BYE to St. VINCENT

The former St. Vincent Medical Center will soon be demolished according to the Sisters of Charity Health System. The hospital that cared for Cleveland's sick since the Civil War era announced in September 2022 it would stop offering inpatient, surgical and emergency room care, transitioning the 492-bed hospital to ambulatory healthcare services. The Sisters of Charity said it is too costly to renovate the building and filed paperwork with the city to have it demolished. The charity plans to construct a health hub in the area to provide a variety of healthcare services to the Central neighborhood.

St. Vincent at the time said that although it was eliminating all its overnight hospital beds, it would continue to provide outpatient mental health services; addiction medicine services through Rosary Hall; primary care, and internal medicine and specialty clinics.

"The seismic shifts in health care over the last decade have created a challenging environment for St. Vincent Charity Medical Center to continue as a traditional acute care hospital. The rise in demand for outpatient care, declining inpatient volume and the growth of telehealth, all of which were accelerated by the COVID-19 pandemic, have placed additional financial pressure on the hospital," St. Vincent said in statement. The hospital closed in November 2022, and the facility was renamed the St. Vincent Charity Community Health Center.

St. Vincent Charity Hospital opened in 1865 at Cleveland's first permanent general hospital. Bishop Amadeus Rappe from the Roman Catholic Diocese of Cleveland acquired the first site and the Sisters of Charity of St. Augustine staffed and managed the facility which served both poor and private paying clients.

Continued Next Page

UCC HQ Renovation Finally Underway:

Construction is finally underway at K&D Group's adaptive reuse project of the historic Electric Building downtown, which they purchased in May 2022 for $4.5 million. The United Church of Christ had purchased the property for $5.2 million in 1989 and spent $2.2 million to install a worship space on the ground floor. The UCC listed the property for sale in August 2020 for $7.2 million.

The nine-story building at 700 Prospect was previously the US headquarters of the United Church of Christ, one of the Protestant church's most liberal church denominations, which they relocated from New York City. K+D says that they plan to spend $46.4 million to convert the property to 120 small one-bedroom apartments with retail on the ground floor.

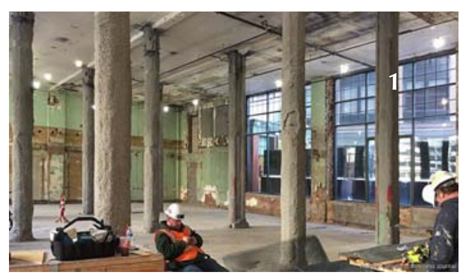
In 2024, the state awarded a $4 million historic tax credit to the property which the K&D Group had been trying to land for two years.

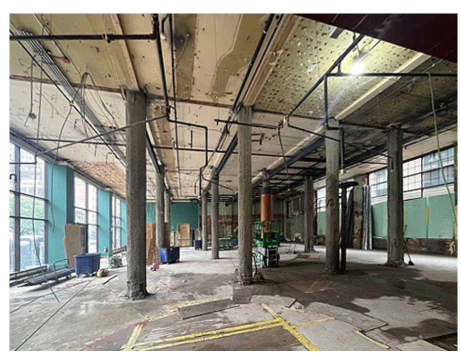
Built in 1900, the Electric Building will hold modestly priced apartments. Price described them as "workforce housing," aimed at young professionals. The average unit will be 550 square feet, with one bedroom. At an expenditure of $385k per unit or $700/square foot, the math looks a bit too strong for the work scope involved. Most units will rent for $1,200 to $1,300 a month, or $2.36/sf/month, the high end of the market.

"Our first residential move-ins will be December of 2025, and then [the construction will] be complete by May 2026," said Doug Price IV, vice president of the commercial real estate developer.

The building's first-floor amenities, including Tom's Watch Bar, and the first three floors of apartments should be completed a year from now, Price said. K&D also is planning to include a fitness center, resident space and a leasing office on the building's first floor.

Above: Former United Church of Christ HQ; 700 Prospect Ave.
Below: Demolition in Progress at 700 Prospect Ave.





St. Vincent, cont'd:

Above: St. Vincent Charity Medical Center

The city's first surgical pavilion and amphitheater was built at St. Vincent's in 1872 and a free medical dispensary for the poor opened in 1894. The city's first Catholic diploma school of nursing was begun in 1894. Rosary Hall, on of he first US hospitals to offer special services and a program for alcoholics opened in 1952. The first open-heart surgery in the Midwest was performed at S. Vincent's in 1956, and St. Vincent developed the first heart-lung machine in the world.

Two years after St. Vincent announced that it was ceasing inpatient care and emergency operations, in November 2024, a permit application was made for demolition. The Sisters of Charity Health System said it is too costly to renovate the building and filed paperwork with the city to have it demolished. The charity said it plans to build a health hub in the area to provide a variety of healthcare services. Outpatient care by St. Vincent Charity continues at two nearby facilities — a medical office building at 2475 E. 22nd plus Joseph & Mary's Home at 2302 Community College Ave. The latter offers medical care for the homeless.

So in just three years, St. Vincent Charity Medical Center went from planning a major expansion to requesting the demolition of nearly its entire main campus to the southeast of Downtown Cleveland. The charity has requested permission to demolish all but the 18,000 square feet HCC Building of the 449,338-square-foot campus. A $13 million archives building is to be constructed to preserve the history of the Sister's on East 22nd Street, south of the campus.

While the HCC Building will be mothballed for an unidentified future use, the building at the other end of the enclosed walkway was purchased by The Centers for Families and Children (CFC), for $1.9M for the 58,286 square foot building, which is to provide integrated health care to people with behavioral health issues.

The St. Vincent Hospital 4+ acre site and the adjacent closed Cuyahoga County Juvenile Justice Center's 8-acre site are contemplated to replace the 1937 Olde Cedar public housing project, the oldest in the country. Combined with Olde Center, the 30-acre site is eyed by CMHA for 900 units.

Spotlight: Calvary New Life Presbyterian Church

Surviving the Tornado

Calvary Presbyterian Church started in 1880 with 73 people meeting in an abandoned wood chapel on what is now E. 79th St. It began as a mission of Old Stone Church. By 1883, the congregation had grown to 250 with 300 in Sunday school.

Charles F. Schweinfurth, one of Cleveland's most revered architects, was commissioned to design the Calvary Sanctuary, Annex and John Bruere Chapel. Once the Annex was completed, the "old wooden chapel" was demolished so the large Schweinfurth Romanesque sanctuary could be completed.

A cornerstone was laid in 1888 and the sanctuary completed and dedicated on January 5, 1890 with ministers in rotation with Old Stone Church. The church was incorporated in 1891 with 311 charter members. Schweinfurth's other notable projects include Old Stone Church on Public Square in 1884 and Trinity Cathedral at East 22nd and Euclid Ave. in 1907.

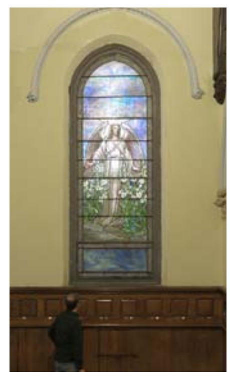
A gym was designed by William Warren Sabin and built in 1911, which was a first for a church in Cleveland. A telephone was installed in 1903. A mission chapel was begun in Collinwood and was supported for many years, evolving to be Immanuel Presbyterian Church.

Sabin's other noteworthy projects include the Dr. Griffin Residence at 3047 Prospect Ave, First Church of Christ at 16200 Euclid Ave., Antioch Baptist Church at 8869 Cedar Ave. and Eldred Hall at Case Western Reserve University.

In the 1920's, the migration east as downtown expanded saw larger homes demolished for apartment buildings. Calvary's exterior was given a complete restoration in the 1920s. Many parishioners moved to the suburbs but retained their membership. A Mission Sunday School at Fernway School in Shaker Heights was begun in

Continued Next Page

Above: New Life Calvary Presbyterian Church



Above: New Life Calvary Presbyterian Church Tiffany Window (L); Door to Sanctuary from Vestibule (R)

Below: New Life Calvary Sanctuary Rear

Below: Calvary Presbyterian Tornado Damage, 2022

Below: New Life Calvary Youth Center Repairs in Progress

1920, which in 1922 merged with Bolton Ave. Presbyterian Church. The church began a radio ministry in 1920.

In 1923, Calvary merged with Bolton Presbyterian Church. During the 1930 Depression, the church increased its care to the needy and contained operating costs to be able to do so. The church voted to remain in the city in 1931.

During the 1940s, many activities nurtured camaraderie and the neglected in the inner city. In 1950, childcare during worship was initiated. In 1970, a restoration campaign successfully funded renovation of the sanctuary and kitchen. In the 1980s, clothing, food, an AA program and a mental health program were initiated as the neighborhood was transitioning. By 1989, the church sat in a wasteland in Midtown, which awaited redevelopment. By 1999, the congregation was in serious decline "as the neighborhood has not rebuilt adequately."

In 2011, Calvary entered into a partnership with Glenville NewLife Community Church with three rotating pastors. In 2013, Calvary PC voted to merge with Glenville New Life Presbyterian Church, with the new congregation now known as New Life at Calvary Church. In 2019, Calvary want online in response to the Global pandemic, reopening the church in June 2020. In 2021, New Life at Calvary donated its historical records to the Western Reserve Historical Society.

In 2022, Calvary lost a large section of its roof in a tornado. They found their drawings from Schweinfurth at the WRHS and have begun repairs over the south portion of the main building which housed the original Fellowship Hall and has served for years as the Youth Center.

The church's plan for their sanctuary is to replace its roof and restore its 36 historical stained glass windows by John LaFarge and Louis Comfort Tiffany. Other needs include replacing the boiler system, repairing the gym roof, restoring the north tower and repairing the masonry envelope.

Below: New Life Calvary Sanctuary Today

Transition: Epworth-Euclid Methodist Put Up for Sale:

Uncertain Fate for "Holy Oil Can" Landmark

For over 75 years the Epworth Methodist congregation has been a University Circle landmark, nicknamed the "Holy Oil Can" because of its tall copper spire modeled after Mont-St.-Michel in Paris. The Euclid Ave. Methodist Episcopal Church began with Methodist classes at Doan's Corners in1831. A church building, known as Doan St. Methodist Episcopal, was constructed in 1837 on Doan (E. 105th) St. A second building was built in 1870 and razed in 1885. In 1887 a new building went up on Euclid Ave. at Oakdale (E. 93rd), and the church became known as Euclid Ave. Methodist Episcopal.

But in April, the church listed the property for sale with Howard Hanna Commercial Real Estate with an asking price of $2,445,000 for the 54,081 square foot facility and its 1.64 acres. Hanna Managing Director Julie Sabroff stated, "The owner is selling the property due to the cost of maintaining the building in the face of declining membership."

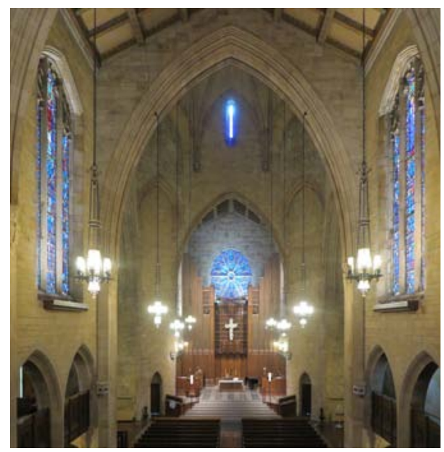
Epworth Memorial Methodist Episcopal looked to the Erie St. Methodist Episcopal Church, formed in 1850 and located on Erie St. (E. 9th) between Eagle St. and Ohio (Central Ave.), as its predecessor. In 1875 the Erie St. Church purchased a building on the corner of Prospect and Huntington (E. 18th) and became known as the Prospect St. or Christ Methodist Episcopal Church.

In 1882 a merger took place with a mission church at Prospect and Willson St. (E. 55th), known as Cottage Chapel. The merger produced Central Methodist Episcopal, where the Epworth League for young people was formed in 1889.

Central was renamed Epworth Memorial when a new building was built in 1891-93. In 1895, another church, Scovill Ave. Methodist Episcopal, was merged into Epworth Memorial.

In 1919-20 the Euclid Ave. and Epworth Memorial congregations merged, creating the Epworth-Euclid Methodist Church and constructing the existing building between E. 107th St. and Chester Ave. The nationally prominent Bertram Grosvenor Goodhue was commissioned to design the church shortly before his death in 1924. Goodhue's senior designers Mayer, Murray and Philip reportedly completed the drawings, though the documents and drawings in the church's archives are the work of Cleveland's premier architects Walker & Weeks.

Below: Epworth-Euclid United Methodist Church sanctuary



Groundbreaking took place in 1926 and the complex was dedicated on June 3, 1928. The Epworth building is a modern adaptation of Gothic themes. The exterior is ornamented with 48 figures by New York sculptor Leo Friedlander. On the interior, the roof is supported by four great arches, with a large rose window, arched transept windows, and four small lancets in the tower, the only openings. T. Owen Bonawit and Howard G. Wilbert designed the stained glass windows. The entire structure is faced in Plymouth granite.

In 1961 Wade Park Methodist Church, organized in 1892 on the corner of Wade Park and Marcy avenues, was merged into Epworth-Euclid Church. In 1992 the church renovated its 80-rank echo organ, one of only four such instruments in the country. The organ was installed in the spire when the church was built.

In the early 1990s, Epworth-Euclid Church's community groups offered day care and child development and area music students utilized church rehearsal rooms. In 2000, the church had active outreach groups and ministries for college students, young adults and young

University Circle United Methodist Church traces its history back to 1831, when the earliest Methodist gatherings in Cleveland were held at

Cleveland Clinic to Demolish Franchester

CCF Continues Its Demolition of Cleveland's Best Architecture

Above: The Bolton Franchester Estate

Hardly a faithful steward of Cleveland's historic architecture regardless of its significance, it has become known that the Cleveland Clinic plans to demolish Franchester, the historic mansion of the Bolton family.

The Clinic began demolition of Philip Johnson's Cleveland Playhouse in January 2023, Johnson's only work in his hometown. Unable to attract a buyer for the TRW headquarters designed by Dirk Lohan, grandson of Mies van der Rohe, the Clinic began demolition of the world-class office complex in October 2023.

The demolition of TRW brought an end to a unique kind of architecture of the 20th century – a corporate headquarters that grew out of its urban industrial beginning as a small enterprise into a Fortune 500 company and worldwide industry leader that made Cleveland home from 1901 to 2002.

In 2023, *NEOtrans* reported that the TRW HQ on the Bolton Estate would be demolished, but the Franchester residence would be preserved by the Clinic.

Franchester was the home of Chester C. and Frances P. Bolton. Chester Castle Bolton was born in Cleveland to Charles Chester and Julia Castle Bolton in September 1882, the oldest of the couple's five sons. Charles Bolton was a prominent local industrialist - Hanna Mining - and business leader, and his wife Julia was the daughter of William Castle, who had served as Mayor of Cleveland in 1855-57. Young Chester Bolton attended University School in Shaker Heights and went to Harvard, completing his degree in 1905.

Below: Franchester

Top: Franchester as a airy Farm
Bottom: Francis P. Bolton

Two years later, he returned to Cleveland and married Frances Payne Bingham, who also came from a long line of Cleveland industrialist and philanthropic families. Early in their marriage, Chester and Frances purchased land in Lyndhurst to build their home. Chester commissioned architect Prentice Sanger to design the Georgian Revival frame colonial for their house.

Prentice Sanger's association with the Boltons began when he and Chester Bolton were Harvard roommates in the early 1900s. Sanger was born in Newport, Rhode Island in 1881. A graduate of Groton School, he was a member of the Harvard Class of 1905. He spent two more years at Harvard after graduation, studying landscape architecture before opening his own office in New York City in 1908. Sanger characterized his practice as specializing in grand houses of the colonial revival style. Construction of Franchester began in 1914 and was completed in 1917. The 27,300-square-foot home is positioned on a southwestern parcel of the 110-acre farm that abuts Mayfield Country Club.

The southwestern quadrant of Lyndhurst, Ohio, is bounded by Richmond Road on the east, Cedar Road on the south, Oakmont Road on the west, and Mayfield Road on the north. Portions of this bucolic, one-square-mile corner of the city

Below: Franchester Living Room

have been home to the Mayfield Country Club, Lyndhurst Park Estates, and Hawken School for the past century. Limited access from surrounding roadways has kept the entire area private and secure since the country club opened in 1908. The southeastern corner of this real estate was occupied by a few of Cleveland's most prominent and influential families. The Boltons made Franchester Place their home on the largest of these parcels from 1917 to 1977.

Chester Bolton had joined the Army National Guard in 1917 and served as an Army Ordnance officer before returning home to Lyndhurst in 1918. He began his political career as a Lyndhurst council member for three years and then moved on to the Ohio Senate. In 1928 he was elected to the United States Congress. Although he lost in 1936, he was re-elected to Congress two years later. Early during his public service, Bolton cultivated a deep interest in breeding Guernsey dairy cattle. He began raising the cattle on his acreage in Lyndhurst, building his herd to nearly 200 heads at Franchester Place.

