

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA]	
]	No. 14-CR-40028-TSH
v.]	
]	
JAMES MERRILL and]	
CARLOS WANZELER]	

GOVERNMENT’S WITNESS LIST

Pursuant to Local Rule 117.1(a)(8)(A), the Government submits the following list of witnesses that it intends to introduce during its case-in-chief.

1. Jeffrey Babener, Law Offices of Babener and Associates, Portland, Oregon;
2. Jillene Belli, Supervisory Special Agent, DHS/HSI;
3. Christopher W. Diorio, Special Agent, DHS/HSI, Boston, Massachusetts;
4. Lisa LaForte, Intelligence Analyst, DHS/HSI;
5. Linda McDonagh, Special Agent, DHS/HSI, Boston, Massachusetts;
6. Paul Melican, Special Agent, Department of Homeland Security (“DHS”), Homeland Security Investigations (“DHS”), Boston, Massachusetts;
7. John S. Soares, Special Agent DHS/HSI, Boston, Massachusetts;
8. Jason Borromei, Laguna Nigel, California;
9. Samantha Brown, Assistant Store Manager, TD Bank, Worcester, Massachusetts;
10. Elyson de Santos, Store Manager, TD Bank, Worcester, Massachusetts;
11. Samantha Sawyer, Senior Investigator, Global Security & Investigations, TD Bank, Worcester, Massachusetts;
12. Joseph Craft, Boonville, Indiana;
13. Randy Crosby, Atlanta, Georgia;
14. Santiago Delarosa, Lynn, Massachusetts;

15. Loreana Espaillat, Framingham, Massachusetts;
16. David Hackett, Lowell, Massachusetts;
17. Donald Haney, Natick, Massachusetts;
18. Erin Eileen Hayes, Greenberg Traurig, LLP, Boston, Massachusetts;
19. Beth Howard, Boston, Massachusetts;
20. Joseph Isaacs, Palm Harbor, Florida;
21. Christianne Jardim, Everett, Massachusetts;
22. Kenneth Kelly, Federal Trade Commission, Washington, D.C.
23. Steven Labriola, West Upton, Massachusetts;
24. Fernando Lemus, Dedham, Massachusetts;
25. Anthony R. Leone, Murtha Cullina LLP (formerly of the Massachusetts Securities Division), Boston, Massachusetts;
26. Andre Lovatti, Brazilian Federal Police, Rio de Janeiro, Brazil;
27. Stuart MacMillian, Safety Harbor, Florida;
28. Giovanni Maldonado, Lynn, Massachusetts;
29. Timothy J. Martin, Huron Consulting Group, Inc., Boston, Massachusetts;
30. Jean-Louis Sorondo, Huron Consulting Group, Inc., New York City, New York;
31. Ernst Merisier, Malden, Massachusetts;
32. Ryan Mitchell, Portland, Oregon;
33. Thomas More, Newport Beach, California;
34. Andreia Moreira, Framingham, Massachusetts;
35. Gerald P. Nehra, Law Offices of Nehra and Waak, Muskegon, Michigan;
36. Danielle Goes Pinto, Ashland, Massachusetts;
37. Alberto Rubio, Framingham, Massachusetts;

38. Michael Schein, Chestnut Hill, Massachusetts;
39. Michael Sheffield, Sheffield Group, Scottsdale, Arizona;
40. Thomas Zappala, Financial Auditor, U.S. Attorney's Office, Boston, Massachusetts;
41. [Recordkeeper, Federal Reserve]
42. [Recordkeeper, Internet Archive]
43. [Recordkeepers, Banks]

The Government reserves the right to supplement and amend this list upon reasonable notice to the Defendant and the Court.

Respectfully submitted,

William Weinreb
Acting United States Attorney

By: /s/ Andrew Lelling
Andrew E. Lelling
Neil J. Gallagher, Jr.
Assistant U.S. Attorneys

Date: September 26, 2016

CERTIFICATE OF SERVICE

I hereby certify that this document, filed through the ECF system, will be sent electronically to the registered participants as identified on the Notice of Electronic Filing, and paper copies will be sent to those indicated as non-registered participants, on September 26, 2016.

/s/ Andrew Lelling
Andrew E. Lelling