

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WISCONSIN

UNITED STATES OF AMERICA,

Plaintiff,

v.

Case No. 06-CR-020

GEORGIA THOMPSON,

Defendant.

DEFENDANT'S FIRST MOTION IN LIMINE

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) contributions made by principals of Adelman Travel Group to the re-election campaign fund of Governor James Doyle;
- (2) an invitation sent by a principal to Governor Doyle to attend an ATG function;
- (3) phone calls placed by and between principals of Adelman Travel Group, Governor Doyle's office and Wisconsin Department of Administration ("DOA"), including DOA Secretary Marc Marotta.
- (4) whether travel agencies which responded to the state's Request for

Proposal made any contributions to Governor James Doyle's campaign fund.

Testimony regarding these subjects is neither probative, nor relevant because it 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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