A group such as this one, which uses the courts as the unwitting vehicle for fraud, extortion, and personal assassination, lawyers as its architects, and the media as the mouthpieces, obstructs the working of the very system we depend upon to do justice.” *Id.* at ¶ 105.

“Had Ms. Ganieva’s [goals] been to redress grievances in the court of law rather than to cancel an individual and everything associated with him, she would have failed. Defendants did not have a leg to stand on, which is why they were forced to resort to bald-faced lies contradicted by Ms. Ganieva’s own texts and talk. But this Enterprise operated not to increase the chance of success in court, but to increase the pressure to pay the blackmailer out of court, to brand the target, to extort him for money by convicting him in the court of public opinion long before any proceedings at all on the merits.” *Id.* at ¶ 107.

“While the extortion and fraudulent pursuit of Mr. Black may not look like a traditional RICO case, machines like this Enterprise, which operate in secret, across state lines, invisibly wreaking havoc unique to our cultural and technological times, represent a threat with even greater potential to disrupt our economy and our social mores than the racketeers of old.” *Id.* at ¶ 108.

“Ms. Ganieva publicly accused Mr. Black of sexual harassing and abusing her for years on Twitter, knowing that those accusations were false, with the intent to cause Mr. Black severe reputational, professional, and economic harm.” *Id.* at ¶¶ 133-134.

“These continued lies that Mr. Black sexually abused Ms. Ganieva were made to cause Mr. Black reputational, professional and economic harm.” *Id.* at ¶ 135.

“Wigdor LLP’s pleadings (actual and proposed) filed on behalf of Ms. Ganieva were shams. Wigdor LLP and Ms. Ganieva knew that the pleadings had no basis in fact and included in them defamatory and libelous statements about Mr. Black that were made (i) without any good faith basis . . . and (v) with the sole purpose of causing Mr. Black severe reputational, professional, and economic harm.” *Id.* at ¶ 136.

“Wigdor LLP filed those complaints on behalf of Ms. Ganieva and in coordination with Mr. Harris, Mr. Rubinstein, and the Flacks not because they had a good faith basis to reasonably believe that their client had any

passably legitimate claim for redress, but because they wanted to publicize and disseminate lurid, scandalous and calumnious accusations about Mr. Black.” *Id.* at ¶ 137.

“With each pleading, Wigdor LLP, Mr. Rubenstein, and the Flacks communicated the filing and substance of that filing to the press.” *Id.* at ¶ 138.

“The allegations in the complaints amount to defamation and libel *per se* under the law as they allege that Mr. Black committed serious crimes, including sexual assault, and thus damages are presumed.” *Id.* at ¶ 142.

“The defamatory statements in Defendants’ pleadings include, but are not limited to: that Mr. Black raped Ms. Ganieva; that Mr. Black ‘sexually harassed and abused’ Ms. Ganieva ‘for years’; that Mr. Black ‘bullied, manipulated, threatened, and coerced’ Ms. Ganieva; that Mr. Black kidnapped her and flew her to Epstein’s home for purported sex trafficking; that Mr. Black previously raped an unidentified woman that he met through Epstein; that Mr. Black is a ‘sadist’ and a ‘sex addict’; and that Mr. Black threatened Ms. Ganieva to sign the NDA, saying ‘If you do not take the money, I will put you in prison’ and ‘If you do not take the money, I will destroy your life.’” *Id.* at ¶ 143.

97. According to Black, Wigdor’s willingness to discuss Ganieva’s allegations in the Ganieva Lawsuit with a reporter from Forbes was proof of defamation *per se*: “Ms. Christensen’s participation in telephone interviews with news organizations, including a statement to Forbes accusing Mr. Black of ‘heinous conduct’ towards Ganieva and of ‘intimidating’ her.” *Id.* at ¶ 144. Of course, speaking with a reporter about a client’s public allegations is not, without more, defamation *per se*.

98. Indeed, Black failed to allege a single “fact” to suggest that Wigdor acted in its capacity as Ganieva’s retained law firm “solely to defame” him.

99. Black even contradicted his own specious allegations against Wigdor. For example, Black repeatedly said Ganieva and Wigdor defamed him to obtain a “financial windfall.” But he knew that Ganieva did not attempt to settle her claims in advance of filing the Ganieva Lawsuit, and, as even he had to acknowledge, *id.* at ¶¶ 70-72, Ganieva “walked away from the

certainty of receiving \$1.2 million a year for nine more years . . . without even making a settlement demand first.” *Id.* at ¶ 2.

