

July 26, 2017

R. Douglas Miller
Sycamore Township Law Director
8540 Kenwood Road
Sycamore Township, Ohio 45236-2010

SYLLABUS:

2017-024

1. A board of township trustees may adopt a resolution pursuant to R.C. 5709.73(B) exempting from real property taxation a percentage of further improvements to a parcel of real property that is already subject to a tax exemption under R.C. 5709.73(B).
2. A board of township trustees of a limited home rule township may not enter into an agreement with an owner of a parcel of real property that is exempt from real property taxation pursuant to R.C. 5709.73(B), whereby the owner makes payments to the township in lieu of taxes under terms that differ from the provisions of R.C. 5709.74 and R.C. 5709.75.



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OPINION NO. 2017-024

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8540 Kenwood Road
Sycamore Township, Ohio 45236-2010

Dear Law Director Miller:

We have received your opinion request regarding the authority of a board of township trustees of a limited home rule township to exempt from taxation improvements made to a parcel of real property located within the unincorporated area of the township pursuant to R.C. 5709.73(B). R.C. 5709.73(B) provides that “[a] board of township trustees may, by unanimous vote, adopt a resolution that declares to be a public purpose any public infrastructure improvements made that are necessary for the development of certain parcels of land located in the unincorporated area of the township.”¹ R.C. 5709.73(B) authorizes the board of township trustees to “exempt from real property taxation not more than seventy-five per cent of further improvements to a parcel of land that directly benefits from the public infrastructure improvements, for a period of not more than ten years.”² “‘Further improvements’ or ‘improvements’ means the increase in the assessed value of real property that would first appear on the tax list and duplicate of real and public utility property after the effective date of a resolution adopted under [R.C. 5709.73] were it not for the exemption granted by that

¹ A “[p]ublic infrastructure improvement’ includes, but is not limited to, public roads and highways; water and sewer lines; ... environmental remediation; land acquisition ...; demolition, including demolition on private property when determined to be necessary for economic development purposes; ... and the enhancement of public waterways...” R.C. 5709.40(A)(8); *see also* R.C. 5709.73(A)(6) (“‘public infrastructure improvement’ [has] the same meaning[] as in [R.C. 5709.40]”).

² A higher percentage of further improvements may be exempted from real property taxation with the approval “of the board of education of each city, local, or exempted village school district within which the improvements are located.” R.C. 5709.73(B); *see also* R.C. 5709.73(D).

resolution.”³ R.C. 5709.73(A)(2); *see generally* R.C. 319.28(A) (requiring a county auditor to compile a general tax list and duplicate). A board of township trustees “that has declared an improvement to be a public purpose under [R.C. 5709.73] may require the owner of the parcel to make annual service payments in lieu of taxes,” as set forth in R.C. 5709.74. R.C. 5709.74(A).

The board of trustees of Sycamore Township has adopted a limited home rule government pursuant to R.C. 504.01.⁴ The board of township trustees desires to adopt a resolution pursuant to R.C. 5709.73(B) that declares to be a public purpose public infrastructure improvements made that are necessary for the development of a parcel of real property located in the unincorporated portion of the township.⁵ The resolution will exempt a percentage of further improvements to the parcel from real property taxation. Rather than following the procedures set forth in R.C. 5709.74, the board of township trustees desires to enter into an agreement with the owner of the parcel whereby the owner will make payments to the board pursuant to the terms of the agreement. A portion of the increased value of the parcel is already exempt from real property taxation under R.C. 5709.73(B) pursuant to a previous resolution adopted by the board of township trustees.

You ask several questions regarding the authority of the board of township trustees to accomplish the foregoing objectives. For ease of discussion, we have rephrased and renumbered your questions as follows:

1. May a board of township trustees of a limited home rule township adopt a resolution pursuant to R.C. 5709.73(B) exempting from real property taxation a percentage of further improvements to a parcel of real property that is already subject to a tax exemption under R.C. 5709.73(B)?
2. May a board of township trustees of a limited home rule township, rather than following the procedures set forth in R.C. 5709.74, enter into an agreement with an owner of real property, the improvements to which are exempt from real property taxation pursuant to R.C. 5709.73(B), whereby the owner agrees to make payments to the township in lieu of taxes? If so, may the board of township trustees deposit the payments made by the owner into the township general fund?

