

# **Bond Case Briefs**

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### **City of Chesterfield v. State**

**Supreme Court of Missouri, en banc - December 24, 2019 - S.W.3d - 2019 WL 7161282**

City and its mayor brought action against State of Missouri, seeking declaration that statutes governing collection and distribution of countywide sales tax are constitutionally invalid special laws.

The Circuit Court entered summary judgment for State. City and mayor appealed.

The Supreme Court of Missouri held that:

- Statute governing collection of sales tax in any first class county “having a charter form of government and having a population of nine hundred thousand or more” was supported by rational basis and, thus, statute was not special law violative of Missouri Constitution, and
- Statute governing distribution of countywide sales tax was supported by rational basis and, thus, statute was not special law violative of Missouri Constitution.

Statute governing collection of sales tax in any first class county “having a charter form of government and having a population of nine hundred thousand or more” was supported by rational basis and, thus, statute was not special law violative of Missouri Constitution when applied to only county within state subjected to statute; county had large population, lacked a central city, had 90 separate municipalities within its borders, had large, unincorporated area, and county was responsible for providing municipal-type services such as police, street maintenance and zoning to unincorporated areas while simultaneously providing county-type services, including court systems, jails and roads to county as a whole.

Statute governing distribution of countywide sales tax was supported by rational basis of providing stable revenue sources and discouraging opportunistic annexations and, thus, statute was not special law violative of Missouri Constitution; classifications in statute governing tax distribution addressed need for predictable and sound revenue streams that benefited the residents of cities, towns and villages within county that did not have city sales tax at time countywide tax became effective, provided significant percentages of funding for services and benefited all county residents, and scheme discouraged opportunistic behavior such as annexations or gerrymandering that were primarily or solely motivated by sales tax distribution formulas in effect at a particular time.