

IN THE UNITED STATES DISTRICT COURT FOR THE  
EASTERN DISTRICT OF VIRGINIA  
Alexandria Division

UNITED STATES OF AMERICA	)	
	)	CRIMINAL NO. 1:18-CR-83
v.	)	
	)	Trial Date: July 25, 2018
PAUL J. MANAFORT, JR.,	)	
	)	The Honorable T. S. Ellis, III
	)	
Defendant.	)	<b><u>UNDER SEAL, EX PARTE</u></b>

**MOTION FOR USE IMMUNITY FOR TRIAL TESTIMONY**

The United States of America, by and through Special Counsel Robert S. Mueller, III, hereby moves that this Court issue an order pursuant to Title 18, United States Code, Sections 6002 and 6003, compelling Cindy Laporta to give testimony or provide other information, which Cindy Laporta refuses to give or provide on the basis of her privilege against self-incrimination as to all matters about which Cindy Laporta may be interrogated in the trial styled United States v. Manafort, Criminal No. 1:18-cr-83, or at any other proceeding ancillary to the above-styled matter, and respectfully alleges as follows:

1. Cindy Laporta has been called to testify or provide other information before said trial.

2. In the judgment of the undersigned, the testimony or other information from said witness may be necessary to the public interest.

3. In the judgment of the undersigned, said witness has refused to testify or provide other information on the basis of her privilege against self-incrimination.

4. This application is made with the approval of Raymond Hulser, Deputy Assistant Attorney General of the Criminal Division of the Department of Justice, pursuant to the authority

vested in him by Title 18, United States Code, Section 6003 and Title 28, Code of Federal Regulations, Section 0.175. A copy of the letter from the Deputy Assistant Attorney General expressing such approval is attached hereto.

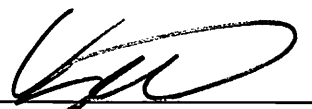
Respectfully submitted,

ROBERT S. MUELLER, III  
Special Counsel

Uzo Asonye  
Assistant United States Attorney  
Eastern District of Virginia

By:

/s/



Andrew Weissmann  
Greg D. Andres  
Brandon L. Van Grack  
Special Assistant United States Attorneys  
Special Counsel's Office

U.S. Department of Justice  
950 Pennsylvania Ave., NW  
Washington, DC 20530  
Phone: (202) 616-0800

# ATTACHMENT A



**U.S. Department of Justice**

**Criminal Division**

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*Assistant Attorney General*

*Washington, D.C. 20530*

July 10, 2018

Robert S. Mueller, III  
The Special Counsel  
The Patrick Henry Building  
601 D Street, N.W.  
Washington, D.C. 20530

Attention: Brandon Van Grack  
Special Counsel's Office

Re: *United States v. Paul J. Manafort, Jr.*: immunization of Cindy Laporta

Dear Mr. Mueller:

Pursuant to the authority vested in me by 18 U.S.C. § 6003(b) and 28 C.F.R. § 0.175(a), I hereby approve your request for authority to apply to the United States District Court for the Eastern District of Virginia for an order, pursuant to 18 U.S.C. §§ 6002-6003, requiring Cindy Laporta to give testimony or provide other information in the above matter and in any further proceedings resulting therefrom or ancillary thereto, provided that she refuses to testify or provide information on the basis of the privilege against self-incrimination.

Sincerely,

A handwritten signature in black ink, appearing to be "RH", written over the typed name and title.

Raymond N. Hulser  
Deputy Assistant Attorney General