

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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United States :

**APPLICATION FOR IMMUNITY  
ORDER**

v. :

S2 20 Cr. 330 (AJN)

Ghislaine Maxwell :

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DAMIAN WILLIAMS, United States Attorney for the Southern District of New York, for the reasons hereinafter set forth and upon the declaration of Assistant United States Attorney Lara Pomerantz, hereby requests an order compelling ██████████ to give testimony pursuant to the provisions of Title 18, United States Code, Sections 6002 and 6003, and respectfully alleges as follows:

1. ██████████ is scheduled to testify at a hearing in *United States v. Ghislaine Maxwell*, S2 20 Cr. 330 (AJN) in the United States District Court for the Southern District of New York, which is scheduled for March 8, 2022;

2. This application is made in good faith and upon my judgment that the testimony from ██████████ may be necessary to the public interest;

3. ██████████ has refused to testify on the basis of his privilege against self-incrimination;


4. This application is made with the approval of the Department of Justice, by the Assistant Attorney General, pursuant to the authority vested by Title 18, United States Code, Section 6003 and Title 28, Code of Federal Regulations, Section 0.175. A copy of the letter setting forth the approval of the Department of Justice for this application is attached hereto.

WHEREFORE, the United States of America by the United States Attorney for the

Southern District of New York respectfully requests the Court to issue an order requiring [REDACTED] [REDACTED] to give testimony at the March 8, 2022 hearing in *United States v. Ghislaine Maxwell*, S2 20 Cr. 330 (AJN), pursuant to the provisions of Title 18, United States Code, Sections 6002 and 6003.

Dated: New York, New York  
March 7, 2022

Respectfully,

  
\_\_\_\_\_  
DAMIAN WILLIAMS  
United States Attorney



**U.S. Department of Justice**

Criminal Division

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Office of the Assistant Attorney General

Washington, D.C. 20530

Mar 7, 2022

The Honorable Damian Williams  
United States Attorney  
Southern District of New York  
1 St. Andrews Plaza  
New York, NY 10007

**Attention:** Lara Pomerantz  
Southern District of New York

**Re:** Witness Immunity Authorization  
[REDACTED]  
United States v. Ghislaine Maxwell, 20 Cr. 330 (AJN)

Attn: Lara Pomerantz

Dear Mr. Williams:

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 Southern District of New York for an order, pursuant to 18 U.S.C. §§ 6002-6003, requiring [REDACTED] to give testimony or provide other information in the above matter and in any further proceedings resulting therefrom or ancillary thereto, provided that the witness refuses to testify or provide information on the basis of the privilege against self-incrimination.

Sincerely,

A handwritten signature in black ink that reads "J. A. H. Hodge".

Jennifer A.H. Hodge  
Deputy Assistant Attorney General

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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United States : **DECLARATION**  
v. : S2 20 Cr. 330 (AJN)  
Ghislaine Maxwell :  
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**State of New York**  
**County of New York**

Lara Pomerantz, pursuant to Title 28, United States Code, Section 1746, hereby declares under penalty of perjury:

1. I am an Assistant United States Attorney in the office of DAMIAN WILLIAMS, United States Attorney for the Southern District of New York, and as such I am one of the Assistant United States Attorneys responsible for the prosecution *United States v. Ghislaine Maxwell*, S2 20 Cr. 330 (AJN).

2. This Declaration is made in support of the application by the United States Attorney for the Southern District of New York for an order pursuant to Title 18, United States Code, Sections 6002 and 6003 directing ██████████ to give testimony at the March 8, 2022 hearing in *United States v. Ghislaine Maxwell*, S2 20 Cr. 330 (AJN).

3. ██████████ has refused to testify on the basis of his privilege against self-incrimination;

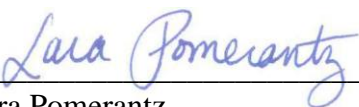
4. Upon information and belief, ██████████ can give relevant testimony before in the above-mentioned matter, which testimony may be necessary to the protection of the public interest.

5. This application for immunity is made in good faith. Other than as may be

set forth above, no prior request for the relief set forth herein has been made.

WHEREFORE, and upon the application of the United States Attorney annexed hereto, it is respectfully requested that the application be granted.

Dated: New York, New York  
March 7, 2022

  
\_\_\_\_\_  
Lara Pomerantz  
Assistant United States Attorney

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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United States : **ORDER**  
  
v. : S2 20 Cr. 330 (AJN)  
  
Ghislaine Maxwell :  
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Upon the annexed application of DAMIAN WILLIAMS, United States Attorney for the Southern District of New York, for an order pursuant to Title 18, United States Code, Sections 6002 and 6003, compelling ██████████ to testify at a hearing in *United States v. Ghislaine Maxwell*, S2 20 Cr. 330 (AJN) scheduled for March 8, 2022, and upon the declaration of Assistant United States Attorney Lara Pomerantz, submitted in support thereof; and it appearing that,

1. ██████████ is scheduled to appear as a witness at a hearing in this case scheduled for March 8, 2022; and,
2. ██████████ has refused to testify on the basis of his privilege against self-incrimination; and,
3. It is the judgment of the United States Attorney that the testimony that ██████████ could give may be necessary to the public interest; and,

Upon the approval of the aforesaid application by the Department of Justice, by the Assistant Attorney General, pursuant to the authority vested in him by Title 18, United States Code, Section 6003 and 28 C.F.R. 0.175; it is hereby:

ORDERED that, pursuant to Title 18, United States Code, Sections 6002 and 6003,

██████████ give testimony at said hearing; and

IT IS FURTHER ORDERED that, pursuant to Title 18, United States Code, Sections 6002 and 6003, no testimony or other information compelled under this Order, or any information directly or indirectly derived from such testimony or other information, may be used against ██████████ in any criminal case, except a prosecution for perjury, giving a false statement, or otherwise failing to comply with this Order.

This Order shall become effective only if after the date of this Order ██████████

██████████ refuses to testify on the basis of his privilege against self-incrimination.

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The Honorable Alison J. Nathan  
United States District Judge

Dated: New York, New York  
March \_\_, 2022