

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA : CIVIL NO. 1:03-CV-2112
:
VS. : (Judge Rambo)
:
LEE ANN GILE :

FILED
HARRISBURG
NOV 25 2003
MARY E. D'ANDREA, CLERK
Per. [Signature]
DEPUTY CLERK

CONSENT JUDGMENT

AND NOW, this 25 day of November, 2003,
in accordance with the Stipulation executed by the
parties, IT IS ORDERED as follows:

1. The defendant, LEE ANN GILE, is permanently enjoined from participating as an officer or employee of any labor union whose activities are regulated in any fashion by the United States Department of Labor, Office of Labor-Management Standards.
2. It is understood by the defendant that violations of this Order may be punished as contempt of court and may subject the defendant to fine or imprisonment.
3. In light of the entry of this consent judgment, the clerk is directed to close this file.

[Signature]
United States District Judge

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FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA : CIVIL NO.
:
vs. : (Judge _____)
:
LEE ANN GILE : Electronically Filed

COMPLAINT

The United States of America, by its undersigned counsel alleges the following:

1. The United States brings this action pursuant to 18 U.S.C. § 1345 to enjoin alleged frauds by the defendant, LEE ANN GILE, and to obtain such additional equitable relief as is warranted to prevent any continuing or substantial injury to the United States or to any other persons or class of persons.
2. This court has subject matter jurisdiction over this action by virtue of 28 U.S.C. § 1345.
3. On or about September 2003, the United States was informed that the defendant, LEE ANN GILE, allegedly defrauded a labor union organization while serving as treasurer of that organization by willfully

embezzling approximately \$1,300 of funds, money and credits of this labor union.

4. In lieu of criminal prosecution in this matter, GILE has expressed a willingness, through her attorney, to consent to the entry of an order permanently enjoining her participating as an officer or employee of any labor union whose activities are regulated in any fashion by the United States Department of Labor, Office of Labor-Management Standards, an order which GILE understands would be punishable as a contempt of court if violated.

5. WHEREFORE, the United States requests that this court enter an order:

(A) Enjoining the defendant, LEE ANN GILE, from participating as an officer or employee of any labor union whose activities are regulated in any fashion by the United States Department of Labor, Office of Labor-Management Standards.

(B) Providing such other equitable relief as
is warranted to prevent any further injury to the
United States or any other persons or class of persons.

Respectfully submitted,

THOMAS A. MARINO
UNITED STATES ATTORNEY

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Dated: _____, 2003

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:
vs. : (Judge _____)
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LEE ANN GILE : (Electronically Filed)

STIPULATION IN COMPROMISE

The United States of America and the defendant in the above-captioned case enter into the following stipulation in compromise of the above-captioned case:

Whereas the defendant, LEE ANN GILE, has been identified as an alleged participant in the willful misapplication of union funds; and

Whereas the United States and the defendant both seek to prevent and avoid any further misapplications of this type.

It is stipulated and agreed as follows:

1. The defendant waives the requirement of service of process by the United States Marshal, agrees that service may be made on the defendant by serving counsel through the United States mails and agrees that the United States District Court for the Middle District of

Pennsylvania may enter an order in the form attached permanently enjoining the defendant, LEE ANN GILE, from participating as an officer or employee of any labor union whose activities are regulated in any fashion by the United States Department of Labor, Office of Labor-Management Standards.


2. The defendant waives the applicable statute of limitations, speedy trial requirements, or equitable defenses such as laches to any other civil action or criminal prosecution should the defendant violate this agreement.

3. It is further stipulated and agreed that any violation of the injunction by the defendant would subject her to the penalties of contempt of court which would include fines and/or imprisonment to be determined by the court.



LEE ANN GILE

THOMAS A. MARINO
UNITED STATES ATTORNEY



MARTIN C. CARLSON
FIRST ASSISTANT U.S. ATTORNEY



DONALD SWOPE, ESQUIRE
Counsel for Defendant