



STATE OF NEW YORK
OFFICE OF THE ATTORNEY GENERAL

LETITIA JAMES
ATTORNEY GENERAL

DIVISION OF ECONOMIC JUSTICE
BUREAU OF INTERNET AND TECHNOLOGY

September 6, 2019

Amar Gueye
P.O. Box 655
Buffalo, NY 14205

Re: Our File Number: 19-035010

Dear Amar Gueye:

On behalf of Attorney General Letitia James, I am writing to notify you that we have received your correspondence.

We appreciate your alerting us to this matter. We believe the organization shown below may be able to assist you and we are forwarding your correspondence there.

If you do not receive a response in the near future, please follow up directly with that organization. I suggest you attach a copy of this letter or, if appropriate, mention that you are adding new information.

Thank you for contacting us.

Sincerely yours,

[REDACTED]

[REDACTED]

Bureau of Internet and Technology

cc: U.S. Attorney's Office (SDNY)
1 St. Andrews Plaza
New York, NY 10007



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Faint text on the left side, possibly a date or reference number.

Faint text on the right side, possibly a name or title.

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Third large faint text block, continuing the text.

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From: Papa G <papadg046@gmail.com>
Sent: Tuesday, September 3, 2019 11:12 PM
To: Internet & Technology (BIT)
Subject: Fwd: LEGAL ACTION ON BEHALF OF AFRICAN MINORS VICTIMS OF EPSTEIN'S SEX TRAFFICKING
Attachments: LEGAL ACTION ON BEHALF OF AFRICAN MINORS VICTIMS OF JEFFREY EPSTEIN'S SEX TRAFICKIN.doc

Please Kindly Submit To My Dear Beloved Sister New York Attorney General Letitia James.
Thank You

----- Forwarded message -----

From: Papa G <papadg046@gmail.com>
Date: Tue, Sep 3, 2019 at 10:46 PM
Subject: LEGAL ACTION ON BEHALF OF AFRICAN MINORS VICTIMS OF EPSTEIN'S SEX TRAFFICKING
To: <haveyoursay@bbc.co.uk>

**UNITED STATES FEDERAL COURT
SOUTHERN DISTRICT OF NEW YORK**

Case No. _____

ALL JANE DOES- & JOHN DOES AKA ALL MINORS - BOYS & GIRLS IN THE AFRICAN CONTINENT (AND THEIR BIOLOGICAL PARENTS OR OTHERS), VICTIMS OF SEX TRAFFICKING RAPE, SEXUAL ABUSE, PHYSICAL VIOLENCE, PSYCHOLOGICAL TRAUMA, AND OR ANY OTHER TYPES OF HARM INFLICTED BY JEFFREY EPSTEIN AND HIS ASSOCIATES,
Plaintiff(s),

v.

JEFFREY EPSTEIN'S ESTATES , DEUTSCHE BANK, JPMORGAN & EPSTEIN'S WALL STREET ALLIES , EPSTEIN' S INSURANCE COMPANIES, AFRICAN PRESIDENTS, AFRICAN GOVERNMENTS, THE AFRICAN UNION & ITS MEMBERS & EMPLOYEES, THE UNICEF & ITS EMPLOYEES, THE UNITED NATIONS & ITS EMPLOYEES & THE UNITED STATES GOVERNMENT.

Defendant(s)

TO THE ABOVE-NAMED DEFENDANT(S)

YOU ARE HEREBY SUMMONED to answer the Complaint in this action and to serve a copy of your Answer upon Plaintiff's attorney

..... at the address stated
.....below within twenty 30 days after the personal service of this Summons, exclusive of the day of service if summons are 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.

Plaintiff(s) designate The Manhattan Federal District Court as the place of trial, the basis of venue is the location of Defendant(s)' operations, as well as Defendant(s)' headquarters located at 9 East 71st Street, New York, NY 10021 and/or the places of the causes of action complained of herein.

Dated:

Manhattan, New York

Respectfully Submitted,

ASSIGNED ATTORNEY'S NAME &
ADDRESS

**UNITED STATES FEDERAL COURT
SOUTHERN DISTRICT OF NEW YORK**

Case No. _____

ALL JANE DOES- & JOHN DOES AKA ALL MINORS- BOYS & GIRLS IN THE AFRICAN CONTINENT (AND THEIR BIOLOGICAL PARENTS OR OTHERS), VICTIMS OF SEX TRAFFICKING RAPE, SEXUAL ABUSE, PHYSICAL VIOLENCE, PSYCHOLOGICAL TRAUMA, AND OR ANY OTHER TYPES OF HARM INFLICTED BY JEFFREY EPSTEIN AND HIS ASSOCIATES,
Plaintiff(s),

v.

