

**COURT OF COMMON PLEAS
LAKE COUNTY, OHIO**

STATE ex rel OPEN	:	Case No.: 24-CV-001067
GOVERNMENT ADVOCATES	:	
C/O BRIAN AMES	:	
	:	Judge: O'Donnell
Relator,	:	
	:	
vs.	:	
	:	
LAKE COUNTY BUDGET	:	
COMMISSION, et al.	:	
	:	
Respondents.	:	

AMENDED COMPLAINT FOR INJUNCTIVE RELIEF AND MANDAMUS

Plaintiff State ex rel Open Government Advocates (the “Advocates”) states the following for its Complaint against Lake County Budget Commission, Christopher Galloway, Charles Coulson, and Michael Zuren:

INTRODUCTION

1. This is an Action under R.C. § 121.22, the Ohio Open Meetings Act (“OMA”), to enjoin the Lake County Budget Commission (“LCBC”) from forming committees to privately deliberate in violation of OMA. The LCBC, a public body in Lake County, OH, formed an advisory committee to recommend a formula for computing taxes. The advisory committee failed to comply with the OMA, resulting in a lack of public notice, participation, and record-keeping for its meetings. These actions undermine transparency, accountability, and public trust in the governmental process.

PARTIES

2. Plaintiff State ex rel Open Government Advocates is a nonprofit organization registered in the State of Ohio.
3. Defendant Lake County Budget Commission (“LCBC”) is a public body under R.C. § 121.22(B), and it is located in Lake County, Ohio.
4. Defendant Christopher Galloway is the elected auditor for the Lake County Budget Commission and is named here in his official capacity.
5. Defendant Charles Coulson is the elected prosecuting attorney for the Lake County Budget Commission and is named here in his official capacity.
6. Defendant Michael Zuren is the elected treasurer for the Lake County Budget Commission and is named here in his official capacity.

JURISDICTION AND VENUE

7. Jurisdiction and venue are proper in this Court because the transactions and occurrences addressed in this Action occurred in Lake County, OH, and Defendant is located in this County.

BACKGROUND FACTS

8. The LCBC is a public body in Lake County, OH.
9. The LCBC is responsible for approving the budgets of all county entities and submitting these budgets to the state.
10. The LCBC formed a new advisory committee to decide on the formula to be used for computing taxes. (See Exhibit 1).

11. The advisory committee was tasked with providing recommendations to the LCBC on tax computation methods. (Id.)
12. This advisory committee was referred to as the “ad hoc” committee.
13. The LCBC began discussing their plans to form this ad hoc committee to propose a formula during their August 7, 2023, meeting.
14. Auditor Galloway further discussed the plans to form this ad hoc committee on August 21, 2023.
15. Auditor Galloway suggested that representatives from several townships, cities, and a village would serve on the ad hoc committee.
16. During the following meeting, further conversations occurred where the LCBC discussed the formation of the ad hoc committee to discuss the formula. (Id.)
17. Ultimately, the ad hoc committee was formed, and its members were Commissioner John Hamercheck, Concord Trustee Morgan McIntosh, Mentor Administrator Ken Filipak, Willoughby Mayor Bob Fiala, and Former Waite Hill Mayor Bob Ranallo.
18. On February 5, 2024, the LCBC discussed the ad hoc committee’s meetings and work on deciding on an alternative formula. (Id.)
19. Thus, the LCBC publicly announced that the ad hoc committee was meeting to deliberate on the formula. (Id.)
20. During the May 16, 2024, LCBC meeting, the LCBC publicly introduced the ad hoc committee as the group that worked on “formulating” a new local government formula for Lake County. See, [\(1522\) Lake County Budget Commission Meeting May 16, 2024 - YouTube](#)

