

Date: January 14, 2025

Crawford County Attorney's Office
Attn: Reina Probert
1st Floor Courthouse, Suite A
Girard, KS 66763

Greetings, Mrs. Probert, the Governing Body of McCune, Kansas ("Governing Body") makes complaint to you under K.S.A. 60-1201, *et. seq.*, specifically, K.S.A. 60-1206(a) as County Attorney of Crawford County, Kansas that Councilmember Jason Han ("Han") has:

- (1) Willfully engaged in misconduct while in office, and
- (2) Willfully neglected to perform any duty enjoined upon such person by law.

The facts upon which these allegations are made are as follows:

1. April 7, 2017, Tosh Kluber as then Mayor of McCune, Kansas wrote to Han addressing his pattern of complaint and criticism of the then City Clerk, Anita McGown, noting implied threats of both civil and criminal liability.
2. On December 10, 2019, Councilmember Becky Cooper read her complaint against Han into their minutes, as this is a public document, the minutes with the statement are included.
3. On August 13, 2024, Han walked out of an open public meeting after his choice to replace a vacancy was not selected stating the League of Kansas Municipalities ("LKM") attorney told him to leave if his choice was not selected.
4. When contacted, the LKM attorney stated that he would never give such advice.
5. On or about August 6 to 12th of 2024, Bobby Clark, Mayor of McCune, Kansas ("Mayor") received an oral complaint from Nicole' Mays, City Clerk of McCune, Kansas ("Clerk") regarding the action of Han. On August 15, 2024, Mayor contacted the City Attorney regarding the complaint. October 22, 2024, Bobby Clark, Mayor of McCune, Kansas ("Mayor") received a written complaint from Nicole' Mays, City Clerk of McCune, Kansas ("Clerk").
6. The Clerk's complaint contains multiple instances of perceived harassment including: (a) accusatory tones and language, (b) insinuation of legal trouble for the Clerk, (c) false information as to the work performance of the Clerk, (d) creating an unsafe and hostile work environment for the Clerk, (e) continually criticizing minutes and wanting to amend all minutes, (f) verbalizing out loud about misspellings, (g) complaining about folders not in order, (h) generally being overly critical of everything done, and (i) making her cry after every meeting.
7. Han insinuates relationships exist with others affording him clout or position which do not exist in an effort to further his position such as:
 - a. In a phone call to Clerk on August 14, 2024, stating he had been talking with the County Attorney regarding meeting minutes and this was several

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conversations; that she was "beeping in" while on a call with the Clerk and that he would call the County Attorney back later.

- b. After council meeting, made statement that he and his wife go to dinner and drink with City Attorney Nodine; City Attorney Nodine does not know where Han resides; City Attorney Nodine has never had dinner with Han and has never had drinks with Han; City Attorney Nodine does not drink alcoholic beverages.
- 8. Multiple employees have resigned due to perceived harassment by Han, including: (a) Linda Perez, (b) Ray Edwards, and (c) Ozzy Panigua.
- 9. Han text messaged Councilmember Debbie Smith before meetings to tell her what he wanted her to do and say and after meetings to complain if she did not do what he wanted. Han bullied her when she did not want his choice for council, continually questioning why not, in front of the candidate, even though she was emotionally upset stating she did not feel comfortable saying anything until he was told to stop, then he said it is illegal for her not to give her reason in the open meeting.

It is the belief of the Governing Body that the facts supporting these allegations support and are sufficient for investigation under K.S.A. 60-1206(a) and respectfully requests you and your office make this investigation of Councilmember Jason Han.

The Governing Body has documentation supporting the factual statements, all of which shall be provided to you upon request:

- A. Complaint of Ms. McGown
- B. April 7, 2017, letter from Tosh Kluber to Han
- C. Complaint of Ms. Mays
- D. October 24, 2024, letter from City Attorney Nodine to Han

The above and forgoing complaint was considered by the Governing Body on 1-14-25 (date). The complaint was approved by the Governing Body by a vote of:

Yea: 4 Nay: ☒ Abstain: 1

SIGNATURE:

ATTESTATION:

Mayor: Bobby Clark
Bobby Clark

Clerk: Nicole Mays
Nicole Mays