



STATE OF WISCONSIN
DEPARTMENT OF JUSTICE

Exhibit K

JAMES E. DOYLE
ATTORNEY GENERAL
Bernadette L. Bridge
Deputy Attorney General

123 West Washington Avenue
P.O. Box 7857
Madison, WI 53707-7857
J. Douglas Haag
Assistant Attorney General
608/266-7836
FAX 608/267-2323

June 10, 1994

Mr. John A. Chavez
Attorney at Law
Post Office Box 419
Cambridge, Wisconsin 53523

RECEIVED
6-13-94

Re: State of Wisconsin v. Leo E. Wanta
Dane County Circuit Case No. 92-CF-683:
Plea Proposal

Dear Mr. Chavez:

In accordance with your request, I am providing you with the state of Wisconsin's present position with regard to disposition of this matter by plea agreement. My offer is as follows:

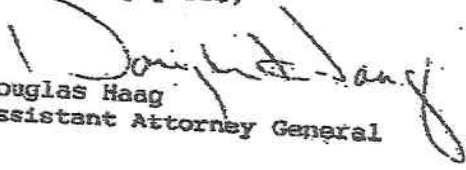
- * 1. The defendant will plead guilty to each of the six counts contained in the information.
- * 2. The state will recommend (or defendant and the state will jointly recommend) that the defendant be placed on probation for a period of five years.
3. That as a condition of probation, defendant will be confined to the Dane County jail for a period of eight months with full credit for time served since his arrival back in the United States in November.
4. As a further condition of probation, defendant will cooperate fully with the Wisconsin Department of Revenue in identifying and locating all of his assets. Those assets include personal assets as well as assets of any and all businesses, partnerships, corporations and other associations in which Mr. Wanta has any financial interest. This cooperation will also include Mr. Wanta providing the Department of Revenue with specific current information on the location of the approximately \$179,000.00 which he withdrew from the bank account of New Republic/USA Financial Group, Ltd., at the Banca Nazionale del Lavoro, New York City branch and forwarded it to two banks in Vienna, Austria.
5. The state agrees that it will bring no additional criminal tax charges against Mr. Wanta for any matters revealed in Mr. Wanta's compliance with condition 4. above.

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6. As a further condition of probation, the defendant will be required to pay the cost of investigation and prosecution.

Should you and your client wish to discuss this proposal further, please notify me as soon as possible. In any event, the state's offer will terminate at noon on Friday, June 24, 1994.

Very truly yours,


Douglas Haag
Assistant Attorney General

DH:dt

Enclosure

cc: Mr. Dennis Ullman

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