The rich milk of the Guernsey grew very popular in the Cleveland area. Increased demand, coupled with ideal conditions for dairy farming, prompted investments by Cleveland's wealthy industrialists and prominent citizens. The Chagrin Valley Guernsey Breeders' Association, comprised of farm owners including Walter White (White Motors), Elbert Baker (Plain Dealer publisher), Jeptha Wade II (mining and manufacturing), Francis E. Drury (Perfection Stove Co.), and the Van Sweringens (rail developers) joined Bolton. Collectively, they owned and operated farms in Lyndhurst, Willoughby, Gates Mills, Chagrin Falls, and Hunting Valley along with other cattlemen in Cleveland's eastern counties.

Chester C. Bolton served as the President of the Association and soon after was named President of the American Guernsey Cattle Club, a national organization. Bolton further expanded his dairy operation by establishing Franchester Farm on 1,200 acres in Ravenna, Ohio, to accommodate

Cleveland Clinic to Demolish Franchester

a growing herd and reduced the Lyndhurst operation to the “laboratory pastures.” By 1933 he owned the largest herd of Guernseys in Ohio and the tenth largest in the United States. Dairy processing and distribution complemented the milk production. The O. A. Dean Dairy, Hillside Dairy, and Bruder Dairy in Cleveland Heights were convenient for the eastern farms to market and distribute the milk. Dean Dairy worked closely with Franchester Farms. One of the Bolton sons later became a Director of Dean Properties.

Chester Bolton passed away in 1939 while serving his fifth term in the House of Representatives. Frances was elected to complete the term and went on to represent Ohio’s 22nd District for another 29 years until her defeat in 1968.

Throughout both careers, Franchester Place served not only as a dairy farm but as a gathering place for business and political events hosted by the Boltons. Though she maintained other homes, Frances continued her legal residence at Franchester Place until her death in 1977.

The Bolton property was maintained for a few more years while it was sold to TRW (Thompson Ramo Wooldridge), a global automobile and aerospace electronics giant to build its world headquarters. The world class building was completed in 1983 and occupied until 2002 when TRW was absorbed in a corporate takeover, leading to the sale of its headquarters property to a Legacy Village retail developer.

Above Franchester Living Room Fireplace
Below: Franchester South Elevation

Top: Franchester East Elevation
Second: Franchester Formal Garden Not Maintained
Third: Franchester Front Entry
Fourth: Franchester Central Stair

TRW donated the HQ building and the remaining land of Franchester to the Cleveland Clinic, which operated a wellness campus there for the next two decades and utilized Franchester as a guest residence and events facility. In 2022, Cleveland Clinic abandoned the site and demolished the TRW building in 2023 with plans to market the property. Despite the transitions that followed Frances Payne Bolton’s death, Franchester Place continued to be maintained as an event center.

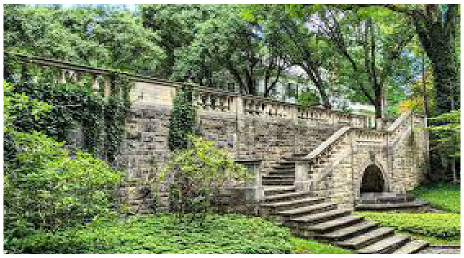
The Franchester colonial revival residence on 110 acres and is noted for an unusual feature: The living room is decorated with paneling from an English manor house once occupied by 19th Century renowned British Royal Navy officer Lord Nelson and Lady Hamilton. The house was the centerpiece of a large working farm, noted for its herd of prize Guernsey cattle.

Franchester figured in the Boltons’ generosity to the community when they donated a tract of adjoining land for the creation of Hawken School. Near relations built grand houses nearby. In 1920, Bolton’s sister and brother-in-law, Elizabeth Bingham Blossom and Dudley S. Blossom, bought 22 acres next door and built their own home. The property is heavily wooded, and notable for its extensive stonework, lawns, and gardens. The house itself is a distinguished survivor, an evocative remnant of a lifestyle that is now threatened by the Clinic.

Cleveland author Tom Matowitz Jr., formerly with *NEOtrans* has submitted Franchester to Preservation Ohio for the 2025 Endangered Buildings List.

Above Franchester’s English Garden Remains
Below: Franchester Grotto Off of the English Garden

Cleveland Clinic to Demolish Franchester



Top: Franchester Grounds
Second: Franchester from Mayfield Country Club
Third: Franchester Rear Terrace
Fourth: Franchester Guernsey Farm
Fifth: Franchester Guernsey Ad

Above: Franchester Service Entry Door
Below: Franchester Dining Room
Bottom: Franchester Front Entry Court

Above: Franchester Foyer Stair
Below: Franchester Foyer 2nd Floor Stair Detail

The Browns' Fight Over Brook Park Continues:

The battle over the Haslam's attempt to get public money to pay for half of the cost of their attempt to build a domed stadium next to Hopkins Airport rages on.

The State Also Calls Out Haslams' Bogus Math:

In addition to County Executive Chris Ronayne and Cleveland Mayor Justin Bibb throwing penalty flags on the Haslams' math for project costs and economic benefits, now the State of Ohio has come out publicly attacking Haslam's assertions, calling the proposed financing "risky" and the revenue forecast "wildly overblown." They are not wrong.

The Browns tried to volley back, but there is overwhelming consensus that the Browns have failed to present responsible, realistic numbers for any part of the project or its impacts from the onset. The Haslams have STILL not released the actual Economic Impact Study they have used to hype only the asserted conclusions which every sports facility export can be expected to destroy if Haslams ever release the 'study.'

In late April, Ohio's Budget Director says that her office does not support the requested $600 million investment in a new stadium because **it will not be a good deal for Ohio and its taxpayers.**

Also, the nonpartisan Legislative Service Commission has warned that **the team's predictions about traffic and events at a new, domed stadium in Brook Park are "overly optimistic."**

The budget director and commission's documents show that state policy analysts are very uncomfortable about the public's proposed role in the $2.4 billion stadium project. Michelle Jarboe reported that they are "**skeptical about the Browns' math on everything** from construction jobs to spending at the 176-acre planned stadium district, where renderings also show apartments, hotels, offices, restaurants, retail and parking." Rightfully so.

Further, State Budget Director Kimberly Murneiks stated in a letter addressed to public officials that the Haslam Sports Group **"inappropriately overstates projections of future taxes generated by the project, over-inflating positive impacts."** Finally, public officials and NGO's in Columbus are calling out the Brows for their deceitful conduct and published 'information.'

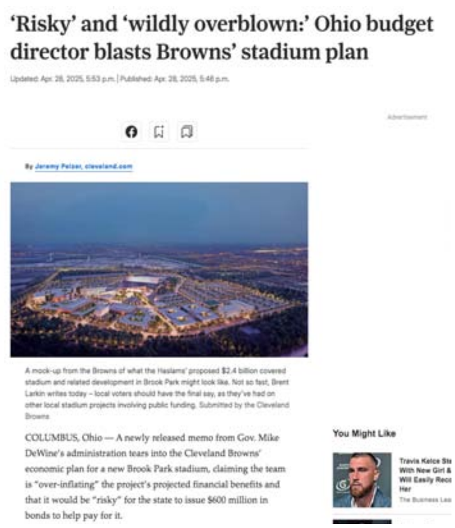
The Browns have tried to push back to both the budget office's report and the Legislative Service Commission's analysis, saying it contained inaccuracies and misinformation. But the Browns have been unable to effectively address their conduct, preferring instead to allege that they have


NEWS > LOCAL NEWS

Browns say new Brook Park stadium district will add $1.2 billion to the local economy

New report runs counter to a study released by the city of Cleveland last month

Above: Media Prints Browns' Irresponsible Assertions Regarding Economic Impact of Brok Park Stadium
Below: Ohio Officials Call Out Browns for "Overblown" Assertions


'Risky' and 'wildly overblown:' Ohio budget director blasts Browns' stadium plan

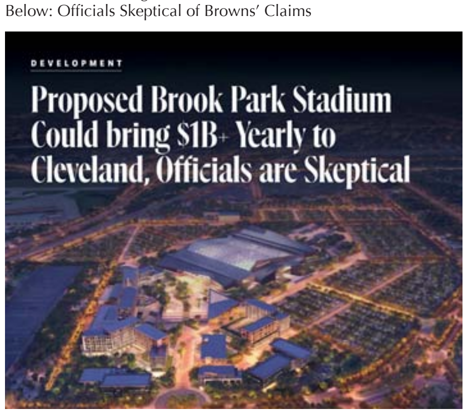
Updated: Apr. 28, 2025, 5:53 p.m. | Published: Apr. 28, 2025, 5:46 p.m.

By Jeremy Pelzer, cleveland.com

A mock-up from the Browns of what the Haslams' proposed $2.4 billion covered stadium and related development in Brook Park might look like. Not so fast, Brent Larkin writes today – local voters should have the final say, as they've had on other local stadium projects involving public funding. Submitted by the Cleveland Browns

COLUMBUS, Ohio — A newly released memo from Gov. Mike DeWine's administration tears into the Cleveland Browns' economic plan for a new Brook Park stadium, claiming the team is "over-inflating" the project's projected financial benefits and that it would be "risky" for the state to issue $600 million in bonds to help pay for it.

Above: Ohio Budget Director Kim Murneiks (L); Wendy Zhan, Director of Ohio Legislative Service Commission (R)
Below: Officials Skeptical of Browns' Claims



addressed these same concerns in conversations with Gov. DeWine. Not good enough.
Ohio's General Assembly is considering a proposal to borrow $600 million for the Brook Park stadium. The state would repay that debt, with interest, using tax revenues from the entire mixed-use stadium district.

But the State has determined that the cost to taxpayers is likely to be double what the Browns have alleged, approaching $1 billion over 25 years.

Sports Experts Substantiate Their Rejections of Browns' Benefit Assertions:

As we have previously reported, the Browns' 2024 'economic impact study' and the self-serving and dishonest claims about being open, honest and collaborative were each disected and found to be glaringly false. To recap:

1. The stadium and mixed-use development will bring an additional 1.5 visitors a year to NEOH:

Wrong. Every study by expert economits and sports scholars conclude that a move to Brook Park will not bring NEW vistors to town. It would simply relocate tham from the lakefront facility.

2. The stadium will be a magnet for major concerts that are passing NEOH by:

As previously, the YEARLY AVERAGE at the 10 other domed stadiums in the US over the last ten years is **THREE** major concerts a year. That is the same number that the lakefront stadium hosted in 2024. The Browns state that they are counting on ten major events annually to each bring 50,000 people to town. So out of nowhere, with a hotel with only 400 rooms, you do not have to be Kreskin to know that a Brook Park facility is NOT going to draw over three times the average of all other domed stadiums in the county and produce net additioal tourism of any consequence.

The fact that there are not ten 50k+ concerts a year on tour in the US apparently escaped the attention of the Browns and RCLCO.

3. The development will pump an additional $1.2 billion annually into Cuyahoga County's economy:

Continued Next Page

Fan Comment: "They have money to pay Deshaun Watson for doing nothing, so they can pay for their own stadium."

ALL of the experts state that based on **ALL** of the evidence from the last thirty years of stadium construyction, the Browns' numbers are simply nonsense.

As two short examples of why, the RCLCO report claimed – without any substantiation – that the Brook Park development would deliver "net growth." If they could have substantited such a claim, they would have released the report. But they could not and did not.

The RCLCO report assumes that 40% of people who attended non-NFL events at the lakefront stadium came from out of state, which is an irresponsible exaggeration and is therefore incorrect. The Rolling Stones will do that. RCLCO believes that those visitors will somehow spend $260 million here annually.

Cleveland's tourism NGO's have routinely significantly exaggerated the volume of people that are a 'visitor' to Cleveland - to disturbing degrees. They count every fan – including Clevelanders - that attends a football, baseball or basketball game as a tourist, which is nonsense. But the hard numbers from the hotel and restaurant revenue indicate that Cleveland visitors spend an average of $158 per day. **At that rate, we will need 1.65 million days of visitors to generate $260 million.** These claims from the Browns and RCLCO are utter nonsense.

4. The Development Will produce 5,400 New Full-Time Jobs:

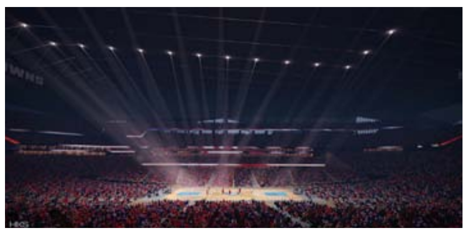
RCLCO predicts that the Brookpark project will produce 5,400 new full-time jobs. Two-thirds of those jobs would be on-site, supposedly fueled by the mixed-use development wrapped around the stadium. The rest of the jobs – 1,980 – would be at other businesses in the region.

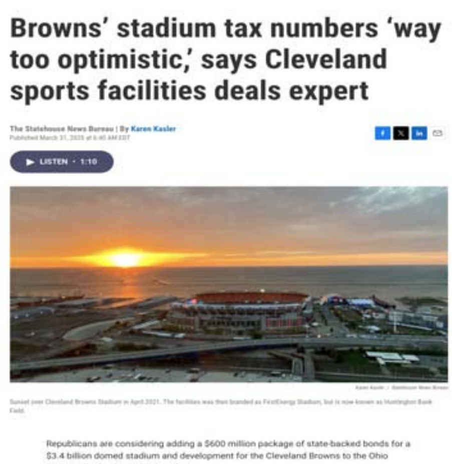
The mixed-use development is proposed to include 300,000 square feet of retail, two hotels totaling 400 rooms, 500,000 square feet of office space (over multiple phases) and 1100 apartments. While that mix and amount of space will never be built within the next 20 years, if it were, that would involve the following job production:

Interestingly, when the Browns selected Lincoln Property Company as their mixed-use developer, Lincoln alleged that the development would allegedly create 3,300 jobs, already one-third less that RCLCO's claim.

Retail Jobs: Accordingly to the US BLS, the country's 6.5 billion square feet of retail space provides employment for 15.5 million people in what are classified as low-wage jobs. That works out to one employee for every 419 square feet, so the Browns first phase of 137,000 square feet

Above: Rendering of Proposed Brook Park Stadium Entry
Below: Stadium as a Basketball Arena - for 67,000?
Middle: Stadium as Entertainment Venue
Lower: Stadium as Soccer Venue
Bottom: Browns' Stadium Tax Numbers are Way Too Optimistic from Ohio Statehouse News Bureau





Browns' stadium tax numbers 'way too optimistic,' says Cleveland sports facilities deals expert

The Statehouse News Bureau | By Karen Kasler

LISTEN • 1:10

Republicans are considering adding a $600 million package of state-backed bonds for a $3.4 billion domed stadium and development for the Cleveland Browns to the Ohio budget, which comes out Tuesday.

of retail can be expected to deliver a whopping 327 jobs. If and when they get to 300,000 square feet, we can expect 716 employees with low-wage jobs.

Construction Jobs: The first phase of construction would take three to four years and include the 67,500-seat stadium and about 1 million square feet of development, including 400 hotel rooms, more than 400 apartments, retail and 12,000 to 14,000 parking spaces.

Lincoln claimed that the project could generate more than 6,000 construction jobs a year at its peak. The Association of General Contractors of America states that a three-year $100M construction project produces 358 jobs per year or a total of 1,073 jobs over those four years. If we believe that Haslams' domed stadium and the $1.2 billion mixed-use project (once it is eventually completed) will really cost $3.4 billion and take four years to complete, at $850M per year, that equates to 3,043 jobs per year, **half of Lincoln's claim** of 6,000 construction jobs each year.

Hotel: A 400-room hotel can be expected to have 75-115 employees.

Office: Assuming that RCLCO is not dishonest enough to count any employees housed in the office portion of the development as jobs created by Lincoln's construction of the building, 300,000 square feet of office space, depending on how it is put in place at what size, could account for 25-40 jobs.

Apartments: The 400 apartments planned for Lincoln's Phase I would require a staff of 12-24. For 1100 units, that translates to 36-48.

So **Phase I jobs would reliably total 439 - 530 low-wage jobs. When completed, the jobs created would total 919 jobs,** quite a bit below the claim of 3,300 - 5,400 from Haslams/ RCLCO/ Lincoln. And given the state of office leasing in Greater Cleveland, with the city giving up 50% of its office space in the past ten years, it is doubtful that there is ANY market demand for office space - particularly in Brook Park in the foreseeable future.

Tax Revenue: Tax revenues from those jobs will not pay for much when it comes to the bonds the Haslams want to cover the other half of the money it will cost to build their stadium so they can keep their other $13.2 billion in their bank.

Summary: It appears that **every** assertion from the Haslam team on costs or jobs is irresponsibly exaggerated or a complete fabrication. It is interesting and disappointing that none of our region's media sources or NGO's have done any work to analyze or challenge the Haslam team's many claims for their intentional misrepresentations.

