

FILED  
CLARK COUNTY AUDITOR

**AMENDED COMPLAINT**

Tax year 2024 BOR no. 2024-037  
County CLARK Date received \_\_\_\_\_

DTE 1  
Rev. 12/22

MAR 31 2025

**Complaint Against the Valuation of Real Property**

Answer all questions and type or print all information. Read instructions on back before completing form.  
Attach additional pages if necessary.

HILLARY HAMILTON  
AUDITOR

This form is for full market value complaints only. All other complaints should use DTE Form 2

☒ Original complaint ☐ Counter complaint

Notices will be sent only to those named below.

	<b>Name</b>	<b>Street address, City, State, ZIP code</b>	
1. Owner of property	Knapheide New Carlisle LLC	1848 Westphalia Strasse, Quincy, IL 62305	
2. Complainant if not owner	Northwestern Local School Dist. Bd. of Edn.	5610 Troy Road Springfield, OH 45502	
3. Complainant's agent	Robert M. Morrow, Esq.	612 Park Street, Ste 300, Columbus OH 43215	
4. Telephone number of contact person	614-573-3015		
5. Email address of complainant	bmorrow@parkstreetlg.com		
6. Complainant's relationship to property, if not owner	School District		
If more than one parcel is included, see "Multiple Parcels" on back.			
7. Parcel numbers from tax bill	Address of property		
2500100023000049	10036 Ballentine Pike, New Carlisle, OH 45344		
2500100023000035	10100 Ballentine Pike, New Carlisle, OH 45344		
25001000023000048	Ballentine Pike		
8. Principal use of property	Commercial		
9. The increase or decrease in market value sought. Counter-complaints supporting auditor's value may have -0- in Column C.			
Parcel number	Column A Complainant's Opinion of Value (Full Market Value)	Column B Current Value (Full Market Value)	Column C Change in Value
2500100023000049	2,420,000	1,481,270	938,730
2500100023000035	0	0	0
25001000023000048	0	0	0
10. The requested change in value is justified for the following reasons: See Exhibit A attached hereto.			

11. Was property sold within the last three years? ☒ Yes ☐ No ☐ Unknown If yes, show date of sale 07/31/2023  
and sale price \$ 2,420,000.00 ; and attach information explained in "Instructions for Line 11" on back.

12. If property was not sold but was listed for sale in the last three years, attach a copy of listing agreement or other available evidence.

13. If any improvements were completed in the last three years, show date \_\_\_\_\_ and total cost \$ \_\_\_\_\_.

14. Do you intend to present the testimony or report of a professional appraiser? ☐ Yes ☐ No ☒ Unknown

15. If you have filed a prior complaint on this parcel since the last reappraisal or update of property values in the county, the reason for the valuation change requested must be one of those below. Please check all that apply and explain on attached sheet. See R.C. section 5715.19(A)(2) for a complete explanation.

- ☐ The property was sold in an arm's length transaction.  
☐ A substantial improvement was added to the property.

- ☐ The property lost value due to a casualty.  
☐ Occupancy change of at least 15% had a substantial economic impact on my property.

Continued on next page

16. If the complainant is a legislative authority and the complaint is an original complaint with respect to property not owned by the complainant, R.C. 5715.19(A)(8) requires this section to be completed.

☒ The complainant has complied with the requirements of R.C. section 5715.19(A)(6)(b) and (7) and provided notice prior to the adoption of the resolution required by division (A)(6)(b) of that section as required by division (A)(7) of that section.

I declare under penalties or perjury that this complaint (including any attachments) has been examined by me and to the best of my knowledge and belief is true, correct and complete.

Date 3-31-2025 Complainant or agent Robert M. Morrow Title (if agency) Attorney for Bd of Educ.  
[Signature]  
Signature

Sworn to and signed in my presence, this 31st day of March, year 2024  
Notary Leanna Carpenter  
Signature



LEANNA CARPENTER  
Notary Public, State of Ohio  
My Commission Expires:  
06-04-2029

## **EXHIBIT A**

Recent sale of parcels in 2023 is best evidence of value. The Parcels ending in 035 and 048 have an appraised value of \$0 for 2024. It appears the parcels may have been merged or combined into the Parcel ending in 049 which has a value for 2024 of \$1,481,270. The filing on the Parcels ending in 035 and 048 is being made for the sole reason they are the prior parcels consolidated into Parcel 2500100023000049.

Counsel for School District is amending its Complaint to identify the only filing on which it is seeking an increase in value is on parcel 2500100023000049. Counsel has been advised that the two parcels which were the subject of the prior sale have been combined into the parcel identified in Item 9. It has been reported that the parcel in Item 9 represents the value assigned to the previous parcels 2500100023000035 and 2500100023000048. The auditor's current value for the newly created parcel is slightly less than the combined value of the two previous parcels which appears to have been attributable to the demolition of a some type of structure on the property, however it appears that the demolition was taken into consideration by the parties to the sale for the sale price since the demolition occurred contemporaneous with the creation of the new parcel.