

**FILED**  
**01-04-2022**  
**Clerk of Circuit Court**  
**Waukesha County**  
**2021CV001710**

STATE OF WISCONSIN    CIRCUIT COURT    WAUKESHA COUNTY  
BRANCH 3

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MICHAEL J. GABLEMAN,  
IN HIS OFFICIAL CAPACITY AS SPECIAL COUNSEL  
TO THE WISCONSIN ASSEMBLY, EX REL. WISCONSIN  
STATE ASSEMBLY,

Petitioner,

v.

Case No. 2021-CV-1710  
Code: Unclassified

ERIC GENRICH, PERSONALLY, AND IN HIS OFFICIAL  
CAPACITY AS MAYOR OF GREEN BAY, WISCONSIN,

Respondent.

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**RESPONDENT MAYOR ERIC GENRICH'S MOTION FOR SANCTIONS**

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Respondent Eric Genrich, Mayor of the City of Green Bay, hereby moves this Honorable Court for an Order sanctioning the Petitioner Michael Gableman, in his official capacity as Special Counsel to the Wisconsin Assembly (hereinafter, "Special Counsel"), pursuant to Wis. Stat. §§ 802.05 (3) and this Court's inherent authority, and issue an order:

1. Requiring that the Special Counsel publish in the *Milwaukee Journal Sentinel*, the *Wisconsin State Journal*, and the *Green Bay Press-Gazette* full-page advertisements acknowledging, using language agreed among the parties and approved by this Court, the inaccuracy of his statements to the Assembly Committee on Campaigns and Elections that Mayor Genrich had violated a lawful obligation to provide testimony, which statements were widely reported, in those publications and elsewhere;
2. Requiring that the Special Counsel publicly assert, the next time he appears before the Assembly Committee on Campaigns and Elections that his prior testimony to the effect that Mayor Genrich had violated a lawful obligation to provide testimony was inaccurate;

3. Requiring the Special Counsel pay a penalty to the Court in an amount, to be determined by the Court, sufficient to deter future repetition of the conduct leading to the imposition of sanctions in this matter;
4. Requiring that, within 30 days of the Court's order, the Special Counsel facilitate for himself and all attorneys in the Office of Special Counsel at least 3 hours of continuing legal education regarding ethical conduct in the practice of law, above and beyond the requirements imposed by SCR 31.02; and
5. Mandating that the Special Counsel, and any person working with or on behalf of the Special Counsel, cease and desist from communicating or attempting to communicate with any represented party, including officials and employees of the City of Green Bay.

The bases of this motion are set forth in the brief and affidavits filed herewith.

Dated January 4, 2022

Respectfully submitted,

STAFFORD ROSENBAUM LLP

By Electronically signed by Jeffrey A. Mandell

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