



Supreme Court of Wisconsin

Office of Lawyer Regulation
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Chief Justice

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Timothy C. Samuelson
Director

January 30, 2025

Via email jjw@winiarskilaw.com and US Mail

Referee James Winiarski

Re: *Disciplinary Proceedings Against Michael J. Gableman*
Sup. Ct. Case No. 2024AP2356-D

Dear Referee Winiarski:

Enclosed please find *OLR's Preliminary Witness List* in the above mentioned matter.

Thank you.

Very truly yours,

/s/ Donald K. Schott

Donald K. Schott
Retained Counsel for OLR

DKS:mc
Enclosure

cc: Clerk of Supreme Court (w/original)
Attorney Peyton B. Engel (w/enclosure)(via email pengel@hurleyburish.com and US Mail)

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CLERK OF SUPREME COURT
OF WISCONSIN

IN THE MATTER OF DISCIPLINARY
PROCEEDINGS AGAINST MICHAEL J.
GABLEMAN, ATTORNEY AT LAW.

CASE CODE 30912

OFFICE OF LAWYER REGULATION,

CASE NO. 2024AP2356-D

Complainant;

MICHAEL J. GABLEMAN,

Respondent.

OLR's PRELIMINARY WITNESS LIST

The Office of Lawyer Regulation (OLR) expects to call any or all of the following as fact witnesses during the disciplinary hearing:

1. Attorney Michael J Gableman(adversely)

Attorney Gableman's anticipated testimony will include, but not be limited to, the following: the events described in all 10 Counts of OLR's *Complaint* filed in this matter, any aggravating and mitigating factors and evidentiary exhibits.

2. Attorney Michael Haas
Madison City Attorney

Attorney Haas' anticipated testimony will include, but not be limited to, the following: the events described in Counts 1-3 and 10 of OLR's *Complaint* filed in this matter, any aggravating and mitigating factors and evidentiary exhibits.

3. Satya Rhodes-Conway
Mayor, City of Madison

Mayor Rhodes-Conway's anticipated testimony will include, but not be limited to, the following: the

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events described in Counts 1-3 of OLR's *Complaint* filed in this matter, any aggravating and mitigating factors and evidentiary exhibits.

4. Representative of City of Madison familiar with documents produced by Madison in response to subpoenas from the Office of Special Counsel.

This witnesses' anticipated testimony will include, but not be limited to, the following: the events described in Counts 1-3 of OLR's *Complaint* filed in this matter, any aggravating and mitigating factors and evidentiary exhibits.

5. Attorney Jeffrey Mandell
Law Forward

Attorney Mandell's anticipated testimony will include, but not be limited to, the following: the events described in Counts 1-3 and 10 of OLR's *Complaint* filed in this matter, any aggravating and mitigating factors and evidentiary exhibits.

6. Eric Genrich
Mayor of Green Bay

Mayor Genrich's anticipated testimony will include, but not be limited to, the following: the events described in Counts 1-3 of OLR's *Complaint* filed in this matter, any aggravating and mitigating factors and evidentiary exhibits.

7. Representative of City of Green Bay familiar with documents produced by Green Bay in response to subpoenas from the Office of Special Counsel.

This witnesses' anticipated testimony will include, but not be limited to, the following: the events described in Counts 1-3 of OLR's *Complaint* filed in this matter, any aggravating and mitigating factors and evidentiary exhibits.

8. Attorney Christa Westerberg
Pines Bach LLP

Attorney Westerberg's anticipated testimony will include, but not be limited to, the following: the events described in Counts 4-7 of OLR's *Complaint* filed in this matter, any aggravating and mitigating factors and evidentiary exhibits.

9. Zakory Niemierowicz
Former Office of Special Counsel Employee

Mr. Niemierowicz's anticipated testimony will include, but not be limited to, the following: the events described in Counts 1-8 of OLR's *Complaint* filed in this matter, any aggravating and mitigating factors and evidentiary exhibits.

10. Robin Vos
Wisconsin State Assembly

Mr. Vos' anticipated testimony will include, but not be limited to, the following: the events described Counts 7-10 of OLR's *Complaint* filed in this matter, any aggravating and mitigating factors and evidentiary exhibits.

11. Any witness identified through discovery.
12. Any witness identified or called by the Respondent.
13. OLR reserves the right to call any additional witnesses required to establish an evidentiary basis for exhibits or other facts for which OLR is not able to obtain a stipulation of admission.
14. OLR reserves the right to call any rebuttal witnesses.
15. In addition, OLR may call any or all of the following witnesses if needed to establish facts which OLR currently believes will not be contested:

- Steven Fawcett
- Jennifer Toftness
- Daniel Lenz
- Edward Blazel
- Hon. Frank Remington

Dated this 30th day of January, 2025.

OFFICE OF LAWYER REGULATION

/s/ Donald K. Schott

DONALD K. SCHOTT
Retained Counsel for OLR
State Bar No. 1010075

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