³ “For purposes of [R.C. 5709.73(B)], ‘improvements’ do not include any property used or to be used for residential purposes.” R.C. 5709.73(A)(2).

⁴ “A limited home rule township ... that has adopted the limited home rule form of township government pursuant to R.C. Chapter 504 ... contrasts with a statutory township, which is a township that has not adopted this limited home rule form of township government.” 2002 Op. Att’y Gen. No. 2002-032, at 2-210 n.2.

⁵ We understand that the parcel will not be “used ... for residential purposes” within the meaning of R.C. 5709.73(A)(2).

R.C. 5709.73-.75 are part of a series of laws enacted by the General Assembly “to promote economic development in Ohio.” *Sugarcreek Twp. v. City of Centerville*, 133 Ohio St. 3d 467, 2012-Ohio-4649, 979 N.E.2d 261, at ¶6 (analyzing the tax increment financing scheme available to municipal corporations pursuant to R.C. 5709.40); *see also* R.C. 5709.671 (“the General Assembly expresses its policy of encouraging political subdivisions of this state to exercise the authority granted under ... [R.C. 5709.73-.75] ... for the purposes stated therein, and for the purposes of retaining existing or creating new employment opportunities within the political subdivision to the extent the exercise of such authority is necessary to result in a net increase in employment in this state above that which would prevail in the absence of the use of such authority”). The authority and procedures set forth in R.C. 5709.73-.75 “permit [a township] to engage in providing needed public improvements” in unincorporated areas of the township and to fund the improvements through “tax increment financing.” 1991 Op. Att’y Gen. No. 91-066, at 2-315 (quoting 1987-1988 Ohio Laws, Part II, 3539 (Sub. H.B. 390, eff. Oct. 20, 1987) (preamble)); *see also* 1989 Op. Att’y Gen. No. 89-079, at 2-367 (“R.C. 5709.73 provides a financing method that a township may use to pay for public improvements that are needed for the development of land in the unincorporated area of the township”). “Tax increment financing (TIF) is an economic development tool that enables ... townships ... to apply the increase in taxes resulting from an increase in the assessed value of a developed parcel of land toward payment of public improvements that directly benefit that parcel.” Ohio Legislative Service Comm’n, Final Bill Analysis, Am. Sub. H.B. 405 (2001).

To create a TIF, [a township] (1) designates a parcel as exempt from taxation on the increased valuation due to improvements for a specified period of time, not to exceed 30 years, (2) generally requires the owner of the parcel to make service payments in the amount of the exempted taxes, and (3) applies those service payments towards financing public improvements that benefit the parcel.

Id.; *see also* *Sugarcreek Twp.*, 2012-Ohio-4649, at ¶6 (under tax increment financing procedures, “improvements to real property are exempted from taxation, and the funds that would have been applied toward taxes are instead applied toward public improvements that benefit the property within the area subject to the TIF”). “A TIF may be comprised of specific parcels (a ‘project TIF’)” as set forth in R.C. 5709.73(B) “or may be what is called an ‘incentive district’ (otherwise known as an ‘areawide TIF’),” as set forth in R.C. 5709.73(C)(1). Ohio Legislative Service Comm’n, Final Bill Analysis, Am. Sub. H.B. 530 (2006). Your questions relate to the authority of a board of township trustees to use the tax increment financing procedure set forth in R.C. 5709.73(B).

The Authority of a Board of Township Trustees to Adopt Multiple Resolutions Pursuant to R.C. 5709.73(B) that Exempt from Real Property Taxation a Percentage of Further Improvements to the Same Parcel of Real Property

The first question asks whether a board of township trustees of a limited home rule township may adopt a resolution pursuant to R.C. 5709.73(B) exempting from real property taxation a percentage of further improvements to a parcel of real property that is already subject

to a tax exemption under R.C. 5709.73(B). R.C. 5709.73(B) provides that “[a] board of township trustees may, by unanimous vote, adopt a resolution that declares to be a public purpose any public infrastructure improvements made that are necessary for the development of certain parcels of land located in the unincorporated area of the township.” The statute authorizes a board of township trustees to “exempt from real property taxation not more than seventy-five per cent of further improvements to a parcel of land that directly benefits from the public infrastructure improvements, for a period of not more than ten years.” *Id.* R.C. 5709.73(B) is silent as to whether a board of township trustees may adopt multiple resolutions that exempt from real property taxation further improvements to the same parcel of real property. Nevertheless, the language of R.C. 5709.73(C)(1) leads us to conclude that a board of township trustees has such authority.

