

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF WISCONSIN

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UNITED STATES OF AMERICA,

Plaintiff,

v.

Case No. 06-CR-020

GEORGIA THOMPSON,

Defendant.

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**DEFENDANT'S SECOND MOTION IN LIMINE**

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Georgia Thompson by her attorneys, Hurley, Burish & Stanton, S.C., by Stephen P. Hurley moves the Court *in limine* for an Order prohibiting the government from seeking to introduce testimony and evidence regarding:

(1) the rescision by the Wisconsin Department of Administration on January 30, 2006, of the "Partner" contract by and between the State of Wisconsin and Adelman Travel Group; and

(2) problems which individual state employees may allegedly have had with Adelman Travel Group *after* the award of the "Partner" travel agency contract when, for example, in making travel reservations, state employees claim to have found lower priced tickets than those offered through by Adelman Travel Group.

Testimony regarding these subjects is neither probative, nor relevant. Such evidence does not bear on the issue of guilt or innocence with respect to whether the accused allegedly engaged in a scheme to deprive the state of the intangible right of Thompson's honest services and/or whether Thompson intentionally misapplied money, thereby depriving the State of Wisconsin of the intangible right of her honest services. Moreover, such testimony is unduly prejudicial and substantially outweighs any probative value it may have. Consequently, this testimony (which forms the foundation for the admission of certain exhibits regarding the same) should not be permitted.

This motion is made pursuant to Rules 401 & 403, FED. R. EVID.; and the Fifth, Ninth and Fourteenth Amendments to the United States Constitution.

**WHEREFORE**, Georgia Thompson respectfully requests that this Court grant the relief requested.

Dated this 1st day of June, 2006.

Respectfully submitted,

HURLEY, BURISH & STANTON, S.C.

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