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April 6, 2026

VIA FEDERAL EXPRESS

Mr. Tim Blackledge
Deputy Examiner in Charge
OFFICE OF THE COMPTROLLER OF THE CURRENCY
101 South Tryon Street
19th Floor
Charlotte, NC 28202

Mr. Peter C. Koch
Director, Litigation Division
OFFICE OF THE COMPTROLLER OF THE CURRENCY
400 7th Street, S.W.
Washington, D.C. 20219

Re: *Jane Doe v. Bank of America, N.A.*, No. 1:25-cv-08520-JSR (S.D.N.Y.)

Dear Mr. Blackledge and Mr. Koch,

We represent Defendant Bank of America, N.A. (“Bank of America” or “Defendant”) in the above-captioned action (“the Action”). Pursuant to 28 U.S.C. § 1715, this notice is to inform you of a proposed settlement of the Action—a lawsuit currently pending in the United States District Court for the Southern District of New York (Rakoff, J.) concerning allegations that Bank of America participated in and benefitted from Jeffrey Epstein’s sex-trafficking venture by virtue of banking and investment services that were provided to Epstein, his co-conspirators, Epstein-related entities, and other Epstein-related individuals.

In accordance with 28 U.S.C. § 1715(b), Bank of America states as follows:

1. The original complaint (filed October 15, 2025) and the amended complaint (filed December 29, 2025) in the Action are contained on the enclosed CD in the folder labeled Tab 1. In addition, all other pleadings filed in the Action are available on the Internet through the federal government’s Pacer service at <https://tinyurl.com/y3fz48sm>. Additional information about the Pacer service may be found at <http://pacer.psc.uscourts.gov>.

April 6, 2026
Page 2

2. By order dated April 3, 2026 (“Preliminary Approval Order”), the Court preliminarily approved the parties’ proposed class action settlement. The Court’s Preliminary Approval Order is included on the enclosed CD in the folder labeled Tab 2. That order sets a final approval hearing on the proposed settlement for August 27, 2026 at 11:00 a.m. in the United States District Court for the Southern District of New York.
3. The proposed forms of direct and publication notice to class members, which provide notice of the proposed settlement and each class member’s right to request exclusion from the class action, are included on the enclosed CD in the folder labeled Tab 3. In the Preliminary Approval Order, the Court approved the proposed forms of direct and publication notice to class members, and authorized distribution of the notices.
4. The parties’ proposed class action settlement agreement dated as of March 27, 2026, including all exhibits (“Settlement Agreement”), is included on the enclosed CD in the folder labeled Tab 4. In the Preliminary Approval Order, the Court preliminarily approved the proposed settlement, finding that it is “fair, reasonable, and adequate” and “(i) is the result of good faith, extensive arm’s-length and non-collusive negotiations; (ii) falls within a range of reasonableness warranting final approval; (iii) has no obvious deficiencies; and (iv) warrants notice of the proposed Settlement to Class Members and further consideration of the Settlement at the Settlement Hearing[.]”
5. There are no additional class-related agreements between class counsel and counsel for Defendant.
6. No final judgment or notice of dismissal has yet been entered in the Action.
7. At this juncture, it is not feasible to provide the name and state of residence for each of the estimated 60 class members covered by the proposed settlement, or an estimate of the number of class members residing in each State and their estimated proportionate share of the settlement. For the sake of completeness, this notice will be served upon the State Attorneys General of all fifty states, Washington, D.C., and all U.S. Territories.

Class members who wish to qualify as participating claimants will submit a confidential questionnaire and release, along with supporting documentation, to the individual who will be appointed by the Court to administer the settlement (“Fund Administrator”). In determining the proportionate share of the settlement amount that each class member is eligible to receive, the Fund Administrator will consider

April 6, 2026
Page 3

the circumstances, severity, type, and extent of that claimant's alleged abuse or trafficking; the nature and duration of the claimant's relationship with Epstein; any cooperation with government investigations, refusal to cooperate with government investigations, or refusal to cooperate with the Action; any convictions related to Epstein's sex-trafficking venture; and the impact of the alleged conduct on the participating claimant. The Fund Administrator will also take the claimant's credibility into consideration when making her award (based on both the claimant's written submission and an in-person or virtual meeting, which may be scheduled at the Fund Administrator's discretion). Each class member's proportionate share will also be dependent upon certain matters to be determined by the Court at the final approval hearing (including, for example, the amount of the attorneys' fees and litigation costs, if any, to award to class members and the amount of any class representative award to Plaintiff), whether certain class members cannot be located, and certain other matters that will not be known until the time of the final approval hearing (including, for example, the number of class members that request exclusion from the Action).

8. Other than the Preliminary Approval Order described above, no written judicial opinions have been issued relating to the proposed settlement as of this date.

Thank you for your attention to this matter.

Very truly yours,

Bethany K. Biesenthal

Bethany K. Biesenthal

CC: All Addressees Listed in Attachment A hereto.
Attachment and Enclosure