JEFFREY EPSTEIN'S ESTATES , DEUTSCHE BANK, JPMORGAN & EPSTEIN'S WALL STREET ALLIES , EPSTEIN' S INSURANCE COMPANIES, AFRICAN PRESIDENTS, AFRICAN GOVERNMENTS, THE AFRICAN UNION & ITS MEMBERS & EMPLOYEES, THE UNICEF & ITS EMPLOYEES, THE UNITED NATIONS & ITS EMPLOYEES & THE UNITED STATES GOVERNMENT ET AL,

Defendant(s),

PRILIMINARY STATEMENT

Plaintiffs by their attorney(s) assigned by the Office of the New York State Attorney General, or the Office of the United State Attorney General, The American Civil Liberties, The National Bar Association Association or Any Legal Entity in the United States that cares about the plight of these vulnerable African minors at the hands of the pervert pedophiles such as Jeffrey Epstein and his associates, bring this case against the Pedophile Jeffrey Epstein's Estate and all the above mentioned Defendants for said crimes committed by the Defendant(s) herein and as a direct result of :

Defendants conducts herein, have caused Plaintiffs to suffer and will continue to suffer great pain of mind and body, severe and permanent emotional distress, physical manifestations of emotional distress, problems sleeping and concentrating, low self-confidence, low self-respect, low self-esteem, feeling of worthlessness, feeling shameful, and embarrassed, feeling alone and isolated, losing faith in God, losing faith in the protection and responsibility of African Governments and or (the American Government & The United Nations)' fiduciary role to safeguard the protection of children throughout Africa. Defendants' criminal conducts have caused Plaintiffs irreparable pains like feeling estranged from African Mainstream society and traditional African

cultures, struggling with alcohol problems, battling anorexia, feeling helpless and hopeless, problems with sexual intimacy, relationship problems, trust issues, feeling confused and angry, feeling that the good things have been ruined, feeling sad and depressed, feeling anxiety, having panic attacks, crying, feeling dirty and used, feeling suicidal, having flashbacks, feeling like they have taken the wrong road, feeling that their innocence was stolen, and feeling that their lives have been ruined.

Plaintiffs were prevented and will continue to be prevented from performing normal daily activities and obtaining the full enjoyment of life; has incurred and will incur in the future medical and psychological treatment together with the expenses associated therewith; and upon information and belief has incurred and will continue to incur loss income and/or loss of earning capacity as a result of the sexual abuse described herein.

JURISDICTION AND VENUE

1-This Court has personal jurisdiction over the Defendants pursuant to CPLR §§ 301 and 302, in that the Defendants named herein reside in and/or conduct business in New York, and, at times relevant herein, conducted activities in New York that gives rise to the claims asserted in the State of New York.

The United States Constitution, in Article III, § 2, gives the Congress the power to permit federal courts to hear diversity cases through legislation authorizing such jurisdiction. Diversity jurisdiction is currently codified at 28 U.S.C. § 1332. " Please see 28 U.S. Code § 1402. United States as defendant.

On the State level, . Venue for this action is proper in the Manhattan Court pursuant to CPLR 503 in that most Defendant(s) reside and transact business in this County and all or a substantial part of the events and/or omissions upon which this action is predicated occurred therein.

PURSUANT TO BP oil spill lawsuit in UNITED STATES That was granted class-action status, similarly, this case deserves proper and fair adjudication in Federal court in the interest of justice.

A U.S. judge has allowed a group of BP Plc (BPL) shareholders to pursue a class-action lawsuit accusing the company of misleading them by understating the severity of the 2010 Gulf of Mexico oil spill. On about November 15, 2012, BP agrees to record criminal penalties for U.S. oil spill: NEW ORLEANS/WASHINGTON (Reuters) - BP Plc will pay \$4.5 billion in penalties and plead guilty to felony misconduct in the Deepwater Horizon disaster, which caused the worst U.S. offshore oil spill ever.

PARTIES

Plaintiffs-AKA All Jane Does & John Does have resided within their respective African countries where Defendants flew his private jet with his friends to entice,

lure and coerce these African vulnerable minors into pervert sex acts they would never have committed at the presence of their biological parents or legal guardians. Plaintiffs who live in poor and underdeveloped countries where there is no sustainable accountability for the rule of law most of the time, did not have access to a legal system where they can seek justice. Plaintiffs were either mostly illiterate or with little education and had no knowledge of their legal rights.

The United States Federal Court- Southern District of New York at all times relevant to the cause(s) of action that has accrued herein.

4. Defendants JEFFREY EPSTEIN'S ESTATES , DEUTSCHE BANK, JPMORGAN & EPSTEIN'S WALL STREET ALLIES , EPSTEIN' S INSURANCE COMPANIES, AFRICAN PRESIDENTS, AFRICAN GOVERNMENTS, THE AFRICAN UNION & ITS MEMBERS & EMPLOYEES, THE UNICEF & ITS EMPLOYEES, THE UNITED NATIONS & ITS EMPLOYEES & THE UNITED STATES GOVERNMENT ET AL, are all legally liable for the criminal acts, permission of the criminal acts and or dereliction of duty to protect poor and vulnerable African minors in African countries.

