# UNITED STATES DISTRICT COURT WESTERN DISTRICT OF MICHIGAN NORTHERN DIVISION

#### UNITED STATES OF AMERICA,

Case No. 2:17-cr-24

Plaintiff,

Hon. Robert J. Jonker Chief U.S. District Judge

vs.

DERRICK GARRELL SAMUELS, a/k/a "Bam,"

Defendant.

### APPLICATION FOR ORDER COMPELLING WITNESS TO PROVIDE TESTIMONY AND/OR OTHER INFORMATION

The United States of America, pursuant to 18 U.S.C. §§ 6001-6003,

respectfully requests this Court to enter an order or orders requiring the following

witnesses to give testimony and provide other information before this Court:

Julaine Nicole Mankowsi,

Katie Marie Seymour, and

## Sara Ann Turner

Each of these witnesses is represented by counsel.<sup>1</sup> The government has reason to believe that one or more of these witnesses, upon being duly sworn, is likely to refuse to give or provide testimony on the basis of the privilege against selfincrimination.

<sup>&</sup>lt;sup>1</sup> Ms. Mankowski is represented by Assistant Federal Defender Elizabeth A. LaCosse. Ms. Seymour is represented by Attorney Sarah E. Henderson. Ms. Turner is represented by Attorney Monica Lubiarz-Quigley.

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Title 18, United States Code, Section 6002, provides that no testimony or other information compelled under such an order (or any information directly or indirectly derived from such testimony or other information) may be used against a witness in any criminal case, except the prosecution for perjury, giving of false statement, or otherwise failing to comply with the order.

This request is made with the approval and authorization of Raymond N. Hulser, Deputy Assistant Attorney General, pursuant to the authority vested in him under 18 U.S.C. § 6003(b) and 28 C.F.R. § 0.175. In the judgment of the undersigned, the testimony or other information from these individuals may be necessary to the public interest.

WHEREFORE, the United States requests that this Court enter an order compelling the testimony of the following witnesses before this Court:

Julaine Nicole Mankowsi, Katie Marie Seymour, and Sara Ann Turner.

Respectfully submitted,

ANDREW BYERLY BIRGE United States Attorney

Isl Maarten Vermaat

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Date: Feb. 2, 2018