Why Have Local Officials Stayed on the Sidelines About a Brook Park Stadium?

A domed stadium in Brook Park is the largest project every proposed here and it also has the

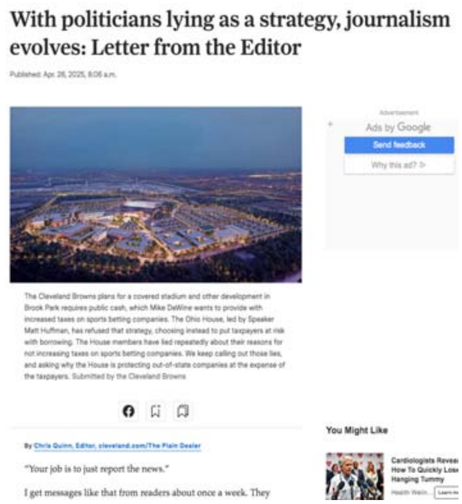
The Browns' Over Brook Park Continues:


NEWS

Cleveland's leadership crisis: Why hotel owners had to fight the Browns stadium plan alone

As Greater Cleveland Partnership and and Destination Cleveland remain silent on the Brook Park stadium proposal, Chris Quinn calls out the "lame ...

Above: Cleveland Leadership Crsis Headline from *Cleveland.com*


With politicians lying as a strategy, journalism evolves: Letter from the Editor

Published Apr. 26, 2025, 8:06 a.m.

The Cleveland Browns plans for a covered stadium and other development in Brook Park requires public cash, which Mike DeWine wants to provide with increased taxes on sports betting companies. The Ohio House, led by Speaker Matt Huffman, has refused that strategy, choosing instead to put taxpayers at risk with borrowing. The House members have lied repeatedly about their reasons for not increasing taxes on sports betting companies. We keep calling out those lies, and asking why the House is protecting out-of-state companies at the expense of the taxpayers. Submitted by the Cleveland Browns

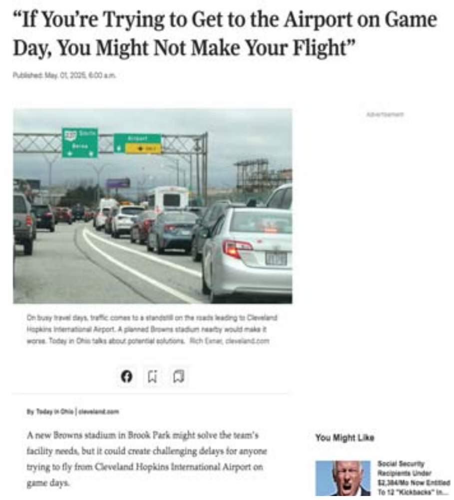
By Chris Quinn, Editor, cleveland.com/The Plain Dealer

"Your job is to just report the news."

I get messages like that from readers about once a week. They

Advertisement
Ads by Google
Send feedback
Why this ad?
You Might Like
Cardiologists Reveal How To Quickly Lose Hanging Tummy

Above: When Politicians Lie Headline


"If You're Trying to Get to the Airport on Game Day, You Might Not Make Your Flight"

Published May. 01, 2025, 6:00 a.m.

On busy travel days, traffic comes to a standstill on the roads leading to Cleveland Hopkins International Airport. A planned Browns stadium nearby would make it worse. Today in Ohio talks about potential solutions. Rich Exner, cleveland.com

By Today in Ohio | cleveland.com

A new Browns stadium in Brook Park might solve the team's facility needs, but it could create challenging delays for anyone trying to fly from Cleveland Hopkins International Airport on game days.

Advertisement
You Might Like
Social Security Recipients Under $2,384/Mo Now Entitled To 12 "Kickbacks" In...

Above: Stadium Infrastructure Headline

most profound consequences for the city's economic and cultural identity and future. Yet except for Chris Ronayne and Justin Bibb, those members of Cleveland's so-called leadesrhip - public and private - have, as could have been expected, been hiding under their covers.

Residents have heard ***nothing*** from the Greater Cleveland Partnership, Team NEO, the Cleveland Foundation, Destination Cleveland, the Gund Foundation - you name them, they are AWOL. on May 1, *Cleveland.com* posed the question 'why?'

Our docile media has not exactly ridden the white horse too hard just yet either. No fact-based stories vetting the Browns' repeated misrepresentations have appeared. Just the usual, "He said...," and "She said..." stuff that takes no brians or integrity to produce.

To date, only the hotel owners have spoken up. Cleveland hotel owners don't want to pay a bed tax increase for a proposed Browns stadium in the suburbs, and their opposition raises questions about why other business organizations in the region remain silent on the issue. The *Today in Ohio* podcast points out that the hotel tax likely would not be needed if lawmakers do what Mike DeWine suggests and increase taxes on sports betting to pay for stadiums.

Cleveland's power players appear to be missing in action during one of the city's most pivotal development debates in decades.

On May 1, podcast host Chris Quinn called out what he says is leadership vacuum in Cleveland's fight over the future location of the Browns stadium. The discussion highlighted a significant development: Cleveland's hotel owners have publicly opposed the proposal by Browns owners Dee and Jimmy Haslams to increase a hotel tax to help fund a new stadium in Brook Park. What's equally notable is who **wasn't** standing with them.

"The hotel owners are supposed to be aligned with Destination Cleveland and the Greater Cleveland Partnership, the chamber of commerce, right? But neither of those groups are speaking," Quinn said.

The Cleveland Hotel Association sent a letter to the Greater Cleveland Partnership as well as city and county officials making their opposition clear. Hotel owners argue that Cleveland already has one of the highest hotel taxes in the country and any increase could hurt their competitiveness. They're also questioning why downtown hotels should help fund a stadium being built outside the city.

What makes this story particularly telling about Cleveland's power dynamics is how **these small business owners have been left to fight this battle alone, while the city's major business organizations remain conspicuously silent.**

"GCP has been absolutely silent on this," Quinn said during the discussion.

The podcast hosts didn't hold back their frustration with what they see as institutional cowardice at a critical moment for the region.

This leadership vacuum comes at a precarious time for Cleveland. The Haslams' plan to move the Browns to Brook Park is gaining momentum, with significant state funding potentially being earmarked for the suburban complex. Meanwhile, Cleveland Mayor Justin Bibb's name was notably absent from County Executive Chris Ronayne's letter to state legislators requesting $350 million for lakefront stadium renovations.

Quinn praised the hotel association's courage to speak up, concluding that, "It was a great story to see pop up because **it shows how lame leadership is in this town."**

Our comunity lacks a town crier who speaks the truth.

Officials and Media Finally Looking at Infrastructure for a Brook Park Stadium:

Officials are finally realizing two important matters that warrant further analysis and accurate math:

1). The Browns' estimates for the infrastructure scope needed to get fans to the proposed domed stadium in Brook Park are, like all of the Browns' estimates so far, way off.

And

2). Getting to the Airport on Game Day - even with massive infrastructure improvemnts, is going to be a serious problem for a long time.

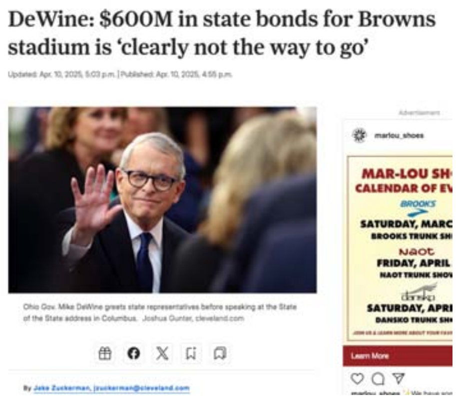
It is another large and significant reason why a domed stadium next to the airport is a dumb idea.

In addition to taking the activity and its attendant food and beverage business out of a weak downtown, the poor fan experience that will result from having to push the facility eight stories into the ground to comply with takeoff and landing clearances from the airport, the noise from the airport, a mediocre design proposal that looks like a pre-engineered cheap metal building, bo

Continued Next Page

The Browns' Fight Over Brook Park Continues:

Above: Browns Stadium Update



DeWine: $600M in state bonds for Browns stadium is 'clearly not the way to go'

Updated: Apr. 10, 2025, 5:03 p.m. | Published: Apr. 10, 2025, 4:55 p.m.

Ohio Gov. Mike DeWine greets state representatives before speaking at the State of the State address in Columbus. Joshua Gunter, cleveland.com

By Jake Zuckerman, jzuckerman@cleveland.com

Above: DeWine's Initial Bond Proposal Gains No Support

Above: Browns Proposed Funding Is a Disgrace

gus alleged economic impacts and an enormous public subsidy for owners sitting on $14.4 billion dollars in a community that already has more than enough debt for previous sports facilities and their endless renovations at the whim of their rich owners, where the community is staring at significant capitol needs for jail and justice center facilities to say nothing of its aging infrasructure, the Haslams rejected the Burke lakefront site as a viable alternative when they should have jumped at the chance.

Contrary to their claims, the Hasslams and the Browns have not been open, honest or collaborative.

Another example of the Leadership Dead Zone in Cleveland is that the officials speaking out on the flaws and risks of the Haslams' pipedream are from Columbus - not here.

The Public Subsidy for the Haslams:

The Browns want to put up only half of the $2.4 billion projected for their Brook Park stadium. Ohio Governor Mike DeWine proposed a 40% tax on sports gambling to fund a sports facilities fund, but legislators replaced it with a $600 million bond issue for the stadium.

• Critics argue the Haslams' plan relies on unrealistic projections and puts taxpayers at risk while benefiting billionaires.

• Cleveland officials are put off by the Haslams' plan and are pursuing legal action to block the move.

IIn the words of Michael Arace of the *Columbus Dispatch*, "The long con being played by Haslam Sports Group in its effort to gouge $1.2 billion from Ohio taxpayers gained momentum this month" when "Ohio Gov. Mike DeWine discussed his proposed state budget during an appearance at a Columbus Metropolitan Club forum... DeWine has proposed a 40% tax on sports gambling operators, with the proceeds dedicated to a sports facilities fund. **The fund is for those times when owners of sports teams are looking for handouts**."

Arace correctly noted that out-of-state operators of online gaming sites dominate the sports gambling industry. Currently, they pay a 20% tax on their revenues, which totaled around $900 million in 2024, according to the Ohio Casino Control Commission's statistics. The state dedicates the tax revenue – $180.8 million – mostly to public education, with a tad (2%) going to programs for problem gamblers.

State legislators have responded to the Haslams' campaign contributions and desires by replacing DeWine's gambling tax proposal with a $600-million bond issue written specifically for Dee and Jimmy and dedicated to the dome that will be placed on land they control out by the airport.

Multiple noted economists throughout the country have been reporting for decades on the efficacy – or lack of it – of taxpayer funding for sports stadiums. The authors find that the amount of public money has risen, from a median of $168 million in public funds per stadium in the 1990s, to $350 million in the 2010s, to $500 million in the 2020s across the four major U.S. sports leagues. **The Browns want more than double that.**

The most notable sources include:

• John Charles Bradbury, Kennesaw State University economist, president of the North American Association of Sports Economists; Journal of Policy Analysis and Management, 2023.

• Victor Matheson, College of the Holy Cross economist, 2018.

• Robert A. Baade, "Professional Sports as Matalysts for Metropolitan Economic Development," Journal of Urban Affairs, 1996.

• Ryan Lanier and Thomas Schatz, "Fields of Failure: The Scandal of Taxpayer Funded Stadiums," Citizens Against Government Waste, 2023.

• Adam Zaretsky, Federal Reserve Bank of St. Louis; "Should Cities Pay for Sports Facilities?," 2001.

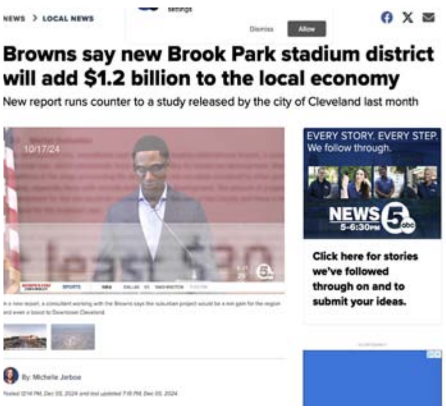
The Federal Reserve Bank of St. Louis' Adam Zaretsky asked the pointed question, Should Cities Pay for Sports Facilities?

The short answer to this question is "No."

When studying this issue, almost all economists and development specialists (at least those who work independently and not for a chamber of commerce or similar organization) conclude that t**he rate of return a city or metropolitan area receives for its investment is generally below that of alternative projects.** In addition, evidence suggests that **cities and metro areas that have invested heavily in sports stadiums and arenas have, on average, experienced slower income growth than those that have not.**

Why, then, would cities engage in such activities? This question is actually harder to answer than the former one because, more often than not, the reasons cited are not quantifiable. In other words, the reasons are not as easily measured as, say, costs, because they include many intangible variables, such as civic pride and political self-interest. Moreover, cities generally justify these decisions—and convince taxpayers of their virtue—with analyses that many economists consider suspect because the studies generally overlook some basic economic realities.

Ken Silliman, retired Gateway Economic Development Corp. chair which oversees operations at


NEWS > LOCAL NEWS

Dismiss Allow

Browns say new Brook Park stadium district will add $1.2 billion to the local economy

New report runs counter to a study released by the city of Cleveland last month

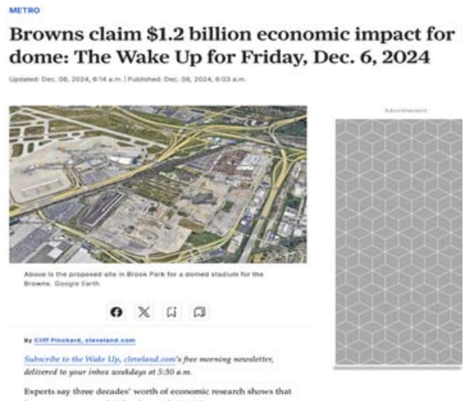
EVERY STORY. EVERY STEP. We follow through.

NEWS 5 5-6:30PM

Click here for stories we've followed through on and to submit your ideas.

By: Michelle Jarboe

Above: Browns' Inflated Economic Impact Claims


METRO

Browns claim $1.2 billion economic impact for dome: The Wake Up for Friday, Dec. 6, 2024

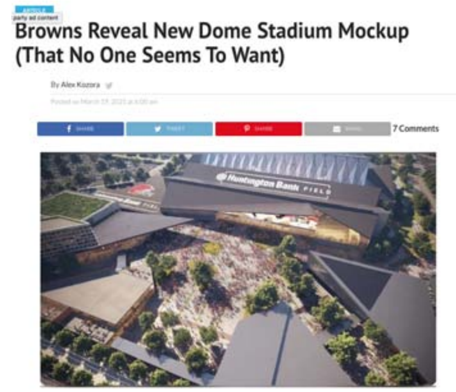
Above is the proposed site in Brook Park for a domed stadium for the Browns. Google Earth

By Cliff Pinckard, cleveland.com

Subscribe to the Wake Up, cleveland.com's free morning newsletter, delivered to your inbox weekdays at 5:30 a.m.

Experts say three decades' worth of economic research shows that

Above: Browns' Inflated Economic Impact Claims


Browns Reveal New Dome Stadium Mockup (That No One Seems To Want)

By Alex Kozora

7 Comments

Above: Browns Create Mock-Up No On Wants

Progressive Field and Rocket Arena and author of the 2023 book *"Cleveland Sports Facilties: A 35-Year History"* told Ideastream, **the Browns "are being way too optimistic about the proceeds from each of those taxes, because they're assuming a large number of events which historic research shows they are not going to get."**

In the April 7 issue of *Crain's Cleveland Business*, design and branding professional **Ciara Ahern asked why state lawmakers are catering to the Haslams instead of taxpayers.** The city and county "are actively fightng to mprotect taxpayers from the Haslams' proposed Book

Browns Keep Peddling Their BS; Bibb & Ronayne Throw the Flag:

In the 3-3-25 issue of *Crain's Cleveland Business*, Kim Palmer used 45.5" of her 47" of space to restating the Browns' bogus claims about the alleged economic impacts of a Brook Park stadium.

She included a paltry 1.5" to a polite but damning quote from Cuyahoga County in response to the Browns' unsubstantiated claims: "We continue to have serious concerns regarding the accuracy and reliability of the revenue projections for the Brook Park proposal provided by HSG. To this point, we have seen nothing in their proposal that justifies the level of public investment and taxation requested."

Shame on Palmer and Crain's for simply printing the nonsense the Browns keep serving up.

Not Always Built with Tax Dollars:

In 1862, William Cammeyer enclosed the Union Club Grounds in Brooklyn, N.Y., and began charging admission, making it the first recorded baseball "stadium" in the United States. The facility was quite attractive to the fledgling sport of baseball because it enabled the exclusion of non-paying spectators and impressed the up-and-coming players, for whom teams were beginning to compete. By the time the National Association was formed in 1871, owners of such enclosed ballparks had a distinct advantage in the competition for teams.