At all relevant times, Mr. Jeffrey Epstein operated his sex trafficking business and related criminal activities in the States of New York with its principal place of business located at 9 East 71st Street, New York, NY 10021 in coordination with his sex business at his multiple locations throughout the world. According to MarkWatch' s article of July 28, 2019, Jeffrey Epstein's Upper East Side on the Upper East Side of Manhattan where Jeffrey Epstein lived in what's reportedly one of the largest private homes in Manhattan, where he allegedly sexually abused underaged girls, an allegation so horrific, real-estate experts say people will go out of their way to avoid walking down the block.

Defendant's principal place of business located at 9 East 71st Street, New York, NY 10021 remained the epicenter of the Epstein Sex Scandal.

Defendants' so called foundation located in his private island in the Virgin Island is nothing but a camouflage and a corporate extension of his sex trafficking business. Upon information and belief, it does not file a yearly tax return with the Internal Revenue Service based upon its designation as an Off Shore Business Entity. Epstein's foundation is an Incorporated Not-for Profit organization serving as a private grant-making foundation blended with his multiple criminal enterprises. The one Billion Dollar Questions here are:

-Does the IRS have Foreign Account Tax Compliance (FATCA) files available on Epstein that might inform with regard to Epstein's foreign financial transactions?

-Have local New York and Florida banks filed Currency Transaction Reports (CTRs) with FinCEN regarding cash deposits and/or withdrawals by Epstein that might explain the "tons of cash" found in his safe?

CAUSES OF ACTION

FIRST CAUSE OF ACTION

Intentional Sexual Crimes and Acts

Plaintiff(s) repeat and realleges each and every allegation set forth in the preliminary statement.

18 U.S. Code § 2340:

(1)

"torture" means an act committed by a person acting under the color of law specifically intended to inflict severe physical or mental pain or suffering (other than pain or suffering incidental to lawful sanctions) upon another person within his custody or physical control;

(2)"severe mental pain or suffering" means the prolonged mental harm caused by or resulting from—

(A)

the intentional infliction or threatened infliction of severe physical pain or suffering;

(B)

the administration or application, or threatened administration or application, of mind-altering substances or other procedures calculated to disrupt profoundly the senses or the personality;

(C)

the threat of imminent death; or

(D)

the threat that another person will imminently be subjected to death, severe physical pain or suffering, or the administration or application of mind-altering substances or other procedures calculated to disrupt profoundly the senses or personality; and

Plaintiffs herein have been raped, sexually abused and assaulted pursuant to Section 130 of the New York State Penal Law.

Said crimes committed by the Defendant(s) herein and as a direct result of the Defendant(s) conduct herein, has caused Plaintiff(s) to suffer and will continue to suffer great pain of mind and body, severe and permanent emotional distress, physical manifestations of emotional distress, problems sleeping and concentrating, low self-confidence, low self-respect, low self-esteem, feeling of worthlessness, feeling shameful, and embarrassed, feeling alone and isolated, losing faith in God, struggling with alcohol problems, battling anorexia, feeling helpless and hopeless, problems with sexual intimacy, relationship problems, trust issues, feeling confused and angry, feeling that the good things have been ruined, feeling sad and depressed, feeling anxiety, having panic attacks, crying, feeling dirty and used, feeling suicidal, having flashbacks, feeling like they have taken the wrong road, feeling that their innocence was stolen, and feeling that their lives have been ruined.

Plaintiff(s) were prevented and will continue to be prevented from performing normal daily activities and obtaining the full enjoyment of life; has incurred and will incur in the future medical and psychological treatment together with the expenses associated therewith; and upon information and belief has incurred and will continue to incur loss income and/or loss of earning capacity as a result of the sexual abuse described herein.

SECOND CAUSE OF ACTION

Negligent Hiring/Retention

Supervision/Direction

Please see U.S. Codes 22 42 U.S.C. § 5851(c). 23 29 U.S.C. § 215(a)(3). 24 29 U.S.C. § 216(b). and 29 U.S.C. § 660(c). 35 42 U.S.C. § 300j-9(i)(1),(2). ; 36 42 U.S.C. § 300j-9(i)(3),(4). 37 18 U.S.C. § 1514A(a). 38 18 U.S.C. § 1514A(b)(2)(D). 39 18 U.S.C. § 1514A(c), (d).

Plaintiff(s) repeat and reallege each and every allegation set forth in the preliminary statement: Violations of U.S. Child Labor Laws:

As per the **Child Labour** (Prohibition and Regulation) Act, 1986, amended in 2016 ("CLPR Act"), a "**Child**" is defined as any person below the age of 14, and the CLPR Act prohibits employment of a **Child** in any employment including as a domestic help. It is a cognizable criminal offense to employ a **Child** for any work.

The sexual abuse of children by adults, including celebrities was foreseeable at all relevant times whenever Jeffrey Epstein was in African soil with his wealthy associates.

Defendant(s) negligently hired, retained, directed, and enticed, coerced Plaintiff(s) into dangerous and degrading sex acts without the protection of African

Authorities or African Law Enforcers who knowingly derelicted on their duty to serve, supervise and protect these poor children from the Defendants who posed a serious threat of sexual abuse and physical harm to all children in the African Continent.

