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**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

UNITED STATES OF AMERICA,)	
Plaintiff,)	
)	
and)	
)	No. 05 C 1239
ELIE BITTON and SILVIA BITTON,)	Magistrate Judge Schenkier
for themselves and as next friends of)	
ALBERT BITTON and ELIZABETH)	
BITTON,)	
Plaintiffs-Intervenors,)	
)	
v.)	
)	
PETER ALTMAYER,)	
Defendant.)	

CONSENT ORDER

The United States initiated case No. 05 C 1239 against the defendant on March 2, 2005, on behalf of Elie Bitton, Silvia Bitton, and their two minor children, pursuant to section 812(o) of the Fair Housing Act, as amended, 42 U.S.C. § 3612(o). Elie Bitton, Sylvia Bitton, and their then minor children, Albert and Elizabeth Bitton, intervened in this action on March 24, 2005. The complaint alleges that the defendant discriminated against the Bittons on the basis of their religion (Jewish) and national origin (Elie Bitton is from Israel and Silvia Bitton is from Mexico), by harassing them, in violation of the Fair Housing Act, 42 U.S.C. § 3617.

The Parties have agreed to the entry of this Consent Order to resolve all claims of the United States and the plaintiffs-intervenors against the defendant and to avoid further expenses and the uncertainties of litigation. By entering into this Consent Order, the defendant does not admit to any violation of the Fair Housing Act, 42 U.S.C. §§ 3601, *et seq.*

I. GENERAL INJUNCTION

Defendant is enjoined from discriminating on the basis of religion or national origin, as prohibited by the Fair Housing Act, 42 U.S.C. § 3617. Defendant is further enjoined from taking any action to coerce, intimidate, threaten or interfere with one or more members of the Bitton family in their exercise or enjoyment of, or on account of their having exercised or enjoyed, rights granted or protected by the Fair Housing Act, in violation of 42 U.S.C. § 3617.

II. MANDATORY EDUCATION AND TRAINING

Within 120 days of the date of entry of this Order, defendant shall undergo training on the provisions of the Fair Housing Act pertaining to discrimination on the basis of religion and national origin. The training shall be conducted by a qualified third party unconnected to defendant or his employees, agents, or counsel. Defendant shall provide to the United States and the plaintiffs-intervenors, within 30 days after the training, the name(s), address(es) and telephone number(s) of the trainer(s) and certifications executed by the trainers confirming his attendance.

III. COMPENSATION OF AGGRIEVED PERSONS

The defendant shall pay to Silvia, Elie, Albert and Elizabeth Bitton the sum of fifteen thousand dollars (\$15,000) as aggrieved persons within the meaning of the Fair Housing Act, provided that no amount shall be paid pursuant to this paragraph before Silvia and Elie Bitton have executed a written release (in the form of Attachment A) and Albert Bitton has executed a written release (in the form of Attachment B) of all claims, legal or equitable, that they might have against

the defendant relating to the claims asserted in this lawsuit. The defendant shall send a check for this amount to counsel for plaintiffs-intervenors¹ within 30 days after the date of entry of this Order.

IV. COURT JURISDICTION, SCOPE AND TERM OF CONSENT ORDER

A. The Parties have consented to the entry of this Order as indicated by the signatures below. To this end, the Parties stipulate and the Court finds that this Court has subject matter jurisdiction over this action pursuant to 28 U.S.C. §§ 1331 and 1345 and 42 U.S.C. § 3612(o). This Consent Order is effective immediately upon its entry by the Court.

B. The Court shall retain jurisdiction over this action and over the defendant for five years from the date of entry of this Consent Order to enforce the terms of the Order, after which time the case shall be dismissed with prejudice. The United States and/or the plaintiffs-intervenors may move the Court to extend the duration of the Order if they determine that the defendant has violated one or more terms of the Order or if the interests of justice otherwise require.

