

consideration. The matter was continued to August 20, 2013 to allow the Assessor time to fulfill the direction. *See Tr., 8-19-13, p. 90, l. 22 through p.91, l. 14.*

The State Board, having considered all evidence, documents and testimony pertaining to the valuation of the property in accordance with NRS 361.227, hereby makes the following Findings of Fact, Conclusions of Law and Decision.

FINDINGS OF FACT

- 1) The State Board is an administrative body created pursuant to NRS 361.375.
- 2) The State Board is mandated to hear all appeals of property tax assessments pursuant to NRS 361.360 and NRS 361.400.
- 3) The Taxpayer and the Assessor were given adequate, proper and legal notice of the time and place of the hearing before the State Board, and the matter was properly noticed pursuant to the Open Meeting Law at NRS 241.020. *See Record, SBE page 64.*
- 4) The subject property consists of an 8.94 acre R.V. park also known as Comstock Country RV Resort. This commercial property is located on the west side of South Carson Street next to Costco in Carson City, Nevada. Improvements include a clubhouse, 2 residences, a maintenance building, shower/restroom building, 150 R.V. sites and R.V. storage parking spaces. *See Record, SBE pages 18-20; Tr., 8-19-13, p. 51, ll. 13-16.*
- 5) Based on the Assessor's recommendation, the Carson City Board of Equalization (County Board) ordered the total taxable value for the subject property of \$2,663,257 be reduced to \$2,609,308 for the 2013-2014 secured roll, with the reduction applied to the improvements and maintaining the original land value. *See Record, SBE page 61.*
- 6) The Taxpayer presented sufficient evidence to support a value different from that established by the County Board. The State Board found the economic obsolescence factor of 10% applied by the Assessor was insufficient to mitigate the significant increase in taxable value caused by reclassification of the property. *See Tr., 8-20-13, p. 250, l. 3 through p.252, l. 15.*
- 7) The State Board found the taxable value of the subject property should be reduced to reflect additional economic obsolescence to \$2,500,000, with the land value established at \$1,947,131 and the improvement value established at \$552,869. *See Tr., 8-20-13, p. 253, l. 14 through p. 255, l. 19.*
- 8) The assessed value as adjusted by the State Board is 35% of taxable value.
- 9) Any finding of fact above construed to constitute a conclusion of law is adopted as such to the same extent as if originally so denominated.

CONCLUSIONS OF LAW

- 1) The Taxpayer timely filed a notice of appeal, and the State Board accepted jurisdiction to determine this matter.
- 2) The Taxpayer and the Assessor are subject to the jurisdiction of the State Board.
- 3) The State Board has the authority to determine the taxable values in the State.

- 4) The subject property is appraised, as adjusted, at the proper taxable value in accordance with NRS 361.227.
- 5) Any conclusion of law above construed to constitute a finding of fact is adopted as such to the same extent as if originally so denominated.

DECISION

The Petition of the Taxpayer is granted based on the above Findings of Fact and Conclusions of Law. The Carson City Comptroller is instructed to correct the assessment roll by adjusting the assessed valuation of the subject property as follows:

2013-2014 Secured Roll

Parcel Number	Taxable Value		Assessed Value	
	Established by County Board of Equalization	Revised By State Board	Established by County Board of Equalization	Revised by State Board
Land	\$1,947,131	\$1,947,131	\$681,496	\$681,496
Improvements	\$662,177	\$552,869	\$231,762	\$193,504
TOTAL	\$2,609,308	\$2,500,000	\$913,258	\$875,000

The Carson City Comptroller is instructed to certify the assessment roll of the county consistent with this decision.

BY THE STATE BOARD OF EQUALIZATION THIS 31st DAY OF OCTOBER, 2013.



Christopher G. Nielsen, Secretary
CGN/ter