21. In fact, the LCBC had the ad hoc committee sit on stage with the LCBC committee during the LCBC's May 16, 2024, meeting. (Id.)
22. Thus, the LCBC used the ad hoc committee to meet and privately deliberate on the formula, to work on "formulating" the formula privately, and ultimately make its recommendations to the LCBC concerning the new alternative formula. (Id.)
23. The LCBC had the ad hoc committee publicly acknowledge all the committee's previous private meetings, deliberations, and recommendations at the May 16, 2024, LCBC meeting. (Id.)
24. The ad hoc committee publicly announced that it had at least eight private meetings where "robust" conversations about the formula occurred. (Id.)
25. In addition, the ad hoc committee admitted that during these private meetings, at least "twenty" different proposals were discussed and deliberated. (Id.)
26. Waite Hill had also previously discussed how intensely ad hoc committee member Former Mayor Bob Ranallo negotiated in the committee meetings during Waite Hill's April 8, 2024, council meeting.
27. During the May 16, 2024, LCBC meeting, the ad hoc committee even discussed "sub groups" it formed to engage in further private deliberations. (Id.)
28. The ad hoc committee admitted that as of May 16, 2024, it did reach a "proposal," which means that the ad hoc committee has already privately determined its recommendations to the LCBC concerning the new alternative formula.
29. The committee further admitted that they spent plenty of time on the recommendations, and that several members of the committee were very savvy with numbers.

30. The ad hoc committee discussed how their private deliberations and recommendations would result in “winners” and “losers.”
31. However, the ad hoc committee did not adhere to the requirements of the Ohio Open Meetings Act.
32. The committee failed to provide notice of its meetings to the public.
33. The public was denied the opportunity to attend and participate in the committee’s meetings.
34. There was no public record of the committee’s meetings, discussions, decisions, thereby violating transparency requirements mandated by law.
35. The actions of the advisory committee, conducted without public oversight, undermined the principles of transparency in government operations.
36. Decisions made by the committee regarding tax computation could have significant financial implications for the residents of Lake County.
37. Simply stated, some of the “losers” of the ad hoc committee’s eight meetings, twenty proposals, and savvy numbers, never got to observe the deliberations that led to their losses.
38. The Advocates requested the following public records from the LCBC concerning the ad hoc committee’s work on May 30, 2024.
 1. Communications including emails, text, and social media messages between the County and the ad hoc committee considering the formula for distributing the local government funds and its members, including John R. Hamercheck, Morgan R. McIntosh, Kenneth J. Filipiak, Robert A. Fiala, Robert A. Ranallo, Dennis Morley, David J. Spotton, Stephen Byron, and James Lyon, concerning the LGF formula sent or received since January 1, 2023.
 2. Communications including emails, text, and social media messages between the Auditor and others sent or received regarding his efforts

to set "a date for the LGF meeting" as described in minutes of the March 18, 2024.

3. Any records documenting the Commission's own efforts to develop a new formula for distribution of local government funds. (Exhibit 2).

39. The LCBC acknowledged receipt of the request the next day on May 31, 2024.

40. The LCBC has still not responded to this request with a single page, exemption, or with a response indicating the availability of the public records.

COUNT I – VIOLATIONS OF THE OPEN MEETINGS ACT

41. Advocates restate all previous paragraphs.

42. Under the OMA, advisory committees and subcommittees are public bodies under R.C. § 121.22(B).

43. As public bodies, committees must comply with the OMA, notice their meetings, and take meeting minutes.

44. Here, the LCBC established a committee that had the purpose of advising the LCBC concerning the tax formula.

45. The LCBC relied on this advisory committee to determine the tax formula to utilize, and the LCBC took the official action of adopting this tax formula.

46. However, the committee did not comply with the OMA as required under Ohio law.

47. The committee did not properly notice its meetings, it met privately, and it did not take meeting minutes of its deliberations and decisions.

48. The LCBC's use of an advisory committee to privately deliberate about the tax formula violated the OMA.

49. The Advocates are entitled to injunctive relief, statutory forfeitures, attorney fees, costs, and invalidation of unlawful actions.

COUNT II – VIOLATIONS OF THE OPEN RECORDS ACT

50. The Advocates restate all previous paragraphs.

51. The LCBC is a public body under the Open Records Act.

52. The ad hoc committee is also a public body under the Open Records Act.

53. All members of both the LCBC, as well as the ad hoc committee, are public officials who were engaged in public business when performing duties on the LCBC and ad hoc committee.

54. Any record of communications concerning the actions of members of the LCBC and the ad hoc committee record the activities of the official actions of these individuals.