100. The fallacy of such assertions was addressed by Judge Engelmayer, who devoted a section of his dismissal opinion to this subject:

Viewed on its own terms, Ganieva’s communications and other conduct in 2021—her tweets, press statements, report to the DA, and state-court lawsuit against Black—do not, as pled, form the *actus reus* of extortion. And [Black’s] FAC does not plead, either, that Ganieva, in 2021, took these actions with the requisite *mens rea*: an intent to extort. . . . the FAC tellingly does not allege that, before taking these actions, Ganieva demanded anew money from Black. On the contrary, the FAC pointedly alleges that Ganieva and her counsel, Wigdor, did not make any pre-litigation demand of him. . . . The FAC itself terms Ganieva’s conduct in 2021 attacking Black and exposing his misdeeds, causing him to cease paying her, as “economically irrational.” Such pleading bolsters that her conduct did not constitute Hobbs Act extortion. It did not entail a threat to money, property, or reputation; a demand of any kind; or an intent to leverage money via a threat.¹⁸

101. On June 30, 2022, Judge Engelmayer dismissed Black’s First SLAPP with prejudice, as he held that the RICO allegations were “glaringly deficient in fundamental respects.”¹⁹ Judge Engelmayer also held that it would be “futile to allow repleading” and denied Black’s request to amend his complaint for a second time.²⁰

102. Black also narrowly escaped Rule 11 sanctions for making frivolous claims.²¹

103. Because the RICO allegations were the only basis for federal jurisdiction, Black’s causes of action under state law, including the defamation claims against Wigdor, were dismissed without adjudication.

¹⁸ *Black v. Ganieva*, 619 F. Supp. 3d 309, 349 (S.D.N.Y. 2022).

¹⁹ *Id.* at 349 n. 24.

²⁰ *Id.*

²¹ See *Black v. Ganieva*, No. 21 Civ. 8824 (PAE), 2022 WL 2354916, at *1 (S.D.N.Y. June 30, 2022).

104. Of course, money is of no concern to Black, so, to further penalize the defendants in the frivolous First SLAPP, Black appealed to the Second Circuit. Once again, Wigdor was forced to incur costs and expenses to defend itself.

105. On March 2, 2023, a three-judge panel of the Second Circuit unanimously upheld the lower court's dismissal of the First SLAPP in its entirety and its decision to deny Black the opportunity to file a second amended complaint.²²

106. Black's allegations against Wigdor were not only factually meritless, but also legally frivolous, as all of Wigdor's conduct was privileged. *See Gottwald v. Sebert*, 40 N.Y.3d 240, 220 N.E.3d 621 (2023).

107. There is no question that Black filed the First SLAPP maliciously and without basis to retaliate against Wigdor and Ganieva for bringing claims against him.

108. As alleged in Ganieva's complaint, she and Black engaged in an extramarital affair, and, starting in 2008, Black sexually assaulted her over a period of years. Ganieva further alleged that, in 2015, after these repeated sexual assaults, she signed, under duress and without being afforded the right to obtain the advice of independent counsel, a purported NDA with Black.

109. Unbeknownst to Ganieva, as described *supra*, at the time Epstein and Karp were working to have Ganieva surveilled and potentially prosecuted or deported. Also, Black was recording various conversations between himself and Ganieva. When she ultimately filed her case, Black retaliated by filing the First SLAPP and attempting to have Ganieva criminally prosecuted.

²² *See Black v. Ganieva*, 619 F. Supp. 3d 309 (S.D.N.Y. 2022), *aff'd*, No. 22-1524-CV, 2023 WL 2317173 (2d Cir. Mar. 2, 2023).

Black's Second SLAPP: Black v. Ganieva and Wigdor

110. Undeterred, on October 31, 2022, Black filed a second SLAPP against Wigdor, this time in New York State Supreme Court.²³

111. Like in the federal First SLAPP, Black's retaliatory state court action forced Wigdor to once again retain separate counsel and incur significant legal costs.

112. In the Second SLAPP, Black dropped the defamation *per se* claim from his First SLAPP and instead alleged against Wigdor another tort, that of tortious interference of contract.²⁴ Black claimed that Wigdor's decision to act as Ganieva's retained counsel in the Ganieva Lawsuit amounted to tortious interference with Ganieva's NDA.

