

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WISCONSIN

U.S. DISTRICT COURT
EASTERN DISTRICT OF WISCONSIN

07 JUL 10 9 43 AM MAI

UNITED STATES OF AMERICA,

Plaintiff,

v.

MICHAEL McGEE, JR.,

Defendant.

07 - CR - 177

Case No. 07-CR-
[18 U.S.C. §§ 666(a)(1)(B), 1951(a)
and 2, 31 U.S.C. § 5324(a)]

INDICTMENT

THE GRAND JURY CHARGES:

ALLEGATIONS COMMON TO ALL COUNTS

1. At all times material to this indictment:

A. The Milwaukee Common Council was a local government that received benefits in excess of \$10,000 during the one year period beginning January 1, 2006, and ending December 31, 2006, and, during the one year period beginning March 1, 2006 and ending February 28, 2007, under a Federal program involving a grant, contract, subsidy, loan, guarantee, insurance, and other form of Federal assistance.

B. Michael McGee, Jr., was an agent of the Milwaukee Common Council, in that McGee was an alderman who exercised policy-making and legislative powers of the City of Milwaukee.

2. The allegations in paragraph 1 are hereby incorporated by reference herein into each and every count of the indictment.

THE GRAND JURY FURTHER CHARGES:

COUNT ONE

In or around July 2006, in the State and Eastern District of Wisconsin,

MICHAEL McGEE, JR.

knowingly affected and attempted to affect interstate commerce and the movement of articles and commodities in interstate commerce by extortion, in that McGee unlawfully obtained approximately \$2,000 in cash, not due to McGee or his office, from J.H., a Milwaukee area business owner, with the consent of J.H., under color of official right. In particular, McGee demanded and accepted \$2,000 from J.H. in exchange for McGee's support of J.H.'s sale of a business and associated transfer of a City of Milwaukee liquor license.

All in violation of Title 18, United States Code, Sections 1951(a) and 2.

THE GRAND JURY FURTHER CHARGES:

COUNT TWO

On or about July 7, 2006, in the State and Eastern District of Wisconsin,

MICHAEL McGEE, JR.

knowingly and corruptly solicited, demanded, accepted, and agreed to accept something of value from J.A. intending to be influenced or rewarded in connection with a business, transaction, or series of transactions of the Milwaukee Common Council involving something of value of \$5,000 or more.

All in violation of Title 18, United States Code, Sections 666(a)(1)(B) and 2.

THE GRAND JURY FURTHER CHARGES:

COUNT THREE

On or about December 14, 2006, in the State and Eastern District of Wisconsin,

MICHAEL McGEE, JR.

knowingly and corruptly solicited, demanded, accepted, and agreed to accept something of value from J.A. intending to be influenced or rewarded in connection with a business, transaction, or series of transactions of the Milwaukee Common Council involving something of value of \$5,000 or more.

All in violation of Title 18, United States Code, Sections 666(a)(1)(B) and 2.

THE GRAND JURY FURTHER CHARGES:

COUNT FOUR

On or about February 2, 2007, in the State and Eastern District of Wisconsin,

MICHAEL McGEE JR.,

for the purpose of evading the reporting requirements of 31 U.S.C. § 5313(a) and regulations prescribed thereunder, knowingly attempted to cause a domestic financial institution to fail to file a Currency Transaction Report required under 31 U.S.C. § 5313(a). In particular, McGee presented to M&I Bank of Milwaukee a total of \$15,000 in United States Currency, and attempted to cause an M&I employee to complete a wire transfer of the \$15,000 to an account in New York City without generating any document or paperwork in McGee's name and without filing the required Currency Transaction Report.

All in violation of Title 31, United States Code, Section 5324(a), and Title 18, United States Code, Section 2.

THE GRAND JURY FURTHER CHARGES:

COUNT FIVE

On or about March 8, 2007, in the State and Eastern District of Wisconsin,

MICHAEL McGEE, JR.

knowingly and corruptly solicited, demanded, accepted, and agreed to accept something of value from U.C., an undercover law enforcement agent posing as a Milwaukee area business owner, intending to be influenced or rewarded in connection with a business transaction, or series of transactions of the Milwaukee Common Council involving something of value of \$5,000 or more.

All in violation of Title 18, United States Code, Sections 666(a)(1)(B) and 2.

THE GRAND JURY FURTHER CHARGES:

COUNT SIX

On or about March 26 and March 27, 2007, in the State and Eastern District of Wisconsin,

MICHAEL McGEE, JR.

knowingly affected and attempted to affect interstate commerce and the movement of articles and commodities in interstate commerce by extortion, in that McGee unlawfully obtained approximately \$2,000 in cash, not due to McGee or his office, from A.S., a Milwaukee area business owner, with the consent of A.S., under color of official right. In particular, McGee demanded and accepted \$2,000 from A.S. in exchange for McGee's support of A.S.'s application to the City of Milwaukee for a permit to operate his business on a 24-hour basis.

All in violation of Title 18, United States Code, Sections 1951(a) and 2.

THE GRAND JURY FURTHER CHARGES:

COUNT SEVEN

On or about April 10, 2007, in the State and Eastern District of Wisconsin,

MICHAEL McGEE, JR.

knowingly affected and attempted to affect interstate commerce and the movement of articles and commodities in interstate commerce by extortion, in that McGee attempted to unlawfully obtain approximately \$20,000, not due McGee or his office, from A.K., a Milwaukee area business owner, with the consent of A.K., under color of official right. In particular, McGee demanded \$20,000 from A.K. in exchange for McGee's support of A.K.'s application to the City of Milwaukee for a zoning variance and a liquor license.

All in violation of Title 18, United States Code, Sections 1951(a) and 2.

THE GRAND JURY FURTHER CHARGES:

COUNT EIGHT

On or about April 10 and April 12, 2007, in the State and Eastern District of Wisconsin,

MICHAEL McGEE, JR.

knowingly and corruptly solicited, demanded, accepted, and agreed to accept something of value from M.A. intending to be influenced or rewarded in connection with a business, transaction, or series of transactions of the Milwaukee Common Council involving something of value of \$5,000 or more.

All in violation of Title 18, United States Code, Sections 666(a)(1)(B) and 2.

THE GRAND JURY FURTHER CHARGES:

COUNT NINE

On or about April 18, 2007, in the State and Eastern District of Wisconsin,

MICHAEL McGEE, JR.

knowingly and corruptly solicited, demanded, accepted, and agreed to accept something of value from A.H. intending to be influenced or rewarded in connection with a business, transaction, or series of transactions of the Milwaukee Common Council involving something of value of \$5,000 or more.

All in violation of Title 18, United States Code, Sections 666(a)(1)(B) and 2.

A TRUE BILL:


FOREPERSON

Dated: 7-14-07



Steven M. Biskupic
United States Attorney