

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WISCONSIN
AT LAW AND IN ADMIRALTY

UNITED STATES OF AMERICA,

Plaintiff,

v.

Case No. 05-C-0183

APPROXIMATELY \$151,801.08
IN UNITED STATES CURRENCY
FROM M&I BANK ACCOUNT 80-11674;

Defendant.

STIPULATION AND SETTLEMENT AGREEMENT

The plaintiff, United States of America, by its attorneys, Steven M. Biskupic, United States Attorney for the Eastern District of Wisconsin, and Assistant United States Attorney Lisa T. Warwick, and the claimants, Audrey George and Patricia Schulz, by and through their attorney, Christopher Ware, hereby stipulate and agree as follows:

1. On February 16, 2005, the United States filed a Complaint for Civil Forfeiture in rem against the defendant property, approximately \$151,801.08 in United States currency from M&I Bank Account 80-11674, (hereinafter “defendant property”), pursuant to Title 18, United States Code, § 981(a)(1)(A).

2. On February 18, 2005, the Internal Revenue Service for the Eastern District of Wisconsin personally served a copy of the Complaint for Civil Forfeiture, Notice of Complaint, and Verification on Audrey George, by and through her attorney, Stephen J. Liccione.

3. On February 18, 2005, the Internal Revenue Service for the Eastern District of Wisconsin personally served a copy of the Complaint for Civil Forfeiture, Notice of Complaint, and Verification on Patricia Schulz, by and through her attorney, Stephen J. Liccione.

4. On February 18, 2005, the Internal Revenue Service for the Eastern District of Wisconsin personally served a copy of the Complaint for Civil Forfeiture, Notice of Complaint, and Verification on Gary George, by and through his attorney, Alexander Flynn. Mr. George did not file a claim to the defendant property.

5. Notice of publication was placed in the Milwaukee Journal Sentinel which ran on February 20, 2005.

6. On or about April 15, 2005, claimants, Audrey George and Patricia Schulz, by and through their attorney, Stephen J. Liccione, filed verified claims to the defendant property.

7. On or about May 5, 2005, claimants, Audrey George and Patricia Schulz, by and through their attorney, Stephen J. Liccione, filed an answer to the defendant property.

8. The claimants hereby consent and agree that upon entry of a judgment of forfeiture in favor of the United States that:

- A. The United States shall return to the claimants, Audrey George and Patricia Schulz, by and through their attorney, Stephen J. Liccione, Reinhart Boerner Van Dueren, S.C., 1000 North Water Street, Suite 2100, Milwaukee, Wisconsin 53202, \$61,801.08 of the defendant property.
- B. The remaining defendant property, \$90,000.00 in United States currency, shall be forfeited to the United States of America under 18 U.S.C. § 981(a)(1)(A) to be disposed of according to law.
- C. The United States agrees not to pursue any forfeiture proceedings against the proceeds from the sale of the television station or seek additional forfeiture of any property currently owned by Audrey George.

- D. Attorney Tom Bolt shall remain free to distribute the station sale monies remaining in the Escrow Account, as well as the Trust Account, without obtaining the government's approval.
- E. As of today's date, the United States Attorney's Office for the Eastern District of Wisconsin does not have any active criminal investigations against Patricia Schulz and Audrey George relating to any money laundering offenses. The legal proceedings in United States v. Gary George remain pending.
- F. Each party agrees to bear its own costs and attorneys' fees.

9. This stipulation contains the entire agreement between the claimants, Audrey George and Patricia Schulz, and the plaintiff, United States of America. This settlement agreement is not an admission of liability or wrongdoing and only contains a resolution of disputed and uncertain legal positions.

10. This Court shall retain jurisdiction in this cause for the purpose of enforcing the terms of this stipulation and settlement agreement.

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| <u>May 10, 2006</u> | <u>s/LISA T. WARWICK</u> |
| Date | Assistant United States Attorney Lisa T. Warwick Bar Number: 1017754 Attorney for Plaintiff Office of the United States Attorney Eastern District of Wisconsin 517 East Wisconsin Avenue, Room 530 Milwaukee, Wisconsin 53202 Telephone: (414) 297-1700 Fax: (414) 297-1738 E-Mail: lisa.warwick@usdoj.gov |

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| <u>May 4, 2006</u> | <u>s/CHRISTOPHER WARE</u> |
| Date | Attorney for claimants, Audrey George and Patricia Schulz |

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| <u>May 4, 2006</u> | <u>s/AUDREY GEORGE</u> |
| Date | Claimant |

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| <u>May 8, 2006</u> | <u>s/PATRICIA SCHULZ</u> |
| Date | Claimant |