55. The Advocates issued a public records request on May 30, 2024, which sought production of certain communications related to the ad hoc committee, and the alternative formula.

56. The Respondents have the duty to produce these records promptly and in a reasonable time.

57. Approximately three months has passed, and the LCBC commission has yet to produce a page or respond in any manner to the Advocate's records request.

58. The LCBC has not responded promptly to the Advocate's request, and it has breached its duties under the Open Records Act.

WHEREFORE, the Advocates respectfully request that this Court finds for him and awards him the following relief:

- a. Injunctive relief;
- b. Statutory forfeitures;

- c. Invalidation under R.C. § 121.22(H);
- d. Attorney fees;
- e. A writ of mandamus instructing the LCBC to produce records;
- f. Costs and expenses; and
- g. All other relief available under law or equity.

Respectfully Submitted,

/s/ Matt Miller-Novak

Matthew Miller-Novak, Esq. (0091402)
Barron, Peck, Bennie & Schlemmer
3074 Madison Road
Cincinnati, Ohio 45209
(513) 721-1350
MMN@BPBSLaw.com

/s/ Robert Thompson

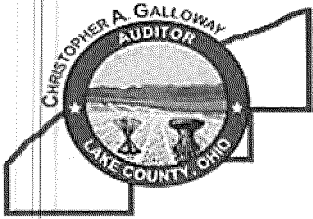
Robert Thompson, Esq. (0098791)
Thompson Legal, LLC
10529 Timberwood Circle, Unit B
Louisville, KY 40223
P: 502-366-2121
F: 502-438-9999
robert@rthompsonlegal.com

Attorneys for Relator

CERTIFICATE OF SERVICE

I certify that this Amended Complaint was served upon Respondents' Counsel, Amily Imbrongo via email at aimbrogno@meyersroman.com on this 29th day of August, 2024.

/s/ Matt Miller-Novak



Christopher A. Galloway
COUNTY AUDITOR

SECRETARY OF
BUDGET COMMISSION
BOARD OF REVISION

ADMINISTRATOR
DATA PROCESSING DEPT.

LAKE COUNTY ADMINISTRATION CENTER
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LAKE COUNTY BUDGET COMMISSION
MONDAY AUGUST 7, 2023
11:00 A.M. COMMISSIONER'S CONFERENCE ROOM

Present: Auditor Chris Galloway
Treasurer Mike Zuren
Prosecutor Charles E. Coulson
Deputy Auditor Mary Beth Armao
See attached sign in sheet for all attendees

Auditor Galloway called the meeting to order at 11:01 a.m.

Roll Call by Deputy Auditor Mary Beth Armao. All present.

Minutes from February 22, 2023 approved and signed. All "Ayes".

Next hearing date scheduled for August 21, 2023 at 10:00 a.m. Location will be in Assembly Room, Building C.

Government Formula was discussed. Auditor Galloway set forth to all present that the Alternate method will be intact throughout 2024. Prosecutor Coulson is submitting opinion to Attorney General for further review. Michael Zuren agreed.

Stephen Byron, Law Director for Kirtland Hills and Waite Hill brought to light his memorandum and legal opinion.

Ken Filipiak, Manager of the City of Mentor suggested a working committee and to let legal process play out.

Dennis Morley, Mayor of the City of Eastlake wants a committee which will be discussed at the next Lake County Mayor/City Manager's meeting. Michael Zuren added that he agrees with creating a committee and to agree on a formula that will work for all municipalities.

Morgan McIntosh, Trustee of Concord Township, proposes to form a committee to decide on a formula.

Auditor Galloway proposes to form committee at next Budget Commission hearing on August 21, 2023.

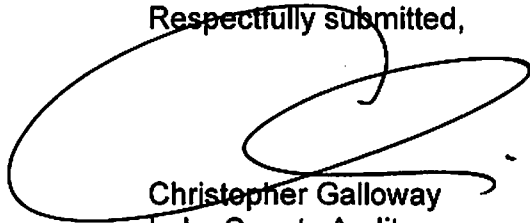
Auditor Galloway proposes the committee representatives could be from the following:

Commissioners
Auditor
City of Mentor
2 other cities in Lake County
2 Townships
1 Village

Jim Lyons, representing the City of Mentor-on-the-Lake spoke about Prosecutor Coulson re-assessing his legal opinion based on the additional information provided by Stephen Byron.

