

BEFORE THE MONTANA TAX APPEAL BOARD

FILED

MAY 22 2018

Montana Tax Appeal Board

CASE No: PT-2017-22

DWIGHT & BEVERLY AXELSEN,

Appellants,

v.

**STATE OF MONTANA,
DEPARTMENT OF REVENUE,**

Respondent.

**FINDINGS OF FACT,
CONCLUSIONS OF LAW, ORDER,
AND OPPORTUNITY FOR JUDICIAL
REVIEW**

Before the Montana Tax Appeal Board is Appellant Dwight & Beverly Axelsen's (Axelsens) appeal from the Cascade County Tax Appeal Board (CCTAB) decision denying their appeal.

For the reasons provided below, the Axelsens' appeal is granted as to land value, but denied as to the value of their improvements.

ISSUES TO BE DECIDED

1. Whether the DOR determined the correct market value of the Axelsens' land and improvements.

FINDINGS OF FACT

2. The land involved in this appeal is described as follows:

Eaton Suburban Addition, S20, T20 N, R04 E,
BLOCK 002, Lot 012, geocode 02-3016-20-4-02-05-
0000.

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3. The property is located in Gibson Flats, a floodplain. CCTAB Hrg. Transcr. 7:18 – 8:2; DOR Ex. F. Gibson Flats, as described by Ms. Axelsen, has a mixture of trailer homes, older homes, and modular homes, making it much different than subdivisions like Foothills Ranch or Homestake Ranch which consist of newer, higher end homes on higher elevation lots. MTAB Hrg. 30:00 – 30:58.
4. The Axelsens' land is 5 acres and being in the floodplain, has a history of flooding. Taxpayer Ex. 12; MTAB Hrg. 7:20 – 7:26.
5. A certification of elevation dated January 10, 1998 lists the elevation at the back door of the Axelsens' home at 3347.11 feet. Taxpayer Ex. 1. The 100-year Flood Plain Elevation is 3350.9 feet. *Id.*
6. On the Axelsens' land is a 2-bedroom, 1 bath home with a small porch and a detached garage. DOR Ex. D.
7. The Axelsens have lived in this home for 40 years. CTAB Hrg. Transcr. 3:8 – 9.
8. In the 2015/2016 tax cycle, the DOR found the Axelsens' land had a value of \$31,300 and their improvements had a value of \$40,120 for a total value of \$71,420. DOR. Ex. D.
9. On July 3, 2017, the Axelsens received their assessment notice for their property. The DOR found the Axelsens' land had a value of \$38,900 and the improvements had a value of \$42,430, for a total value of \$81,330. DOR Ex. D; MTAB Hrg. 1:12:30 – 1:12:57.

AB-26 Review

10. On July 5, 2017, the Axelsens requested an informal review of their assessment.

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11. The DOR issued its final determination on July 17, 2017 and denied the Axelsens' request for a reduction. In the determination letter, the DOR stated:

The CDU rating in place last reappraisal cycle addressing the location in the flood plain, condition of the home and lack of updates to the home is still in place for the current reappraisal cycle. This property is assessed with a poor CDU rating (condition, desirability, and utility). A poor CDU rating indicates the dwelling is in poor condition and has poor utility, the desirability of the property is poor, and the location is poor to address any deficiency the parcel may have due to being located in the flood plain. DOR Ex. C.

CCTAB hearing – appeal and outcome

12. On July 25, 2017, the Axelsens appealed to the CCTAB. The Axelsens claimed their land had a value of \$15,650 and the improvements on the land have a value of \$35,000, for a total value of \$50,650. CCTAB Hrg. Transcr. 2:15 – 2:17.
13. The CCTAB heard the Axelsens' appeal on October 12, 2017.
14. After hearing the evidence, the CCTAB denied the Axelsens' appeal and affirmed the DOR's value of the Axelsens' land and improvements.

