



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*

January 5, 2022

By ECF

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*, S2 20 Cr. 330 (AJN)

Dear Judge Nathan:


The Government has become aware that a juror has given several interviews to press outlets regarding his jury service in this case.¹ While the Court instructed jurors that they were free to discuss their jury service with anyone of their choosing, some of the statements, as related in the media, merit attention by the Court. In particular, the juror has described being a victim of sexual abuse. Assuming the accuracy of the reporting, the juror asserted that he “flew through” the prospective juror questionnaire and does not recall being asked whether he had been a victim of

¹ The Government is aware of at least three interviews at this point, which are available at the following links: (1) <https://www.independent.co.uk/news/world/americas/maxwell-juror-account-abuse-b1986478.html>; (2) <https://www.dailymail.co.uk/news/article-10370193/Ghislaine-Maxwell-juror-says-evidence-convinced-panel-predator.html>; and (3) <https://www.reuters.com/world/us/some-ghislaine-maxwell-jurors-initially-doubted-accusers-juror-says-2022-01-05/>.

sexual abuse, but stated that “he would have answered honestly.”²

Based on the foregoing, the Government believes the Court should conduct an inquiry. *See, e.g., United States v. Langford*, 990 F.2d 65, 68-69 (2d Cir. 1993). The Government proposes that the Court schedule a hearing in approximately one month, along with an appropriate schedule for pre-hearing briefing regarding the applicable law and the scope of the hearing. The Government respectfully submits that any juror investigation should be conducted exclusively under the supervision of the Court. *See, e.g., United States v. Gagnon*, 282 F. App’x 39, 40 (2d Cir. 2008). If the Court decides to schedule such a hearing, the Government respectfully suggests that the Court’s staff promptly contact the juror to notify him of the hearing and inquire whether he would like counsel to be appointed in connection with it.

The Government reached out to defense counsel last night regarding the juror’s statements, but defense counsel have not yet responded and thus the Government is not aware of the defense position on this issue.

² *See* <https://www.reuters.com/world/us/some-ghislaine-maxwell-jurors-initially-doubted-accusers-juror-says-2022-01-05/>. 

Respectfully submitted,

DAMIAN WILLIAMS
United States Attorney

By: _____s/

Maurene Comey

Alison Moe

Lara Pomerantz

Andrew Rohrbach

Assistant United States Attorneys

Southern District of New York

Cc: Defense Counsel (by ECF)