In many ways, not much has changed since then. Teams today are still attracted by modern facilities, and cities go out of their way to provide them. In other ways, though, much has changed. Nowadays, facilities are not usually owned privately by individuals, but, rather, publicly by a government agency. And even though public financing of stadiums is a more common practice today, cities did pony up for a few of the older, well-known stadiums in times past. And today, the most popular baseball park in the US is Boston's Fenway Park – also the oldest.

Some prime examples of government-owned stadiums from yesteryear are the Los Angeles Coliseum and Soldier Field, both of which are still in use today. Other famous venues, such as Fenway Park, Ebbets Field, Wrigley Field, Yankee Stadium and the original Comiskey Park, were all privately financed and owned.

In fact, prior to World War II, of the 28 major league sports facilities that were built - for which data are available - only five were paid for in part or whole with taxpayer dollars. Since World War II, however, of the roughly 140 sports facilities that have been built or refurbished, only 14 did not use taxpayer dollars.

Taxpayer Investment ROI?

The dollars being invested in sports facilities are quite substantial considering the overall contribution the industry makes to the economy. In testimony before the U.S. Congress, economist Robert Baade said that Chicago's professional sports industry - which includes five teams - accounted for less than one-tenth of one percent of Chicago's personal income. Baade further commented that even when compared with the revenue of other industries, professional sports teams contribute small amounts to the economy. He noted, for example, that "the sales revenue of Fruit of the Loom exceed[ed] that for all of Major League Baseball (MLB), while the sales revenue of Sears [was] about thirty times larger than that of all MLB revenues."

Still, cities are driven by the idea that playing host to professional sports teams builds civic pride and increases local tax receipts from the team-related sales and salaries. When it comes to salaries, however, economist Mark Rosentraub noted in a 1997 article that there is no U.S. county where professional sports accounts for more than 1 percent of the county's private-sector payroll.

Although sports facilities certainly generate tax revenues from their sales, the pertinent question is whether these revenues are above and beyond what would have occurred in the region anyway. To address this question, city proposals to use taxpayer money to finance sports facilities are routinely accompanied by "economic impact studies."

These studies, which are **often commissioned by franchise owners as is the case with the Browns** and conducted by an accounting firm or local chamber of commerce, **generally use spurious economic techniques to demonstrate the number of new jobs and additional tax revenues that will be generated by the project**. Just like in Cleveland. Haslams hired their own firm and the Greater Cleveland Partnership - on whose Board Dee Haslam sits - has kept quiet. The

Continued Next Page

assumptions that are made in these studies—such as how much of the newly generated income will stay in the region and how many "secondary" jobs will be created—often **cannot be substantiated by economic theory.**

Estimates of income that will be generated and, hence, spent in the region are often overstated. Most of the "big" money in sports goes to the owners and players, who may or may not spend the money in the hometown since many live in other cities. And because athletic careers are usually short-lived, much of the players' income is invested. Moreover, league rules often require ticket revenues be shared with franchise owners in other cities as a way to subsidize teams in smaller markets. In the case of the National Football League, every visiting team leaves town with 34 percent of the gate receipts from each game.

On top of all this, the value of the subsidy a team receives when a city foots a portion of the bill for a new stadium or arena often shows up as a higher team resale price, which then ends up in the owner's pocket. For example, Eli Jacobs bought the Baltimore Orioles for $70 million in 1989, just after the team had convinced the state of Maryland to build it a new $200 million ballpark from lottery revenues. The enormously popular Oriole Park at Camden Yards opened in 1992. The following year, Jacobs sold the Orioles for $173 million. The sale netted Jacobs an almost 150% return, with zero money out-of-his-pocket for the new ballpark.

The Reality of Economic Impact Studies:

Economic impact studies tend to focus on the increased tax revenues cities expect to receive in return for their investments. The studies, however, often gloss over, or outright ignore, that **these facilities usually do not bring new revenues into a city or metropolitan area.** Instead, the revenues raised are usually just substitutes for those that would have been raised by other activities. And in the case of the Browns in Brook Park, the enterprise already exists so increased tax revenues are not a significant factor.

Any student of economics knows that households have budget constraints that are binding, which means that families have only so much money to spend, particularly on entertainment. If the family chooses to spend the money at the ballpark, for example, then those funds cannot be spent on other activities. Thus, no new revenues are actually being generated.

Public funds used for a stadium or arena can generate new revenues for a city only if one of the following situations occurs: 1) the funds generate new spending by people from outside the area who otherwise would not have come to town; 2) the funds cause area residents to spend money locally that would not have been spent there otherwise; or 3) the funds keep turning over locally, thereby "creating" new spending.

Very little evidence exists to suggest that sporting events are better at attracting tourism dollars to a city than other activities. More often than not, tourists who attend a baseball or hockey game, for example, are in town on business or are visiting family and would have spent the money on another activity if the sports outlet were not available.

Economists Roger Noll and Andrew Zimbalist have examined the issue in depth and argued that, as a general rule, sports facilities attract neither tourists nor new industry. A good example, once again, is Oriole Park at Camden Yards. This ballpark is probably the most successful at attracting outsiders since it is only 40 miles from the nation's capital, where there is no major league baseball team. About a third of the crowd at every game comes from outside the Baltimore area. Noll and Zimbalist point out that, "Even so, the net gain to Baltimore's economy in terms of new jobs and incremental tax revenues is only about $3 million a year—not much of a return on a $200 million investment."

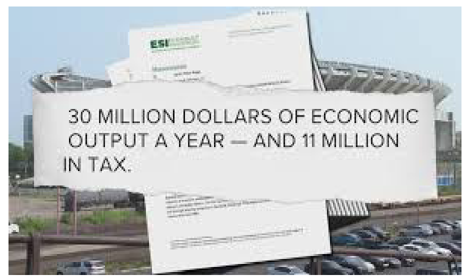
The claim that sporting facilities cause residents to spend more money in town than they would otherwise is even harder to substantiate. To prove such a claim, the agency performing the analysis would need for its report both detailed information about the spending patterns of households and the ability to ferret out the information about their spending in other regions, which, at best, is extremely difficult and may even be impossible.

Without such information, the report's authors could back into this claim only with some fancy footwork and shaky assertions. That is, they would have to contend that residents are spending more in town because of higher incomes that enable households to devote more of their entertainment budgets toward local sporting events. Then, the authors would have to demonstrate that incomes are up because money was spent on the stadium. If they can't, the argument falls apart since the only conclusion is that incomes rose for unrelated reasons; **throwing tax dollars at the stadium did not affect households' spending patterns.**

Multipliers:

Of the three circumstances described that purportedly generate new revenues, the third—funds keep turning over locally, thereby

Above: Economic Impact Claims by Browns' Move
Below: City's Dec. 2024 Economic Impact Report



"creating" new spending—is probably the most spurious from an economist's viewpoint. Such a claim relies on what are called multipliers.

Multipliers are factors that are used as a way of predicting the "total" effect the creation of an additional job or the spending of an additional dollar will have on a community's economy. It works something like this: A stadium is built, which creates new jobs in the region. Because more people are working, they spend money in the area (for lunch, parking, etc.), which in turn requires local businesses to hire additional workers to support the increased demand.

These extra workers further increase demand for goods and services in the area, requiring more new jobs...and so on. That is, the dollars keep turning over locally. The story is the same for fans spending money at the arena, which provides income for arena workers, who then spend the money, generating incomes for other workers... and so on.

On their faces, these are compelling arguments. Some researchers have even attempted to quantify these effects, developing precise multipliers that tell analysts how much the new spending or job creation should be "multiplied" by to arrive at the "total effect" the spending or job creation will have on the local economy.

These multipliers are often specific enough to distinguish between various industries, occupations and locations. Thus, economic development specialists and planners will generally latch on to multipliers and confidently proclaim that the 1,000 new jobs created by this industry will actually create 4,355 new jobs and generate $5.5 million in new revenue in the community when all is said and done. It makes for great headlines, but are such outcomes believable?

Probably not. As Mark Twain once said: “It’s not what we don’t know that hurts. It’s what we know that just ain’t true.” For one thing, these new jobs most likely just lure workers away from other jobs in town and do not actually lead to a net change in jobs in the area. For another, many of the jobs are low-paying, part-time and needed only on game days. Moreover, authors of these economic impact studies often choose multipliers arbitrarily or with clients’ wishes in mind to get the desired outcome. As economist William Hunter has pointed out, multiplier analysis can be used to justify any public works project because “even the smallest multiplier will guarantee community income growth in excess of public expenditures.”

Continued Next Page

Even if economic impact studies are taken at face value, however, the cost of creating these jobs is usually out of the ballpark. In Cincinnati, for example, when two new stadiums were proposed to keep the NFL Bengals and the MLB Reds in town, the economic impact study claimed that 7,645 jobs would be created or saved because of the stadium investment. Since the project was estimated at $520 million, each new or saved job was reported to cost about $68,000.

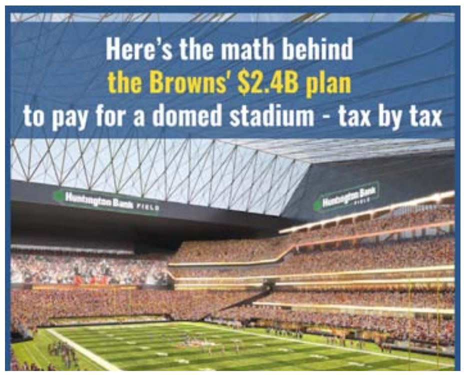
When economists John Blair and David Swindell examined the $68,000 figure a bit closer, though, they discovered it was too low because the study’s estimate of 7,645 new or saved jobs was too high. Blair and Swindell then re-evaluated the report, corrected for double-counting and other problems, and concluded that only 3,530 jobs would be created or saved if the stadium proposal passed. Thus, the cost per job was actually going to run more than $147,000. In contrast, state economic development programs spend about $6,250 per job to create new jobs.

In the case of the Browns, the jobs at the lakefront stadium would simply be transferred to Brook Park if they pull off the move. Any residual jobs and multiplier would only apply to the possibility that events at the stadium that would otherwise by booked at other existing venues are somehow greater in number than the current paradigm. **Given the proximity to Detroit and Indianapolis domed stadiums, the Browns’ assertions in this regard is specious.**

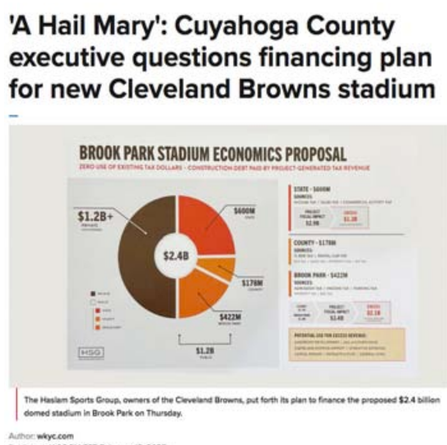
Economic Impact Study Omissions:

Another glaring omission from these economic impact studies is the value of the next-best investment alternative—what economists call the opportunity cost. “There’s no such thing as a

Above: Browns’ Exaggerated Claims are Unsubstantiated
Below: Browns’ Plan Calls for More Taxes



Below: Ronayne Questions Browns’ Financing Pie Chart



free lunch” is a favorite economist expression because it sums up exactly what opportunity cost means: When making a choice, something always has to be given up.

The value of the “losing” choice must be considered when making the decision and when calculating the value, or return, of the “winning” choice. In other words, when a city chooses to use taxpayer dollars to finance a sports stadium, the city’s leaders must consider not only what the alternative uses of those funds could be—such as schools, police, roads, etc.—but they must also figure what return the city would receive from these other ventures.

Then, the return from the city’s next-best alternative (for example, schools) must be subtracted from the total return of the “winning” choice to arrive at the “actual” return of the stadium investment. This adjusted calculation, though, is almost always missing from sports stadium impact studies. Why? Because in just about every case, the adjusted calculation would show that the next-best alternative was actually the better alternative.

Has financing sports stadiums ever been the best alternative? Research shows “No.”

In their book, Noll and Zimbalist - along with 15 other collaborators - examined the local economic development argument from a wide variety of angles. In every case, the conclusions were the same. **“A new sports facility had an extremely small (perhaps even negative) effect on overall economic activity and employment. No recent facility appears to have earned anything approaching a reasonable rate of return on investment.”**

No recent facility has been self-financing in terms of its impact on net tax revenues. Regardless of whether the unit of analysis is a local neighborhood, a city, or an entire metropolitan area, the economic benefits of sports facilities are de minimus.

In fact, research has shown that subsidizing sports facilities usually does not affect a city’s growth and, in some cases, may even hurt growth since funds are being diverted from alternatives with higher returns. In a 1994 study that examined economic growth over a 30-year period in 48 metropolitan areas, Robert Baade found that of the 32 metro areas that had a change in the number of sports teams, only two showed a significant relationship between the presence of a sports team and real per-capita personal income growth. These cities were Indianapolis, which saw a positive relationship, and Baltimore, which had a negative relationship.

Moreover, Baade found that of the 30 metro areas where the stadium or arena was built or refurbished in the previous 10 years, only three areas showed a significant relationship between the presence of a stadium and real per-capita personal income growth. **And in all three cases - St. Louis, San Francisco/Oakland and Washington, D.C. - the relationship was *negative*.**

Andrew Zimbalist & Roger Noll, Brookings Institute; *Sports, Jobs and Taxes*; 1997: Contrary

Continued Next Page

The Browns' Fight Over Brook Park Continues:

to the Browns specious claims, researchers have uniformly confirmed that **sports facilities attract neither tourists nor new industry.**

One promotional study estimated that the local annual economic impact of the Denver Broncos was nearly $120 million; another estimated that the combined annual economic benefit of Cincinnati's Bengals and Reds was $245 million.

Such promotional studies overstate the economic impact of a facility because they confuse gross and net economic effects. Most spending inside a stadium is a substitute for other local recreational spending, such as movies and restaurants. Similarly, most tax collections inside a stadium are substitutes: as other entertainment businesses decline, tax collections from them fall.

To find out more, see Roger Noll and Andrew Zimbalist's edited book, *Sports, Jobs, and Taxes: The Economic Impact of Sports Teams and Stadiums.*

America is in the midst of a sports construction boom. New sports facilities costing at least $200 million each have been completed or are under way in Baltimore, Charlotte, Chicago, Cincinnati, Cleveland, Milwaukee, Nashville, San Francisco, St. Louis, Seattle, Tampa, and Washington, D.C., and are in the planning stages in Boston, Dallas, Minneapolis, New York, and Pittsburgh. Major stadium renovations have been undertaken in Jacksonville and Oakland. Industry experts estimate that more than $7 billion will be spent on new facilities for professional sports teams before 2006.

Most of this $7 billion will come from public sources. The subsidy starts with the federal government, which allows state and local governments to issue tax-exempt bonds to help finance sports facilities. Tax exemption lowers interest on debt and so reduces the amount that cities and teams must pay for a stadium.

Since 1975, the interest rate reduction has varied between 2.4 and 4.5 percentage points. Assuming a differential of 3 percentage points, the discounted present value loss in federal taxes for a $225 million stadium is about $70 million, or more than $2 million a year over a useful life of 30 years. Ten facilities built in the 1970s and 1980s, including the Superdome in New Orleans, the Silverdome in Pontiac, the now-obsolete Kingdome in Seattle, and Giants Stadium in the New Jersey Meadowlands, each cause an annual federal tax loss exceeding $1 million.

State and local governments pay even larger subsidies than Washington. Sports facilities now typically cost the host city more than $10 million a year. Perhaps the most successful new baseball stadium, Oriole Park at Camden Yards, costs Maryland residents $14 million a year.

Renovations aren't cheap either: the net cost to local government for refurbishing the Oakland Coliseum for the Raiders was about $70 million. Most large cities are willing to spend big to attract or keep a major league franchise. But a city need not be among the nation's biggest to win a national competition for a team, as shown by the NBA's Utah Jazz's Delta Center in Salt Lake City and the NFL's Houston Oilers' new football stadium in Nashville.

Why Should Taxpayers Subsidize Sports Facilities?

The economic rationale for cities' willingness to subsidize sports facilities is revealed in the campaign slogan for a new stadium for the San Francisco 49ers: "Build the Stadium—Create the Jobs!" Proponents claim that sports facilities improve the local economy in four ways.

First, building the facility creates construction jobs. Second, people who attend games or work for the team generate new spending in the community, expanding local employment. Third, a team attracts tourists and companies to the host city, further increasing local spending and jobs. Finally, all this new spending has a "multiplier effect" as increased local income causes still more new spending and job creation.

Advocates argue that new stadiums spur so much economic growth that they are self-financing: subsidies are offset by revenues from ticket taxes, sales taxes on concessions and other spending outside the stadium, and property tax increases arising from the stadium's economic impact.

Unfortunately, these arguments contain bad economic reasoning that leads to overstatement of the benefits of stadiums. Economic growth takes place when a community's resources—people, capital investments, and natural resources like land—become more productive.