MTAB hearing

15. The Axelsens' appealed to this Board on November 7, 2017.
16. The Axelsens requested this Board value their land at \$15,650. The Axelsens also request this Board find their improvements have a value of either \$35,000 or the DOR's value of \$42,430 be reduced for obsolescence by 20 percent for a value of \$33,944. MTAB Hrg. 2:30 – 2:49.

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17. Beverly Axelsen represented the Axelsens. She was the only witness to testify in the Axelsens' appeal.
18. This Board admitted the following exhibits submitted by Mrs. Axelsen:
 - a. Taxpayer Ex. 1: Certificate of Elevation of the Axelsens' property;
 - b. Taxpayer Ex. 2: Google satellite map;
 - c. Taxpayer Ex. 2ii: Floodway map;
 - d. Taxpayer Ex. 3: Floodplain administrator document (July 22, 1986);
 - e. Taxpayer Ex. 4: Cascade County Planning Board (September 19, 1997);
 - f. Taxpayer Ex. 5: Cascade County Planning Board (June 11, 2003);
 - g. Taxpayer Ex. 6: Information about 5 Acre lot at 81 Highland Road;
 - h. Taxpayer Ex. 7: Assessment notice for Axelsens' property;
 - i. Taxpayer Ex. 8: Photographs of the Axelsens' home from the 1980s;
 - j. Taxpayer Ex. 8ii: 27 photographs of the Axelsens' home;
 - k. Taxpayer Ex. 9: Montana Tax Appeal Board correspondence with Beverly Axelsen (May 4, 1988);
 - l. Taxpayer Ex. 10: 1993 and 1996 tax statements showing the Axelsens paid for the Rural Improvement District;
 - m. Taxpayer Ex. 11: Cascade County Floodplain Regulations (effective March 19, 2013);
 - n. Taxpayer Ex. 12: Great Falls Tribune article on flooding in the Gibson Flats (dated April 27, 1969);
 - o. Taxpayer Ex. 13: Documents related to the Rural Improvement District by the Board of County Commissioners of Cascade County (June 18, 1984);

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- p. Taxpayer Ex. 14: Bid to add insulation to the Axelsens' home (January 17, 2018);
- q. Taxpayer Ex. 15: Bid to replace windows in the Axelsens' home (January 16, 2018);
- r. Taxpayer Ex. 16: Bid to stabilize and repair basement walls in the Axelsens' home (February 8, 2018);
- s. Taxpayer Ex. 17: Acknowledgment signed by Suzi Dickman as to the condition of the Axelsens' home (January 29, 2018);
- t. Taxpayer Ex. 18: Realtor and Tyler Technologies information on properties listed in the DOR's land model;
- u. Taxpayer Ex. 19: Correspondence between the Axelsens and Susan Conell of the Cascade County Planning Division about requirements to build on the Axelsens' land (February 20, 2018);
- v. Taxpayer Ex. 20: Photographs at 76 Eaton Avenue property being built;
- w. Taxpayer Ex. 21: Home at 1315 13th Avenue with a value of \$76,818;
- x. Taxpayer Ex. 22: Photographs of hard water stains found in the Axelsens' home;
- y. Taxpayer Ex. 23: Realtor.com information on property at 28 Eaton Avenue;
- z. Taxpayer Ex. 24: Appellants' responses to DOR's discovery requests;
- aa. Taxpayer Ex. 25: DOR's responses to the Axelsens' discovery requests;
- bb. Taxpayer Ex. 26: Map showing elevation in the area as to her home and others; and
- cc. Taxpayer Ex. 27: Axelsens handwritten notes on a copy of DOR's Ex. E.