Jeffrey Epstein and his associates have carefully calculated their crimes of sex trafficking in the African continent by using sophisticated means such as a private jet and lucrative offers to recruit poor African minors to participate in his criminal sex enterprises and to fulfill their pedophilia acts.

African Authorities were very well aware of the criminal sex trafficking business conducted on African soil By Epstein and his associates.

Defendant(s) owed a duty care care to all persons, including Plaintiff(s), who were likely to come within the influence of the Defendants, in their roles as adults, wealthy business operators, celebrities, supposedly role models or philanthropists, African authorities, legal guardians, protectors, teachers, counselors, trustees, directors, officers, employees, agents, servants and/or volunteers, and to insure that the Defendant did not abuse their authority to injure minors by sexual assault, battery, and/or abuse on African Soil.

At all times material hereto, Defendants' actions were willful, wanton, malicious, reckless, and/or outrageous in their disregard for the rights and safety of the Plaintiffs.

As a direct and proximate result, Plaintiffs have suffered and will continue to suffer the injuries described herein after.

By reason of the foregoing, the Defendants are liable to the Plaintiffs jointly, severally, and/or in the alternative, for compensatory damages, and for punitive damages, together with interest and costs.

THIRD CAUSE OF ACTION

Negligence/Gross Negligence

Please see U.S. Codes 46 15 U.S.C. § 2622(a). 47 15 U.S.C. § 2622(b). 48 15 U.S.C. § 2622(c),(d).

Plaintiff(s) repeat and reallege each and every allegation set forth in the preliminary statement as if fully set forth herein.

Defendant(s) knew, or were negligent in not knowing, that Jeffrey Epstein and his pedophile associates posed a threat of sexual abuse and harm to the Plaintiffs.

The acts of covering up and or facilitating the Defendants' sex-trafficking business described herein above were undertaken, and/or enabled by, and/or during the course, and/or within the scope of the Defendants ' multiple and secret trips to African Countries.

Defendants owed Plaintiffs who at relevant times herein were minors, a duty to protect them from the sexual deviancy of the Defendants, both prior to and/or subsequent to the misconduct committed herein.

Defendant(s) willful, wanton, gross negligent and /or negligent act(s) of commission and/or omission, resulted directly and /or proximately in the damages set forth for years.

Defendant(s) :

- a. provided improper or ambiguous orders or failed to make proper regulations, and/or employed improper persons or instrumentalities in work involving risk of harm to others;
- b. failed adequately to supervise the acts of the Defendants Pedophiles
- c. permitted, and/or intentionally failed and/or neglected to prevent, negligent and/or grossly negligent conduct and/or allowed other tortious conduct by persons, whether or not their servants and/or agents and/or employees, upon or with instrumentalities under their control; and
- d. allowed the acts of omission and/or commission and/or any or all of the allegations in this Complaint to occur.

At all times material hereto, with regard to the allegations contained herein, the **Defendants, Pedophiles were under the direct supervision, employ and/or control of the African Presidents, African governments, African Law enforcers, The agencies of the African Union, UNICEF ,The United Nations agencies and The United States Government.**

At all times material hereto, defendant(s) actions were willful, wanton, malicious, reckless, and outrageous in their disregard for the rights and safety of the Plaintiff(s), which represented criminal conduct.

As a direct result of said conduct, Plaintiff(s) have suffered the injuries and damages described herein. herein.

By reason of the foregoing, Defendant(s), jointly, severally and/or in the alternative, are liable to the Plaintiff(s) for compensatory damages, and for punitive damages, together with interest and costs.

FOURTH CAUSE OF ACTION

Breach of Fiduciary Duty

Please see HISTORY: § 2921.44. Dereliction of duty.

134 v H 511 (Eff 1-1-74); 148 v S 12. Eff 6-8-2000.

19xx Committee Report or Comment; 1974 Committee Comment to H 511

Plaintiffs repeat and reallege each and every allegation set forth in the preliminary statement.

Through their position at the Defendant(s) facilities, private Plane and private hotel rooms in African soil, Plaintiffs were placed in direct contact with other minor children. Defendants lured Plaintiffs inside Hotel rooms, in Mr. Epstein's private Jet and other secluded areas for money. It was under these circumstances that Plaintiffs came under the direction and control of the Defendants who used their power over the Plaintiff to sexually abuse them.

There exists a fiduciary relationship of trust, confidence, and reliance between the Plaintiffs and all the Defendants.

Pursuant to this fiduciary relationship, Defendant(s) assumed a duty to act in the best interests of the Plaintiff(s).

Defendant(s) breached their fiduciary duties to Plaintiff(s).

At all times material hereto, Defendant(s) actions and/or inactions were willful, wanton, malicious, reckless, and outrageous in their disregard for the rights and safety of the Plaintiff(s).

As a direct result of said conduct, Plaintiff(s) have suffered injuries and damages described herein.

By reason of the foregoing, Defendant(s), jointly, severally, and/or in the alternative, are liable to the Plaintiffs for compensatory damages, and for punitive damages.

