

Bond Case Briefs

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Worthington City Schools Bd. of Edn. v. Franklin Cty. Bd. of Revision

Supreme Court of Ohio - August 27, 2014 - N.E.3d - 2014 -Ohio- 3620

Board of education (BOE) appealed real-property-valuation of the County Board of Revision (BOR) of a commercial building consisting of warehouse and office space. The Board of Tax Appeals (BTA) ordered that the auditor's valuation be reinstated. Taxpayer appealed.

The Supreme Court of Ohio held that:

- Record contained no support for finding that taxpayer's counsel prepared written valuation;
- Knowledgeable employee of taxpayer's corporate affiliate could give owner-opinion testimony as to property's value; and
- The BTA was precluded from reverting to auditor's valuation.

Board of Tax Appeals (BTA) was precluded from reverting to auditor's valuation of commercial real property consisting of warehouse and office space in spite of the its findings that taxpayer's opinion of value, under income approach, lacked market data, where county board of revision (BOR) adopted new value based on owner's opinion of value, which shifted burden of going forward with evidence to city board of education (BOE), and no new evidence was presented at the BTA.