

IN THE COURT OF COMMON PLEAS
CRAWFORD COUNTY, OHIO

FILED CLERKS OFFICE
2025 JUL 22 PM 2:01

JANELLE MOORE
CRAWFORD COUNTY

Kurt A. Fankhauser
1415 Michigan Dr.
Bucyrus, OH 44820

Plaintiff, PRO SE
vs.

CASE NO.: 25CV0183

City of Bucyrus
500 S. Sandusky Ave.
Bucyrus, OH 44820

Brandon Gobrecht
3645 State Route 4
Bucyrus, OH 44820

Kali Lewis
422 Wallace Ave.
Bucyrus, OH 44820

Kim Felkey
150 Schell Ave.
Bucyrus, OH 44820

Clarissa Slater
3645 State Route 4
Bucyrus, OH 44820

Defendants

**VERIFIED TAXPAYER COMPLAINT
FOR INJUNCTIVE RELIEF, DECLARATORY
JUDGEMENT, AND DAMAGES**

**[ORC 733.56, 733.59, and Related Common Law
Causes of Action]**

Now comes Plaintiff Kurt A. Fankhauser, pro se, a resident and taxpayer of the City of Bucyrus, Ohio,
and for his complaint against Defendants alleges as follows:

I. PARTIES, JURISDICTION AND VENUE

1. PLAINTIFF is a taxpayer, elected Council President, and resident of the City of Bucyrus, Ohio.
2. Defendant City of Bucyrus is a municipal corporation organized under the laws of the State of Ohio and located in Crawford County, Ohio.

3. Defendant Brandon Gobrecht is the duly acting Law Director for the City of Bucyrus.
 4. Defendant Clarissa Slater is a Councilmember for the City of Bucyrus
 5. Defendant Kali Lewis is the Auditor for the City of Bucyrus.
 6. Defendant Kim Felkey is the Deputy Auditor of the City of Bucyrus and acting Payroll Clerk.
 7. Lawdirector Gobrecht and Councilwoman Slater are in a domestic partnership and both reside at the same address of 3645 State Route 4.
 8. Jurisdiction is proper in this Court pursuant to R.C. §§ 733.56, 733.59, and the Court's equitable and legal jurisdiction to hear claims involving the misuse of public funds.
 9. Venue is proper in this Court under Civ.R. 3 as all events occurred within Crawford County, Ohio.
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II. Plaintiff States the following:

8. PLAINTIFF is the direct supervisor of the Bucyrus Council Clerk, Miranda Wise, and is responsible for approving her timesheets prior to their submission to the City's Payroll Clerk.
9. On July 14, 2025, Ms. Wise tendered her resignation with her stated final workday as July 25, 2025, though a true 14 days from the resignation notice would have been July 28, 2025.
10. Ms. Wise did not provide a reason for her resignation in her letter nor consult with PLAINTIFF her direct supervisor regarding her resignation.
11. On the same day, local news reported Clerk Wise's resignation and quoted Defendant Gobrecht as saying: "It is a damned shame that the coordinated attack on our city, which is orchestrated by our Council President and his band of rascals, has driven off not just another Council Clerk, but the best Council Clerk this city has seen in decades."
12. Said statement was false, malicious, and defamatory, implying the Clerk left due to PLAINTIFF's conduct despite PLAINTIFF later confirming with Mayor Truka that Ms. Wise left to accept a job with Starbucks to obtain college tuition benefits.
13. On July 16, 2025, PLAINTIFF instructed Ms. Wise to post a media notice for a replacement Council Clerk. Ms. Wise refused the direction from the Council President, stating that only full Council could authorize such notice. Defendant Gobrecht concurred.
14. On July 17, 2025, Ms. Wise verbally requested paid personal leave for July 21–25, 2025 to PLAINTIFF who was her supervisor responsible for approving any such requests.