C. The parties to this Consent Order shall endeavor in good faith to resolve informally any differences regarding interpretation of and compliance with this Order prior to bringing such matters to the Court for resolution. However, in the event of a failure by the defendant to perform in a timely manner any act required by this Consent Order or otherwise to act in accordance with any provision

¹ For purposes of this Consent Decree, counsel for plaintiffs-intervenors are Jonathan K. Baum and Daniel J. Polatsek, Katten Muchin Rosenman, 525 West Monroe Street, Suite 1900, Chicago, Illinois 60661.

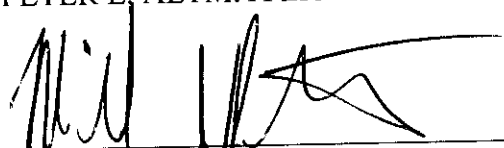
thereof, the United States or plaintiffs-intervenors may move this Court to impose any remedy authorized by law or equity.

So ORDERED this 18TH day of JANUARY, 2006


UNITED STATES MAGISTRATE JUDGE

The undersigned hereby apply for and consent to the entry of this Order:

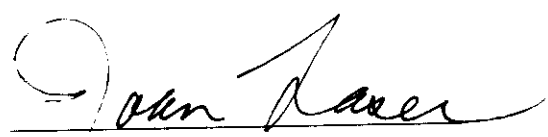
For the Defendant,
PETER L. ALTMAYER



MICHAEL J. PETRO, Esq.
53 West Jackson Boulevard, Suite 324
Chicago, Illinois 60604
(312) 913-1111

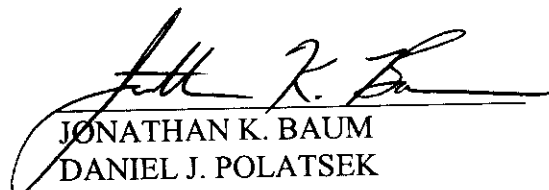
For the Plaintiff,
UNITED STATES OF AMERICA

PATRICK J. FITZGERALD
United States Attorney



By: JOAN LASER
Assistant United States Attorney
219 South Dearborn Street
Chicago, Illinois 60604
(312) 353-1857

For the Plaintiffs-Intervenors,
SILVIA, ELIE, ALBERT AND ELIZABETH BITTON



JONATHAN K. BAUM
DANIEL J. POLATSEK
GAIL KIM
KATTEN MUCHIN ROSENMAN
525 W. Monroe Street, Suite 1900
Chicago, IL 60661
(312) 902-5200

LAURIE A. WARDELL
ELYSSA BALINGIT WINSLOW
CHICAGO LAWYERS' COMMITTEE
FOR CIVIL RIGHTS UNDER LAW, INC.
100 N. LaSalle St., Suite 600
Chicago, IL 60602
(312) 630-9744

ATTACHMENT A

Release

In consideration of the Consent Order entered in *United States v. Peter Altmayer*, No. 05 C 1239, and of the payment of the sum of fifteen thousand dollars (\$15,000.00), pursuant thereto, I, _____, for myself and as next friend of Elizabeth Bitton, hereby release the defendant named in this action from any and all liability for any claims, legal or equitable, I may have against him arising out of the issues alleged in the action as of the date of the entry of the Consent Order. I fully acknowledge and agree that this release of the defendant shall be binding on my heirs, representatives, executors, successors, administrators, and assigns. I hereby acknowledge that I have read and understand this release and have executed it voluntarily and with full knowledge of its legal consequences.

(Signature)

(Date)

ATTACHMENT B

Release

In consideration of the Consent Order entered in *United States v. Peter Altmayer*, No. 05 C 1239, and of the payment of the sum of fifteen thousand dollars (\$15,000.00), pursuant thereto, I, Albert Bitton, hereby release the defendant named in this action from any and all liability for any claims, legal or equitable, I may have against him arising out of the issues alleged in the action as of the date of the entry of the Consent Order. I fully acknowledge and agree that this release of the defendant shall be binding on my heirs, representatives, executors, successors, administrators, and assigns. I hereby acknowledge that I have read and understand this release and have executed it voluntarily and with full knowledge of its legal consequences.

(Signature)

(Date)