19. At the hearing, the DOR was represented by Nicholas Gochis. The following witness testified on behalf of the DOR:

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- a. Joan Vining, DOR Property Assessment Division area manager; and
 - b. Kathryn Kakalecik, DOR Property Assessment Division appraiser.
20. This Board admitted the following exhibits submitted by the DOR:
- a. DOR Ex. A: Classification and Appraisal Notice dated July 3, 2017;
 - b. DOR Ex. B: AB-26 Form;
 - c. DOR Ex. C: AB-26 Determination Letter;
 - d. DOR Ex. D: 2017 Property Record Card;
 - e. DOR Ex. E: Land model sales information;
 - f. DOR Ex. F: FEMA Map;
 - g. DOR Ex. G: Aerial photograph which includes a handwritten list; and
 - h. DOR Ex. H: Property Assessment Division Procedure No. 2-3-001.1.

The value of the Axelsens' land

21. Ms. Axelsen presented evidence of historical flooding in the Gibson Flats. Taxpayer Ex. 12 – 13. According to Ms. Axelsen, living in a floodplain requires drainage, dikes, and ditches to deal with the excess water. MTAB Hrg. 11:28 – 11:45; Taxpayer Ex. 11.
22. Ms. Axelsen also showed residential construction in the Gibson Flats floodplain must be two feet above the Base Flood Elevation (BFE); approximately six feet from the ground. Taxpayer Ex. 20. Those proposing to build in the floodplain need an engineer to certify the construction will be two feet above the BFE. Taxpayer Ex. 19. Also, “the project must have 15 feet of additional fill all around the building at 2 feet above BFE as well as a compaction test certified by a licensed engineer.” *Id.* There are also increased insurance costs associated with building in the flood plain. *Id.*

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23. Ms. Axelsen prepared Taxpayer Ex. 27 which showed the DOR's computer assisted land pricing (CALP) model relied on properties in non-floodplain subdivisions like Foothills Ranch. MTAB Hrg. 25:48 – 27:13; 1:50:08 – 1:54:11; 2:11:00 – 2:11:50.
24. Foothills Ranch features \$270,000 to \$400,000 homes. MTAB Hrg. 25:48 – 27:13; 1:50:08 – 1:54:11; Taxpayer Ex. 27. A 2.120-acre lot in the Foothills Ranch sold for approximately \$30,000. *Id.*; *see also* Taxpayer Ex. 6 and 18.
25. Ms. Axelsen testified the DOR's land sales model used land sales from Homestake Ranch and they did not appear to have either the water or elevation issues that her property had. MTAB Hrg. 2:11:50 – 2:12:16.
26. Three five acre properties used in the DOR's land model had a higher elevation than the Axelson's land, according to Ms. Axelsen, and had values between \$26,000 to \$28,000. MTAB Hrg. 25:48 – 27:13; 1:50:08 – 1:54:11; Taxpayer Ex. 27.
27. The DOR's land model also included the following nonfloodplain land values:
 - a. A 15 acre property with a value of \$50,000. DOR Ex. E.
 - b. An 18 acre property with a value of \$75,000. DOR Ex. E.
28. Joan Vining, DOR area manager and IAAO certified appraiser, admitted the DOR's land sales model – referred to as the Area 9 model – included land values from Foothills Ranch. MTAB Hrg. 2:05:10 – 2:08:13. According to Ms. Vining, those land values should have been removed from the Area 9 model used to value the Axelsens' land. *Id.*

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The value of the Axelsens' improvements

