

APR - 8 2026

Tax year 2025 BOR no. 2025-161  
County CLARK Date received 4/8/2026

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.

|   |   | <b>Name</b>   | <b>Street address, City, State, ZIP code</b> |
|---|---|---|--|
| 1. Owner of property  |   | Zuber Crossing, LLC                                   | 7771 Concord Rd., Delaware, OH 43015         |
| 2. Complainant if not owner   |   | Northeastern Local School District Board of Education | 4435 Bosart Rd., Springfield, OH 45503       |
| 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                                   |  |
| 3200200001000141  |   | 208 SAINT PARIS CONNECTOR SPRINGFIELD OH 45504        |  |
| 3200200001100002  |   | 2304 N BECHTLE AV SPRINGFIELD OH 45504                |  |
| 8. Principal use of property  |   | commercial vacant land                                |  |
| 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<br>Complainant's Opinion of Value<br>(Full Market Value) | Column B<br>Current Value<br>(Full Market Value)      | Column C<br>Change in Value                  |
| 3200200001000141  | 917,200   | 917,200   | 0  |
| 3200200001100002  | 628,140   | 628,140   | 0  |
| 10. The requested change in value is justified for the following reasons:<br>Adjacent parcel 3200200001100001 sold for \$600,000 in 2023 by Zuber Crossing LLC. Parcels in question have been marketed for commercial development for the past 3-4 years. This is also the 5th year since 2020 with the same argument that this Board has rejected on each prior case. The Second District Court of Appeals has rejected same legal argument being made by the owner. Owner has filed to attempt to have the Ohio Supreme Court accept prior appeal. Case should be consolidated with BOR Case 2025-160. The Complaint should be rejected and no reduction in value is warranted. |   |   |  |

11. Was property sold within the last three years?  Yes  No  Unknown If yes, show date of sale \_\_\_\_\_ and sale price \$ \_\_\_\_\_ ; 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.  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.

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 4-7-26 Complainant or agent Robert M. Morrow Title (if agency) Attorney for Bd of Educ  
[Signature]  
Signature

Sworn to and signed in my presence, this 7th day of April year 2026  
Notary Leanna Carpenter  
Signature



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