R.C. 5709.73(C)(1) authorizes a board of township trustees to create a tax increment financing district and to exempt from real property taxation “improvements to parcels within the district.” R.C. 5709.73(C)(1) expressly states that “[a] proposed district may not include any parcel that is or has been exempted from taxation under division (B) of this section or that is or has been within another district created under this division.” R.C. 5709.73(C)(1) unambiguously prohibits a board of township trustees from creating a tax increment financing district that includes a parcel of real property that is already subject to a tax exemption pursuant to a resolution adopted under R.C. 5709.73(B). R.C. 5709.73(B) does not contain similar language prohibiting a board of township trustees from adopting a resolution pursuant to R.C. 5709.73(B) that exempts from taxation a parcel of real property that is already subject to an exemption under division (B) or any other division of R.C. 5709.73. As is apparent from the language in R.C. 5709.73(C)(1), when the General Assembly intends to prohibit a board of township trustees from exempting a percentage of improvements to a parcel of real property from real property taxation pursuant to tax increment financing methods, it explicitly provides as much in the language of the relevant statute. *Cf.* 2015 Op. Att’y Gen. No. 2015-005, at 2-49 (the absence of language in R.C. 5723.01(A)(3) that declares that a political subdivision takes title to forfeited property free and clear of any liens “is particularly significant in light of the Revised Code’s other foreclosure and forfeiture statutes” that include such language).

Accordingly, we conclude that a board of township trustees may adopt a resolution pursuant to R.C. 5709.73(B) exempting from real property taxation a percentage of further improvements to a parcel of real property that is already subject to a tax exemption under R.C. 5709.73(B).⁶ This conclusion applies to a board of township trustees whether or not the board has adopted a limited home rule government for the township pursuant to R.C. 504.01.

⁶ Although a board of township trustees may adopt multiple resolutions pursuant to R.C. 5709.73(B) with respect to the same parcel of real property, the ability of a board of township trustees to require service payments in lieu of taxes from the owner of that property is restricted as provided by the provisions in R.C. 5709.911. R.C. 5709.911(A)(1) authorizes a “township ... that has enacted a[] ... resolution under ... [R.C. 5709.73]” to “file an application for exemption

The Authority of a Board of Township Trustees of a Limited Home Rule Township to Receive Service Payments in Lieu of Taxes Outside the Strictures of R.C. 5709.74

The second question asks whether a board of township trustees of a limited home rule township may enter into an agreement with an owner of real property, the improvements to which are exempt from real property taxation pursuant to R.C. 5709.73(B), whereby the owner agrees to make payments to the township in lieu of taxes. The board of township trustees proposes this agreement as an alternative to requiring service payments in lieu of taxes pursuant to R.C. 5709.74. If a board of township trustees of a limited home rule township has the authority to enter into such an agreement, you ask whether the board of township trustees may deposit the payments into the township general fund.

R.C. 5709.74(A) authorizes “[a] township that has declared an improvement to be a public purpose under [R.C. 5709.73]” to “require the owner of the parcel to make annual service payments in lieu of taxes to the county treasurer on or before the final dates for payment of real property taxes.” The service payments required under R.C. 5709.74(A) “shall be charged and collected in the same manner and in the same amount as the real property taxes that would have been charged and payable against any improvement made on the parcel if it were not exempt from taxation.” *Id.* Pursuant to R.C. 5709.74(B), “[m]oneys collected as service payments in lieu of taxes shall be distributed at the same time and in the same manner as real property tax payments,” with the exception that “the entire amount so collected shall be distributed to the

under [R.C. 5709.73] in the same manner as other real property tax exemptions,” unless the owner of the property “excludes the property from such exemption.” Pursuant to R.C. 5709.911(A)(2)(a)-(b), if a township files an application for a real property tax exemption under R.C. 5709.73, “and more than one real property tax exemption applies by law to the property or a portion of the property, ... [a]n exemption granted under ... [R.C. 5709.73] ... shall be subordinate to an exemption ... granted under any other provision of the Revised Code,” and the township may not require service payments in lieu of taxes under R.C. 5709.74 “with respect to the property or portion of the property that is exempt from real property taxes under that other provision ... during the effective period of the exemption.”