FIFTH CAUSE OF ACTION

Breach of Statutory Duty to Report Abuse under Soc. Serv. Law Sections 413 and 420

Plaintiffs repeat and reallege each and every allegation set forth in the preliminary statement as if more fully set forth in this cause of action. Pursuant to N.Y. Soc. Serv. Law Sections 413 herein.

Pursuant to N.Y. Soc. Serv. Law Sections 413 and 420, Defendants had a statutory duty to report reasonable suspicion of abuse of children in their care.

Defendants breached that duty by knowingly and willfully failing to report

reasonable suspicion of abuse by Defendants.

As a direct and/or indirect result of said conduct, Plaintiffs have suffered injuries and damages described herein.

By reason of the forgoing, Defendants, jointly, severally, and/or in the alternative, are liable to Plaintiffs for compensatory damages, and for punitive damages, together with interest and costs.

SIXTH CAUSE OF ACTION

Violation of New York Debtor-Creditor Law

Plaintiff(s) repeat and reallege each and every allegation set forth in the preliminary statement.

Upon information and belief, the Defendants have engaged and continues to engage in a course of conduct which seeks to hide Defendants' assets held by, owned and/or possessed by the Defendants', use capricious means to absolve Defendants and or wave the liability of Defendants from the totality of their criminal activities in African soil at all relevant times for years.

Upon information and belief, The Defendants have engaged in a course of conduct in transferring, assigning and hypothecating assets in anticipation of foregoing debt obligations, engendered by lawsuits and other legal actions pending/or that will be pending,

whereby the Estate of Jeffrey and its associates, its financial allies will be named as a Defendant, together with African Presidents, African governments, African Law enforcers, The agencies of the African Union, the agencies of UNICEF ,The United Nations agencies and The United States Government.

The act and /or acts of transferring, assigning, or hypothecating assets in anticipation of forthcoming debt obligations constitutes a fraud upon creditors and/or potential creditors as defined with N.Y. Debtor-Creditor Law Section 275.

That upon information and belief, assets having a fair market value in excess of dozens of Millions of Dollars have been transferred, assigned and /or hypothecated to other entities by Jeffrey Epstein and his Billionaire Associates and celebrities to African Authorities who knowingly allowed such a corrupt sex-trafficking machine to go on for years in African soils to the detriment of poor African minors with impunity.

Said entities include but are not limited to the Jeffrey Epstein's foundation, DEUTSCHE BANK, JPMORGAN & EPSTEIN'S WALL STREET ALLIES , EPSTEIN' S INSURANCE COMPANIES , African Presidents, African governments, African Law enforcers, The agencies of the African Union, the agencies of UNICEF ,The United Nations agencies and The United States Government.

That upon information and belief, Defendant Jeffrey Epstein and his associates were responsible for the transfer, assignment and/or hypothecation of assets to corrupt African Authorities under the blind eyes of the United States Governments and its racist judicial branch to willfully auction African children in the world market. This activity was promulgated and carried out in anticipation of forthcoming legal actions filed or legal actions that would be filed at the aftermath of Jeffrey Epstein's first criminal trial in the state of Florida.

According to Reporter Colin DWYER, Prosecutors and accusers say that from at least the early 2000s, Epstein and his network of friends recruited girls as young as 14 years old, misled them and forced them to have sex with him and other prominent men. Though suspicions long lingered around the financier, he eluded attempts to get him to stand trial – including in 2008, when he accepted a lenient plea deal that meant only about a year in jail for the sex crime he admitted.

That upon information and belief, Defendants have violated and continues to violate the New York State Debtor-Creditor Law including but not limited to Sections 274, 275 and 276.

That by reason of the foregoing, Defendant(s) jointly, severally, and/or in the alternative, are liable to Plaintiff(s) for all assets, funds and money fraudulently transferred, assigned and/or hypothecated, including the payment of counsel fees as defined within Section 276-A of the New York Debtor-Creditor Law.

SEVENTH CAUSE OF ACTION

Loss of Consortium

Plaintiff(s) repeat and reallege each and every allegation set forth in the preliminary statement.:

Plaintiff(s) who may still be living in various parts of Africa or outside of Africa have suffered psychological damages that has negatively impacted their ability to get married based on the stigma and stereotypes in traditional and cultural African lifestyles. Plaintiffs have also suffered constant dissolution of marriages and relationships over the years pertaining to the relevance of this case.

That as a result of the wrongful intentional, reckless, and negligent acts, together with the criminal acts of the Defendant(s) as heretofore alleged; Plaintiff(s) were caused to suffer, and will continue to suffer in the future, loss of consortium, loss of society, affection, assistance, and conjugal fellowship, all to the detriment of their marital relationship.

That all of the injuries and damages were caused solely and proximately by the wrongful conduct and omissions of Defendant(s).

By reason of the foregoing, Defendant(s) jointly, severally, and/or in the alternative, are liable to Plaintiff(s) for compensatory damages, and for punitive damages, together with interest and costs.

