

BEFORE THE STATE TAX APPEAL BOARD
OF THE STATE OF MONTANA

SUSAN A. HEDAHL and)	DOCKET NO.: PT-1999-18
DANNY O. SMRDEL,)	
)	
Appellants,)	
)	
-vs-)	
)	
THE DEPARTMENT OF REVENUE OF)	FACTUAL BACKGROUND,
THE STATE OF MONTANA)	CONCLUSIONS OF LAW,
)	ORDER and OPPORTUNITY
Respondent.)	<u>FOR JUDICIAL REVIEW</u>

The above-entitled appeal was heard on April 27, 2000, in the City of Missoula, in accordance with an order of the State Tax Appeal Board of the State of Montana (the Board). The notice of the hearing was given as required by law.

Susan Hedahl and Danny Smrdel, appearing on their behalfs, presented evidence and testimony in support of the appeal. The Department of Revenue (DOR) was represented by James Fairbanks, Region 4 Leader. Testimony was presented and exhibits were received. The Board then took the appeal under advisement. The Board having fully considered the testimony, exhibits, and all things and matters presented to it by all

parties, finds and concludes as follows:

FACTUAL BACKGROUND

1. Due, proper and sufficient notice was given of this matter, the hearing, and of the time and place of the hearing. All parties were afforded opportunity to present evidence, oral and documentary.

2. The property which is the subject of this appeal is described as follows:

Lot 12, Seeley Lake, Section 10, Township 16 North, Range 15 West, comprised of 1.65 acres, County of Missoula, State of Montana. (State Lease Number 3060984).

3. The DOR appraised the subject leased lot at \$27,274 for the 1999 tax year.

4. For the 1999 tax year, the taxpayers appealed to the Missoula County Tax Appeal Board on November 4, 1999 requesting a reduction in the land value to \$10,000 and a value of \$2,500 for the improvements, citing the following reason for appeal:

Excessive increase.

5. In its December 13, 1999 decision, the county board stated:

The appellants and the DOR agreed to a value of \$11,760 for the buildings. The land value cannot be addressed by county boards and requires direct appeal to the State Tax appeal Board. 77-1-208(1), MCA. 15-2-302 (1), MCA.

6. The taxpayers and the DOR reached an agreement on the improvement value.

7. Pursuant to Section 77-1-208, MCA, this Board accepted jurisdiction from the Missoula County Tax Appeal Board.

8. The remaining issue before this Board is that of the land value.

TAXPAYERS' CONTENTIONS

The taxpayers own a cabin at Lot 12 on the west shore of the Clearwater River below Seeley Lake. Lot 12 has been leased from the State of Montana by Ms. Hedahl's family since the early 1940's.

According to Ms. Hedahl, the taxpayers' requested land value of \$10,000 was obtained through the following reasoning: ". . . the lease rate since 1994 has been \$325.50, based upon an appraised value of \$9,300. So, we just took that figure and rounded it up to \$10,000 and used that as a fair amount of what we could afford to pay for our leased rate per year."

Last August, the taxpayers received a letter from the Department of Natural Resources in which it notified the taxpayers that the leased land had been appraised at \$27,274. The lease rate of 3.5 percent per year was applied to that value, resulting in an annual lease payment due of \$954.59.

Ms. Hedahl stated that the lease rate, since 1994, has been \$325.50, based upon an appraised value of \$9,300. This is a \$629.09 increase, or a tripling of the previous lease fee. Prior to that, "for many years" the annual lease fee was only \$35.00.

The taxpayers contested this increase through the AB26 form for property review with the Department of Revenue in Missoula County. The appraisal was not adjusted as a result of this review.

The taxpayers' reasons for contesting the subject appraisal are:

1. A tripling of the annual lease fee, which is a financial hardship.
2. The property is on the Clearwater River which is only ankle deep during most of the year. Therefore, there is no swimming or boating access to Seeley Lake itself.
3. Most of the subject 1.65 acres is in a five year (sic) flood plain.

The taxpayers presented photographs showing flooding in the area of the subject property.

Ms. Hedahl testified that they do not have private access to the property. They must enter through their neighbor's privately owned property. The subject lot is not served by water or sewer. No improvements have been made to the land in 60 years. The taxpayers acquired the property about one and a half years ago from Ms. Hedahl's mother.