113. As he did in his frivolous federal First SLAPP, Black claimed that Joshua Harris ("Harris"), Ganieva, and Wigdor worked together to smear his reputation. Casting Harris, Ganieva and Wigdor as the "three bad actors," Black wrote, "[a]mong other things, their collective misconduct has cost Plaintiff the chairmanship of the company he founded, took public, and ran for some 30 years."

114. Black made these allegations despite the public revelations following Epstein's death that, between 2012 and 2017, he had paid Epstein nearly \$200 million, as well as Black's forced exit as CEO from Apollo on January 25, 2021.

115. In sum and substance, Black's accusations against Wigdor in the Second SLAPP were the same as the First SLAPP alleging that Wigdor had worked with Ganieva to "destroy Black's personal and professional reputation":

²³ *Leon Black v. Guzel Ganieva and Wigdor LLP*, Index No. 654108/2022 (N.Y. Sup. Ct.) (the "Second SLAPP").

²⁴ *Black v. Ganieva*, Index No. 654108/2022, NYSCEF Doc. No. 1, ¶¶ 102-111.

Wigdor's conduct was malicious and done in bad faith in that Wigdor publicly smeared Black despite knowing that Ganieva's claims were prohibited by the Agreement. Wigdor continued to pursue and ultimately to file false allegations against Black, even after it knew the allegations were demonstrably false.²⁵

116. Black's claims relating to Wigdor involved Wigdor's representation of Ganieva in the Ganieva Lawsuit, *see* Second SLAPP, NYSCEF Doc. No. 1, ¶ 93 ("Despite facing documentary evidence that the additional allegations in the Amended Complaint were fabricated, on September 20, 2021, Wigdor sought permission to file yet another complaint, adding even more new lies to the old ones" and "this pleading too violated the confidentiality and waiver provisions of the Agreement, and was filed with Wigdor's assistance and encouragement and at its inducement.").

117. The purported inducement by Wigdor, according to Black, was Wigdor's comments to the media about the Ganieva Lawsuit, and his "upon information and belief" allegation that Wigdor had "induced" Ganieva to tweet about Black's sexual violence in March 2021, causing Black to cease paying Ganieva to stay silent.²⁶

118. In conclusory fashion, Black said that Wigdor "knew" Ganieva's allegations were "objectively and demonstrably false. Despite this, [Wigdor] took no action to withdraw or correct their pleadings."²⁷ Again, the reason why Black claimed Wigdor "must have known" is because Black said he never sexually assaulted Ganieva and everything she said was a fabrication.

119. In sum, Black's complaint in the Second SLAPP, his amended complaint (NYSCEF Doc. No. 42) and the second amended complaint (NYSCEF Doc. No. 100) rehashed the themes of the federal First SLAPP, revolving around "lies" by Ganieva.

²⁵ NYSCEF Doc. No. 1, ¶ 81; NYSCEF Doc. No. 100, ¶ 98.

²⁶ *See* NYSCEF Doc. No. 42, ¶ 50-51; NYSCEF Doc. No. 100, ¶ 8.

²⁷ *Id.* at ¶ 97.

120. Black cared little that his tortious interference with contract cause of action was bogus.

121. The only goal of Black's Second SLAPP was to punish Wigdor for daring to represent a woman who had accused him of sexual assault.

122. Ganieva's allegations involve matters of public concern and her speech is protected, and so do Wigdor's actions in the course of zealously representing Ganieva.

123. Further revealing that Black's goal is protracted vexatious litigation, he has done everything possible to delay a ruling on Wigdor's motion to dismiss the Second SLAPP—a motion Black knows he will lose.

124. On January 13, 2023, Wigdor filed a motion to dismiss the Second SLAPP. On March 13, 2023, Black filed an amended complaint.

125. On April 14, 2023, Wigdor filed a second motion to dismiss.

126. On June 16, 2023, Black opposed the motion, and Wigdor filed its reply brief on July 5, 2023.

127. On August 14, 2023, the day Black commenced his Third SLAPP against Wigdor, discussed *infra*, in the Second SLAPP Black filed a motion for leave to file a second amended complaint ("SAC").

128. Wigdor opposed the motion, but on March 21, 2024, citing the liberal standard under CPLR § 3025(b), that leave to amend must be "freely given upon such terms as may be just," the court granted Black leave to amend a second time.