Meeting adjourned at 11:52 a.m.

Respectfully submitted,

A large, stylized handwritten signature in black ink, consisting of several overlapping loops and a long horizontal stroke at the bottom.

Christopher Galloway
Lake County Auditor
Secretary Budget Commission

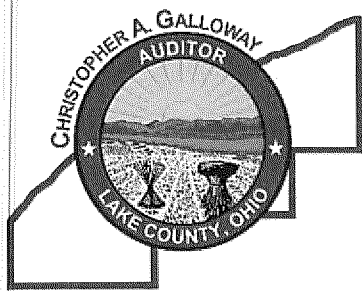
These meeting minutes have been approved on

8-21-23

Auditor Christopher Galloway Date: _____


Prosecutor Charles Coulson Date: 5/29/24


Treasurer Michael Zuren Date: 8-21-23



Christopher A. Galloway

Lake County Auditor

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LAKE COUNTY BUDGET COMMISSION

MONDAY, AUGUST 21, 2023

10:00 A.M.

ASSEMBLY ROOM IN THE BASEMENT OF THE LAKE COUNTY ADMIN BLDG

Minutes prepared by Mary Beth Armao

In Attendance: Chief Deputy Auditor Michele Pennell; Treasurer Michael Zuren; Prosecutor Charles E. Coulson; Deputy Auditor Barb Hogya; Deputy Auditor Mary Beth Armao; Dennis Morley (Mayor-Eastlake); Bruce Scott (Willoughby Hills); Chris Page (Perry Twp); Steve Byron (Waite Hills/Kirtland Hills); Michael Cooper (Lakeland); Vicky Scherbakov (Lakeland); DeeAnne Culbertson (Madison Lib); Chris Brassell (Lake Metroparks); Colleen Snyder (Mentor Lib); Morgan McIntosh (Concord Twp); Kara Cervelli (Fairport Harbor Lib); Maria Rimes (Madison Twp); Vicki Simmons (WE Pub Lib); David Malinowski (Mentor); Richard Zalensky (Wickliffe Lib); Jane Carle (Kirtland Lib)

Chief Deputy Auditor Michele Pennell called the meeting to order at 10:01 a.m.

Mayor of Eastlake Dennis Morley discussed a meeting where to set up a proposed Ad hoc committee to discuss formula per the last Budget Commission meeting on August 7, 2023..

Old Business

The minutes from the previous Budget Commission meeting were brought to the floor. The minutes from the August 7, 2023 meeting were first motioned by Treasurer Zuren for approval. Mr. Coulson seconded the motion. The minutes from the August 7, 2023 meeting were unanimously approved, all "Ayes".

New Business

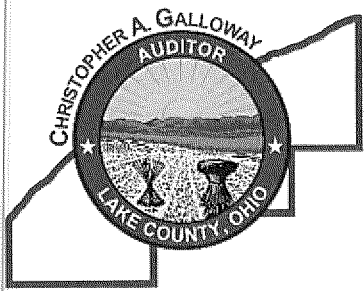
Budgets were read aloud by Deputy Hogya.

Lake County

Inside Millage: 1.00 mill

Outside Millage: 0.30 mills Narcotics; 1.10 mills Children Services; 0.70 mills Crime Lab; 4.90 mills Development Disabilities; 1.60 mills ADAMHS

Total Outside Millage: 9.40 mills



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Lake Metroparks

Inside Millage: 1.00 mill
Outside Millage: 3.10 mills

Eastlake City

Inside Millage: 3.00 mills
Outside Millage: 9.80 mills

Lakeline Village

Inside Millage: 3.00 mills
Outside Millage: 5.00 mills

Timberlake Village

Inside Millage: 3.00 mills
Outside Millage: 18.2 mills

Willoughby Hills

Inside Millage: 3.00 mills
Outside Millage: 4.30 mills

Willoughby City

Inside Millage: 3.0 mills (it was presented by Deputy Hogya that we will need to add 1.40 mills to Willoughby City because it currently on has 1.6 mills)
Outside Millage: 9.80 mills