The taxpayers contend that the subject leased lot should not be compared with deeded land for valuation purposes due to differences in ownership rights.

Taxpayers' Exhibit 1 is a DOR document showing the legal description and appraised values assigned in an area of Seeley Lake known as "Dogtown" (the subject area). Ms. Hedahl presented this document to demonstrate that most of the lots have received the same appraised value, yet are not all similar in terms of terrain, access, etc. She speculates that all of the lots were assigned an "average" value without regard to individual characteristics.

Taxpayers' Exhibit 2 is a copy of six listings for State lease land, three of which are located in the Seeley Lake area. These listing prices for these lots ranged from \$16,000 to \$79,000. Ms. Hedahl presented this exhibit to demonstrate the wide variety of listed prices on State lease land. The \$16,000 listing concerned bare land. The lessee was attempting to sell the right to lease the land for \$16,000.

The remainder of the listings concern improved land, some containing "very nice homes." Mr. Smrdel directed the Board's attention to a listing of a cabin on State lease land for \$39,900, with a "remodeled kitchen, living room with fireplace and efficient new oil heater, french doors leading

to a deck, a full bath room/utility room and bedroom. The upstairs attic has been used as two more bedrooms. Property includes a shed and is on community water." Mr. Smrdel speculates that the value of this property "probably on deeded property would be far in excess of that. It just gives a prime example of the actual value of leased property, which is much less than deeded land. Therefore, a comparison of leased property to deeded land is really hard to make and be rational about it because it, in fact, cannot be compared. You would obtain no equity in it." The lessee also receives no tax benefit from the lease, according to Mr. Smrdel.

Taxpayers' Exhibit 3 is a copy of a document they received from the Department of Natural Resources (DNRC) concerning cabin site lease fees. Ms. Hedahl directed the Board's attention to the comparison between an annual lease fee of \$875 associated with a site value of \$25,000 and the purchase price at 8 percent interest for 30 years, \$2,220.68. Ms. Hedahl argued that, because her family has leased this property for over 60 years, they would have paid for the property twice by now. Therefore, a comparison of an annual lease fee and an annual purchase amount is inappropriate "when you can't use it as an asset and you cannot make improvements that you can take with you."

Taxpayers' Exhibit 4 is a copy of an article from

the *Great Falls Tribune*, dated February 27, 2000, entitled: "Lake cabin owners get tax relief." Ms. Hedahl testified that she presented this exhibit to demonstrate the contrast between the tax benefits recently granted to water-fronting property owners and the situation faced by State land lessees. The tax break, enacted by the 1999 Legislature, affects about 6,000 water-fronting properties. In essence, this legislation provides that the assessed value of water-fronting land can be no more than 75 percent of the value of any home on the property. The tax break is essentially limited to anyone who has a modest cabin or home on land whose market value has increased dramatically in recent years. "Those of us just down the road at Seeley Lake, leasing land, our taxes have tripled and I think ours is less than a modest cabin since it has no amenities with it. . . I just wanted to present this article as an inequal determination of land values." (Susan Hedahl testimony, State Tax Appeal Board hearing, April 27, 2000.)

Taxpayers' Exhibit 7 is a copy of Section 15-7-131,

MCA:

Policy. It is the policy of the state of Montana to provide for equitable assessment of taxable property in the state and to provide for periodic revaluation of taxable property in a manner that is fair to all taxpayers.

DEPARTMENT OF REVENUE CONTENTIONS

DOR Exhibit A is a copy of an appraisal performed by Mr. Fairbanks for the DNRC, with pages specific to this appeal highlighted:

Introduction: In 1983, Montana law required that cabin site licenses and fees be determined at 5% of the current market value of the property. . . in 1989, 77-1-208, MCA, was amended requiring the Department of Revenue (DOR) to appraise the cabin sites in the course of reappraising property subject to taxation. This change made available the property appeal processes necessary to resolve valuation disputes. Additionally, the fee was changed to 3.5% of value (70% of the original 5% to address leasehold value.) In the summer of 1989, county appraisal offices (DOR) supplied DNRC with values for cabin sites consistent with ad valorem tax values based on 1982 market sales. In 1993, DOR supplied state lease values were based on January 1992 market indications. For 1998, DNRC is provided values based upon current market influences consistent with a recently completed statewide reappraisal. While ad valorem tax appraisals affected by Senate Bill 195 were "phased-in," DNRC state lease values were affected in pertinent part by 77-1-208, MCA: *"The value may be increased or decreased as a result of the statewide periodic revaluation of property pursuant to 15-7-111 without any adjustment as a result of phasing in values. Market sales of lake properties increasing dramatically in the past few years have consequently influenced cabin site values for current renewals. . . ."*