129. On March 21, 2024, Black filed his SAC.

130. On April 9, 2024, Wigdor filed its third motion to dismiss the Second SLAPP.

131. Black surely understands that his tortious interference of contract claim against Wigdor is meritless. However, prolonged litigation advances Black's goal of forcing Wigdor to incur additional legal expenses and further damage to its professional reputation.

Black's Retaliatory Sanctions Motions in the Ganieva and Pierson Lawsuits

132. On November 28, 2022, Cheri Pierson ("Pierson") filed a lawsuit alleging that, in 2002, Black raped her on the third floor of Jeffrey Epstein's Manhattan mansion. *Pierson v. Black*, Index No. 952002/2022, New York Supreme Court (again, the "Pierson Lawsuit").

133. Pierson asserted claims under the Victims of Gender-Motivated Violence Protection Law ("VGMVPL") and sought damages for Black's sexual violence. Pierson alleged that Epstein arranged for her to meet Black at Epstein's home, and several weeks after the assault, Black gave her \$5,000 in cash.

134. Pierson retained Wigdor to represent her in her lawsuit.

135. In its capacity as Pierson's legal counsel, Wigdor filed the Pierson Lawsuit.

136. Three weeks later, on December 16, 2022, Black simultaneously filed motions for sanctions against Wigdor in the Ganieva Lawsuit and in the Pierson Lawsuit.²⁸

137. But for substituting Pierson's name for Ganieva's, the sanctions motions were identical, in substance and in spirit.

138. In both, the basis for Black's request for sanctions against Wigdor was the law firm's alleged quest to smear and destroy his reputation.

139. A sampling of the grounds for sanctions filed in the Ganieva Lawsuit provides further insight:

²⁸ See *Ganieva v. Black*, Index No. 155262/2021, NYSCEF Doc. No. 225; *Pierson v. Black*, Index No. 952002/2022, NYSCEF Doc. No. 10.

Wigdor has engaged in a methodical pattern of filing false and unsubstantiated litigation against Black in an attempt to harass him and destroy his reputation.

Wigdor's systematic malicious conduct can only be explained as an intentional effort to ruin Black's reputation, increase leverage against Black with a view toward a financial windfall, and shamelessly promote itself.

[Wigdor] repeatedly abused the court system to launder frivolous, unsubstantiated, and damaging accusations of sexual assault against Black across two lawsuits.

Wigdor has done so in a carefully orchestrated, and ongoing, malicious campaign intended not to redress any legitimate legal grievances but to harass him and attempt to destroy a well-earned and sterling reputation built over decades of professional and charitable endeavors.²⁹

140. Black's absurd allegations were premised on the identical grounds as his First SLAPP and his Second SLAPP, namely, the fundamentally flawed allegation that Ganieva's claims lacked merit. Black repeated his claim that he never sexually assaulted Ganieva, and that Wigdor should be sanctioned for not taking Black at his word. Black takes the indefensible position that, because Wigdor did not "drop the litigation" on behalf of Ganieva, it deserved to be sanctioned.

141. Black used the fact that Wigdor also represents Pierson as grounds for sanctions: "To further increase the public pressure on Black and smear his reputation, Wigdor filed an independent complaint on behalf of Pierson on November 28, 2022—the first business day after the ASA went into effect."³⁰ Further, he used every opportunity to disparage Pierson in the

²⁹ See Index No. 155262/2021, NYSCEF Doc. No. 226.

³⁰ Index No. 155262/2021, NYSCEF Doc. No. 226 at 9.

Ganieva sanctions motion and said that Wigdor “turned to Pierson—a serial litigant whom Black does not know” purely for leverage purposes.³¹

142. Having nothing to do with sanctionable conduct, Black argued that:

The *Pierson* complaint also served to broadcast Wigdor as one of the first firms to file an ASA action. Wigdor, whose practice involves significant numbers of sexual assault and harassment lawsuits, lobbied the New York State Assembly for the passage of the ASA.

The *Pierson* lawsuit serves as an advertisement for Wigdor’s services in this space, and Wigdor has prominently advertised its claims against Black on its website.³²

143. Black never bothered to explain how or why Wigdor’s representation of two plaintiffs with claims against Black is different from the countless other legal actions in which the law firm has successfully represented sexual assault victims – work the firm has engaged in for 21 years.