EIGHT CAUSE OF ACTION

Whistle Blower Cause of Action

Please see U.S. Codes 49 P.L. 101-12, 103 Stat. 16; P.L. 103-424, 108 Stat. 4361 (codified, as amended, in various sections of Title 5 U.S.C.). 50 5 U.S.C. § 2302(a)(2)(B). 51 5 U.S.C. § 2302(a)(2)(B)(i). 52 5 U.S.C. § 2302(a)(2)(B)(ii). 53 5 U.S.C. § 2105(e).

Please see U.S. Codes 5 U.S.C. § 7701(b)(2)(A). 72 5 U.S.C. § 1212(c)(2). 73 5 U.S.C. § 1211(a). It provides that the Office of Special Counsel (OSC) will be headed by the Special Counsel and have a judicially noted official seal. The Senate report states that although the MSPB and the OSC had "separated themselves administratively in 1984," the whistleblower legislation "completes this process by establishing the OSC as an independent agency." S.Rept. 100-413 at 18. Moreover, the statute provides that the Special Counsel, appointed by the President, with the advice and consent of the Senate, may only be removed from office for "inefficiency, neglect of duty, or malfeasance in office." 5 U.S.C. § 1211(b).

Plaintiff(s) repeat and reallege each and every allegation set forth in the preliminary statement.

That Plaintiffs became aware of the gravity of the sex abuse by foreign agencies in African Soil, informed African Authorities in the case of the sex abuses committed by the French peacekeeper in the Central Republic of Africa and others and the corrupt African Authorities cowardly kept a blind eye and a silent voice concerning the wrongful conducts being exhibited by Defendants.

New York Law as codified under The Labor and relevant sections including but

not limited to N.Y. Labor Law Section 740; encourages employees to come forward and report violations on the part of their employers. To encourage this reporting New York State has enacted legislation to protect employees from being retaliated against for reporting wrongful conduct.

The lack of reporting of such a criminal enterprise by African authorities, African governments, The agencies of the African Union, the agencies of UNICEF, the agencies of the United Nations and the United States Government along with the International Criminal Courts as required pursuant to the NY Soc. Serv. Law Sections 413 and 420 violated such law as well.

Plaintiff(s) have sustained pecuniary loss, compensatory loss, mental anguish and suffering as a result of the Defendants wrongful conduct in instituting retaliation against these plaintiff(s).

161. That all the injuries and damages were caused solely and proximately by the wrongful conduct of the Defendant(s). That the Defendant(s) have caused mental and physical, pain and suffering among the Plaintiff(s). Defendant(s) Intentional/negligent infliction of emotional upset has damaged the Plaintiff(s).

By reason of the foregoing, Defendant(s) jointly, severally, and/or in the alternative, are liable to Plaintiff(s) for compensatory damages, and for punitive damages, together with the interest and costs.

NINTH CAUSE OF ACTION

The Racketeers Influenced and Corrupt Organizations Act (RICO)

18 U.S.C. Sections 1961-1968

Plaintiff(s) repeat and reallege each and every allegation set forth in the preliminary statement.

Defendant(s) are "persons" or entities within the meaning of U.S.C. Section 1961(3) who conducted the affairs of the enterprise through a pattern of racketeering activity in violation of U.S.C. 18 Section 1962.

Section 1961(4) consisting of (i) Defendant(s) including their employees and agents; (ii) the priests; (iii) accountants; (iv) attorneys and other co-conspirators as set forth herein.

THE JEFFREY EPSTEIN'S ESTATE, DEUTSCHE BANK, JPMORGAN & EPSTEIN'S WALL STREET ALLIES, EPSTEIN'S INSURANCE COMPANIES ET AL, AFRICAN PRESIDENTS, AFRICAN GOVERNMENTS, THE AFRICAN UNION & ITS MEMBERS & EMPLOYEES, THE UNICEF & ITS EMPLOYEES,

THE UNITED NATIONS & ITS EMPLOYEES & THE UNITED STATES GOVERNMENT.

Defendants are an ongoing entities (enterprises) that function as a continuing unit and used as a tool to effectuate Defendants' pattern of racketeering.

Defendants fall within the meaning of 18 U.S.C. Section 1961(4) and

consists of "persons" associated together for the common purpose of; (i) harassing, threatening, extorting, and misleading victims' of sexual abuse committed by priests; and misleading Defendant victims and the media to prevent the reporting, disclosure or prosecution of the sex trafficking, and (ii) destroying, mutilating, or concealing records, documents or other evidence to prevent the use of such evidence to report or prosecute their sexual crimes. Defendants conducted and participated in the criminal conduct

through a pattern of racketeering activity within the meaning of 18 U.S.C. Section 1961(1) and 1961 (5), which includes multiple instances of tampering with a witness or victim in violation of 18 U.S.C. Section 1512, and multiple instances of obtaining victim(s) for the purpose of committing or attempting, but not limited to aggravated sexual abuse, rape and sodomy, in violation of N.Y. Penal Law Sections 130-130.50 and 18 U.S.C. Sections 1590 and 1591.

Within the Jeffrey Epstein's sex enterprise, there was a common communication network by which co-conspirators shared information on a regular basis. Defendants used the common communication network for the purpose of enabling the criminal sexual activities of Defendants in African Soil at all relevant times without accountability.