29. Mrs. Axelsen then addressed the various problems with her home which she argued required a reduction of the DOR's assessed value.
30. The basement has pumps to remove water from the basement because the basement regularly floods. MTAB Hearing 1:06:22 – 1:07:04.
31. Ms. Axelsen testified to the following problems with her home:
 - a. The home has old pulley style windows. MTAB Hrg. 12:11 – 13:08; Taxpayer Ex. 8, 8ii, and 22.
 - b. The ceiling has water stains. MTAB Hrg. 19:02 – 19:18; Taxpayer Ex. 8, 8ii, and 22.
 - c. The foundation has water damage. MTAB Hrg. 19:02 – 19:18; Taxpayer Ex. 8, 8ii, and 22.
 - d. The home relies on a shallow well with natural gas pockets. Therefore, the Axelsens cook with and drink bottled water. MTAB Hrg. 19:53 – 20:30.
 - e. Due to water damage and age, the floors are described by Ms. Axelsen as washboard floors. MTAB Hrg. 19:02 – 19:18.
 - f. The basement is partially earth and has an 80-gallon barrel sunk into the floor. Two sump pumps rest on the barrel to pump out water when the basement floods. MTAB Hrg. 12:11 – 13:08; Taxpayer Ex. 8, 8ii, and 22.
 - g. The doors are warped due to water damage. MTAB Hrg. 12:11 – 13:08; Taxpayer Ex. 8, 8ii, and 22.
 - h. The strong odor of diesel permeates the home. MTAB Hrg. 7:52 – 7:59; 22:02 – 22:15.
32. Ms. Axelsen presented evidence of what it would cost to make certain improvements to her home:
 - a. A bid from Klinefelter's Insulation to insulate the exterior walls of the Axelsens' home at a total cost of \$2,385.00. Taxpayer Ex. 14.
 - b. A bid from Chinook Windows to replace all of the single pane windows in the home with energy

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efficient windows for a total cost of more than \$10,000. Taxpayer Ex. 15.

- c. A bid from Gittins Foundation Specialists to replace the concrete slab in the basement and to address the water issues in the basement for a total cost of \$23,500. Taxpayer Ex. 16. MTAB Hrg. 32:10 – 32:46.

33. Ms. Kakalecik has worked for the DOR for six years. MTAB Hrg. 1:08:28 – 1:08:34. She is a certified residential and agricultural appraiser. MTAB Hrg. 1:09:04 – 1:09:31. She was not the appraiser who valued the Axelsens' land and improvements for the 2017/2018 tax cycle. MTAB Hrg. 1:10:01 – 1:10:19. However, she did review the appraisal in preparation of this hearing and agreed with the appraisal completed by the prior appraiser. MTAB Hrg. 1:10:20 – 1:10:30.
34. Ms. Kakalecik stated the DOR used the cost approach rather than the comparable sales approach to value the Axelsens' home and improvements because the home and improvements were unique due to its location and its lack of updating. MTAB Hrg. 1:18:03 – 1:18:47; DOR Ex. H.
35. The cost approach starts with a replacement cost new for the improvements. MTAB Hrg. 1:22:33 - 1:59:00. The replacement cost new value is then adjusted to account for cost of materials where the improvements sit as well as the condition, utility, and desirability (CDU) of those improvements. *Id.* Ms. Kakalecik explained with the cost approach the DOR factored in the condition of the Axelsen's improvements. *Id.*
36. Ms. Kakalecik testified the DOR took several steps to account for the poor condition of the Axelsens' improvements. *Id.*

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37. The DOR, prior to completing the cost approach, also adjusted the square footage of the Axelsens' home given its use and condition. The Axelsens' basement is 1,107 square feet. DOR Ex. D; MTAB Hrg. 1:21:47 – 1:22:09. However, the basement has two pumps. When the basement floods, it is mostly unusable. The DOR, therefore, valued the basement as being only 378 square feet. *Id.*
38. For the CDU of the home and garage, the DOR listed both as "poor" and thus only 38 percent good; i.e. depreciated by 62 percent. DOR Ex. D.; MTAB Hrg. 1:25:28 – 1:26:23. Ms. Kakalecik testified a CDU of "very poor" would be an unlivable home. *Id.* Because the Axelsen's home was still livable, Ms. Kakalecik testified "poor" was the lowest CDU the DOR could assign. *Id.*; MTAB Hrg. 1:49:30 – 1:51:24.
39. To whatever extent the following conclusions of law may be construed as findings of fact, they are incorporated accordingly.

