

SECOND AMENDED COMPLAINT

MAR 31 2025

Tax year 2024 BOR no. 24-039
County CLARK Date received _____

DTE 1
Rev. 12/22

HILLARY HAMILTON
AUDITOR

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.

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.

	Name	Street address, City, State, ZIP code	
1. Owner of property	Rex 5600 LLC	7439 Sheridan Rd., Flushing, MI 48433	
2. Complainant if not owner	Northeastern Local School District Bd. of Educ.	4435 Bosart Road, Springfield, OH 45503	
3. Complainant's agent	Robert M. Morrow, Esq.	612 Park Street, Ste. 300, Columbus, OH 43215	
4. Telephone number and email address of contact person 614-573-3015 bmorrow@parkstreetlg.com			
5. Complainant's relationship to property, if not owner School District			
If more than one parcel is included, see "Multiple Parcels" instruction.			
6. Parcel numbers from tax bill	Address of property		
2200300034000054	0 Urbana Rd., Springfield, OH 45502		
2200300034400032	0 Urbana Rd., Springfield, OH 45502		
22003000281000039	0 Urbana Rd., Springfield, OH 45502		
7. Principal use of property Commercial & Agricultural Vacant			
8. 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
2200300034000054	700,000	82,240	617,580
2200300034400032	(for all parcels including parcel 065) See Exhibit A	(for all parcels including parcel 065) See Exhibit A	(for all parcels including parcel 065) See Exhibit A
22003000281000039			
9. The requested change in value is justified for the following reasons: Recent sale of parcels in question is the best evidence of value. A third parcel (2200300028100065) now exists replacing parcel 22003000281000039 and was involved in the sale but no value is assigned. See Exhibit A for a description of that parcel which is also being filed upon as an additional parcel and the value sought.			

10. Was property sold within the last three years? ☒ Yes ☐ No ☐ Unknown If yes, show date of sale 2/14/2023

and sale price \$ 700,000 ; and attach information explained in "Instructions for Line 10" on back.

11. 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.

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

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

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

15. 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 of 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 3-31-25 Complainant or agent (printed) Robert M. Morrow Title (if agent) Attorney

Complainant or agent (signature) 

Sworn to and signed in my presence, this 31st day of March 2025
(Date) (Month) (Year)

Notary 



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

EXHIBIT A

Information relating to parcel 2200300028100065

Based upon information provided by the auditor's office subsequent to the filing of the Complaint and the Amended Complaint, it appears a newly created parcel 2200300028100065 (Parcel 065) now exists. The auditor's online records do not detail any information that Parcel 065 was involved in the sale, however it appears that may have been the case and that Parcel 065 was combined from parcel 2200300028100039 and parcel 2200300034000068 subsequent to the sale. Neither of these parcels is showing any value for 2024 and it would appear that those parcels were consolidated into parcel number 2200300028100065. The difference between the auditor's office of the two parcels listed on the original Complaint was \$617,580. Parcel 065 did not exist at the time of the sale and the Board of Education is seeking an increase in value to the sale price of \$700,000 to be assigned by the auditor among Parcel 065, and Parcel Nos. 2200300034000054 and 2200300034400032 which are the other two parcels that were included in the sale and the sale price.