Purpose of appraisal: The purpose of the appraisal is to estimate the current market value of the subject DNRC cabin site lease as of January 1, 1996. DOR procedures for the valuation of DNRC leases provide in pertinent part that the annual fee for the DNRC cabin site leases is based on the full market value as determined by the DOR (77-1-208, MCA). The valuation of tract land and other parcels in the area where the lease is located should serve as the basis for valuation of the cabin site acreage. To this end, the property rights appraised are herein considered in fee simple interest, assuming no indebtedness or incumbrances against the property.
. . .

General description of the concept: The Computer Assisted

Land Pricing (CALP) system is based on the principle that it is possible to arrive at a reasonable and satisfactory estimate of land value through the application of various incremental adjustments and influence factors to a BASE PRICE paid for a unit of land. The unit of land may be a standard lot size in front feet, or in acres. Once the BASE SIZE and BASE VALUE is determined, the PRIMARY and RESIDUAL VALUES are assigned. Parcels that are smaller or larger than the BASE are adjusted from the BASE VALUE by the residual . .

Dog Town: Located in the NW1/4 of Section 16, T16N, R15W, the so-called DOG TOWN residential development is located at the intersection of the Clearwater River and Riverview Drive near the town of Seeley Lake. These cabin sites are developed with modest homes providing year-round use. Sixty-five lots exist in the development. Lots 1 through 22, and 33 through 37 enjoy access to the Clearwater River below the Riverview Drive Bridge, offering no boat access to Seeley Lake.

Area sales of parcels with river exposure provide valuation at \$30,000 for the first (primary) acre, and \$800 for additional acres. Adjustments to the base valuation are made for lots developed with less than useful access to the river. Interior lots are subject to CALP pricing schedules also developed from market sales at \$18,300 for the 1 acre BASE SIZE, and for parcels smaller or larger than one acre, \$2200 per acre adjustments are made.

EXAMPLE

River backing 1.38 acre Lot 22,		
\$30,000 + \$304 (.38 Ac @ \$800) X 90% grade/access factor	=	\$27,274
Interior 1.38 acre Lot 23,		
\$18,300 + \$836 (.38 Ac @ \$2200)	=	\$19,136
Interior .91 acre Lot 45,		
\$18,300 - \$198 (.09 Ac @ \$2200)	=	\$18,102

Mr. Fairbanks noted that the subject lot has been granted a ten percent reduction in recognition of diminished river access due to the location of the improvements in relation to the river. (The improvements are located to the rear of the lot). Mr. Fairbanks had asked each of his

appraisers to walk each of these lots and to make notes concerning topography. Adjustments were then made to the appraised value of each of the lots in recognition of individual topographical characteristics and river access.

BOARD DISCUSSION

The taxpayers emphasized that there should be differences in market value between private lots and state lease lots due to such factors as the rules and regulations that must be followed by persons living on leased lots and the 100 foot setbacks on leased lots that can be used by the public. They believe that the State should not appraise these lots in the same manner. In attempting to address this issue, the Board studied the history of the legislation that regulates fees for state cabin site leases, as enacted in 1983 and amended in 1989 and 1993. §77-1-208, MCA states that "The board (of land commissioners) shall set the annual fee based on **full market value** (*emphasis added*) for each cabin site and for each licensee or lessee who at any time wishes to continue or assign the license or lease. The fee must attain **full market value** (*emphasis added*) based on appraisal of the cabin site value as determined by the department of revenue..." The original legislation, which was enacted by the 1983 legislature as House Bill 391 (Chapter 459), reads, in pertinent part:

AN ACT TO REQUIRE THAT IF THE BOARD OF LAND COMMISSIONERS ADOPTS RULES TO ESTABLISH THE MARKET VALUE OF CABIN SITE LICENSES AND LEASES, IT ADOPT A METHOD OF VALUATION OF CURRENT CABIN SITE LICENSES AND LEASES BASED UPON AN APPRAISED LICENSE OR LEASE VALUE AND A METHOD OF VALUATION OF INITIAL CABIN SITE LICENSES OR LEASES BASED UPON A SYSTEM OF COMPETITIVE BIDDING; AND PROVIDING FOR THE VALUATION, DISPOSAL, OR PURCHASE OF FIXTURES AND IMPROVEMENTS.