Increased productivity can arise in two ways: from economically beneficial specialization by the community for the purpose of trading with other regions or from local value added that is higher than other uses of local workers, land, and investments. **Building a stadium is good for the local economy only if a stadium is the most productive way to make capital investments and use its workers.**

In the Brookings book, *Sports, Jobs, and Taxes*, Knoll, Zimbalist and 15 collaborators examine the local economic development argument from all angles: case studies of the effect of specific facilities, as well as comparisons among cities and even neighborhoods that have and have not sunk hundreds of millions of dollars into sports

'A Hail Mary': Cuyahoga County executive questions financing plan for new Cleveland Browns stadium

The Haslam Sports Group, owners of the Cleveland Browns, put forth its plan to finance the proposed $2.4 billion domed stadium in Brook Park on Thursday.

Author: wkyc.com
Published: 11:06 PM EST February 13, 2025

Above: Ronayne Labels Browns Financing Math a "Hail Mary"
Below: DeWine's Financing for Browns Receives Opposition
Middle: DeWine Initilly Proposed Bonds for Browns

cleveland.com

Top Stories News Sports Life

NEWS

Legislative opposition mounts to DeWine's proposed tax hike to aid a new Browns stadium

Legislative leaders from both parties are giving a chilly reception to DeWine's plan to fund stadium projects by doubling the state's sports-gambling ...

13h ago Jeremy Pelzer

'We should pay for this with cash': Gov. Mike DeWine balks at using state bonds to pay for Cleveland Browns stadium

Updated: Feb. 11, 2025, 5:02 p.m. | Published: Feb. 11, 2025, 4:23 p.m.

Gov. Mike DeWine, with Cleveland Browns and Cincinnati Bengals helmets, speaks during his daily coronavirus briefing Thursday, April 23, 2020. (Ohio Governor's Office)

Ad removed. Details

By Jeremy Pelzer, cleveland.com

COLUMBUS, Ohio—Gov. Mike DeWine is open to giving the Cleveland Browns the $600 million they want from the state to

The Browns' Fight Over Brook Park Continues:

development. **In *every* case, the conclusions are the same. A new sports facility has an extremely small (perhaps even negative) effect on overall economic activity and employment.**

No recent facility appears to have earned anything approaching a reasonable return on investment. No recent facility has been self-financing in terms of its impact on net tax revenues. Regardless of whether the unit of analysis is a local neighborhood, a city, or an entire metropolitan area, the economic benefits of sports facilities are de minimus.

As noted, a stadium can spur economic growth if sports is a significant export industry—that is, if it attracts outsiders to buy the local product and if it results in the sale of certain rights (broadcasting, product licensing) to national firms. But, in reality, sports has little effect on regional net exports. These conclusions from dogmatically reputable research professionals make the Browns claims nonsense.

Promotional studies also fail to take into account differences between sports and other industries in income distribution. Most sports revenue goes to a relatively few players, managers, coaches, and executives who earn extremely high salaries—all well above the earnings of people who work in the industries that are substitutes for sports. Most stadium employees work part time at very low wages and earn a small fraction of team revenues.

Thus, substituting spending on sports for other recreational spending concentrates income, reduces the total number of jobs, and replaces full-time jobs with low-wage, part-time jobs.

A second rationale for subsidized stadiums is that stadiums generate more local consumer satisfaction than alternative investments. There is some truth to this argument. Professional sports teams are very small businesses, comparable to large department or grocery stores. They capture public attention far out of proportion to their economic significance. Broadcast and print media give so much attention to sports because so many people are fans, even if they do not actually attend games or buy sports-related products.

A professional sports team, therefore, creates a "public good" or "externality"—a benefit enjoyed by consumers who follow sports regardless of whether they help pay for it. The magnitude of this benefit is unknown, and is not shared by everyone; nevertheless, it exists. As a result, sports fans are likely to accept higher taxes or reduced public services to attract or keep a team, even if they do not attend games themselves. These fans, supplemented and mobilized by


ideastream public media

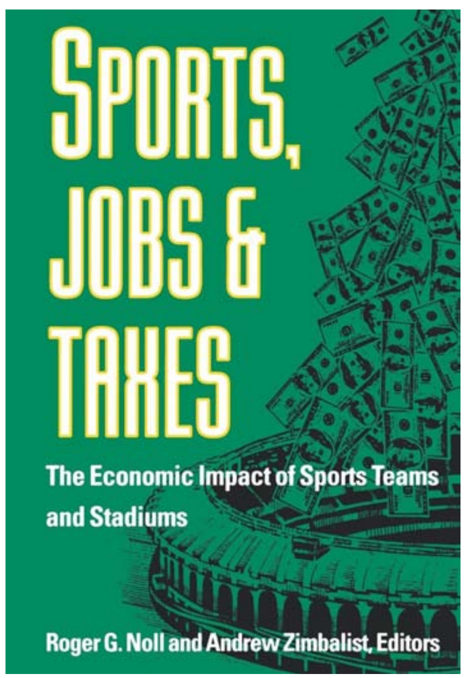
All Things Considered

Sports

'Too risky.' City, county leaders bite back after Browns amend lawsuit to leave Cleveland

Ideastream Public Media | By Abbey Marshall

Top: Ronayne Bits Back After Browns Amend Lawsuit
Below: *Sports, Jobs * & Taxes: The Economic Impact of Sports Teams and Stadiums*; Roger Noll & Andrew Zimbalist



Survey:

By Votes of 57%-24% and 61%-28%, people want the Browns Stadium to be in Downtown Cleveland.

teams, local media, and local interests that benefit directly from a stadium, constitute the base of political support for subsidized sports facilities.

Sumary of Recent Studies on Taxpayer Subsidies of Sports Facilities:

Public Policy Toward Professional Sports Stadiums: A Review; John Charles Bradbury, Dennis Coates and Brad Humphreys. Journal of Policy Analysis and Management, September 2023.

• **The study:** The authors break down a range of policy considerations for public funding of stadiums. They provide a history of stadium funding since the 1900s, examine research efforts to quantify intangible social benefits of sports teams, describe prominent public funding mechanisms and cast a critical eye toward news reporting.

• **The findings:** With many large U.S. cities facing fiscal crises in the 1980s, government officials began to push the narrative of sports stadiums as economic drivers, "where each dollar spent generates more than one dollar of economic activity as it is recirculated within the community — thereby growing employment income, property values and tax revenues," the authors write.

• Economists began to study the issue around this time. By the turn of the century, "economists were largely in agreement that **stadiums were poor public investments," in terms of tangible benefits, like jobs and spending, "and more recent studies continue to confirm these findings."** Economists then began to explore whether there were intangible benefits to residents of a city with a professional sports franchise — the cultural pride from living in a "big league" city, for example.

• One way economists do this is through something called the contingent valuation method, which surveys residents on what they would personally pay for their city to host a sports team. These individual values are then extrapolated to a wider population to put a dollar value on the intangible factors residents enjoy from simply having a professional franchise, whether they go to games or not. Based on results from seven studies conducted in the 2000s and 2010s, "non-use values" amount to "13% of total capital construction costs and 16% of public contributions," suggesting that **"intangible social benefits of hosting professional sports teams are well below levels needed to justify typical subsidies."**

• In looking at news coverage of public subsidy proposals for sports franchises, the authors note

Continued Next Page

The Browns' Fight Over Brook Park Continues:

that "economic impact estimates from advocacy reports may be repeated without external validation of credibility, and **press release statements from stadium boosters are quoted in stories without critical assessment."**

• The authors write: "As a potential institutional reform, communities should assess all stadium proposals through referendums and initiatives, a once-common practice which has declined over the last few decades. Public votes ensure that subsidies are congruent with voter preferences and allow time for careful consideration of all relevant costs and benefits, so that voters can make informed decisions."

Growth Effects of Sports Franchises, Stadiums and Arena: 15 Years Later; Dennis Coates. Chapter from The Economic Impact of Sports Facilities, Franchises, and Events, October 2023.

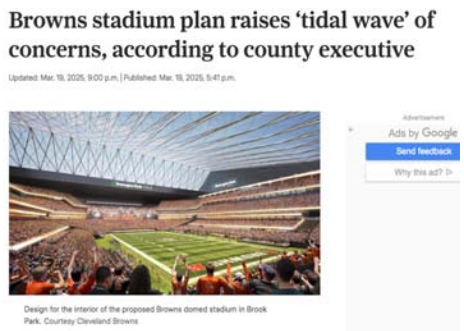
• **The study:** The author, who conducted foundational research with Brad Humphreys starting in the mid-1990s into how sports stadiums affect per capita income, returns to this question with another 17 years of data, from 1969 to 2011. This analysis adds hockey and soccer franchises in addition to MLB, NFL and NBA — along with the American Basketball Association, which merged with the NBA in 1976 — and covers all urban areas in the U.S., including those without a professional team.

• **The findings:** Average personal income grew about 1.4% per year over the period studied, regardless of whether there was a sports stadium in the area. **The economic effects of sports franchises account for less than 1.5% of local economic activity**, measured by personal income, wages and salaries, and wages per job.

• **The author writes:** "The results of this exercise are largely consistent with the findings of Coates and Humphreys and of numerous other studies that have found that **the effect of sports franchises and stadium and arena construction on local economies is weak or nonexistent.** Indeed, franchises, stadiums, and arenas may be harmful rather than beneficial to the local community."

Do Local Businesses Benefit from Sports Facilities? The Case of Major League Sports Stadiums and Arenas; Timur Abbiasov and Dmitry Sedov. Regional Science and Urban Economics, January 2023.

• **The study:** The authors explore a single economic consequence of sports stadiums — foot traffic to nearby retail and food establishments — in a single year, 2018, for MLB NBA, NFL and NHL franchises. Precise foot traffic for 92 sports facilities and surrounding businesses is from SafeGraph, a company that tracks "location data


Browns stadium plan raises 'tidal wave' of concerns, according to county executive

Updated: Mar. 19, 2025, 9:00 p.m. | Published: Mar. 18, 2025, 5:41 p.m.

Design for the interior of the proposed Browns domed stadium in Brook Park. Courtesy Cleveland Browns

Advertisement
Ads by Google
Send feedback
Why this ad?

Above: Browns' Plan raises "Tidal Waves" of Concerns
Below: *Sports Illustrated* cover with Art Modell Fighting the Browns; December 4, 1995

Below: 61% Want the Browns to Play Downtown

of mobile devices with installed participating applications," the authors write.

• **They acknowledge that "the grounds for subsidizing professional sports are weak,"** based on past research, but also cite news reports suggesting businesses near sports stadiums suffered curtailed revenue during the COVID-19 pandemic.

• **The findings:** Every 100 visits to a baseball stadium generates 29 visits to nearby restaurants and similar establishments, and six visits to retail stores. The authors find similar results for football stadiums, but little business sale spillover for basketball and hockey arenas. The authors note that professional football and baseball games typically draw much larger crowds than basketball and hockey games.
• **B**asketball and hockey games have a slight negative effect on foot traffic to health, finance and education-related businesses. The authors note that these sports often have arenas located in central business districts, which may lead people who are not going to a game to avoid those areas during game time.

• **The authors** "find that a median sports facility generates approximately $11.3 million of annual additional spending for food and accommodation and retail businesses, with the aggregate spillovers varying substantially across facilities and sports."

• They do not account for negative effects of sports stadiums — such as increased crime, as explained in the next paper — or the revenue of nearby businesses compared with the public costs of building a stadium or improving an existing one.

• **The authors write:** "Our results indicate that the chances of a community economically benefitting from a sports facility via the spillover channel are higher if the facility hosts a popular team and is visited frequently."

Gov. DeWine Muddies the Water:

Governor Mike DeWine is walking a tightrope to try and give the Haslams some money for their Brook Park stadium for the Browns while knowing that local city and county leaders have told the Haslams to kiss off for Brook Park money. In January 2025, Haslams asked DeWine to give them $200M - $600 million, which amounts to a third of the state's entire two-year budget for capitol improvements – a ridiculous request.

In February in House Bill 96, DeWine's full $60.9 billion budget proposal calls for doubling the state's tax on sports betting to 40% and using the proceeds to fund future pro sports stadium projects. DeWine has estimated this tax would raise $130 million to $180 million a year.

• The bill creates a legal definition for "major sports facilities," describing them as at least a $100 million renovation or a $1 billion new construction of a professional sports facility (pages 167 through 169 of the bill). It also creates a special category of stadium project that includes housing, hotels, parking garages and other elements of a mixed-used development. These mixed-use stadium projects must receive at least 60% of their

Former *Plain Dealer* editor Brent Larkin observed on 3-23-25 that for 16 straight years near the end of the 20th century;

"Ohio had governors from Cleveland who would never have allowed state government to act in ways that would harm their hometown: Democrat Dick Celeste and Republican George Voinovich were different in many ways. But both

Continued Next Page

of them would find it difficult to win today in a state that once awarded them four consecutive landslide wins, Celeste in 1982 and 1986, then Voinovich in 1990 and 1994.

And not since 1997, when Patrick Sweeney left the Ohio House after serving 30 years representing much of Cleveland's West Side, has Cleveland had a legislator with real power, someone who could singlehandedly veto any project designed to harm the central city.

Now, Greater Cleveland has become a mere afterthought in Columbus, viewed by state legislators as a shrinking and tired old place that's best ignored and, if necessary, betrayed.
As for Cleveland proper, its influence with state government is probably only a bit more than Rendville, the smallest place in Ohio, a tiny Appalachian village of 28 tucked into the southeast corner of Perry County.

There is no better example of Cleveland's lack of clout in Columbus than the legislature's determination to guarantee $600 million in bonds to help finance Browns owners Jimmy and Dee Haslam's $2.4 billion (before the inevitable massive cost overruns) covered stadium complex designed to harm downtown Cleveland.

With little or no due diligence, the legislature seems willing to put taxpayer funds and the state's credit rating at risk by accepting at face value the Browns' revenue projections to avoid a default on the bonds.

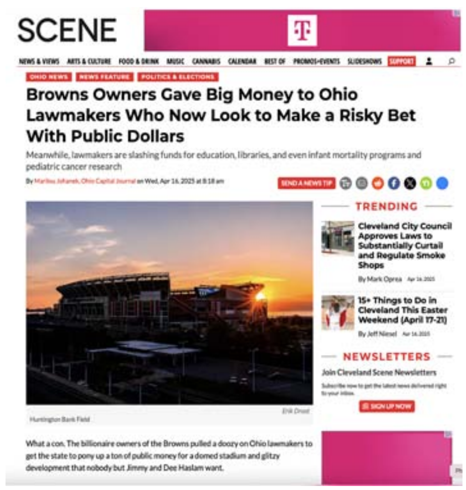
Imagine walking into your neighborhood bank


Haslams gave Ohio GOP leaders $120,000 in months before making $600 million request for stadium funding

By: Morgan Trau

COLUMBUS, Ohio — The owners of the Cleveland Browns, the Haslam family, had given $120,000 to the two top legislative leaders at the Ohio Statehouse in the months before they requested $600 million for their new football stadium. The House's proposed budget gave it to them.

Above & Below: Haslams Doled Out $120K to State Lawmakers


SCENE

NEWS & VIEWS ARTS & CULTURE FOOD & DRINK MUSIC CANNABIS CALENDAR BEST OF PROMOS-EVENTS SLIDESHOWS SUPPORT

OHIO NEWS NEWS FEATURE POLITICS & ELECTIONS

Browns Owners Gave Big Money to Ohio Lawmakers Who Now Look to Make a Risky Bet With Public Dollars

Meanwhile, lawmakers are slashing funds for education, libraries, and even infant mortality programs and pediatric cancer research

on Wed, Apr 16, 2025 at 8:18 am

SEND A NEWS TIP

TRENDING

Cleveland City Council Approves Laws to Substantially Curtail and Regulate Smoke Shops

By Mark Oprea

15+ Things to Do in Cleveland This Easter Weekend (April 17-21)

By Jeff Niesel

NEWSLETTERS

Join Cleveland Scene Newsletters

SIGN UP NOW

Huntington Bank Field

What a con. The billionaire owners of the Browns pulled a doozy on Ohio lawmakers to get the state to pony up a ton of public money for a domed stadium and glitzy development that nobody but Jimmy and Dee Haslam want.

with some full-color renderings and few numbers tossed on a page, then asking for $600 million.

Most bankers would push the "we're being robbed" button underneath their desk. But not Republican members of the Ohio House Arts, Athletics and Tourism Committee, who adoringly treated a Browns lawyer with kid gloves during a March 10 hearing. Watch the video. It's nauseating.

Here's just one example, a hugely important one, of why this entire debt repayment plan is a sham: The Browns include state income tax receipts as an important part of the repayment revenue stream needed to avoid default on the $600 million bond issue that would be guaranteed by Ohio's taxpayers.

