

# **Bond Case Briefs**

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## **TAX - OHIO**

### **Columbus City Schools Board of Education v. Franklin County Board of Revision**

**Supreme Court of Ohio - August 15, 2018 - N.E.3d - 2018 WL 3913177 - 2018 -Ohio- 3254**

Owner of low-income-housing property filed a complaint seeking a reduction in the property's valuation for tax purposes. City board of education filed a countercomplaint urging retention of the auditor's valuation.

The county board of revision reduced the assessed value, and the board of education appealed. The Board of Tax Appeals increased the value. Owner appealed.

The Supreme Court of Ohio held that:

- Board of Tax Appeals was required to consider memorandum submitted by owner's appraiser purporting to show that adding in the property's rent subsidies resulted in a rent elevated above market rent;
- It lacked jurisdiction to consider whether property was 100 percent rent restricted; and
- Fact that contract establishing rent subsidies was not in the record did not preclude consideration of rent subsidies.