WHEREAS, on February 13, 1981, the Board of Land Commissioners proposed to adopt rules concerning surface licenses and leases for the use of state forest lands for recreational cabin sites by private individuals, which rules would have established the market value of recreational cabin site licenses and leases by a system of competitive bidding; and

WHEREAS, the rules would have allowed out-of-state interests and other parties to increase by competitive bidding the cost of current cabin site licenses and leases and would thereby have worked a hardship on or dispossessed current licensees and lessees and were therefore subsequently withdrawn by the Board; and

WHEREAS, the policy of this state for the leasing of state lands as provided in 77-1-202 is that the guiding principle in the leasing of state lands is "that these lands and funds are held in trust for the support of education and for the attainment of other worthy objects helpful to the well-being of the people of this state"; and

WHEREAS, allowing current cabin site licensees and lessees to continue to enjoy the benefits of existing licenses and leases and the benefits of their labor is a worthy object helpful to the well-being of the people of this state in that it promotes continuity in the case of state lands, promotes use of state lands by the public by granting a minimal expectation of continuing enjoyment, and promotes satisfaction with governmental processes.

THEREFORE, it is the intent of this bill to direct that if the Board of Land Commissioners adopts any rules under whatever existing rulemaking authority it may have to establish the market value of current cabin site licenses or leases, that the Board, in furtherance of the state policy expressed in 77-1-202, adopt a method of establishing the market values of cabin site licenses and leases which would not cause undue disruption to the lives and property of and useful enjoyment by current licensees and lessees.

BE IT ENACTED BY THE LEGISLATURE OF THE STATE OF MONTANA:

Section 1. **Method of establishing market value for licenses and leases.** (1) If the board adopts, under any existing authority it may have on October 1, 1983, a method of establishing the market value of cabin site licenses or leases differing from the method used by the board on that date, the board shall under that authority establish a method for setting the market value of:

(a) each cabin site license or lease in effect on October 1, 1983, for each licensee or lessee who at any time wishes to continue or assign his license or lease, which method must be **5% of the appraisal of the license or lease value of the property** (*emphasis added*), which value may be increased or decreased every fifth year

by 5% of the change in the appraised value..."

In a hearing before this Board concerning a state lease lot in Flathead County, (**Marilyn A. Harmon and Daniel E. Harmon v. Department of Revenue, PT-1999-19**), held on April 26, 2000 in Kalispell, Mr. Miller testified that, following the passage of the above legislation, statewide meetings were held with lessees, who expressed their concerns with the 5% fee. This resulted in the reduction to 3.5% (or 70% of the 5%), as implemented by Senate Bill 226 (Chapter 705), passed by the 1989 legislature. As introduced, Senate Bill 226 proposed a reduction of the 5% fee to "1.5% of the appraisal of the cabin site value as determined by the county appraiser." The fiscal note for the bill stated: "The significant difference between the current process and this proposed law is the percentage used to derive the rental. Current law provides that the rental will be **5% of the lease value (3.5% of appraised value)**. The proposed legislation sets the rental at **1.5% of appraised value.**" (*Emphasis added*) During the February 1, 1989 hearing on Senate Bill 226 before the Senate Committee on Natural Resources, the following exhibit was presented by the bill's sponsor, Senator Matt Himsl:

RENTAL RETURNS ON CABIN SITES ON STATE LANDS

The Forestry Division - Department of State Lands is charged with the responsibility of administering the cabin sites...

According to the Forestry Division, 633 cabin sites have been identified on state lands. Almost all of these sites are in areas west of the Continental Divide... All of the identified state land cabin sites were under lease under the old law.