But Vivek Ramaswamy, the odds-on favorite to be Ohio's next governor, has promised to repeal the income tax when he's elected. **How can you repay bonds with a revenue stream that no longer exists?**

In terms of atrocious public policy, guaranteeing $600 million to a big campaign contributor for a project that may include hotels, office buildings, restaurants, and entertainment venues that will compete with similar places just a dozen miles north in the city of Cleveland is yet another example of why the Ohio General Assembly is a place where integrity and decency come to die."

There was a time, not that long ago, when no state official would have even contemplated such a malignant maneuver that would damage Cleveland. But population loss, mind-numbing voter apathy, an absence of even a trace of corporate leadership and corrupt gerrymandering have taken a huge toll on Cleveland's clout.

Gerrymandering keeps Republicans in control of the state legislature, allowing lawmakers to draw legislative districts that favor rural and exurban areas at the expense of Ohio's large cities. State Issue 1, a ballot issue designed to end gerrymandering and replace it with a more democratic process, was narrowly defeated by Ohio voters last November.

Jimmy and Dee Haslam were the second largest contributors to the campaign to defeat Issue 1, giving $100,000. Now it's time for the Republican-run legislature to pay its debt.

Mayor Justin Bibb's handling of the Browns attempt to move had focused largely on the city's legal attempt to use what is called the "Modell Law," which prevents a sports franchise from moving if taxpayer help funded their stadium. Bibb had been firm but restrained until mid-March.

That all changed after a March 18 legal filing from the Browns suggesting the city has done little to include the Browns in its lakefront planning process. The filing also referred to the existing stadium as "a deteriorating open-air stadium that sits idle most of the year."

The next day, Bibb angrily struck back, referring to the Browns' attempt to saddle taxpayers with half the Brook Park covered stadium's projected $2.4 billion cost as a "scheme" that "pays for itself on the backs of fans."

Added Bibb, in part, "The Haslams need to raise your taxes, make it more expensive for you to attend games, and steal events away from downtown Cleveland to pay for their stadium."

Continued Next Page

The Fight Over the Browns in Brook Park Continues:

Under significant pressure from the Haslams and their supporters, Cuyahoga County Executive Chris Ronayne has been under constant and significant pressure to support the use of taxpayer money to fund the Browns' plan to desert downtown. **Not once has Ronayne flinched in his opposition.**

And Gov. Mike DeWine, too, has suggested the legislature seems to be overly generous in its attempts to help the Browns. DeWine could use his line-item veto if the Haslam handout is included in the state budget, but the legislature could then try to override that veto.

The Haslams' history also raises questions about the wisdom of putting taxpayers at risk to help fund his Brook Park project.

In 2014, Pilot Flying J, Jimmy Haslams' family business, paid $92 million to the U.S. Department of Justice as a penalty for massive fraud by the company that cheated customers out of more than $50 million in promised discounts and rebates.

When the federal government's investigation ended in 2018, 17 former employees, including the company's former president, had been convicted of fraud-related crimes. A number of them went to prison. Haslam was never charged and denied any knowledge of the schemes. However, an FBI affidavit quoted an informant saying Haslam was in the room during a meeting when the scheme to cheat customers was discussed.

Early last year, the Haslam family and Warren Buffett's Berkshire Hathaway settled a lawsuit that included allegations by Buffett's company that Haslam fraudulently inflated the value of his company, which Berkshire Hathaway was in the process of purchasing - and now owns.

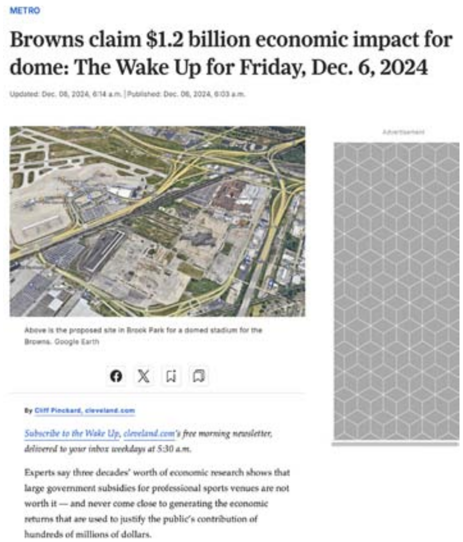
It's apparent that none of this history is seen as relevant by the conscience-free Ohio elected officials involved in this rotten business.

Whatever a generous supporter wants, that generous supporter gets. Even if what taxpayers get is the shaft."

Brent Larkin was The Plain Dealer's editorial director from 1991 until his retirement in 2009.

Bibb Takes Off the Gloves:

On 3-18-25, Dave Jenkins of the Haslam Sports Group released a letter to fans. In it, he made a number of claims that are just that – claims. His lie enraged Cleveland Mayor Justin Bibb, who roared back the next day.


METRO

Browns claim $1.2 billion economic impact for dome: The Wake Up for Friday, Dec. 6, 2024

Updated: Dec. 06, 2024, 6:14 a.m. | Published: Dec. 06, 2024, 6:03 a.m.

Above is the proposed site in Brook Park for a domed stadium for the Browns. Google Earth

By Cliff Pinckard, cleveland.com

Subscribe to the Wake Up, cleveland.com's free morning newsletter, delivered to your inbox weekdays at 5:30 a.m.

Experts say three decades' worth of economic research shows that large government subsidies for professional sports venues are not worth it — and never come close to generating the economic returns that are used to justify the public's contribution of hundreds of millions of dollars.

Above & Below: Browns' Suspect Economic Impact Claims
Bottom: Model Lawsuit Between Cleveland & Haslams


More taxpayer money benefits pro sports owners amid 'stadium construction wave'

Research shows stadium and arena projects are poor public investments.

BY: KEVIN HARDY - FEBRUARY 21, 2024 4:25 AM

Jenkins said that the Brook Park stadium would be a 'catalyst' that would not require existing taxpayer revenues. **The 'catalyst' part is just an aspirational assertion void of fact.** That tax part is right – it depends upon all new and additional tax revenues to fund the half Haslam is too cheap to put up himself.

Jenkins claims that the Browns have done 'extensive due diligence' and that their stadium proposal with the adjacent mixed-use development "is the most viable long-term solution." **Yet another opinion void of fact.**

And still the Browns have refused to release their due diligence work product and the so-called economic impact study their consultants have summarized that no one with any economic or financial wherewithal has considered to be credible.

It is logical to imagine that the Browns' failure to show their cards is because they know deep down inside that the data they compiled is not accurate or supportable and that they are full of it. Even without the work product, everyone has pointed out the serious flaws in the Browns' assertions of benefits to the Brook Park project.

Jenkins claims that the project will drive "millions of visitors to the region throughout the year for premier large-scale events which will dive the fiscal and economic impact necessary to pay for the public portion of the funding model." **So would a lakefront stadium. CAF has previously pointed out the flaws in these claims and calculations by the Browns.**

The number of large 'premier events' available in the US is limited and with domed stadiums – with a history that proves the Browns' projections to be grossly exaggerated – already in Detroit and Indianapolis, the notion that a Brook Park stadium will draw millions more is simply nonsense.

And if it was true, it fails to make a case that a Brook Park location justifies abandoning the city's urban chore where the infrastructure is already in place.

Jenkins claims that the Browns love Cleveland and everything about it.

No, they do not. They are not being good Clevelanders. They are not demonstrating a concern for the well being of the community beyond their own little mismanaged profit center.

The move to the suburbs does damage to the city center and the thousands of jobs that hang by a thread with the eight game day crowds the lakefront stadium hosts each year. His letter did not acknowledge that **the *average* ticket price**

The Browns’ Over Brook Park Continues:

today – BEFORE the proposed added taxes – is already $247 per seat, and that they want to control their parking lots to fleece fans out of another $94 million.

That’s what the Browns lose if they stay downtown. Some have said that the parking is what this fight is all about.

Published reports say the Browns’ revenue last year was $581 - $605 million – including the absurd salary of QB Deshaun Watson, with a profit of $85 million. Jimmy and Dee Haslam are reportedly worth between $8 - $14 BILLION. Watson has played only 19 games in his three years here, producing only 19 touchdowns with 12 interceptions. In just last year, Cincinnati’s Joe Burrow threw 43 touchdowns with 9 interceptions in his 17 games.

Ohio’s House and Senate are both are controlled by Republicans, then would work out their differences on a giveaway to the Haslams in order to pass something before a June 30 legal deadline. DeWine could veto parts of the final budget bill he does not like.

Ronayne Says Browns’ Math is Bogus:

In late February, Cuyahoga County Executive Chris Ronayne expressed doubts about the Cleveland Browns’ $1.2 billion taxpayer ask for a new $2.4 billion dome stadium, warning that the team’s financial projections, particularly on bed tax revenue, may be overly optimistic.

Ronayne, a critic of the team’s plan to move from downtown Cleveland to Brook Park, was the first local leader to publicly question whether the funding model – which largely taps stadium-generated tax dollars and new local tourism taxes – could leave taxpayers on the hook for shortfalls in the years ahead.

“The county’s assessment of the bed tax (increase) is it might yield $250 million,” Ronayne told cleveland.com. **“Their numbers are inflated two times.”**

However, Browns owner Jimmy Haslam, in outlining the proposal, noted that the team’s $1.2 billion investment in the stadium makes it “in our interest for these numbers to be right, too. We’re not going to have some crazy, wild projection.”

But the Browns *have* inflated alleged benefits and short-sold risks and the yet-undefined infrastructure scope and cost if the stadium is built in Brook Par,. Determining who is more likely to be right requires not only assumptions about business growth and inflation but also private business tax figures that are not publicly available.


‘Risky’ and ‘wildly overblown:’ Ohio budget director blasts Browns’ stadium plan

Above: State Officials Call Brownns’ Plan ‘Risky and Overblown’
Second: County Opposes Brook Park Stadium
Third:Ronayne Calls Browns’ Financing Plan a ‘Hail Mary’


Cuyahoga County opposes Cleveland Browns' Brook Park stadium. City in negotiations with team


'A Hail Mary': Cuyahoga County executive questions financing plan for new Cleveland Browns stadium

The team laid out a detailed roadmap for how it believes the public’s $1.2 billion share would be covered. The plan spans multiple levels of government, relies on a mix of new and existing taxes, and stretches repayment over 30 years. Here’s how it breaks down:

Cuyahoga County

About $178 million of the $600 million the Browns are asking the county to borrow would be covered by two taxes – on hotel stays and car rentals – raising an estimated $550 million to pay back the principal and interest.

The Browns say raising the countywide bed tax from the current 6.5% to 7.5% would generate $450 million over 30 years. Cleveland’s hotel operators are ballistic about this idea, saying that the county’s tax on hotel rooms is already monstrous.

This is what Ronayne’s office pegged at $250 million. In a follow-up, Ronayne’s office provided a spreadsheet adding up to $210 million over the next 25 years, assuming a 4% increase each of the next two years, 3% in 2028 and 2% each year the rest of the way through 2050. The data also showed an expected growth of 5% this year.

The inflation rate and the number of years factored into projections are crucial. The Browns based their calculations on historical trends in Cuyahoga County, assuming annual increases of 2.1% in hotel demand and 2.5% in hotel rates. They argue this is a conservative estimate, noting that historically room rates have gone up 3% to 4%.
The second county ask – something that would require a state law change – is a $6 rental car fee. The Browns estimate that would raise about $100 million over 30 years.

Brook Park

The rest of the $600 million in county borrowing – $422 million - would be covered from new Brook Park city tax revenue, the Browns say. Although the funding would come from Brook Park, the county is being asked to issue the bonds because it can secure bonds of this size more easily and at a lower cost than the smaller city could. The Browns identified three Brook Park taxes they predict would raise about $1.7 billion over 30 years.

Vetting The Browns’ Economic Impact Claims:

The Haslams finally came out with a plan to fund their stadium in Brook Park since they do not want to spend more than one tenth of their own money. For months, the team has refused to share potential financing plans for construction of its $2.4 billion domed stadium. While owners Jimmy and Dee Haslam want local and state taxpayers to pony up $1.2 billion for it, Cuyahoga County has already refused to chip in, and it is unclear what state lawmakers will agree to contribute with the Governor and House divided before the matter even gets to the Ohio Senate.

In December, the Browns released ‘findings’ from an economic impact study **that they refuse to release** but that they are using to lobby for a public handout.

Following the Browns’ PR assertions, Cuyahoga

Continued Next Page

The Fight Over the Browns in Brook Park Continues:

County Executive Chris Ronayne's team said they had not reviewed the findings, but said a **"biased report attempting to justify an unprecedented sum of taxpayer money for a new stadium does not change our position,** and we're going to have to throw a flag on the play."

"Economic impact studies commissioned by organizations with a vested interest often present overly optimistic projections that do not reflect the financial realities faced by local governments and taxpayers," the county's statement said. And that has proven true with the Haslams. The findings in the team study conclude a domed stadium would attract three to seven additional big events to Northeast Ohio each year, beyond what the current open-air stadium on Cleveland's lakefront already draws in.

Those extra events, along with some smaller ones, would nearly double the number of stadium visitors in the Cleveland area each year, according to the study from Maryland-based RCLCO Real Estate Consulting. The firm claims a new domed facility could attract up to 1.5 million visitors, double the 670,000 to 770,000 today at the lakefront stadium. Lucas Oil Stadium reports 420,000 guests from 2024 concerts. That includes a Pink/ Sheryl Crow show and three nights of Taylor Shift shows which is a phenomena that does not carry over to other artists in Midwest small cities.

Browns' talking heads RCLCO's Erin Talkington allege that their alleged 124% increase in Lakefront stadium attendance would translate annually to $1.2 billion in additional economic impact for the region, beyond the sum the existing lakefront stadium already generates, according to, who provided an overview of the study's findings to cleveland.com and The Plain Dealer. The problem with their assertion is that to achieve a $1.2 billion increase in economic impact, every seat would have to generate $1,800 per person. Even the Browns' average ticket price of $247 per ticket only gets you $13.7% of $1,800.

The Browns did not respond to cleveland.com's inquiry as to how much they believe the existing stadium contributes to the local economy.

The Browns released the study weeks after Cleveland Mayor Justin Bibb released his own study, which questioned the economic viability of the Haslam's plans for a domed stadium and adjacent mixed-used development in suburban Brook Park. Bibb's study concluded that there is insufficient demand for such a project and argued that the move would harm downtown Cleveland's economy. The Haslams' 'study'

Above: *Crain's* Readers Are Opposed to Ohio Debt to Help Haslams
Below: Ohio House Passes $600M Bond Plan

concludes the opposite – without substantiation.

Even if the stadium is no longer in downtown Cleveland, the Browns' study predicts a spillover effect that ultimately benefits the city of Cleveland. That is because a dome would supposedly draw more events to the region and result in more spending than exists today in downtown Cleveland and across Cuyahoga County, Talkington said.

But a domed stadium in Brook Park or on the lakefront would not be drawing people from Detroit or Indianapolis for major concerts who already had a domed stadiums and a history of courting and managing such events, making the Browns' projections even more suspect.

Out of the hypothetical $1.2 billion in economic gains for Northeast Ohio, Talkington said about $200 million of it represents spending that would happen outside the Brook Park site. That would include fan spending at restaurants, bars, hotels and other amenities located in Cleveland and across the county.

The main contributor to that impact, according to Talkington, are the major concerts and events at the proposed 60,000-person venue that the Browns believe would newly attract hundreds of thousands of out-of-state and local visitors to the stadium.

The open-air lakefront stadium today hosts about 10 football games and 3 major events or concerts annually, according to Talkington and Browns spokesman Peter John-Baptiste. But a domed stadium, they say, would not only host the same number of NFL games, it would also attract at least six to 10 major events per year, resulting in 50-70 days of usage at the stadium. **Those numbers are phony.** No other domed stadium (except SoFi in L.A. which has a separate 6,000 seat concert venue and two NFL teams) in the US hosts that many 'major' events. **The average over the last ten years is three events per domed stadium, just like Cleveland's current lakefront stadium.**

Major events would include big concert tours, such as Taylor Swift, Beyonce, The Rolling Stones, or other large-crowd-drawing entertainment, such as college sports tournament finals. Lesser attractions such as monster truck jams, bridal fairs or WWE events will draw 20k - 30k crowds which are curetly accommodated here by the Rocket Mortgage Fieldhouse, Convention Center and IX Center because truck jams and motocross events do not draw 60,000 spectators. The NCAA regional finals at Rocket Mortgage Fieldhouse do well to fill 20,000 seats, but unless it is the NCAA championship, those events will not fill 60,000 seats.

Cleveland.com's **previous reporting shows it is unlikely that a domed stadium would attract several more major events per year**, compared to the shows that already are hosted at the existing open-air stadium, which have included acts like Beyonce or WWE Summer Slam, in recent years. That is because there are only so many major event tours each year.

