

- 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.
- 4) The subject property is 98,881 square feet (2.27 acres) of vacant land zoned as light industrial and terraced; the property is located on the north side of Forrest Way in Carson City, Nevada. *See Tr., 5-16-12, p.108, l. 24 through p. 109, l. 3. Record, SBE page 7.*
- 5) The Carson City Board of Equalization (County Board) accepted the Assessor's recommendation to uphold the land taxable value of \$2.25 per square foot for a total taxable value of \$222,483 for the 2012-2013 secured roll. *See Record, SBE page 7-9.*
- 6) The State Board found the values proposed by the Taxpayer and the Assessor were inadequately supported by the evidence. The State Board determined the appropriate value should be based on 85% of the previous year's value. *See Tr., 5-16-12, p. 116, l. 24 through p. 117, l. 19.*
- 7) The State Board found the taxable value of the subject property should be reduced to \$190,344. *See Tr., 5-16-12, p. 118, l. 23 through p. 119, l. 18.*
- 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 has jurisdiction to determine this matter.
- 2) The Taxpayer and the Assessor are subject to the jurisdiction of the State Board. In particular, the State Board has jurisdiction to hear Taxpayer's appeal for the 2012-2013 secured roll pursuant to NRS 361.360(1) and NRS 361.400.
- 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 and NAC 361.118 for the 2012-2013 tax year.
- 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:

2012-2013 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
008-681-26				
Land	\$222,483	\$190,344	\$77,869	\$66,620
TOTAL	\$222,483	\$190,344	\$77,869	\$66,620

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 6th DAY OF JULY, 2012.



Christopher G. Nielsen, Secretary to the Board
CGN/ter