



STATE OF NEVADA  
STATE BOARD OF EQUALIZATION

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SHELLIE HUGHES  
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In the Matter of )  
 ) Case No. 21-149  
APN(s): 156-040-14, 156-040-15, 156-040-09, )  
156-141-04, 156-111-23 )  
 )  
St. James's Village, Inc., )  
PETITIONER )  
 )  
v. )  
 )  
Washoe County Assessor, )  
RESPONDENT )  
 )  
Appeal from Decision of the Washoe County )  
Board of Equalization )

NOTICE OF DECISION

***Appearances***

Caryn Tijsseling and Fred Woodside appeared on behalf of the Petitioner, St. James's Village, Inc. (Taxpayer).

Pete Kinne and Chris Sarman appeared on behalf of the Respondent, Washoe County Assessor (Assessor).

***Summary***

The matter of the Taxpayer's petition for review of property valuation for real property on the 2021-2022 secured roll came before the State Board of Equalization (State Board) for hearing via Zoom on September 27, 2021. The Washoe County Board of Equalization (County Board) heard Taxpayer's property tax appeal on February 26, 2021. The County Board upheld the Assessor's total taxable values of \$7,480,000 for the five parcels.

The State Board, having considered all evidence, documents and testimony pertaining to the taxable value for the subject property, 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. Taxpayer and 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.
4. Taxpayer has the burden of proof pursuant to NAC 361.741.
5. The subject property is comprised of five large acreage, undeveloped parcels, totaling 371.17 acres and are located in the southeast portion of St. James's Village, which is 13 miles south of Reno. The five parcels have tentative map approval for 220 single family homes.
6. Taxpayer presented evidence showing additional costs that may be associated with infrastructure development with the subject property, including access issue, sewer issues, and disputes with the Truckee Meadows Water Authority.
7. The subject property is part of a listing for sale
8. The subject property had been valued per acre, but given its listing price and the tentative map, Assessor changed its valuation to be based on the number of lots.
9. Assessor applied a per lot sales price of \$170,000 based on sales of lots within St. James's Village and discounted it by 80% to account for infrastructure and other development costs.
10. To test its taxable value, Assessor presented evidence of comparable sales of large acreage parcels of undeveloped land.
11. Assessor's methodology was reasonable.
12. The value allocation among the parcels shall be consistent with SBE 100.
13. 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.

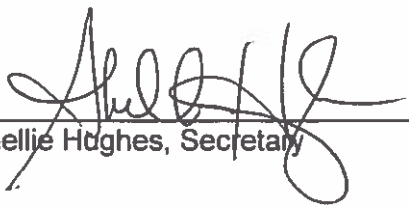
### **CONCLUSIONS OF LAW**

1. Taxpayer and Assessor are subject to the jurisdiction of the State Board.
2. The State Board has the authority to determine the taxable values in the State.
3. Taxpayer failed to meet its burden to show the County Board's decision was in error.
4. The taxable value for the subject property does not exceed full cash value.
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**

Based on the above Findings of Fact and Conclusions of Law and a preponderance of the evidence, the State Board decided by a unanimous vote to uphold the taxable value determined by the Assessor. The Petition is denied.

BY THE STATE BOARD OF EQUALIZATION THIS 26<sup>th</sup> DAY OF January, 2022.

  
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Shellie Hughes, Secretary