

SUMMARY STATEMENT

Jayo Dev., Inc. v. Ada Cnty. Bd. Of Equalization, Docket No. 41668

The Idaho Supreme Court unanimously affirmed the decision of the Ada County district court affirming the Board of Tax Appeals' decision to deny appellant, Jayo Development, Inc.'s (Jayo Development), application for a business inventory property tax exemption for the 2012 tax year. The Supreme Court concluded that the plain and unambiguous language of the 2012 version of Idaho Code section 63-602W authorized the exemption for the land developer who developed the property, not any developer who subsequently acquired the land. The Supreme Court also concluded that, under the language of the statute, this exemption was lost if the land developer transferred the property to a third party. Because Jayo Development was not the entity that originally developed the land, Jayo Development was not entitled to the exemption. Because Jayo Development brought the appeal without a reasonable basis in law, the Supreme Court awarded attorney fees pursuant to Idaho Code section 12-117(1).