However, if the application for exemption under R.C. 5709.73 is filed by the owner of the property or by the township with the owner’s written consent either attached to the application or provided after approval of the application by the Tax Commissioner, and more than one real property tax exemption applies to the property, “no other exemption shall be granted for the portion of the property already exempt under [R.C. 725.02, R.C. 1728.10, R.C. 5709.40, R.C. 5709.41, R.C. 5709.45, R.C. 5709.73, or R.C. 5709.78] unless the municipal corporation, township, or county that enacted the authorizing ordinance or resolution for the earlier exemption provides its ... consent to the subsequent exemption.” R.C. 5709.911(B)(1)-(2). The consent required by R.C. 5709.911(B)(1) and (B)(2) is not an issue in this instance, as the political subdivision granting the subsequent exemption under R.C. 5709.73(B) is the same political subdivision that granted the earlier exemption under R.C. 5709.73(B).

township in which the improvement is located.” However, R.C. 5709.913(D) provides that “[f]or any tax year that the owner of a parcel of real property” that has been exempted from real property taxation under R.C. 5709.73 “is required to make service payments in lieu of taxes ... , a portion of the total amount of payments made for the year equal to the amount calculated under [R.C. 5709.913(C)(4)] shall be distributed to the” county in lieu of distribution to the township.⁷

R.C. 5709.75(A) requires a township that receives service payments in lieu of taxes under R.C. 5709.74 to “establish a township public improvement tax increment equivalent fund into which those payments shall be deposited.” Subject to limited exceptions,⁸ “money deposited in ... the township public improvement tax increment equivalent fund shall be used by the township to pay the costs of public infrastructure improvements.” R.C. 5709.75(B). “Any unencumbered money remaining in the township public improvement tax increment equivalent fund ... upon dissolution of the ... fund shall be transferred to the general fund of the township.” R.C. 5709.75(E).

A township may adopt a limited home rule government pursuant to the provisions in R.C. Chapter 504. *See* 2014 Op. Att’y Gen. No. 2014-041, at 2-362 (“[i]n 1991, the General Assembly enacted R.C. Chapter 504, which authorizes a township to adopt a limited self-government form of township government”). “The adoption of a limited home rule government “grants a limited home rule township authority to exercise a greater measure of authority, in a greater number of matters, than the authority granted to townships generally by the other

⁷ R.C. 5709.913(C) states:

Each time a county auditor’s sexennial reappraisal or triennial update of the assessed value of a parcel of real property to which this section applies results in an increase in such assessed value, the county auditor shall determine the following amounts:

- (1) The amount of the increase in assessed value that is attributable to the base real property;
- (2) The amount determined under division (C)(1) of this section multiplied by the percentage of improvements in the district to be exempted from taxation under section 5709.40, 5709.45, or 5709.73 of the Revised Code, as applicable;
- (3) The product of the amount calculated under division (C)(2) of this section multiplied by the rate of the taxes levied by the county within the ten-mill limitation the proceeds of which are deposited in the county general fund;
- (4) The product of the amount calculated under division (C)(3) of this section multiplied by one-half.

⁸ R.C. 5709.75(C), for example, authorizes a township to distribute funds to various subdivisions that would have received taxes if not for the exemption under R.C. 5709.73. *See also* R.C. 5709.75(D) (authorizing a board of township trustees that is party of a hold-harmless or service agreement to expend money to pay public safety expenses of the township).

provisions of R.C. Title 5.’” 2016 Op. Att’y Gen. No. 2016-023, at 2-255 (quoting 2014 Op. Att’y Gen. No. 2014-041, at 2-362 (quoting 2002 Op. Att’y Gen. No. 2002-032, at 2-210 n.2)). A township that has adopted a limited home rule government may, within the unincorporated area of the township, “[e]xercise all powers of local self-government” and “[a]dopt and enforce ... local police, sanitary, and other similar regulations” when the exercise of those powers and the adoption and enforcement of those regulations are not in conflict with general laws. R.C. 504.04(A)(1)-(2). Our opinions have recognized that “[t]he home rule authority granted to townships by R.C. 504.04(A) to exercise all powers of local self-government and to adopt and enforce police, sanitary, and similar regulations ... mirrors the home rule authority granted to municipalities by Ohio Const. art. XVIII, § 3.”⁹ 2014 Op. Att’y Gen. No. 2014-041, at 2-362; *see also* 2016 Op. Att’y Gen. No. 2016-023, at 2-255 n.9; 2015 Op. Att’y Gen. No. 2015-031, at 2-304. “It is, therefore, reasonable to conclude that the General Assembly intended to grant to limited home rule townships home rule authority that is similar to the home rule authority of municipal corporations under Ohio Const. art. XVIII, § 3.” 2015 Op. Att’y Gen. No. 2015-031, at 2-304.