144. Black filed the sanctions motions vexatiously, knowing they were frivolous and would be denied.

145. On February 7, 2023, the court in the Ganieva Lawsuit denied Black’s motion for sanctions against Wigdor. The court reiterated that Ganieva’s claims did have merit, and it held that Black’s “argument that [Ganieva] and Wigdor advanced meritless claims against [Black] is unavailing.”³³

146. In a carbon copy motion filed on December 16, 2022, Black sought sanctions against Wigdor in the Pierson Lawsuit.

³¹ *Id.*

³² *Id.* at 10.

³³ See *Ganieva v. Black*, Index No. 155262/2021, at NYSCEF Doc. No. 277.

147. In an outrageous example of trying to shame and blame someone making accusations of sexual assault, Black attached to his motion as much information about Pierson's personal life as his expensive team of investigators could uncover, in a cynical effort to embarrass Pierson. Disgustingly, an affidavit detailing irrelevant information about Pierson alleged that she had been sued for uncollected debts by medical entities and credit card companies. Black argued that such alleged lawsuits, if accurate, should have been "evidence" to Wigdor that Pierson must have been lying about her sexual assault claims against Black.

148. On February 6, 2023, the court denied in its entirety Black's preposterous motion for sanctions. *Id.* (Doc. No. 277).

Black's Third SLAPP: Black v. Wigdor LLP and Ganieva

149. On August 14, 2023, Black filed his Third SLAPP against Wigdor, in New York State Supreme Court. *Leon Black v. Wigdor LLP and Guzel Ganieva*, Index No. 158062/2023 ("Third SLAPP").

150. Not only was the new action unquestionably related to Black's Second SLAPP, it was essentially the same claim. Nonetheless, Black's lawyers did not check the box for related actions when they filed the initial paperwork with the New York State Supreme Court.

151. Because vexatious litigation is Black's goal, the last thing he wanted to happen was for the Second SLAPP and the Third SLAPP to be consolidated.

152. Rather, Black wanted it to appear as if Wigdor had been sued numerous times, so, in an act of gamesmanship, he switched the order of the named defendants in the caption.

153. Making Black's malicious intent all the more obvious is the fact that he filed a Second Amended Complaint in the Second SLAPP on the same day he filed (as unrelated) the Third SLAPP.

154. By this time, it was no surprise that Black’s complaint contained in sum and substance the identical allegations against Wigdor set forth in his dismissed federal First SLAPP in 2021, in his Second SLAPP filed in 2022, and in his sanctions motions.

155. For example, even though the individuals with claims against Black were Wigdor’s clients—not Wigdor—his allegations in the Third SLAPP focused on Wigdor:

“[Wigdor] intended simply to harm and humiliate Black, resulting in his resignation from his positions at Apollo and from other high-profile positions he held at other institutions.”³⁴

156. The Third SLAPP repeated the accusations set forth in Black’s First SLAPP in support of his defamation *per se* cause of action. This time, however, Black re-packaged the defamation claim as one for malicious prosecution.

157. Black argued that Wigdor was liable to him for malicious prosecution based on the following, *inter alia*:

Defendant Wigdor LLP (“Wigdor”) has a unique business model: it threatens to sue defendants with scandalous allegations that can be avoided only at the cost of a large settlement, of which Wigdor takes a substantial cut. When Plaintiff Leon Black had the temerity to reject this scheme, Wigdor sought to teach him a lesson by three separate headline-grabbing lawsuits which it knew, or should have known, were false. Third SLAPP, NYSCEF Doc. No. 1, ¶ 1

Plaintiff’s instant claim for malicious prosecution arises out of Wigdor’s unethical and unlawful filing of a series of false and malicious complaints on behalf of Ganieva. Defendants unethically filed these complaints, which lacked even a shred of probable cause and were wholly contradicted by evidence. *Id.*, ¶ 3

Wigdor encouraged and filed Ganieva’s fictitious lawsuit on her behalf and used their public relations acumen and contacts to ensure that her lies were broadly disseminated. *Id.*, ¶ 5

³⁴ See Index No. 158062/2023, NYSCEF Doc. No. 5, ¶ 17.

No ethical or reasonable attorney would have brought such claims.
But Wigdor did. *Id.*, ¶ 6

158. To support his specious claims of malicious prosecution, the Third SLAPP repeated the allegations he used to support his specious claims of defamation *per se*, all of which related to Wigdor's representation of Ganieva and Pierson, including:

On June 1, 2021, [Wigdor and Ganieva] commenced a meritless civil action against Black in New York Supreme Court seeking damages . . . Defendants initiated this action without probable cause and despite knowing that the claims were barred by the [NDA] Agreement. Further, Defendants pursued the meritless claims even after being confronted with facts that exonerated Black. Such conduct demonstrates that Defendants acted maliciously and intentionally for the improper purpose of harassing and injuring Black.