Talkington and John-Baptiste pointed to places like Indianapolis, where, they say, Lucas Oil Stadium hosted 13 major event days in 2023 and 2024, or Detroit's Ford Field, which, they say, hosted 11 major events in that span. Cleveland, by comparison, hosted three. **The comparison is flawed.**

The issue here is the definition of 'major' which would not include truck jams that draw 20,000 and could easily be/ are accommodated at either the Convention Center, IX Center or Rocket Mortgage Fieldhouse. Ford Field events for 2025 reflect the usual assortment of monster truck jams, a bridal fair, wrestling finals and Michigan Panthers football – **none of which can legitimately be classified as major events. Their 'major' events for 2025 appear to only be Billy Joel/ Stevie Nicks, ACDC and Kendrick Lamar.**

The Fight Over the Browns in Brook Park Continues:

Indianapolis hosted the 2025 NBA All-Star Game, and has scheduled NCAA *regional* finals, motocross and monster jam events - **no concerts at all, which make the claims by Talkington and John-Baptiste hollow.** In the four years **from 2021 – 2014, the Lucas Oil 'major' concerts totaled six:** Miley Cyrus, Guns N' Roses, Motley Crew/ Def Leppard, Steven Sills/ Ann Willson/ John Mellencamp, Pink/ Sheryl Crow and Taylor Swift. **From 2009 – 2020, only eight acts:** Garth Brooks, Taylor Swift, U2, One Direction, Kenny Cheney, Madonna, Cheap Trick and Foreigner. **So over 16 years, Indianapolis hosted 14 acts that can be classified as 'major.'**

Tour promoters choose their venues based on a variety of factors, including the regional population and average annual income, where the Browns say Cleveland falls short compared to places like Detroit. But the Browns argue that having a domed stadium is a deciding factor for tour promoters to choose places like Cleveland, along with the size of the broader population that can travel to a particular site. Given Cleveland's drivability to the East Coast

Continued Next Page

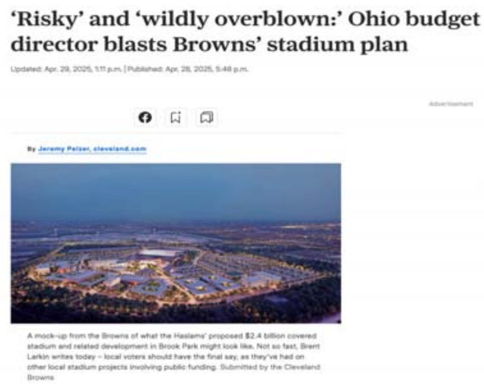
and other major U.S. population centers, the Browns believe a domed stadium in Cleveland would allow it to attract more major concerts than it does today. Possibly – but not by much.

As for attracting more mid-size events to the region, the city of **Cleveland's study correctly points out that a domed stadium in Brook Park would draw events away from the taxpayer-funded Rocket Mortgage FieldHouse, convention center and other existing venues.**

Talkington and John-Baptiste disagreed, saying a domed stadium would add more such events to the region, not take away from venues that already host them. But the net add of events that otherwise skip town are less than a handful. **We looked at all ten domed stadiums in the US and found that every domed stadium in the last ten years averaged only three such major events a year.** They said a domed stadium could host things like a Home and Garden Show, or monster truck jam – notably, events that are already hosted at the basketball arena and I-X Center.

A Review of Literature on Public Funding of Private Sports Teams' Facilities:

In their book, *Public Dollars, Private Stadiums*, authors Kevin Delaney and Rick Eckstein provide an eye-opening account of recent battles over publicly financed stadiums in some of America's largest cities. Their interviews with the key decision makers present a behind-the-scenes look at how and why powerful individuals and



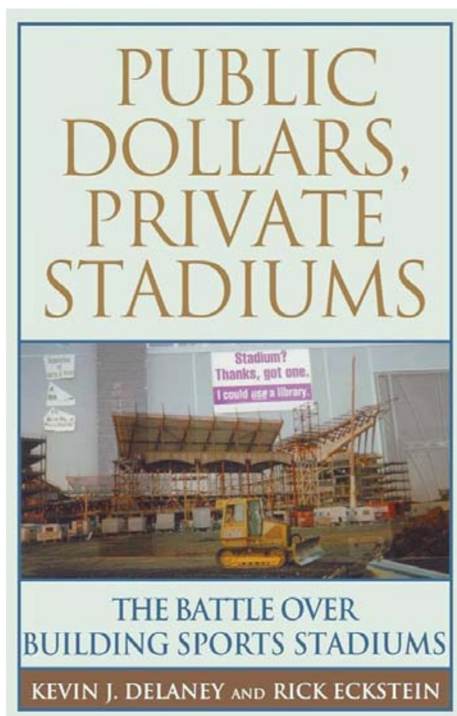
'Risky' and 'wildly overblown:' Ohio budget director blasts Browns' stadium plan

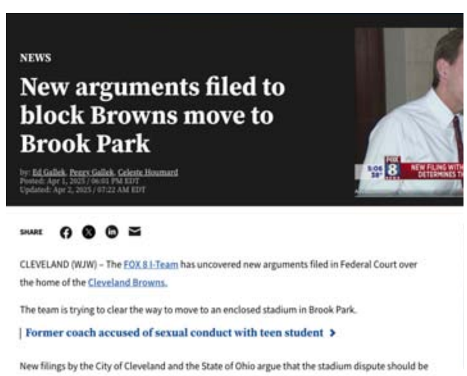
Updated: Apr. 29, 2025, 1:11 p.m. | Published: Apr. 28, 2025, 5:48 p.m.

By Jeremy Pelzer, cleveland.com

A mock-up from the Browns of what the Haslams' proposed $2.4 billion covered stadium and related development in Brook Park might look like. Not so fast, Brent Larkin writes today – local voters should have the final say, as they've had on other local stadium projects involving public funding. Submitted by the Cleveland Browns

Above: State Officials Call Brownns' Plan 'Risky and Overblown'
Second: *Public Dollars, Private Stadiums;* Kevin L. Delaney & Rick Eckstein
Bottom: New MOdell Lawsuit Arguments





NEWS

New arguments filed to block Browns move to Brook Park

by: Ed Gallek, Peggy Gallek, Celeste Houmard
Posted: Apr 1, 2025 / 06:01 PM EDT
Updated: Apr 2, 2025 / 07:22 AM EDT

SHARE

CLEVELAND (WJW) – The FOX 8 I-Team has uncovered new arguments filed in Federal Court over the home of the Cleveland Browns.

The team is trying to clear the way to move to an enclosed stadium in Brook Park.

| Former coach accused of sexual conduct with teen student

New filings by the City of Cleveland and the State of Ohio argue that the stadium dispute should be

organizations foist these sports palaces on increasingly unreceptive communities.

Delaney and Eckstein show that in the face of studies demonstrating that new sports facilities don't live up to their promise of big money, proponents are using a new tactic to win public subsidies by delivering intangible "social" rewards, such as prestige and community cohesion. The authors find these to be empty promises as well, demonstrating that new stadiums may exacerbate, rather than erase, social problems in cities.

Since this book's publication, this trend has continued as virtually every major league city has been held up by owners for new stadiums and indoor arenas. The authors, sociologists at Temple and Villanova Universities, offer cases studies in the debates over public financing of sports arenas and the enormous amount of dollars pulled out of government entities to make them possible.

They focus on debates since the 1980s in Cleveland, Cincinnati, Minneapolis, Denver, Phoenix, San Diego, Hartford, Pittsburgh, and Philadelphia over the financing of stadiums. In virtually every case a new stadium eventually was built with significant taxpayer involvement. There have been only small successes in these political debates in the last 25+ years.

The authors note that any effort to build a new stadium comes first from the sports team owner, who always pleads that without a new arena the team will be unable to complete in the league and will have to move elsewhere. One may question whether or not this is true; in instances where information has come to light the teams are almost never as destitute as the owner states.

The result has been, according to the authors, that an estimated $10 billion in public funds has been spent on new sports complexes since the 1980s.

Sports writer Dave Zirin succinctly argues that if these teams are subsidized by public funds, then the public should have a say in their management. He has argued in many settings that we have every right to make demands on owners since we who live in cities where they exist help pay for their upkeep through our tax dollars for stadiums and infrastructure. "We should have the right to withhold tax money for a stadium unless a public advocate is added to a

Continued Next Page

The Fight Over the Browns in Brook Park Continues:

team's board of directors", writes Zirin in *"Bad Sports: How Owners are Ruining the Games We Love."*

The authors also emphasize that a coalition of team leadership, government officials, and the business community always work together to ensure the public funding of sports arenas. Invariably, they emphasize how it will be great for the local economy. These new sports complexes, proponents argue, contribute millions of dollars of net worth to the city/county/state. They also create hundreds if not thousands of new jobs - low-wage jobs.

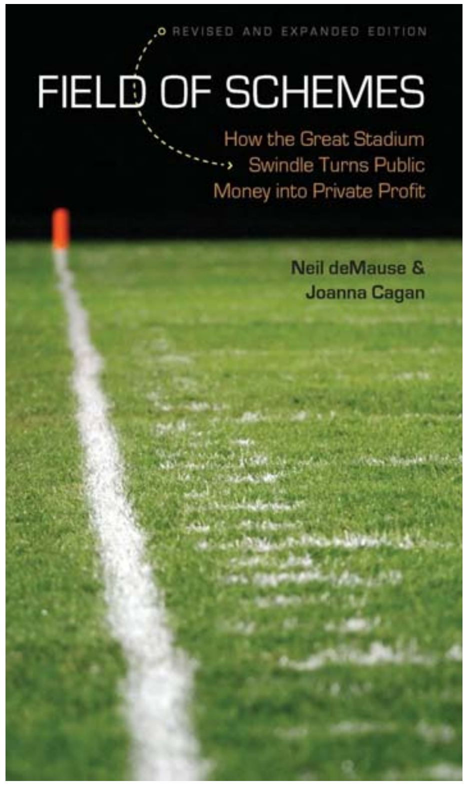
Despite these claims, as Delaney and Eckstein make clear, **economists have found no evidence of positive economic impact of professional sports teams and facilities on urban economies.** Local politicos always invoke the presumed transformation of Baltimore's inner harbor or some other local where a stadium's presence seemingly helped advance investment. That "post hoc, ergo propter hoc" argument is, at best, incomplete and largely refutable with rigorous economic analysis.

Delaney and Eckstein quote a Pittsburgh executive in their section on the fight over stadiums in that city: "Sports...you can argue over the numbers, **but they are just not economic generators.** If you had $100 million to spend in the region and wanted to get the most impact, sports wouldn't do it. **It's not like it's creating a lot of jobs.** You know, the Steelers won all those Super Bowls when the steel mills were pulling out of town." The authors understand that the Pittsburgh executive was correct about economics; even so owners keep getting sports complexes built at government expense.

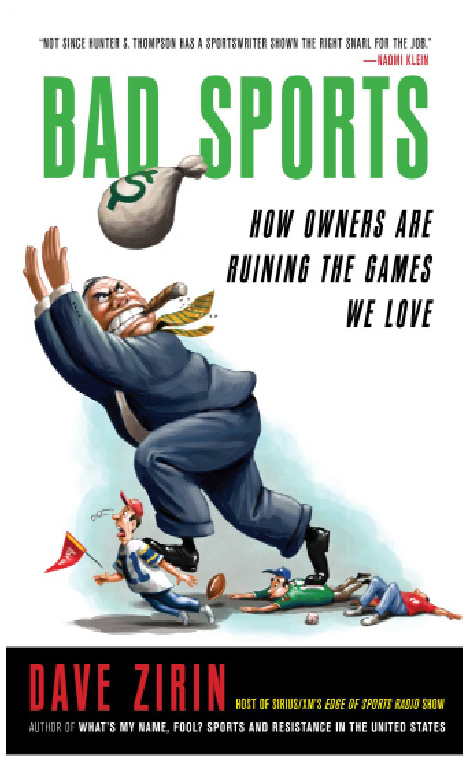
The authors emphasize the roles of local growth coalitions, public-private partnerships that campaign for and usually achieve their ends. Sometimes there are public hearings and votes; sometimes not, but whenever these coalitions are strong they gain stadium deals relatively quickly. Where they are weak or non-existent, they either fail altogether or the effort is delayed.

No question, the local business community, along with local government officials and opinion leaders, is critical to the success of efforts to gain public financing for sports complexes. The authors are academic researchers who are not grinding axes in this book, but they do make the clear case that there is little reason to believe the boosterism of advocates for stadium building. The cases studies are excellent.

Funny, engaging, and sharply pointed in his



Above: *Field of Schemes: How the Great Stadium Swindle Turns Public Money Into Private Profit;* Neil deMause & Joanne Cagan
Below: *Bad Sports: How Owners are Ruining the Games We Love*; Dave Zirn



appraisal of the sports complex bankrupting our cities, the celebrated author of A People's History of Sports in the United States returns with a hard-hitting indictment of big business and the corrupt practices that are ruining the sports we love. When attending a baseball game becomes a luxury reserved for the wealthy few and cities build multi-million dollar stadiums while letting their bridges crumble, the price of sports in this country demands reassessment.

Author Dave Zirin in the audio book *Bad Sports: How Owners Are Ruining the Games We Love*, cuts through the hype and bombast to give us a portrait of sports ownership as irresponsible as the financial shenanigans that drove the nation to the edge of economic ruin.

From the outrageous use of public funds for stadium construction to the use of these spaces for religious and political platforms, Zirin raises vital questions about misplaced priorities and moral abdications among the politicians we elect and the owners of the teams we root for.

Speaking out in clear and passionate terms for the rights of any taxpayer and sports fan, Zirin returns America's favorite pastimes back to where they belong - in the open and for the people.

Field of Schemes: How the Great Stadium Swindle Turn Public Money into Private Profit by Neil DeMause and Joanna Cagan is a play-by-play account of how the drive for new sports stadiums and arenas drains $2 billion a year from public treasuries for the sake of private profit.

While the millionaires who own sports franchises have seen the value of their assets soar under this scheme, taxpayers, urban residents, and sports fans have all come out losers, forced to pay both higher taxes and higher ticket prices for seats that, thanks to the layers of luxury seating that typify new stadiums, usually offer a worse view of the action.

Field of Schemes: How the Great Stadium Swindle Turns Public Money into Private Profit by Neil DeMause and Joanna Cagan is a play-by-play account of how the drive for new sports stadiums and arenas drains $2 billion a year from public treasuries for the sake of private profit. While the millionaires who own sports franchises have seen the value of their assets soar under this scheme, taxpayers, urban residents, and sports fans have all come out losers, forced to pay both higher taxes and higher ticket prices for seats that, thanks to the layers of luxury seating that typify new stadiums, usually offer a worse view of the action.

The stories in *Field of Schemes*, from Baltimore to Cleveland and Minneapolis to Seattle and dozens of places in between, tell of the sports-team owners who use their money and their political muscle to get their way, and of the stories of spirited local groups—like Detroit's Tiger Stadium Fan Club and Boston's Save Fenway Park!—that have fought to save the games we love and the public dollars our cities need for other more important uses.

The Modell Law Litigation:

The City alleges that the Browns and HSG violated the Modell Law by attempting to relocate the Browns to Brook Park without negotiating in good faith regarding the future of the franchise, without the City's approval and without offering the City or other local parties a reasonable opportunity to purchase the team. The Browns cannot argue those facts. The Browns are arguing that the Modell Law is unconstitutional. They feel that all they have to do is wait until their lease expires, whereupon their position is that they have no obligation to the City.

In January, the City of Cleveland and the State of Ohio took several key actions in the battle to prevent the Cleveland Browns from relocating to a domed facility in Brook Park, Ohio.

On January 14, 2025, the City filed a lawsuit in the Cuyahoga County Court of Common Pleas seeking to enforce the Modell Law against the Browns and the Haslam Sports Group (HSG) to prevent their move to Brook Park. A day later, the City filed a motion to dismiss the Browns' preemptive lawsuit in the Northern District of Ohio. That same day, the State also filed a motion to dismiss the Browns' lawsuit in the Northern District of Ohio.

Background of the Dispute

As a refresher, the Modell Law, named after the infamous former Browns owner, Art Modell, requires Ohio professional sports teams that receive taxpayer funding for stadiums to either:

1.) Obtain approval to relocate from the political subdivision where the home games are held, or
2.) Provide six-month's notice and allow the political subdivision or other local parties an opportunity to buy the team before relocation.

The dispute centers around the Browns' announcement that it intends to build a $2.4 billion, state-of-the-art stadium and entertainment complex in Brook Park, Ohio. The proposed site is approximately 15 miles south of their current home, Huntington Bank Field, located on Cleveland's lakefront. The Browns' current lease with the City of Cleveland is set to expire at the end of the 2028 NFL season.

The legal dispute formally began when the Browns filed a preemptive lawsuit on October 24, 2024, in the United States District Court, Northern District of Ohio. On October 31, the State intervened and aligned its legal position with the City.

The Browns later filed an amended complaint on November 15, 2024. The amended complaint reiterated the Browns' claims from its October 24, 2024 complaint, but the Browns updated the complaint to state that it intends to comply with the current term of lease by playing its home games in the City until the lease expires, rather than moving during the term–a reference to its commitment to comply with the lease.