15. On July 18, PLAINTIFF, after consulting the Bucyrus Auditor's and Mayor's Offices, denied the request to the Council Clerk via email because (1) personal leave is not paid out upon resignation and (2) the short notice and upcoming duties required her presence.
16. Later in the day on July 18, Ms. Wise submitted a timesheet including the five days of personal leave despite not receiving required approval from PLAINTIFF.
17. On July 18, PLAINTIFF verbally informed Payroll Clerk Kim Felkey that the timesheet was unapproved and directed that the five days of leave should not be paid.
18. On July 18, PLAINTIFF sent a written notice via email to Auditor Lewis, Law Director Gobrecht, and Deputy Auditor Felkey detailing the unapproved submission.
19. Despite the above, Law Director Gobrecht responded with a misleading email claiming a past practice of "rubber-stamping" such leave, and falsely alleged a "hostile work environment."
20. On July 18, DEFENDANT Clarissa Slater, in her official capacity as City Councilperson, issues a press release to multiple media news outlets stating "This week, Council Clerk Miranda Wise submitted her two-week resignation notice amid an increasingly hostile and retaliatory environment created by Council President Kurt Fankhauser. Ms. Wise—a diligent and respected public servant—had fully complied with every requirement imposed upon her, completing updates to the permanent legislative record and the public Documents on Demand portal. Yet, President Fankhauser continued to deny her legally entitled leave, shifted expectations repeatedly, and ultimately stated he would deny it "no matter what." This culminated in a volatile incident where Mr. Fankhauser yelled at Ms. Wise, slammed a chair, and stormed out of City Hall—leaving the Clerk visibly upset. Following this, he issued a public email refusing to assume the administrative duties of the Clerk, despite his own ability to serve as Clerk Pro Tem under municipal practice. His abdication of duty—even though the law allows him to perform them until a new Clerk is appointed—conflicts with guidance from the Law Director and places the City's legislative process at risk.
21. Said statement by Councilwoman Slater was false, malicious, and defamatory towards PLAINTIFF.
22. On July 20, 2025, PLAINTIFF reported the falsified timesheet to the Ohio State Auditor's Office.
23. On July 21, 2025, PLAINTIFF verbally and in person requested the return of the timesheet from Auditor Lewis to correct errors, which was denied.
24. On July 21, 2025, PLAINTIFF contacted Ms. Wise via text, noting her absence and classifying her as a no-call, no-show in accordance with her resignation's stated end date and also informed her there were multiple issues with the time sheet she had supplied to the Auditors Office.
25. Ms. Wise did not respond. She effectively stopped working as of July 18, 2025, providing only four days of notice since her original resignation letter of July 14, 2025. Far short of two weeks.

26. PLAINTIFF alleges that Defendants plan to illegally pay out unapproved "personal hours," violating city policy and misappropriating taxpayer funds.
 27. PLAINTIFF alleges that past practice of the City of Bucyrus will show that it does not pay out personal hours on separation. Any such payment would be an illegal expenditure under Ohio law.
 28. PLAINTIFF further alleges Defendants Gobrecht, Lewis, and Felkey are engaged in a coordinated effort to misappropriate city funds by unlawfully authorizing unearned compensation to Ms. Wise.
 29. PLAINTIFF believes that Defendant Gobrecht made false assurances to Ms. Wise regarding payment for unearned time and has participated in a coordinated smear campaign with other city officials to damage PLAINTIFF's reputation.
 30. PLAINTIFF alleges Defendants and other Council Members are willfully delaying efforts to fill the vacant Clerk position to increase PLAINTIFF's administrative burden and harm his effectiveness by forcing him to do interim duties of Council Clerk which are not required to be done by a municipality's Council President per Ohio Law.
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III. CLAIMS FOR RELIEF


28. PLAINTIFF realleges all prior paragraphs.
29. The planned or attempted payment of unapproved personal leave to a resigned employee constitutes an illegal disbursement of public funds.
30. Defendants have refused to correct or prevent the disbursement after being notified, warranting taxpayer intervention under R.C. § 733.59.
31. There exists an actual controversy as to whether the city may pay personal leave that was not approved and not worked.
32. PLAINTIFF seeks a declaration that such payment is unlawful and unenforceable.
33. There exists an actual controversy as to whether the Council President is required to perform duties of Council Clerk in the absence of a Clerk or appointed Clerk Pro-Tem
34. PLAINTIFF seeks a declaration that such duties are not a legal requirement to be performed by a Council President per Ohio Law.
33. PLAINTIFF seeks a preliminary and permanent injunction prohibiting the Auditor's Office from processing or paying any unapproved personal time for Ms. Wise.

34. The quoted public statement made by Defendant Gobrecht in his official capacity as Law Director on July 14, 2025 was false, malicious, and defamatory per se, falsely imputing misconduct to PLAINTIFF in connection with his official duties.
35. The quoted public statement made by Defendant Slater in her official capacity as Councilperson on July 18, 2025 was false, malicious, and defamatory per se, falsely imputing misconduct to PLAINTIFF in connection with his official duties.
36. Said statements caused reputational harm and emotional distress to PLAINTIFF.
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PRAYER FOR RELIEF

WHEREFORE, PLAINTIFF respectfully requests that this Court:


- A. Issue a declaratory judgment finding the proposed payment of unapproved personal hours to Miranda Wise to be unlawful;
- B. Issue a preliminary and permanent injunction barring the City of Bucyrus and its officials from making said payment;
- C. Issue a declaratory judgment finding the Council President is not required by Ohio Law to perform Council Clerk Duties;
- D. Award actual and punitive damages against Defendant GOBRECHT and Defendant SLATER in the amount of \$75,000 each for defamation against PLAINTIFF;
- E. Award PLAINTIFF costs and all other relief this Court deems just and proper under law and equity.



Kurt A. Fankhauser, Plaintiff / Pro Se
1415 Michigan Dr.
Bucyrus, OH 44820
419-569-5814 – cell phone

VERIFICATION

I, Kurt Fankhauser, do hereby state that the foregoing allegations in the Verified Complaint are true to the best of my knowledge, belief, and information



Kurt A. Fankhauser, Plaintiff / Pro Se