On information and belief, Wigdor incited Ganieva to file her fictitious claims.

As a result of Defendants' conduct, Black's reputation was destroyed, he was forced to step down from the business empire he dedicated his life to building, not to mention leadership positions at numerous philanthropic organizations. Black has suffered public abuse as a result of Defendants' meritless filings harming personal life and ability to conduct business. Black has also expended substantial amounts of time, effort and expense defending himself against Defendants' unwarranted allegations.³⁵

159. As supposed proof of Wigdor's malicious prosecution, Black pointed to the allegations in the Pierson Lawsuit involving Epstein. Of course, Epstein's involvement was relevant to the sexual assault allegations against Black.

160. It was inexcusable to commence a lawsuit alleging malicious prosecution because Wigdor represented a plaintiff who alleged facts about Black that involved Epstein. It is

³⁵ Third SLAPP, NYSCEF Doc. No. 5, ¶¶ 112-116.

understandable that Black no longer wishes to be associated with Epstein, but that is not grounds for a malicious prosecution lawsuit.

161. The vindictive nature of the Third SLAPP is further evidenced by gratuitous derogatory statements in the complaint that were falsely characterized as “alleged facts,” such as:

Wigdor is a bottom feeder, who represents claimants and asserts claims that no plaintiff’s firm with even a shred of legitimacy ever would.

162. Naked opinion disparaging a law firm does not belong in the fact section of a legal complaint, of course. Additionally, despite shamelessly accusing Wigdor of misconduct in public filings, in private, Black’s lawyer Michael Carlinsky of Quinn Emanuel (who signed his name not just to the Third SLAPP Complaint but to other vindictive filings against Wigdor as well) has repeatedly sought from Wigdor legal advice and favors for his own family members and close friends. Carlinsky has also called Wigdor the “best plaintiff’s lawyer,” and he has referred multiple potential clients to Wigdor.

163. Black also used his vast resources to generate well-placed media reporting about his lawsuits against Wigdor, in a further effort to damage and harm Wigdor’s reputation. Black retained public relations consultants for this purpose, who used their connections with esteemed and widely read publications like *The Wall Street Journal* and *Financial Times*, as well as popular social media platforms, to disseminate as much negative press about Wigdor as possible.

164. Black’s Third SLAPP complaint also included false allegations that Pierson tried to settle her claims before filing the Pierson Lawsuit. For example, Black said: “This time, Wigdor followed its usual playbook, threatening to file wholly unsupported claims unless Black paid an exorbitant settlement. When he refused, Wigdor filed yet another baseless lawsuit.”³⁶

³⁶ See Third SLAPP, NYSCEF Doc. No. 2, ¶¶ 16, 17, 96, 97.

165. Pierson did not try to settle her claims before filing her lawsuit.

166. Black knew that Pierson did not try to settle her claims before filing her lawsuit.

167. Black's lawyers knew that Pierson did not try to settle her claims before filing her lawsuit.

168. Undeterred by civil penalties pursuant to New York's anti-SLAPP laws or under the CPLR, Black brazenly filed the complaint with such false content, daring Wigdor to test his resolve.

169. Only after immediate action by Wigdor did Black and his lawyers withdraw the false allegations about pre-litigation demands.

170. On August 24, 2023, Black filed an amended complaint that omitted these falsehoods.

171. Of course, his original complaint with the defamatory statements about Pierson and Wigdor remains on the public docket.

172. As with his Second SLAPP suit, Black began to engage in dilatory tactics in the Third SLAPP. He waited until Wigdor had expended the time and money to fully brief its motion to dismiss to, on October 30, 2023, move to adjourn his deadline to respond to the motion to dismiss with a request to amend his complaint by November 20, 2023.

173. On November 27, 2023, Black filed his second amended complaint.

174. On January 11, 2024, Wigdor filed another motion to dismiss the sole cause of action, malicious prosecution.

175. On September 24, 2024, the court denied the motion to dismiss, and Wigdor promptly appealed to the First Department.