Each Defendant and or participant participant in the Epstein's Sex Trafficking racketeering "enterprise" has a systematic linkage to each other participant through organizational ties, organizational relationships, financial ties, and the continuing coordination of their activities, through Epstein's Financial associates. The Defendant(s) and their co-conspirators functioned as a continuing unit with the purpose of furthering the illegal scheme, conduct and their common purpose.

The RICO Defendant(s) used the mails and wire for the transmission, delivery, and/or shipment of the following by the RICO Defendant(s) or third parties, that were foreseeably caused to be sent as a result of Defendant(s) illegal scheme:

- a. Contracts between Jeffrey Epstein's associates, accountants, and attorneys, who advised, counseled, and enabled the criminal RICO enterprise;
- b. Wires among The Jeffrey Epstein's circle of friends and organizations that assisted in facilitating the RICO enterprise;
- c. Payments to the law firms and accountants to perform their roles in

concealing the misconduct of the Defendants;

d. Emails from the law firms and accountants to perform their roles in concealing the sexual misconduct inherent within the Jeffrey Epstein's circle of friends.

e. Emails to members and/or employees of the Defendants to manage the location and/or relocation of the employee and co-conspirators or other perpetrators of the RICO organization.

The RICO Defendant(s) utilized the interstate and intercontinental mail and wires for the purpose of obtaining money or property, or concealing the transfer, assigning or hypothecating money or property, by the means of omissions, false pretenses, and misrepresentations described herein.

The RICO Defendant(s) also used the Internet and other electronic facilities to carry out the scheme and conceal the ongoing illicit activities.

The RICO Defendant(s) also communicated by U.S. mail, by interstate facsimile,

and by interstate electronic mail with various other affiliates, regional offices, divisions, and other third-party entities in furtherance of the scheme.

The mail and wire transmissions described herein were made in furtherance of Defendant(s) scheme and common course of conduct to deceive the public about the illicit sexual conduct rampant within the Epstein's circle of friends.

By reason of the foregoing, the Defendant(s) are in violation of both the New York State and Federal RICO provisions and the Plaintiff(s) should be awarded damages forthwith.

TENTH CAUSE OF ACTION

Piercing The Corporate Veil

Alter Ego Doctrine

Plaintiff(s) repeat and reallege each and every allegation set forth in the preliminary statement.

Please see U.S. Coded 49 P.L. 101-12, 103 Stat. 16; P.L. 103-424, 108 Stat. 4361 (codified, as amended, in various sections of Title 5 U.S.C.). 50 5 U.S.C. § 2302(a)(2)(B). 51 5 U.S.C. § 2302(a)(2)(B)(i). 52 5 U.S.C. § 2302(a)(2)(B)(ii). 53 5 U.S.C. § 2105(e).

The Defendant, promulgated, formed, and incorporated various business entities as apart of its' business operations and organization.

That these entities were formed as Not-For -Profit & Philanthropic Corporations which would exempt them from various regulations Tax Exempt entities would be entitled to.

Said Philanthropic not-for-profit corporations & Foundations were not required to file yearly fiscal tax returns and were not subject to regulations similar other public corporations.

That the Defendants have utilized these various entities and organizations to transfer, assign, commingle and conceal assets.

That the Defendant(s) corporate designations are alter egos of the "Defendants.

That Defendant(s), Their Foundations and or subsidiaries are used to transfer, assign, commingle and/or conceal assets of all the above named defendants

That, the corporations utilized by the Defendants, have been utilized for wrongdoing, fraud, and injustice to third parties.

Defendants, have failed to maintain separate and distinct identity among the corporate Defendant(s). Said corporations are but an alter ego of their principal places of business.

Wherefore, the corporations of The Foundation of Jeffrey Epstein and its criminal co- conspirators should be dissolved by judicial decree at the conclusions of all legal actions caused by these criminal entities.

WHEREFORE, Plaintiff(s) demand judgment against the Defendants on each cause of

action as follows:

- a. Awarding compensatory damages in an amount to be proved at trial and not less than Five Hundred Million Dollars.
- b. Awarding punitive damages to the extent permitted by law;
- c. Awarding prejudgment interest to the extent permitted by law;
- d. Awarding costs and fees of this action, including attorney's fees, to the extent permitted by law; and
- e. Awarding such other and further relief as to this Court may seem just and proper.

f. Implement new national and International rules & regulations as recommended by the Human Rights Advocate & International Legal Scholar, the Honorable Gueye, Amar Coura for a binding equal protection of the rule of law and in the interest of Justice across Continental jurisdictions.

JURY DEMAND

Plaintiff(s) demand a trial by jury on all issues so triable.