The 1983 Legislature passed HB 391 which instructed the Board of Land Commissioners to change the method of valuing cabin site licenses and leases after October 1, 1983, to:

(a) each cabin site license or lease in effect on October 1, 1983, for each licensee or lessee who at any times wishes to continue or assign his license or lease, which method must be **5% of the appraisal of the license or lease value of the property...** (*Emphasis added*)

The problem surfaced when the department began to implement the 1983 law in 1987 and began issuing notices that the rental fees would be **5% of the appraised value of the land, interpreting lease value to be market value.** (*Emphasis added*) That judgment shot the leases which had been \$150 a year up to \$2,300 a year, in some cases. A storm of protests from the lessees got the department to reconsider and **the Board determined that the "lease value" would be 70% of the appraised market value, then applied the 5%.** (*Emphasis added*) The method still drove the leases sky high and brought into play the appraisal values which the lessees protested. The department appraisers then re-visited the sites and began making adjustments, some of the reappraisals dropped as much as \$10,000. There seems to have been no standard judgment. As an example a lease, which about five years ago was \$50, went up to \$150 and then went up to \$2,300, then dropped \$910 a year. This explains why people are upset.

Senate Bill 226 would be a simple and uniform procedure: The County appraiser, who already goes on the property to appraise the improvements, would appraise the land, just as he does the neighbor. **Since the lessee does not have the rights of the fee-simple landowner, and since the state reserves a "public corridor" on the beach, the lessee does not have a private beach and adjustments in value would be made accordingly.** (*Emphasis added*)

Then if the rental fee would be 1.5% of the appraised value, the lessee would be paying about the same as his neighbor pays in taxes to support the government. However, in this case of state lands, it would go to the state elementary and secondary school funds.

If the lessee didn't like the appraisal value, he would have the same appeal structure as any other landowner and the system would be uniform."

Senator Himsl testified that "the 1.5% figure is arbitrary but the State will find that the total tax runs between 1.4 and 1.8 of the market value." During the committee's executive action on the bill, 1.5% was amended to

2%. As amended, the bill was transmitted to the House and was heard by the House Taxation Committee on March 31, 1989. During the hearing an amendment was proposed to return the fee to the original 5%, but the amendment failed. The committee passed the bill with the 2% rate to the House floor for action, where it was amended to 3.5% and passed. The joint House/Senate conference committee considering the bill's amendments allowed the 3.5% to remain, and the final bill was passed with that percentage. The joint conference committee also added a provision to the bill for a minimum fee, so the final language of the relevant section reads as follows: §77-1-208, MCA, 1 (a)...The fee must be **3.5%** of the appraisal of the cabin site value as determined by the department of revenue **or \$150, whichever is greater...**" (*Emphasis added*)

Senate Bill 424 (Chapter 586), passed by the 1993 legislature, amended §77-1-208 to eliminate the 3.5% annual fee, substituting the language that is presently in statute: "(1) The board shall set the annual fee **based on full market value** for each cabin site... The fee must **attain full market value** based on appraisal of the cabin site value as determined by the department of revenue." (*Emphasis added*) An attempt was made in the Senate Taxation Committee to restore the language to 3.5%, but the amendment was defeated. The statute has not

been further amended since 1993.

The applicable Administrative Rules of Montana state:
36.25.110 MINIMUM RENTAL RATES (6)(a) Effective March 1, 1996, and except as provided in (b), the minimum rental rate for a cabinsite lease or license is **the greater of 3.5% of the appraised market value of the land**, excluding improvements, as determined by the department of revenue pursuant to 15-1-208, MCA, **or \$250.** (*emphasis added*) (b) For cabinsite leases or licenses issued prior to July 1, 1993, the minimum rental rate in (a) is effective on the later of the following dates: (i) the first date after July 1, 1993, that the lease is subjected to readjustment pursuant to the terms of the lease, or the first date after July 1, 1993, of lease renewal, whichever date is earlier; or (ii) March 1, 1996. (c) Until the minimum rate in (a) becomes applicable, the minimum rate is the greater of 3.5% of the appraised market value of the land, excluding improvements, as determined by the department of revenue pursuant to 15-1-208, MCA, or \$150.