It is well established that the home rule powers of a municipal corporation “relate solely to the internal affairs of a municipality and may not extend to matters of general and statewide concern.” 1996 Op. Att’y Gen. No. 96-043, at 2-163; *see also Marich v. Bob Bennett Constr. Co.*, 116 Ohio St. 3d 553, 2008-Ohio-92, 880 N.E.2d 906, at ¶11 (powers of local self-government include any power related “to the government and administration of the internal affairs of the municipality” (quoting *Beachwood v. Bd. of Elections of Cuyahoga Cnty.*, 167 Ohio St. 369, 148 N.E.2d 921 (1958) (syllabus, paragraph one))); *Am. Fin. Servs. Ass’n v. City of Cleveland*, 112 Ohio St. 3d 170, 2006-Ohio-6043, 858 N.E.2d 776, at ¶28 (“[i]t is a fundamental principle of Ohio law that, pursuant to the ‘statewide concern’ doctrine, a municipality may not, in the regulation of local matters, infringe on matters of general and statewide concern” (quoting *Reading v. Pub. Utilities Comm’n*, 109 Ohio St. 3d 193, 2006-Ohio-2181, 846 N.E.2d 840, at ¶33 (quoting *State ex rel. Evans v. Moore*, 69 Ohio St. 2d 88, 89-90, 431 N.E.2d 311 (1982)))). “[W]here matters of statewide concern are at issue, the state

⁹ Article XVIII, § 3 of the Ohio Constitution states that “[m]unicipalities shall have authority to exercise all powers of local self-government and to adopt and enforce within their limits such local police, sanitary and other similar regulations, as are not in conflict with general laws.” Unlike the home rule authority conferred upon municipal corporations by Ohio Const. art. XVIII, § 3, “[t]he General Assembly has ... placed certain additional restrictions upon the exercise of home rule powers by a limited home rule township.” 2014 Op. Att’y Gen. No. 2014-041, at 2-363. R.C. 504.04(A)(1), for example, prohibits a township that has adopted a limited home rule government from enacting taxes “other than those authorized by general law” and from “encroach[ing] upon the powers, duties, and privileges of elected township officers or ... modify[ing] the form or structure of the township government.” R.C. 504.04(B) limits the authority of a home rule township by providing that “[n]o resolution adopted pursuant to [R.C. Chapter 504] shall do any of the” things delineated in R.C. 504.04(B)(1)-(7).

retains the power ... to address those matters,” notwithstanding the home rule authority conferred upon a municipal corporation by Ohio Const. art. XVIII, § 3. *Am. Fin. Servs. Ass’n*, 2006-Ohio-6043, at ¶27. “[T]he term ‘statewide concern’ describes ... those areas of authority which are outside the outer limits of ‘local’ power, i.e., those matters which are neither ‘local [self-government]’ nor ‘local police and sanitary regulations.’” *Id.* at ¶29. As explained by the Ohio Supreme Court in *Village of Beachwood v. Board of Elections of Cuyahoga County*, 167 Ohio St. 369, 371, 148 N.E.2d 921 (1958):

To determine whether legislation is such as falls within the area of local self-government, the result of such legislation or the result of the proceedings thereunder must be considered. If the result affects only the municipality itself, with no extraterritorial effects, the subject is clearly within the power of local self-government and is a matter for the determination of the municipality. However, if the result is not so confined it becomes a matter for the General Assembly.

These principles apply with equal force to the home rule powers of a limited home rule township. *See* 2015 Op. Att’y Gen. No. 2015-031, at 2-304 (“[i]t is ... reasonable to conclude that the General Assembly intended to grant to limited home rule townships home rule authority that is similar to the home rule authority of municipal corporations under Ohio Const. art. XVIII, § 3”).

