

IN THE COURT OF COMMON PLEAS  
LORAIN COUNTY

AARON C. KNAPP,

PLAINTIFF

VS.

CITY OF LORAIN, OHIO, ET AL.

DEFENDANT

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( Case No. 26CV000053  
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( JUDGE CHRISTOPHER ROTHGERY  
(  
( ANSWER OF DEFENDANT  
( CITY OF LORAIN, OHIO  
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(

Now comes Defendant, City of Lorain, Ohio and for its Answer to the Plaintiff's Complaint states as follows:

1. Defendant denies for want of knowledge or information sufficient to form a reasonable belief as to the truth of the matters asserted in paragraphs 1, 4, 10, 11, 12, 20, 27 and 28 of Plaintiff's Complaint.
2. Defendant denies the allegations contained in paragraphs 2, 3, 5, 23, 24, 25, 26, 29, and 30 of Plaintiffs Complaint.
3. Defendant admits, in part, the allegations contained in paragraphs 6, 8, 9, and 18, except that valid reasons existed for the delays alleged in Plaintiff's complaint.
4. In response to Paragraphs 7, 15, 16, 17 and 21 of the Plaintiff's Complaint, the Defendant states that in the copy of the Plaintiff's Complaint provided to the Defendant, the Exhibits referred to in Plaintiff's Complaint are not properly marked and/or attached, therefore, the of Defendant for lack of knowledge sufficient to form a reasonable belief as to the

truthfulness of the matter asserted, denies the allegations in paragraph 7, 15, 16, 17 & 21 of the Plaintiff's Complaint.

5. In response to paragraphs 13, 14 and 15 of the Plaintiff's Complaint, the Defendant admits that the Defendant received correspondence from the Plaintiff in October and November of 2025 regarding his public records' requests but deny each and every other allegation set forth in said paragraphs.
6. In response to Paragraph 19 of the Plaintiff's Complaint, the Defendant admits that the Plaintiff appeared at the Lorain City Hall on a least three occasions and demanded to immediately inspect all of the records he requested and that doing those instances was informed by either Attorney Bowles and or Attorney Zaleski, that the he could not then examine the records, and deny each and every allegation set forth in Paragraph 19 of the Complaint.
7. In response to Paragraph 22 of the Plaintiff's Complaint, the Defendant admits that it never informed the Plaintiff that "no responsive records exist", that the Defendant did not provide the Plaintiff with a written denial citing a specific statutory exemption and denies each and every other allegation set forth in said paragraph 22 of the Plaintiff's Complaint.
8. In response to Paragraphs 31, 32, 33 and 34 of the Plaintiff's Complaint, the Defendant states that the matters set forth in said paragraphs appear to be Requests for Relief and do not contain allegations of fact or alleged damage. However, to the extent the paragraphs contain any matters that require an admission or denial they are hereby denied.
9. In the event there are any allegations set forth in the Plaintiff's Complaint that have not been expressly admitted or denied as set forth above, they are hereby denied.

## **AFFIRMATIVE DEFENSES**

1. The Defendant has failed to set forth a valid claim against the Defendant upon which relief can be granted.
2. The in accordance with the provisions of ORC §149.43 has fully complied with the Plaintiffs Public Records Request after a thorough search of the public records demanded by the Plaintiff.
3. The Defendant has properly redacted the documents provided to the Plaintiff in response to his Public Records Requests in accordance with the provisions of ORC §149.43.
4. The Plaintiff's Complaint was filed with the Court on January 9, 2026. On the morning of January 9, 2026, the Defendant informed the Plaintiff's attorney that the requested records would be provided to the Plaintiff by the end of the business day on January 9, 2026. During the afternoon of January 9, 2026, prior to the City of Lorain having knowledge that the Plaintiff's Complaint had been filed with the Court, produced the appropriate public records to the Plaintiff in full compliance with the provisions of ORC §149.43.  
  
Having fully answered the Plaintiff's Complaint, the Defendant hereby requests that the

Plaintiff's Complaint be dismissed, with prejudice, at Plaintiff's cost.

Respectfully submitted,



KENNETH R. RESAR

Asst. Law Director

City Of Lorain

200 West Erie Avenue

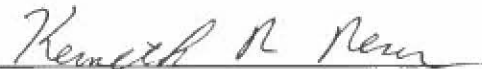
Lorain, Ohio 44052

Email: [Kenneth\\_Resar@cityoflorain.org](mailto:Kenneth_Resar@cityoflorain.org)

Phone: 440.204.2250

#### SERVICE

Copy of the foregoing Answer of Defendant City of Lorain has been served on Robert Gargas, Attorney at Law via email – [rjgargas@gmail.com](mailto:rjgargas@gmail.com) this 16<sup>th</sup> day of March 2026.



Kenneth Resar

Asst. Law Director

City of Lorain, Ohio