



Law Forward Inc.  
P.O. Box 326  
Madison, WI 53703-0326

December 3, 2021

Michael Gableman  
Special Counsel  
200 South Executive Drive, Suite 101  
Brookfield, Wisconsin 53005

**Re: Our client: City of Green Bay**

Dear Mr. Gableman,

We are in receipt of two messages – apparently from Edward Chaim and Thomas Obregon – left earlier today on the voicemail of a personal cell phone belonging to an employee of the City of Green Bay. Both callers identify themselves as working with your office, and you identified both callers as individuals you employ during your testimony on December 1, 2021.

This is unacceptable. As you are aware, the Rules of Professional Conduct prohibit an attorney from communicating directly with a person they know to be represented by counsel about the subject of that representation, with limited exceptions not applicable here. SCR 20:4.2. To the extent you are receiving assistance from non-lawyer investigators, you are responsible for ensuring that their conduct is “compatible with the professional obligations” of an attorney. SCR 20:5.3.

My firm and our co-counsel have repeatedly requested, verbally and in writing, that you and your office communicate exclusively with us and stop contacting City of Green Bay employees directly. I returned the call from Mr. Obregon and left a message indicating that any communication should be directed to the City’s outside counsel; I left him my phone number to return the call to discuss any requests he may have for information from that or other City of Green Bay employees.

If the Office of Special Counsel makes any further attempt to communicate directly with any party we represent regarding your investigation, except where authorized by law, we will be forced to file a complaint with the Office of Lawyer Regulation. I noted the same in my message to Mr. Obregon.

Sincerely,

*Electronically signed by Daniel S. Lenz*  
Daniel S. Lenz  
Staff Counsel  
Law Forward, Inc.

CC: States United Democracy Center & Stafford Rosenbaum LLP