



U.S. Department of Justice

*United States Attorney
Southern District of New York*

*The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007*

November 14, 2021

BY EMAIL

The Honorable Alison J. Nathan
United States District Court
Southern District of New York
United States Courthouse
40 Foley Square
New York, New York 10007

Re: *United States v. Ghislaine Maxwell*, 20 Cr. 330 (AJN)

Dear Judge Nathan:

The parties respectfully submit this joint letter to provide the Court with a list of names, places, and relevant entities, for purposes of examining prospective jurors during voir dire. This letter is respectfully requested to be filed under seal to protect the privacy of witnesses and third parties.

I. List of Names

The following is a list of names that jurors may hear at trial:

- Juan Alessi
- Maria Alessi
- [REDACTED]
- Janusz Banasiak
- [REDACTED]
- Daniel Besselsen
- [REDACTED]
- [REDACTED]
- [REDACTED]
- Michael Buscemi

- [REDACTED]
- Tracy Chappell
- [REDACTED]
- Dr. Park Dietz
- Eva Anderson Dubin
- Glen Dubin
- [REDACTED]
- Bennett Gershman
- Lesley Groff
- Dr. Ryan Hall
- [REDACTED]
- [REDACTED]
- [REDACTED]
- Jordana Feldman
- [REDACTED]
- Stephen Flatley
- [REDACTED]
- Robert Hanson
- [REDACTED]
- [REDACTED]
- Paul Kane
- Robert Kelso
- [REDACTED]
- [REDACTED]
- Gerald LaPorte
- [REDACTED]
- Dr. Elizabeth Loftus
- John Lopez
- [REDACTED]

- [REDACTED]
- Pat McHugh
- [REDACTED]
- [REDACTED]
- Jennifer Naso
- [REDACTED]
- [REDACTED]
- [REDACTED]
- David Rodgers
- Alfredo Rodriguez
- Dr. Lisa Rocchio
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- Lawrence Visoski
- Les Wexner
- [REDACTED]

II. List of Places

The following is a list of places that may be discussed at trial:

- 358 El Brillo Way, Palm Beach, Florida
- Zorro Ranch, 39 Zorro Ranch Road, Stanley, New Mexico
- 9 East 71st Street, New York, New York
- [REDACTED] New York, New York
- [REDACTED] New York, New York
- Little St. James Island, U.S. Virgin Islands
- [REDACTED] London
- [REDACTED] Camp, [REDACTED]

III. List of Entities

The following is a list of entities, institutions, and programs that may be referenced at trial:

- [REDACTED] Camp
- [REDACTED] School
- [REDACTED] School
- [REDACTED] School [REDACTED]
- Mar-a-Lago
- Days of Our Lives

Respectfully submitted,

DAMIAN WILLIAMS
United States Attorney

By: s/_____

[REDACTED]

Assistant United States Attorneys
Southern District of New York

Cc: Defense Counsel (By email)