Willowick City

Inside Millage: 3.00 mills
Outside Millage: 16.75 mills

Madison Township

Inside Millage: 2.9500 mills
Outside Millage: 12.00 mills

Madison Village

Inside Millage: 2.00 mills
Outside Millage: 3.80 mills



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Madison Fire

Inside Millage:

Outside Millage: 10.48 mills

Perry Township

Inside Millage: 3.60 mills

Outside Millage: 7.55 mills

Perry Fire

Inside Millage:

Outside Millage: 8.50 mills

North Perry Village

Inside Millage: 2.30 mills

Outside Millage:

Kirtland City

Inside Millage: 3.00 mills

Outside Millage: 8.05 mills

Kirtland Hills

Inside Millage: 3.00 mills

Outside Millage: 20.00 mills

Waite Hill

Inside Millage:

Outside Millage: 2.20 mills

Painesville City

Inside Millage: 3.00 mills

Outside Millage: 7.67 mills

Painesville Township

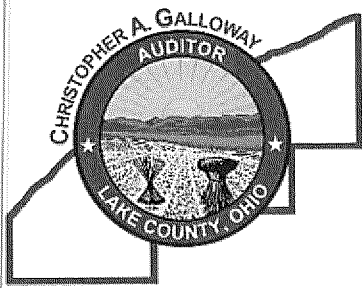
Inside Millage: 2.55 mills

Outside Millage: 20.57 mills

Leroy Township

Inside Millage: 3.00 mills

Outside Millage: 12.80 mills



Christopher A. Galloway

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Concord Township

Inside Millage: 3.00 mills

Outside Millage: 9.25 mills

Grand River

Inside Millage: 2.50 mills

Outside Millage: 8.00 mills

Fairport Harbor Village

Inside Millage: 2.06 mills

Outside Millage: 4.90 mills

Painesville Township Park

Approval by Commission only

Lakeland Community College

Inside Millage: 2.30 mills

Outside Millage: 0.30 mills

Libraries

Perry

Outside Millage: 1.75 mills

Madison

Outside Millage: 2.25 mills

Fairport Harbor

Outside Millage: 2.06 mills

Willoughby Eastlake

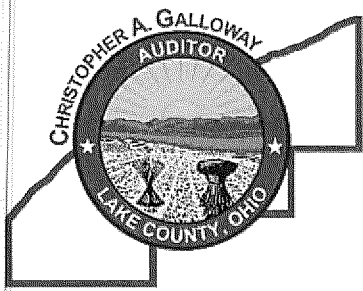
Outside Millage: 3.30 mills

Wickliffe

Outside Millage: 2.90 mills

Mentor

Outside Millage: 2.00 mills



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Morley
Outside Millage: 1.00 mills

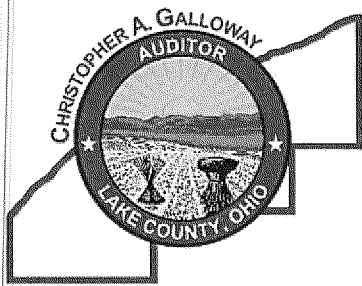
Kirtland
Outside Millage: 1.00 mills

All budgets approved by the Commission. There were not any questions or concerns.

With no furth business, the Budget Commission adjourned at 10:21am.

Respectfully submitted,

Christopher A. Galloway
Lake County Auditor
Secretary Budget Commission



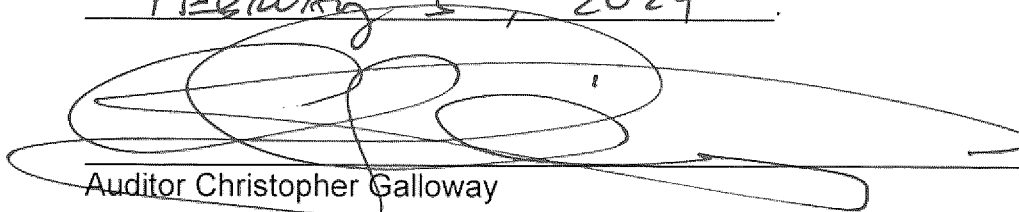
Christopher A. Galloway
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These meeting minutes have been approved on

