

**United States District Court**  
**SOUTHERN DISTRICT OF NEW YORK**

TO: Experian  
Custodian of Records  
Attn: Rick Haas  
701 Experian Parkway  
Allen, TX 75013

**GREETINGS:**

WE COMMAND YOU that all and singular business and excuses being laid aside, you appear and attend before the GRAND JURY of the people of the United States for the Southern District of New York, at the United States Courthouse, 500 Pearl Street, Room 480 (via North elevators), in the Borough of Manhattan, City of New York, New York, in the Southern District of New York, at the following date, time and place:

Appearance Date: July 2, 2020

Appearance Time: 10 a.m.

to testify and give evidence in regard to alleged violations of federal criminal law, including:  
18 U.S.C. § 371

and not to depart the Grand Jury without leave thereof, or of the United States Attorney, and that you bring with you and produce at the above time and place the following:

SEE ATTACHED RIDER. **Personal appearance is not required** if the requested records are (1) produced by on or before the return date to Assistant U.S. Attorney [REDACTED] at: U.S. Attorney's Office, Southern District of New York, 1 St. Andrew's Plaza, New York, NY 10007, telephone: [REDACTED], or via email at [REDACTED]; and (2) accompanied by an executed copy of the attached Declaration of Custodian of Records. **PLEASE PROVIDE IN ELECTRONIC FORMAT IF POSSIBLE.**

Failure to attend and produce any items hereby demanded will constitute contempt of court and will subject you to civil sanctions and criminal penalties, in addition to other penalties of the Law.

DATED: New York, New York  
June 29, 2020

/s (AR)  
AUDREY STRAUSS  
*Acting United States Attorney for the  
Southern District of New York*

[REDACTED]  
Assistant United States Attorney  
One St. Andrew's Plaza  
New York, New York 10007  
Telephone: [REDACTED]  
[REDACTED]



The image shows a handwritten signature in black ink that reads "Audrey Strauss". To the right of the signature is the official seal of the United States District Court for the Southern District of New York. The seal is circular with a rope-like border and contains an eagle with spread wings in the center. The text around the eagle reads "UNITED STATES DISTRICT COURT" at the top and "FOR THE SOUTHERN DISTRICT OF NEW YORK" at the bottom.

**RIDER**

(Grand Jury Subpoena to Experian, June 29, 2020)

Please provide any and all credit reports, fraud alerts, and related documents pertaining to the following individuals and identifiers listed, including all known accounts and lines of credit, addresses and personal identifying information, and all credit inquiries regarding the individuals and the addresses provide at the time of said inquiry regardless of whether accounts were open:

NAME	GHISLAINE MAXWELL
DOB	12/25/1961
SSN	[REDACTED]
ADDRESS	[REDACTED]
PHONE	[REDACTED]

**N.B.: Personal appearance is not required if the requested records are (1) produced by on or before the return date to Assistant U.S. Attorney [REDACTED] at: U.S. Attorney's Office, Southern District of New York, 1 St. Andrew's Plaza, New York, NY 10007, telephone: 212-637-2415, or via email at [REDACTED]; and (2) accompanied by an executed copy of the attached Declaration of Custodian of Records. PLEASE PROVIDE IN ELECTRONIC FORMAT IF POSSIBLE.**

**IMPORTANT: REQUEST FOR NON-DISCLOSURE**

**Due to the ongoing nature of the investigation, it is requested that you do not disclose any information relating to this Grand Jury subpoena request to any third party.**

Declaration of Custodian of Records

Pursuant to 28 U.S.C. § 1746, I, the undersigned, hereby declare:

My name is Rick V. Haas  
(name of declarant)

I am a United States citizen and I am over eighteen years of age. I am the custodian of records of the business named below, or I am otherwise qualified as a result of my position with the business named below to make this declaration.

I am in receipt of a Grand Jury Subpoena, dated June 29, 2020, and signed by Assistant United States Attorney [REDACTED], requesting specified records of the business named below. Pursuant to Rules 902(11) and 803(6) of the Federal Rules of Evidence, I hereby certify that the records provided herewith and in response to the Subpoena:

- (1) were made at or near the time of the occurrence of the matters set forth in the records, by, or from information transmitted by, a person with knowledge of those matters;
- (2) were kept in the course of regularly conducted business activity; and
- (3) were made by the regularly conducted business activity as a regular practice.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on August 11, 2020  
(date)

/s/ Rick V. Haas  
(signature of declarant)

Rick V. Haas, Custodian of Records  
(name and title of declarant)

Experian  
(name of business)

701 Experian Parkway, Allen TX 75013  
(business address)

Definitions of terms used above:

As defined in Fed. R. Evid. 803(6), "record" includes a memorandum, report, record, or data compilation, in any form, of acts, events, conditions, opinions, or diagnoses. The term, "business" as used in Fed. R. Evid. 803(6) and the above declaration includes business, institution, association, profession, occupation, and calling of every kind, whether or not conducted for profit.