CONCLUSIONS OF LAW

40. To whatever extent the foregoing findings of fact may be construed as conclusions of law, they are incorporated accordingly.
41. The Axelsens timely appealed the CCTAB's decision to this Board. Therefore, this Board has jurisdiction to hear and decide this matter. *See* Mont. Code Ann. § 15-2-301(1)(b).
42. "In connection with any appeal under [Mont. Code Ann. § 15-2-301], the state board is not bound by common law and statutory rules of evidence or rules of discovery and may affirm, reverse, or modify any decision. To the extent that this section is in conflict with the Montana

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Administrative Procedure Act, this section supersedes that act.” Mont. Code Ann. § 15-2-301(5).

Burden of Proof

43. “As a general rule, . . . the appraisal of the DOR is presumed to be correct and the taxpayer must overcome this presumption. The Department of Revenue should, on the other hand, bear a burden of providing documented evidence to support its assessed values.”
Workman v. The Department of Revenue of the State of Montana, 1997 WL 37203, *1 (Mont.Tax.App.Bd.), *citing Western Airlines, Inc. v. Catherine J. Michunovich, et al*, 149 Mont. 347, 428 P.2d 3, (1967).
44. The appraised value supported by the most defensible valuation information serves as the value for ad valorem tax purposes. Mont. Admin. Reg. 42.18.134, formerly Mont. Admin. Reg. 42.18.110(12); *Rainbow Senior Living of Great Falls v. Montana Department of Revenue*, 2013 WL 6062167 (Mont.Tax.App.Bd.); *Keck v. Montana Department of Revenue*, 2013 WL 2476838 (Mont.Tax.App.Bd.).
45. The taxpayer has the burden to show the DOR’s appraisal should be reduced. Mont. Code Ann. § 26-1-401; *Baitis v. Department of Revenue of the State of Montana*, 2004 MT 17, ¶28, 319 Mont. 292, 302, 83 P.3d 1278, 1284.

Market Value

46. “All taxable property must be assessed at 100 percent of its market value except as otherwise provided.” MCA § 15-8-111(1).

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47. “Market value is the value at which property would change hands between a willing buyer and a willing seller, neither being under any compulsion to buy or to sell and both having reasonable knowledge of relevant facts.” MCA § 15-8-111(2)(a).
48. This Board, upon hearing a tax appeal, may increase or decrease a property value to ensure the property is “assessed at 100 percent of its market value.” *See Puget Sound Energy Inc. v. State Dept. of Revenue*, 2011 MT 141, 255 P.3d 171; and *O’Neill v. Department of Revenue*, 2002 MT 130, 49 P.3d 43.
49. Under Montana law, the DOR can use a combination of approaches – i.e. the market data approach, the income approach, and the cost approach – to value a property. *Albright v. State*, 281 Mont. 196, 208 - 209 (Mont. 1997). The DOR does not have to use only one approach when it “appraises property and estimates market value.” *Id.* at 208.
50. The Montana Supreme Court in *Albright* concluded:

We recognize that the Department’s method of assessing property and estimating market values is by no means perfect, and will occasionally miss the mark when it comes to the Constitution’s goal of equalizing property valuation. However, perfection in this field is, for all practical purposes, unattainable due to the logical and historical preference for a market-based method, and the occasional lack of market data. Nonetheless, we conclude that the Department’s interdisciplinary method – which utilizes the market data approach, the income approach, the cost approach, or some combination of those approaches – is a reasonable attempt to equalize appraisal of real property throughout the State and that it comports with the most modern and accurate appraisal practices available. *Id.* at 213.