The City's Complaint

In January 2025, the City took action and filed its own complaint in the Cuyahoga County Court of Common Pleas. According to the City's complaint, the City is attempting to prevent the Browns from abandoning the City and public that provided the Browns with a stadium and maintained that stadium through thick and thin–and to ultimately protect the City's and taxpayers' past, present, and future investments in the Downtown Cleveland lakefront stadium.

The City alleges that the Browns are attempting to bypass the Modell Law's requirements by improperly filing a lawsuit in federal court. The complaint mentions HSG's previous acquisition of the Columbus Crew, which was, in part, due to the Modell Law. This is a fact. But now, HSG and the Browns seek a declaration that the Modell Law is unconstitutional.

The City asserts claims for a violation of the Modell Law and breach of contract and requests a declaratory judgment and injunctive relief. The City alleges that the Browns and HSG violated the Modell Law by attempting to relocate the Browns to Brook Park without negotiating in good faith regarding the future of the franchise, without the City's approval and without offering the City or other local parties a reasonable opportunity to purchase the team.

It also alleges that by violating the Modell Law, the Browns are in breach of its lease agreement. The City also seeks clarification from the Cuyahoga County Court of Common Pleas that the Modell Law applies to the Browns' planned move to Brook Park.

The State's Motion to Dismiss

As an intervener-defendant in the Browns' federal lawsuit, the State filed its motion to dismiss the Browns' preemptive lawsuit on January 15, 2025.

Above: Gov. DeWine Is Not In Favor of the State Issuing Bonds for Haslams' Brook Park Stadium

Notably, the State AG takes a hard stance in favor of the City. The State argues that as a threshold matter, the federal court should abstain from considering the Browns' claims until an Ohio court has determined the constitutionality and breadth of the Modell Law. It also dives into the merits of the case by highlighting the fact that the Browns could have avoided the Modell Law entirely by not accepting taxpayer money.

Additionally, the State argues, in part, the law survives the Browns' constitutional vagueness challenge to the Modell Law since it provides "a person of ordinary intelligence a reasonable opportunity to know what is prohibited."

The State argues that the Modell Law existed prior to the Browns' contract with the City, and thus, the Contract Clause claim fails. According to the State, the Browns' Dormant Commerce Claus claim should also fail since the Browns' move is intended to be intrastate, from Cleveland to Brook Park, and because the City acts as a market participant, each making the Dormant Commerce Clause inapplicable.

The City's Motion to Dismiss

The City's Motion to Dismiss, also filed on January 15, 2025, is less about the merits of the Complaint, and more about the procedure of the litigation. The City focuses on the Northern District's alleged lack of jurisdiction over the Browns' claims and the importance of the Modell Law being fully litigated in state court prior to federal review–a legal principle referred to as abstention.

As its threshold matter, the City argues that since the Browns do not plead or invoke diversity jurisdiction and the Browns' claims under the Declaratory Judgment Act should be dismissed because the Declaratory Judgment Act allegedly does not create subject matter jurisdiction on its own, and therefore, the Browns' lawsuit should be litigated in state court.

Coninued Next Page

The Fight Over the Browns Continues:

The City's Motion to Dismiss also notes that the Browns lack standing because the Browns have not suffered an injury as the Modell Law has not been officially enforced against the Browns, and as a result, the City claims that the Browns are merely requesting an advisory opinion. Finally, the City notes that even if the Northern District has jurisdiction, the case does not belong in federal court since "anticipatory actions" filed in federal court before federal court are consistently dismissed by federal courts.

Summary

The City's lawsuit and motion to dismiss reinforces the stance it has taken in the media over the last six months to protect its economy and growth downtown. The City also notes that the Browns' departure from downtown would have a negative economic impact of at least $30 million in annual economic output and approximately $11 million in tax revenue.

Year to year, the City rightly claims that these losses would affect downtown businesses, jobs, and tourism that rely on the Browns and events held at Huntington Bank Field.

Despite the local politics involved, the State's stance now highlights its intent to support the Browns. The State's position has previously been that the Modell Law was enacted to prevent such moves of professional sports teams from outside the limits of the political subdivision itself - here, a 15-mile trip down I-71 from Cleveland to Brook Park. But now that the Haslams' have greased palms in Columbus with campaign contributions, State representatives have demonstrated a willingness to float bonds for gthe Browns. The Ohio Senate must now take up the question.

Ultimately, the City, State, and HSG's respective chess moves are underscoring the importance of not just the merits of the claims but what court should hear those merits. By preemptively filing their suit in federal courts, the Browns appear to prefer an appointed federal judge to hear its claims, while the City, with filing in state court, appears to prefer an elected state judge to decide the fate of the Browns in Downtown Cleveland.

Progressive Field and Rocket Arena and author of the 2023 book *"Cleveland Sports Facilties: A 35-Year History"* told Ideastream, **the Browns "are being way too optimistic about the proceeds from each of those taxes, because they're assuming a large number of events which historic research shows they are not going to get."**

In the April 7 issue of *Crain's Cleveland Business*, design and branding professional **Ciara Ahern asked why state lawmakers are catering to the Haslams instead of taxpayers. The city and county "are actively fightng to protect taxpayers from the Haslams' proposed Book Park Pplan, which they view as disadvantageous for taxpayers and the region."**

DeWine is not happy with the hefty price of the $600 million in bonds which could cost taxpayers over one billion dollars since the risk is on taxpayers if the developers' profits do not meet or exceed Haslams' expectations.

Ahern correctly pointed out that **"bonds have a demonstrated history of draining public resources."** Chicago's $587 million in 2002 to renovate Soldier Field was supposed to involve $387M through municipal bonds through a tourism tax. In 2022, the city owed $640 million on its $387M bonds.

In Georgia, taxpayers are losing $15 million a year on the new Atlanta Braves stadium. Oakland had to cut its police force by 18% in 2011 to pay off the Oakland Coliseum debt which caused average police response times to increase to 17 minutes. And Oakland still had stadium debt when the Athletics relocated to Las Vegas in 2024, necessitating additional large cuts to programs and servces.

Ahern asks why if city, county and the governor all oppose Halslams' Brook Park stadium plan and there is an absence of demonstrated public support by taxpayers for the project, why are Ohio lawmakers introducing the amendment to fund the Haslams?

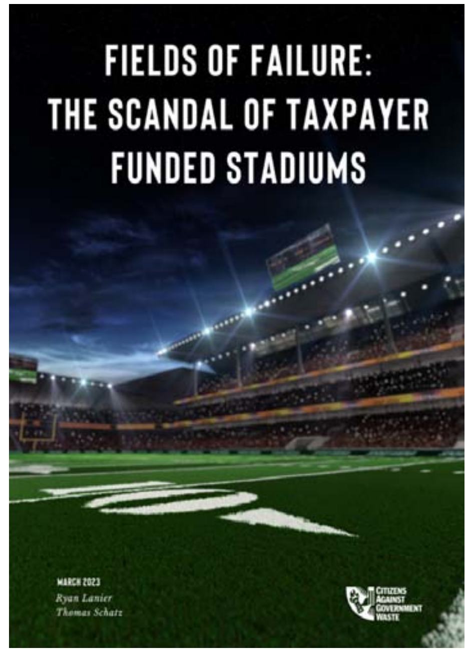
Ahern's conclusion: **"Ultimately, the Haslams' stadium plan socializes the cost and privatizes the profits for a leisure complex in the suburbs that doesn't benefit surrounding businesses, taxpayers or anyone except themselves."**

Brook Park's Just-in-Time Infrastructure Funding Requst:

Brook Park has authorized its mayor or director of public service to apply for funds from the Ohio Department of Transportation's 'Transportation Review Advisory Council (TRAC)' for infrastructure upgrade monies to enable the proposed Browns' stadium in their city to proceed.

BP Mayor Orcutt describes their perceived betterments to include "improvements to the ramps of I-71 north and south, a potential Engle Road overpass for the railroid, and a pedestrian bridge over Engle Road."

Established in 1997, TRAC provides funding for major transportation projects in Ohio over $12M that improve mobility, reduce congestion and support economic development. Maura Zurick of *cleveland.com* noted that some BP council members voiced concerns about that lack of information and renderings currently available. But Brook Park was in a big hurry as the application deadline was days away on May 31, 2025, with an ODT decision expected in early 2026.



Above: *Fields of Failure: The Scandal of Taxpayer Funded Stadiums: Citizens Against Government Waste;* Ryan Lanier & Thomas Schatz


Above: Ciara Ahern (L); Ken Silliman (R)

Akron Beacon Journal Slams Public Funding for Browns

In a May 30 Editorial from the ABJ Board, "Lawmakers shouldn't hand over such a large sum of money for a billionaire to replace a 25-year-old stadium as schools go underfunded."

"Anyone who lives in Northeast Ohio — and indeed, even many outside the region — are familiar with the fiercely dedicated Cleveland

The Fight Over the Browns Continues:

Browns fanbase."

"But state lawmakers are taking that dedication too far with the proposal of $600 million in bonds to fund a new domed Browns stadium in Brook Park."

ABJ noted that if realized, it "would make it one of the most expensive sports venues in the world." The 1-13 Browns do not deserve their practice facility in Berea.

The ABJ noted that Haslam "paints it as a project that will bring up to 1.5 million more visitors here each year and generate more than $1.2 billion for the local economy annually."

"But upon closer examination, these numbers begin to fall apart."

"Sen. Nickie Antonio, the Senate minority leader, said the numbers are like "working off the back of a napkin.""

"She asked the nonpartisan Legislative Service Commission (LSC) to weigh in on the proposal. The organization called the team's projections about traffic and events "overly optimistic.""

"The academic literature on publicly funded sports stadiums is vast, covering many decades, sports, states and municipalities," the LSC wrote in a memo. **"The overwhelming conclusion from this body of research is that there are little to no tangible impacts of sports teams and facilities on local economic activity. A second conclusion is that the level of government subsidies given for the construction of facilities far exceeds any observed economic benefits when they do exist."**

"The state's budget director does not support the proposal, nor do the governor, all the candidates for the next governor, the Cuyahoga County executive or the mayor of Cleveland, among other local politicians."

"It's no surprise the proposal is drawing the ire (and legal battle) of Cleveland Mayor Justin Bibb. What Haslam fails to consider in his economic analysis is the negative impact a move out of downtown would have on the city of Cleveland and the surrounding bars, restaurants and hotels that depend on Browns games to survive."

"Despite the opposition, the plan has garnered enough support to pass the House."

"Unsurprisingly, much of that support comes from lawmakers who have benefited from Haslam family donations. Matt Huffman, Republican speaker of the House and the largest beneficiary of the Haslams, according to an

Browns vs. Cleveland and the county: Who really holds the power in the stadium standoff?

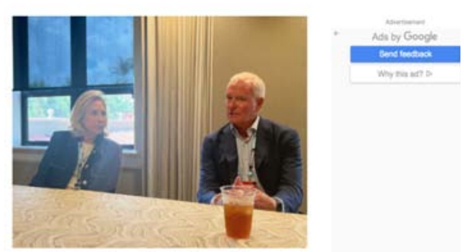
Updated: May. 19, 2025, 2:05 p.m. | Published: May. 18, 2025, 5:30 a.m.

The Cleveland Browns want to build a $2.4 billion covered stadium on the site of multiple former Ford Motor Co. plants in Brook Park. (Google Earth image) Rich Exner, cleveland.com

Six Simple Reasons Why the Browns Do Not Deserve Taxpayer Money for Their Brook Park Stadium:

The Browns team has demonstrated a lack of coherent critical thinking that justifies faith in them as business owners to deserve a substantial taxpayer give-away for the Brook Park Stadium:

1. Deshaun Watson Contract: Jimmy Haslam has admitted that they "took a big swing and a miss with Deshaun Watson" and his rediculous guaranteed $230 million contract. NO ONE who could see Watson had not played in a year, and had multiple sex abuse compliants that would keep him off the field for a signifiant amount of time, thought this was a sound move-*in any way*. As a reminder, the Browns still owe Watson - who will not take a snap - $46 million for each of the next two seasons.



Browns owner Jimmy Haslam: 'We took a big swing and a miss with Deshaun Watson'

Updated: Apr. 01, 2025, 6:47 a.m. | Published: Mar. 31, 2025, 1:31 p.m.

The Houston Texans look awfully smart. The Browns look awfully stupid.

2. Browns' Proposed Lakefront Development: In 2011, the Browns proposed a silly and substantial development downtown with large office and residential buildings. Aside from the mediocre urban design, the scope of the project was completely absurd in a city with no population growth that was then and is still in last place of US major cities in job growth. Simply stated, there was and will not be for decades to come market demand of any consequence for even a meaningful part of such a development. No lendor would participate in such a foolish development.

The absurdity of the proposal reflects a lack of awareness of Haslam's team on the dynamics and feasibility of urban development. Simply stated, these folks do not know what they are doing.

3. Haslams Need to First Build a Capable Football Team: At 1-13 last year, the Haslams and the Browns do not have their eye on the (foot)ball, which is their primary obligation to the fans.

Baker Mayfield was tasked to play behind an offensive line that was unable to pass protect and unable to block for the running game. So in an example of inept football thinking, they traded him to the Carolina Panthers for a **fifth round** draft pick and STILL had to pay $10.5 million of his contract, with Carolina picking up only $4.85 million.

In 17 games in 2024, Mayfield earned a passer rating of 106.8 with 4,500 yarrs, 41 touchdowns and 16 interce[ptions, indicating that the problems in Cleveland did not include Baker Mayfield.

Carolina looks awfully smart. The Browns look awfully stupid.

4. Fans Do Not Want the Stadium Anywhere but Downtown: In recent surveys, **the public overwhelmingly indicated that they want the Browns to play their games downtown, the latest margin being 61% downtown, 28% in Brook Park.**

Even Gov. DeWine says **the public should decide what their preference is because presumably, it should matter to everyone.**

5. Browns' Selection of Brook Park as Their Site for a Domed Stadium: In a location with no infrastructure or amenities, the Browns' Ford plant site will require the stadium to be pushed eight stories into the ground to comply with FAA takeoff and landing restrictions. And they have already tried to BS us that it will be an "immersive" fan experience. Try '**submersive**.'

6. An Expenditure of This Magnitude Should Go Before the Voters: For decades, local citizens have been taken advantage of by elected officials who have routinely usurped the right of taxpayers to have a say on how their tax dollars are spent.

The Medical Mart/ Convention Center Fiasco ($850 million), Public Square Renovation ($50 million), Browns Lakefront Renovations since 2010 ($243 million), Downtown Hilton Hotel ($260 million), 2023 - 2024 Rocket Area Renovation ($68.4 million), and 2024 Progressive Field/ Rocket Arena repairs ($40 million) have all been funded by taxpayers **without a vote of any kind** from the public to the tune of **$1.5114 BILLION.**

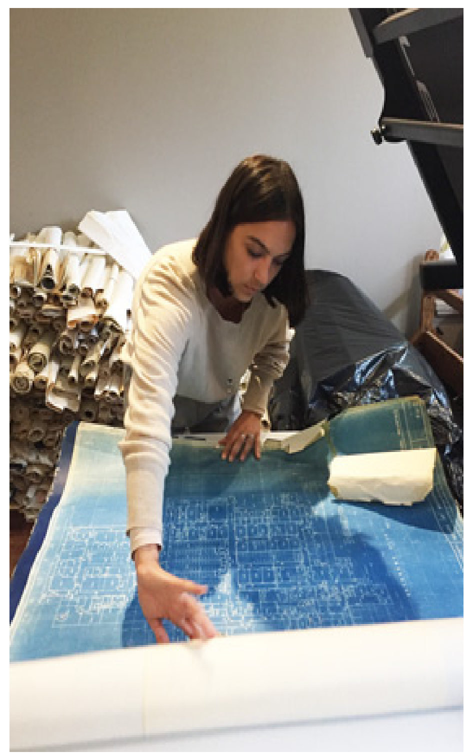
Enough.

Who/ What is CAF?

For over 75 years the Epworth Methodist congregation has been a University Circle landmark, nicknamed the "Holy Oil Can" because of its tall copper spire modeled after Mont-St.-Michel in Paris. The Euclid Ave. Methodist Episcopal Church began with Methodist classes at Doan's Corners in1831. A church building, known as Doan St. Methodist Episcopal, was constructed in 1837 on Doan (E. 105th) St. A second building was built in 1870 and razed in 1885. In 1887 a new building went up on Euclid Ave. at Oakdale (E. 93rd), and the church became known as Euclid Ave. Methodist Episcopal.

But in April, the church listed the property for sale with Howard Hanna Commercial Real Estate with an asking price of $2,445,000 for the 54,081 square foot facility and its 1.64 acres. Hanna Managing Director Julie Sabroff stated, "The owner is selling the property due to the cost of maintaining the building in the face of declining membership."

Who/ What is CAF?



"I don't know why people hire architects and then tell them what to do."

Frank Gehry
1929 -