FEBRUARY 5, 2024



Auditor Christopher Galloway

Date: 2/5/24



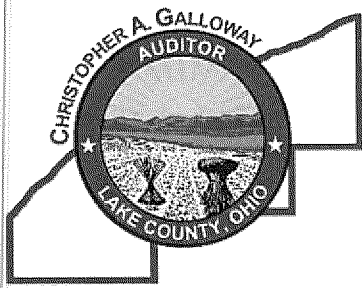
Prosecutor Charles Coulson

Date: 2/5/24



Treasurer Michael Zuren

Date: 2-5-24



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Lake County Budget Commission Meeting

Date: February 5, 2024

Time: 11:00 a.m.

Location: Lake County Administration Building, Auditor's Conference Room

Minutes prepared by Mary Beth Armao

In Attendance: Auditor Chris Galloway, Treasurer Mike Zuren, Prosecutor Charles Coulson, Deputy Auditor Barb Hoggia, and Deputy Auditor Mary Beth Armao

Call to Order: 11:01 a.m.

Election of Chair for 2024 - motion made by Prosecutor Coulson to appoint Auditor Galloway as Chair, Treasurer Zuren seconded the motion.

Treasurer Zuren made a motion to approve the minutes of the August 21, 2023 Budget Commission. The motion was seconded by Prosecutor Coulson.

Vote: All "Ayes".

Old Business None.

New Business

Auditor Galloway proposed to have Budget Commission meetings bimonthly going forward on the 1st and 3rd Mondays of the month. The next meeting is scheduled for Wednesday, February 21, 2024 at 10 a.m. The location will be the Lake County Administration Building, Prosecutor's work room.

The LGF Adhoc meetings were discussed. Need to determine statutory or alternate formula for budget commission. It was proposed that a required LGF hearing to be held the first week of April for all council, trustees, mayors, etc. to attend to discuss how budgets will be affected by adopting new alternate formula or using the statutory formula.

The budget hearings for schools have been set for February 21, 2024 at 10:00 a.m. in the Prosecutor's Work Room at the Lake County Administration Building.

Vote: All "Ayes".



Christopher A. Galloway
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With no further business to discuss, Auditor Galloway motioned to adjourn the meeting, which was seconded by Treasurer Zuren.

Vote: All "Ayes". Motion carried.

Meeting adjourned at 11:37 a.m.

These meeting minutes have been approved on

2/21/24




Auditor Christopher Galloway

Date: 2/21/24



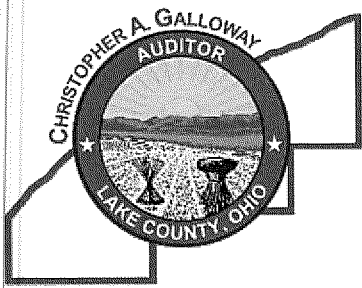
Prosecutor Charles Coulson

Date: 2/21/24



Treasurer Michael Zuren

Date: 2-21-24



Christopher A. Galloway

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Lake County Budget Commission Meeting -

Date: March 18, 2024

Time: 10:00 am

Location: Lake County Auditor's Conference Room

Minutes prepared by Mary Beth Armao

In Attendance: Auditor Galloway, Treasurer Zuren, Prosecutor Coulson, and Deputy Auditor, Mary Beth Armao.

Call to Order: 10:01 AM

Roll Call: Auditor Galloway, Treasurer Zuren, and Prosecutor Coulson

February 21, 2024 minutes were approved by Treasurer Zuren, 2nd by Prosecutor Coulson. All "Ayes" that minutes were approved.