Statutes that authorize exemptions from real property taxation and delineate the manner in which local governments may receive and use payments in lieu of taxation address matters of statewide concern and can therefore not be altered or regulated by the home rule powers of local governments. *Cf.* 2007 Op. Att’y Gen. No. 2007-035, at 2-362 (recognizing that statutes that establish standard methods of keeping records of real property ownership and levying taxes on that property are general laws addressing matters of statewide concern). Local governments derive a major source of their revenue from real property taxation. *Id.* A parcel of real property that is exempt from taxation produces less revenue for the local governments entitled to levy taxes upon that property. Pursuant to the statewide concern doctrine, it is not within the scope of a local government’s home rule powers to grant an exemption from real property taxation that affects the tax revenue collected by other local governments and to determine in what manner the local government may receive and use payments from the owner of the exempted property in lieu of taxation. Accordingly, the authority to determine the circumstances under which a local government may exempt real property from taxation and receive payments in lieu of taxation rests solely with the General Assembly.

The General Assembly enacted R.C. 5709.73-.75 as part of a system of statutes that address circumstances in which local governments may exempt real property from taxation to fund public infrastructure improvements. *See, e.g.,* R.C. 5709.40-.43 (governing the tax increment financing procedure available to municipal corporations); R.C. 5709.78-.81 (governing the same with respect to counties). The provisions of R.C. 5709.73-.75 address matters of statewide concern that cannot be modified or circumvented by the home rule powers

of a local government. R.C. 5709.74 and R.C. 5709.75 provide the specific, limited circumstances in which a township may collect and use, for the purpose of funding public infrastructure improvements, revenues that would have otherwise been distributed to other political subdivisions in the form of real property taxes were the further improvements to the real property not exempt from taxation under R.C. 5709.73.¹⁰ A board of township trustees of a limited home rule township may not disregard the procedures set forth in R.C. 5709.74 and R.C. 5709.75 and instead enter into an agreement with an owner of real property, the improvements to which are exempt from real property taxation pursuant to R.C. 5709.73(B), whereby the owner agrees to make payments to the township in lieu of taxes pursuant to the terms of the agreement. Such an action would exceed the scope of home rule powers conferred upon a limited home rule township under R.C. 504.04(A).

Accordingly, we conclude that a board of township trustees of a limited home rule township may not enter into an agreement with an owner of a parcel of real property that is exempt from real property taxation pursuant to R.C. 5709.73(B), whereby the owner makes payments to the township in lieu of taxes under terms that differ from the provisions of R.C. 5709.74 and R.C. 5709.75. Because we have concluded that a board of township trustees of a limited home rule township does not have this authority, it is unnecessary for us to consider whether payments made to a limited home rule township under the proposed agreement may be deposited into the township general fund.

Conclusions

In sum, it is our opinion, and you are hereby advised that:

1. A board of township trustees may adopt a resolution pursuant to R.C. 5709.73(B) exempting from real property taxation a percentage of further improvements to a parcel of real property that is already subject to a tax exemption under R.C. 5709.73(B).
2. A board of township trustees of a limited home rule township may not enter into an agreement with an owner of a parcel of real property that is

¹⁰ R.C. 5709.74(A) states that a board of township trustees “may” require an owner of real property to make service payments in lieu of taxes. Therefore, a board of township trustees is not required to use the authority conferred upon it by R.C. 5709.74 and R.C. 5709.75. *See generally Dorrian v. Scioto Conservancy Dist.*, 27 Ohio St. 2d 102, 271 N.E.2d 834 (1971) (syllabus, paragraph one) (“[i]n statutory construction, the word ‘may’ shall be construed as permissive and the word ‘shall’ shall be construed as mandatory unless there appears a clear and unequivocal legislative intent that they receive a construction other than their ordinary usage”). However, if a board of township trustees elects to receive payments in lieu of taxes from an owner of a parcel of real property that is exempt from taxation under R.C. 5709.73(B), R.C. 5709.74 and R.C. 5709.75 represent the sole method by which a township may receive such payments.

exempt from real property taxation pursuant to R.C. 5709.73(B), whereby the owner makes payments to the township in lieu of taxes under terms that differ from the provisions of R.C. 5709.74 and R.C. 5709.75.

Very respectfully yours,

A handwritten signature in blue ink that reads "Michael Dewine". The signature is written in a cursive style with a long, sweeping tail on the "e".

MICHAEL DEWINE
Ohio Attorney General