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51. First, the DOR did not provide sufficient evidence supporting its value of the Axelsens' land. The DOR admitted at the hearing that its land sales model included sales which should not have been included in determining the value of the Axelsens' land. This means, the DOR's CALP is inaccurate as to the base rate and residual rate listed.
52. Ms. Axelsen requested this Board value her land at \$15,500. Her evidence showed the flaws in the DOR's land sales model and thus overvalued her property. However, she provided no evidence showing her land had a market value of \$15,500.
53. Therefore, this Board must determine the market value of the Axelsens' land.
54. The DOR's land sales model includes three 5-acre lots with values from \$26,000 to \$28,000. None of these lots were located in Gibson Flats and based on the testimony none had the water or elevation problems associated with the Axelsens' property. Ms. Axelsen presented evidence of the significant building costs associated with building in the floodplain: including a report from a certified engineer and 15 feet of additional fill to address the construction being two feet above the BFE.
55. This means the Axelsens' land has a value less than the DOR's value and certainly less than a 5 acre, nonfloodplain lot. However, the issue is how much less value?
56. This Board does not know the specifics of the three 5 acre land sales. This Board notes the 18 acre lot and 15 acre nonfloodplain lots also used in the DOR's CALP have an average value of \$19,000 per acre; though this Board acknowledges it cannot rely solely on a per acre value given base acre rates and residual rates.

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57. Considering these five lot values and in particular accounting for the location of the Axelsens' land, this Board finds \$20,000 best represents the market value of the Axelsens' land and best approximates what a willing buyer and willing seller would consider if the Axelsens' property exchanged hands given its floodplain location.
58. Second, the DOR presented sufficient evidence supporting its value of the Axelsens' improvements. The DOR completed a cost approach which considered the condition of the Axelsens' improvements. The DOR valued only 378 square feet of the Axelsens' basement to account for the basement's poor condition and limited utility. The DOR then found the improvements had a CDU of "poor" and the improvements were only 38 percent good. The DOR presented sufficient evidence showing it properly used the cost approach in finding the Axelsens' improvements had a value of \$42,130.
59. The Axelsens also failed to meet their burden to disprove the DOR's value. The Axelsens presented evidence of their home's condition. However, this Board does not believe the evidence presented supports reducing the CDU of the Axelsens' improvements to "very poor." A "very poor" CDU is reserved for an unlivable home. The Axelsens still live in their home and while there is water damage, the home appears to still be livable. This Board, therefore, does not find the Axelsens' improvements need to be adjusted to provide for more than 62 percent depreciation.

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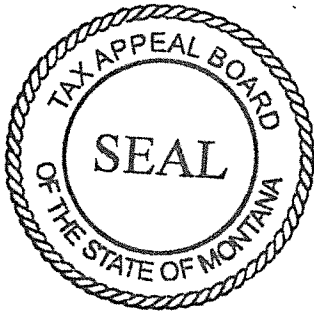
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ORDER

1. The Axelsens appeal is granted in part as to value of their land and denied as to the value of their improvements.
2. For the 2017 and 2018 tax years, the DOR is ordered to value the Axelsens' property, identified by geocode 02-3016-20-4-02-05-0000, as follows:
 - a. The Axelsens' land will be valued at \$20,000.
 - b. The Axelsens' improvements will be valued at \$42,430.
 - c. The total value of the Axelsens' property, therefore, is \$62,430.

Ordered May 22ND, 2018.



David L. McAlpin

David L. McAlpin, Chairman
MONTANA TAX APPEAL BOARD

Stephen A. Doherty

Stephen A. Doherty, Member
MONTANA TAX APPEAL BOARD

Valerie A. Balukas

Valerie A. Balukas, Member
MONTANA TAX APPEAL BOARD

Notice: You may be entitled to judicial review of this Order by filing a petition in district court within 60 days of the service of this Order. Mont. Code Ann. § 15-2-303(2).

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Certificate of Service

I certify that I caused a true and correct copy of the foregoing *Findings of Fact, Conclusions of Law, Order, and Opportunity for Judicial Review* to be sent by United States Mail via Print and Mail Services Bureau of the State of Montana on _____, 2018 to:

Dwight & Beverly Axelsen
132 Gibson Flats Road
Great Falls, MT 59405

Nicholas Gochis
Montana Department of Revenue
Legal Services Office
P.O. Box 7701
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Lynn Cochran, Admin. Paralegal
MONTANA TAX APPEAL BOARD

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