Old Business: None

New Business: Amended Certificates of Estimated Resources were signed for the following:

Lake County, Kirtland Library, Riverside, Mentor Public Schools, City of Mentor, City of Eastlake, City of Willoughby, Painesville City Schools, City of Kirtland, Wickliffe, Willowick, Timberlake, Grand River, Madison Township, Madison Village, Perry Village, Lake Metro Parks, Fairport Library, and Leroy Township

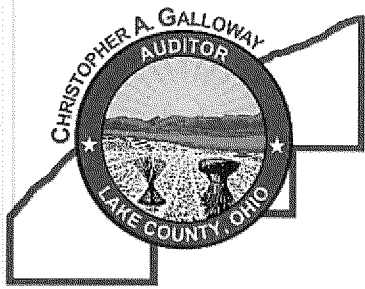
Amended Certificates of Estimated Resources were approved by Treasurer Zuren and 2nd by Auditor Galloway. All "Ayes" to approve them.

Certificates of Appropriations were signed by Auditor Galloway for the following:

Mentor Public Schools, Painesville City Schools, Riverside Schools, City of Wickliffe, Fairport Harbor Village, Madison Township, Grand River, Kirtland Hills, Perry Township, Madison Village, and Concord Township

Auditor Galloway presented Certificate of Tax Revenue for Police and Fire for Fairport Harbor Village to Treasurer Zuren & Prosecutor Coulson, then signed it.

Auditor Galloway said he was still working on a date for the LGF meeting.



Christopher A. Galloway
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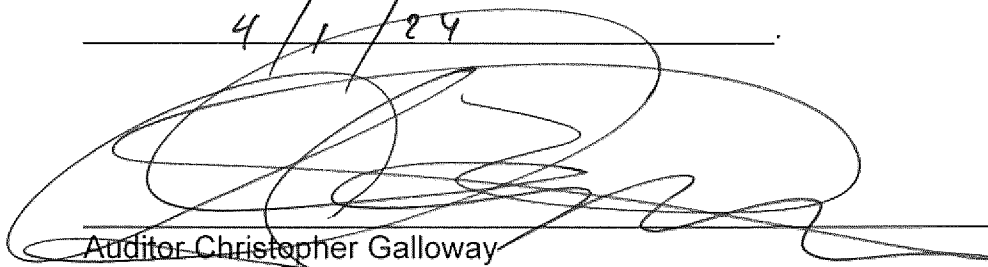
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With no pertinent matters to attend to at this time, Auditor Galloway asked for a motion to adjourn the meeting.

Adjourned at 10:08 AM.

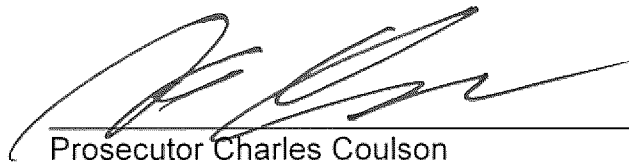
These meeting minutes have been approved on

4/1/24



Date: 4/1/24

Auditor Christopher Galloway



Date: 4/1/24

Prosecutor Charles Coulson



Date: 4-1-24

Treasurer Michael Zuren

Public records request

Exhibit 2

From Brian M Ames <bmames@protonmail.com>
To Armao, Mary Beth<MaryBeth.Armao@lakecountyohio.gov>
BCC Miller-Novak, Matt<mmn@bpbslaw.com>, Robert Thompson<Robert@rthompsonlegal.com>, Vanessa Wells<vebay31@gmail.com>
Date Thursday, May 30th, 2024 at 6:36 AM

Pursuant to R.C. 149.43, the Public Records Act, I hereby request authentic copies of the following official records of the Lake County Budget Commission (the "Commission") and Christopher A. Galloway (the "Auditor") (collectively, the "County"):

1. communications including emails, text, and social media messages between the County and the ad hoc committee considering the formula for distributing the local government funds and its members, including John R. Hamercheck, Morgan R. McIntosh, Kenneth J. Filipiak, Robert A. Fiala, Robert A. Ranallo, Dennis Morley, David J. Spotton, Stephen Byron, and James Lyon, concerning the LGF formula sent or received since January 1, 2023.
2. communications including emails, text, and social media messages between the Auditor and others sent or received regarding his efforts to set "a date for the LGF meeting" as described in minutes of the March 18, 2024.
3. Any records documenting the Commission's own efforts to develop a new formula for distribution of local government funds.

Responsive records should be emailed to bmames@protonmail.com

Best regards,
Brian M Ames

Sent with [Proton Mail](#) secure email.