

BEFORE THE IDAHO BOARD OF TAX APPEALS

BRUCE VALLEJO,	)	
	)	
Appellant,	)	APPEAL NO. 25-A-1085
	)	
v.	)	FINAL DECISION AND ORDER
	)	
ADA COUNTY,	)	
	)	
Respondent.	)	
	)	
_____	)	

RESIDENTIAL PROPERTY APPEAL

This appeal is taken from a decision of the Ada County Board of Equalization denying an appeal of the valuation for taxing purposes on property described by Parcel No. R1326130280. The appeal concerns the 2025 tax year.

This matter came on for hearing October 21, 2025, in Boise, Idaho, before Board Member Leland Heinrich. Appellant Bruce Vallejo was self-represented. Ada County Chief Deputy Assessor Brad Smith represented Respondent.

Board Members Leland Heinrich, Kenneth Nuhn, and Doug Wallis join in issuing this decision.

The issue on appeal concerns the market value of an improved residential property.

The decision of the Ada County Board of Equalization is modified.

FINDINGS OF FACT

The assessed land value is \$125,300, and the improvements' value is \$462,200, totaling \$587,500. Appellant contends the correct total value does not exceed \$545,000.

The subject property is a .16 acre parcel located in the Cazador subdivision in Kuna, Idaho. The property is improved with a two (2) story 2,475 square foot four (4)

bedroom, two and one-half (2½) bathroom residence constructed in 2022 with a 959 square foot attached three (3) car garage.

Appellant was concerned with the increase in subject's assessed value and questioned whether it was reflective of the current marketplace. Appellant shared information on six (6) sales from subject's subdivision which occurred during 2024, focusing on two (2) particular sale properties characterized by Appellant as most representative of the subject property. The first sale involved a residence with the same floorplan as the subject residence which sold for \$565,000, or \$228 per square foot, in August 2024. The second sale concerned a 2,556 square foot residence constructed by the same builder as subject. This property sold for \$490,000, or \$192 per square foot, in January 2024. Based on these two (2) price rates, Appellant contended subject's value falls between \$520,000 and \$545,000 and requested the assessed value be reduced accordingly.

Respondent questioned Appellant's inclusion of the second sale property in the analysis. According to Respondent, the transaction was atypical, and the sale price was below market. In a conversation with the realtor involved in the sale, Respondent learned the property was initially listed in July 2023 with an asking price of \$564,900. The property went under contract, but it ultimately fell out of escrow. The sellers desired to keep the closing date because they were in the process of closing on another property, so the realtor searched for a cash buyer who could keep the closing date. During that process, water was also found in the crawl space of the residence. Against this backdrop, the sellers ultimately agreed to a price of \$490,000. In Respondent's view, the sale was not

typical and should be excluded from consideration, particularly given the number of other timely sales in the neighborhood.

In support of subject's assessed value, Respondent developed a comparative sales model comprised of three (3) sales from subject's subdivision involving two (2) story residences. Sale No. 1 was the same property referenced above by Appellant with the same floorplan as subject. The property sold for \$565,000 in August 2024. Respondent applied a 0.35% per month time adjustment to bring the sale price current to the January 1, 2025, date of assessment, resulting in an adjusted sale price of \$573,322.

Sale No. 2 concerned a 2,286 square foot three (3) bedroom, three and one-half (3½) bathroom residence constructed in 2021 which sold for \$585,990 in April 2024. After adjusting the price for date of sale, Respondent made further adjustments for differences in finished living area, bathroom count, garage square footage, and lot size. The result was an adjusted sale price of \$600,761.

Sale No. 3 was the March 2024 purchase of a 2,403 square foot four (4) bedroom, two and one-half (2½) bathroom residence constructed in 2023 for \$499,900. After applying a time adjustment, Respondent also made adjustments for finished living area, garage square footage, and lot size. Respondent determined an adjusted sale price of \$558,760.