The Board agrees that the taxpayers have a valid concern about potential buyers of leased properties worrying about future increases in lease fees. The Montrust Supreme Court decision (**Montanans for the Responsible Use of the School Trust v. State of Montana, ex rel. Board of Land Commissioners**

and Department of Natural Resources and Conservation, 1999

Mont. 263; 989 P.2d 800), referred to in Mr. Miller's testimony, was filed by a citizens' action group, *Montanans for the Responsible Use of the School Trust*, against the Montana Board of Land Commissioners and the Department of Natural Resources and Conservation, challenging fourteen school trust lands statutes, including §77-1-208, MCA, relating to cabin site leases. The decision, in pertinent part, states: "¶26 The District Court (of the First Judicial District) ruled that §77-1-208, MCA did not violate the trust because it requires that full market value be obtained. However, the District Court found that the Department had a policy of charging a rental rate of 3.5% of appraised value (hereafter, the rental policy) and that Montrust had introduced an economic analysis of cabin site rentals showing that the rental policy's 3.5% rate was 'significantly below a fair market rental rate.' The District Court concluded that the rental policy violated the trust's constitutional requirement that full market value be obtained for school trust lands... ¶31...we conclude that the rental policy violates the trust... In the present case, the trust mandates that the State obtain full market value for cabin site rentals. Furthermore, the State does not dispute the District Court's determination that the rental policy results in below

market rate rentals. We hold that the rental policy violates the trust's requirement that full market value be obtained for school trust lands and interests therein."

Future large increases in lease fees as a result of the Montrust suit may have results that are unfavorable to present leaseholders, including fewer potential buyers for their properties, and declining values of their improvements. Two previous Board decisions relevant to these concerns are *DOR v. Louis Crohn, PT-1997-158*, and *DOR v. Burdette Barnes, Jr., PT-1997-159*. In both instances, the Board stated that "the improvements that are located on this lot are not a part of the appeal before the Board. It is arguable that the **value of the improvements has been impacted by the increasing lease fee to a point where they are not attractive on the market.** The testimony of other lessees in other appeals that have in fact been attempting to sell the improvements and have not received a great amount of interest from potential purchasers, might be indicative of the fact that **potential buyers are aware of the amount of the annual fee and believe they must be compensated by a lower purchase price for the improvements.**"
(Emphasis added)

However, this Board concludes that the DOR has satisfactorily carried out its statutory mandate to determine

full market value under Section 77-1-208(1), MCA.

CONCLUSIONS OF LAW

1. The State Tax Appeal Board has jurisdiction over this matter. **Section 15-2-302, MCA and Section 77-1-208, MCA.**

2. **Section 15-8-111, MCA. Assessment - market value standard - exceptions.** (1) All taxable property must be assessed at 100% of its market value except as otherwise provided.

3. **Section 77-1-208, MCA. Cabin site licenses and leases - method of establishing value.** (1) The board shall set the annual fee based on full market value for each cabin site and for each licensee or lessee who at any time wishes to continue or assign the license or lease. The fee must attain full market value based on appraisal of the cabin site value as determined by the department of revenue. . . The value may be increased or decreased as a result of the statewide periodic revaluation of property pursuant to 15-7-111 without any adjustments as a result of phasing in of values. An appeal of a cabin site value determined by the department of revenue must be conducted pursuant to Title 15, Chapter 2.

4. It is true, as a general rule, that the appraisal of the Department of Revenue is presumed to be correct and that the taxpayer must overcome this presumption.

ORDER

IT IS THEREFORE ORDERED by the State Tax Appeal Board of the State of Montana that the subject land shall be entered on the tax rolls of Missoula County by the Assessor of that county at the 1999 tax year value of \$27,274, as determined by the Department of Revenue and affirmed by this Board.

Dated this 16th day of May, 2000.

BY ORDER OF THE
STATE TAX APPEAL BOARD

GREGORY A. THORNQUIST, Chairman

(S E A L)

JAN BROWN, Member

JEREANN NELSON, Member

NOTICE: You are entitled to judicial review of this Order in accordance with Section 15-2-303(2), MCA. Judicial review may be obtained by filing a petition in district court within 60 days following the service of this Order.

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on this 16th day of May, 2000, the foregoing Order of the Board was served on the parties hereto by depositing a copy thereof in the U.S. Mails, postage prepaid, addressed to the parties as follows:

Susan A. Hedahl and Danny O. Smrdel
3013 9th Street NE
Great Falls, Montana 59404

Office of Legal Affairs
Department of Revenue
Mitchell Building
Helena, Montana 59620

Attn: James Fairbanks
Missoula County Appraisal Office
Missoula County Courthouse
200 West Broadway
Missoula, Montana 59802

DONNA EUBANK
Paralegal