Dated: September 2, 2019

Respectfully Submitted,

PLAINTIFF'S ASSIGNED ATTORNEY

RECOMMENDATIONS

I, GUEYE AMAR COURA respectfully recommend that THE AFRICAN GOVERNMENTS INDIVIDUALLY & COLLECTIVELY THROUGH THE AFRICAN UNION, THE UNITED NATIONS, UNICEF, THE INTERNATIONAL CRIMINAL COURTS, THE EUROPEAN UNION, CANADA, AUSTRALIA, ASIAN & PACIFIC NATIONS AND THE UNITED STATES ENFORCE NEW RULES THAT:

-All western philanthropies, medical foundations, international academic institutions, European or American along with Asian institutions funding women's groups in Africa or Black populations must first register in their own countries of origin, they must register with the United Nations and must provide in writing their true mission, goal and the transparent reason why they intend to conduct business in African countries.

-These western entities must provide a timeline for each trip they make to any African country, what do they intend to do, what population group they seek to work with, what kind of service they want to implement in African Countries and what do they expect in return? Nobody is working for nothing no matter what is their hidden motive. Therefore the truth must be spelled out about any project in African soil with a mandatory accountability at the end of each project with dates, data and proof of contribution. As an advocate for Human Rights, I am equally the founder of a 501c 3 Tax Exempt NGO in the United States. I sure can speak about our accomplishments and achievements for the past Twenty Five Years without a single dime from The Racist United States Government. The multiple American and Canadian organizations that have covertly or overtly copied our programs will not dare to challenge my statement here. If not, I invite them all to meet me on National Television or on BBC World News to make their case.

The Senegalese Business Women who have used the micro-loans of my non profit to start their business enterprises have successfully managed their profits to launch imports-exports projects in China or Europe and still live in peace with their husbands. Those African women do not need a cheap cell phone from any so called White Woman Billionaire who will attempt to trick them to sell their husband or become a Lesbian for any reason.

-It is the duty of every African president, his or her government and African NGOs, the African Union, the United Nations, UNICEF, the European Union, Canada, Russia, The Asian & Pacific Countries to monitor on a daily basis all western foundations and

western companies, to ask questions, write daily reports on their daily activities to establish accountability and transparency and to prevent future exploitation of African children and African women for something as frugal as a cell phone or small amount of money. Black women in Africa and the United States must understand that no white person or white foundation is going to love them more than they can love themselves. I had many "so called White friends when my two television programs were broadcasting on the air. Now that the Truth Matters program is no longer on the air, I do no longer hear from those white folks. I will tell them good riddance and may God Bless them.

Any white institutions or white person that is offering you money or a chip electronic gadget to sell your husband or your family, such an offer is manipulating you to unknowingly auction your own father, your own children and your own life and when you die, God will burn your soul eternally for your fraudulent business transaction.

Any so called White Woman Billionaire who comes to Africa and telling you to abandon your husband for a cell phone or any amount of money is only using the same old tricks to divide and conquer African people just like her white ancestors and white pirates have sold millions of your ancestor for four hundred years.

These so called White Woman Billionaires have a vicious untold vendetta against Black Men & Black Muslims for whatever reason and are using hateful messages like "African men abuse Black women". The candid truth is that white men have more means to buy and consume alcohol than Black men, white men tend to get drunk more than any one else but no matter how much they get drunk and beat their wives or children, no one is crucifying them around the world.

Please see the following data:

According to the 2003 NSDUH, 38.2% of White young adults 18 to 25 years of age in the U.S. reported any illicit drug use in the past year, followed by African-American (30.6%) and Hispanic (27.5%) young adults (SAMHSA, 2004a)

These European, American, Canadian, Australian and even Asian organizations or companies must provide to African Governments, The African Union and the United Nations a clear and verifiable data of what did they accomplish at the end of their project, what type of data did they collect, what kind of medicine did they distribute to African population, what are the effects of such medicines, what region, state, city or segment of the population did the western entity work with and how are they going to use such data and for what purpose? Often western foundations that have collected millions of data from African populations for Billions of Dollars brag about how many

millions of African lives have they saved with some experimental medicines prohibited in the western world and there is no trace, no data to verify their amplified claims of contribution to these African Populations.

As Robert Nesta Marley said, “ you can fool some people some of the time but you cannot fool all of the people all of the times”. There have been rumors that many African populations have suffered more harm than ever since the first time they come in contact with some western organizations.

In 2008, the Center for Research on Multinational Corporations released a document full of examples of the detrimental effects of unethical clinical testing that went on the 1990s and throughout the 2000s in the developing world. The report included the case of clinical trials in Uganda between 1997 and 2003, when women taking the anti-transmission drug Nevirapine experienced thousands of serious adverse effects (SAEs). Those days are over. For African Leaders who acquire a fortune and fame with a one minute picture with some western So Called Billionaires by accepting the dumping of garbage in their country, the collection of data or the corrupt experimentation of unhealthy medicines, if I ever learn about such practice, not only I will file a legal action in International courts as a Human Rights Advocate but I will also broadcast such evil practice to the rest of the world.

My Name is Mr. Amar Gueye. I am Non-Attorney Spokesperson and an International Legal Advocate. Should anyone have a question, comment or brief in support of this legal action, please feel free to write to:

Mr. Amar Gueye
P.O. Box 655
Buffalo, New York 14205
Papadg046@gmail.com

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August 29, 2019

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