In analyzing the adjusted price data, Respondent came to the conclusion subject's assessed value of \$587,500 was somewhat overstated. Because it shared the same floorplan as subject, Respondent championed Sale No. 1 as the best indicator of subject's current market value, as the only necessary adjustment was for date of sale. Based on this, Respondent proposed reducing subject's value to \$573,322.

CONCLUSIONS OF LAW

This Board's goal in its hearings is the acquisition of sufficient, accurate evidence to support a determination of market value in fee simple interest or, as applicable, a property's exempt status. This Board, giving full opportunity for all arguments and having considered all the testimony and documentary evidence submitted by the parties, hereby enters the following.

Idaho Code § 63-205 requires taxable property be assessed at market value annually on January 1; January 1, 2025, in this case. Market value is always estimated as of a precise point in time. Idaho Code § 63-201 provides the following definition,

“Market value” means the amount of United States dollars or equivalent for which, in all probability, a property would exchange hands between a willing seller, under no compulsion to sell, and an informed, capable buyer, with a reasonable time allowed to consummate the sale, substantiated by a reasonable down or full cash payment.

Market value is estimated according to recognized appraisal methods and techniques. The sales comparison approach, the cost approach, and the income approach comprise the three (3) primary methods for determining market value. *Merris v. Ada Cnty.*, 100 Idaho 59, 63, 593 P.2d 394, 398 (1979). The sales comparison approach is commonly used in the valuation of a residential property. In general terms, the approach examines recent sales of similar property and considers the differences in property characteristics between subject and the sale properties.

Appellant did not develop a traditional sales comparison analysis but did provide information on six (6) recent sales from subject's subdivision. Of these, Appellant focused on two (2) sale properties regarded as most representative of subject. The first sale concerned a residence with the same floorplan as subject, while the other sale property

was a 2,556 square foot residence with five (5) bedrooms. Appellant's inclusion of the first sale property is appropriate, but the Board had concerns with the second sale.

To begin, there is some question whether the sale was a typical arm's-length transaction. According to Respondent, the sellers faced some pressure to close on the sale by a particular date, and there was also a condition issue related to water found in the crawl space at the time of sale, both of which likely influenced the sale price downward. Respondent's characterization of the transaction appears accurate given that the sale residence, at 2,556 square feet, was the largest sale residence in the entire group of sales, yet the \$490,000 sale price was the lowest. With these concerns, and the fact there are several other relevant sales in the record, the Board did not place any weight on this transaction.

Though Respondent developed an analysis of three (3) sales, Respondent emphasized Sale No. 1, which was the sale referenced by Appellant above with a floorplan matching subject's. Respondent regarded this sale, with a time-adjusted price of \$573,322, as the best indicator of subject's current market value. The Board concurs. In addition to sharing the same lot size as subject, the sale involved a residence with the same floorplan as the subject residence and was constructed in the same year by the same builder. The properties are highly similar, and the subject's valuation should reflect such.

Idaho Code § 63-511 places the burden on Appellant to establish error in subject's valuation by a preponderance of the evidence. Given the record in this matter, the Board found the burden of proof satisfied but did not find sufficient support for the value petitioned by Appellant. Giving primary weight to the sale with the same floorplan, the

Board will reduce subject's assessed value to \$573,000. The decision of the Ada County Board of Equalization is modified accordingly.

FINAL ORDER

In accordance with the foregoing Final Decision, IT IS ORDERED that the decision of the Ada County Board of Equalization concerning the subject parcel be, and the same hereby is, MODIFIED to reflect a decrease in total assessed value to \$573,000, with \$447,700 attributable to the improvements and \$125,300 to the land.

IT IS FURTHER ORDERED, pursuant to Idaho Code § 63-1305, any taxes which have been paid in excess of those determined to have been due be refunded or applied against other *ad valorem* taxes due from Appellant.

Idaho Code § 63-3813 provides that under certain circumstances the above-ordered value for the current tax year shall not be increased in the subsequent assessment year.

DATED this 8th day of December, 2025.