

July 24, 2025

**VIA EMAIL ONLY**

Arbitrator Susan J.M. Bauman  
125 North Hamilton Street, Unit 407  
Madison, WI 53703

**RE: Opposition to the City of Milwaukee's Request to Adjourn Arbitration**

Dear Arbitrator Bauman:

As you know, my firm and I serve as legal counsel for the Milwaukee Police Association ("MPA"). Please accept this correspondence as the MPA's opposition to the City of Milwaukee's ("City") request to adjourn the upcoming arbitration hearing to allow for the City to retain outside legal counsel at the eleventh hour. MPA's lead labor counsel, Attorney Matthew Tobin, stands prepared to arbitrate this matter as scheduled, starting on August 19, 2025, and we respectfully request that you deny the City's request for an adjournment.

The contract between the MPA and City of Milwaukee expired in December of 2022. Since at least September of 2023 (following the passage of Act 12), the MPA has diligently pursued a resolution of this matter through direct negotiation, mediation and, ultimately, arbitration. Time and time again the MPA's efforts to bring this matter to a conclusion have been stymied by the City's constant issues and self-inflicted delays. For over 2 ½ years, MPA members have courageously served their City despite not having a contract and now the City seeks yet another delay so that it can apparently use taxpayer money to hire outside legal counsel to contest the MPA's efforts to receive fair compensation for the City's police officers.

Originally, the MPA was negotiating this matter with City Labor Negotiator Nicole Fleck. After many months of direct negotiations, an unsuccessful mediation with the WERC was held on April 8, 2024 with Chairman James Daley. The MPA then served a Petition for Final and Binding Arbitration on April 15, 2024. For reasons unknown to the MPA, Ms. Fleck left the position of Labor Negotiator in approximately May of 2024. The City then requested a stay of the arbitration proceeding while it appointed a new Labor Negotiator. Ultimately, Veronica Rudychev was appointed to that position in approximately June of 2024.

Mr. Rudychev and the City then requested additional time for Ms. Rudychev to familiarize herself with this matter before engaging in arbitration. The MPA agreed to this request. Tragically, while discussions regarding a resolution of this case were ongoing, Ms. Rudychev passed away in October of 2024.

The City then requested a stay of these proceedings while it recruited and approved a new Labor Negotiator. Initially, Attorney Ben Roovers was set to become the new Labor Negotiator for the

City in November of 2024. However, he withdrew his application prior to being approved by the City's Common Counsel. The City then, again, requested additional time to recruit a new Labor Negotiator.

Mr. Nick DeSiato, the Mayor's Chief of Staff, eventually was appointed as the interim Labor Negotiator for the City of Milwaukee in late December of 2024. Mr. DeSiato requested yet another extension of time to familiarize himself with this matter and to independently attempt to negotiate a resolution with the MPA. The MPA, once again, patiently granted this request and engaged in further direct negotiations. Eventually, however, in approximately April of 2025, the City reappointed Ms. Fleck to the position of Labor Negotiator.

At approximately the same time, the City of Milwaukee informed the MPA that it would be replacing its lead attorney on this matter and that Attorney Ben Roovers would be accepting a position with the City and taking over as lead legal counsel on this arbitration. With that said, Attorney Roovers is certainly not the only Milwaukee Assistant City Attorney who has represented the City in this matter. Nonetheless, at the request of Attorney Roovers and the City, the MPA agreed to arbitrate this matter in August of 2025 as opposed to June of 2025.

After more than a year of delays caused solely by the City, the City is requesting yet another extension of time – now so that the City can spend taxpayer funds on lawyers rather than police officers, to prepare for an arbitration that was initiated back in April of 2024.

The members of the MPA have gone years without an appropriate raise. Each day that goes by without a contract further harms Milwaukee police officers and it stands in the way of the City being able to meaningfully recruit the additional officers that it desperately needs. The MPA and its members deserve their day in court and the City, after having delayed this matter for more than a year, should no longer be allowed to avoid this arbitration.

The MPA respectfully requests that you deny the City's request to stay this arbitration and order that this matter proceed on August 19, 2025. The police officers of the City of Milwaukee deserve to be heard and any further delay would be an abdication of the City's responsibility to the officers who protect it every day.

We appreciate your consideration in this matter.

Very truly yours,

  
SAMUEL C. HALL, JR.

cc: Attorney Ben Roovers, Assistant City Attorney  
Milwaukee Police Association