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

## 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 Conor O'Brien to give testimony or provide other information, which Conor O'Brien refuses to give or provide on the basis of his privilege against selfincrimination as to all matters about which Conor O'Brien may be interrogated in the trial styled <u>United States v. Manafort</u>, Criminal No. 1:18-cr-83, or at any other proceeding ancillary to the above-styled matter, and respectfully alleges as follows:

1. Conor O'Brien 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 his 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 Case 1:18-cr-00083-TSE Document 135 Filed 07/17/18 Page 2 of 4 PageID# 2104

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

By:

expressing such approval is attached hereto.

Respectfully submitted,

ROBERT S. MUELLER, III Special Counsel

í 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

Uzo Asonye Assistant United States Attorney Eastern District of Virginia Case 1:18-cr-00083-TSE Document 135 Filed 07/17/18 Page 3 of 4 PageID# 2105

## ATTACHMENT A

Case 1:18-cr-00083-TSE Document 135 Filed 07/17/18 Page 4 of 4 PageID# 2106



**U.S. Department of Justice** 

Criminal Division

Assistant Attorney General

Washington, D.C. 20530

July 3, 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 Conor O'Brien

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 Conor Broderick O'Brien to give testimony or provide other information in the above matter and in any further proceedings resulting therefrom or ancillary thereto, provided that he refuses to testify or provide information on the basis of the privilege against self-incrimination.

Sincerely,

Raymond N. Hulser Deputy Assistant Attorney General