176. On March 6, 2025, in a landmark decision, the First Department reversed the trial court.³⁷

177. The First Department found:

Plaintiff’s malicious prosecution claim involves “public petition and participation” so as to trigger the procedural requirements of New York’s amended anti-strategic lawsuits against public participation (anti-SLAPP) (*see* Civil Rights Law § 76-a and CPLR 3211[g][1]) . . . Plaintiff’s malicious prosecution claim is properly dismissed under CPLR 3211(g)(1), as his opposition failed to show that the claim has a “substantial basis.” “Substantial basis” under the anti-SLAPP law means “such relevant proof as a reasonable mind may accept as adequate to support a conclusion or ultimate fact, which is the same “substantial evidence” standard that “has been equated with the ordinary summary judgment standard” and it requires the submission of evidence such as an affidavit rather than reliance on the mere allegations in the complaint.

FIRST CAUSE OF ACTION
(New York Civil Rights Law § 70-a and § 76-a)

178. Plaintiff hereby repeats, reiterates and re-alleges each and every allegation in all of the preceding paragraphs as if fully set forth herein.

179. New York courts have construed “public interest” broadly, as encompassing all but purely private matters, and they have defined matters of public concern to include “a matter of political, social, or other concern to the community,” even if it does not “affect the general population.”

180. Ganieva’s claims in the Ganieva Lawsuit involved publicly protected speech about matters of public concern and implicated her “right to petition.”

181. By filing a lawsuit, Ganieva also exercised her First Amendment right to access the courts and petition for redress of grievances.

182. Wigdor represented Ganieva in her lawsuit.

³⁷ *See Black v. Ganieva*, 228 N.Y.S.3d 91 (App. Div., First Dep’t 2025).

183. Wigdor's legal representation of Ganieva and any statements about her claims inherently involved protected speech about matters of public concern.

184. Pierson's claims in the Pierson Lawsuit involved publicly protected speech about matters of public concern and implicated her "right to petition."

185. By filing a lawsuit, Pierson also exercised her First Amendment right to access the courts and petition for redress of grievances.

186. Wigdor represented Pierson in the Pierson Lawsuit.

187. Wigdor's legal representation of Pierson and any statements about her claims inherently involved protected speech about matters of public concern.

188. Black, knowing he had no basis in law or in fact for bringing any action against Wigdor for its representation of Ganieva or Pierson, filed multiple strategic lawsuits and/or motions against public participation against Wigdor solely to intimidate and punish Wigdor for its representation of his accusers.

189. Black used his vast resources to generate well-placed media reports about his lawsuits against Wigdor to damage and harm Wigdor's reputation.

190. Black retained public relations consultants to disseminate as much negative press about Wigdor as possible.

191. Black's SLAPPs did in fact cause reputational harm and other compensatory damages.

192. Wigdor is also entitled to an award of attorneys' fees and costs incurred in defending against the SLAPPs and sanctions motions and in prosecuting this action.

193. Wigdor is also entitled to an award of punitive damages.

PRAYER FOR RELIEF

WHEREFORE, Plaintiff prays that the Court enter judgment in its favor and against Defendant, containing the following relief:

- A. A declaratory judgment that the actions, conduct and practices of Defendant complained of herein violate the laws of the State of New York;
- B. An injunction and order permanently restraining Defendant and any and all persons acting in concert with them, from engaging in any such further unlawful conduct;
- C. An award of damages for any and all other monetary and/or non-monetary losses suffered by Plaintiff, including, but not limited to, lost revenues and profits, reputational harm and harm to its professional reputation, including by placing well-placed media reports about his lawsuits and use of social media platforms to disseminate negative press about Wigdor as widely and extensively as possible, in an amount to be determined at trial;
- D. An award of punitive damages, and any applicable penalties and/or liquidated damages, in an amount to be determined at trial;
- E. Prejudgment, post-award prejudgment, and post-judgment interest on all amounts due;
- F. An award of costs that Plaintiff has incurred in this action, including, but not limited to, expert witness fees, as well Plaintiff's reasonable attorneys' fees and costs to the fullest extent permitted by law; and,
- G. Such other and further relief as the Court may deem just and proper.

JURY DEMAND

Plaintiff hereby demands a trial by jury on all issues of fact and damages stated herein.

Dated: New York, New York
March 2, 2026

GISKAN SOLOTAROFF & ANDERSON LLP

By: 

Raymond Audain
1 Rockefeller Plaza, 8th Floor
New York, New York 10020
raudain@gslawny.com
Tel: 212-847-8315

Attorneys for Plaintiff