Bond Case Briefs

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Cox v. Grady Hotel Investments, LLC

Supreme Court of Missouri, en banc - April 21, 2026 - S.W.3d - 2026 WL 1082986

County assessor brought action against hotel owner, seeking review of State Tax Commission's (STC) finding that owner only had a leasehold interest in real property improvements and assessment of the taxable valuation of interest at zero.

After school district intervened, the Circuit Court rendered judgment reversing STC's finding. The Court of Appeals affirmed and remanded case back to STC. On remand, assessor and district sought review of STC's determination affirming hearing officer's decision to value hotel by subtracting from the purchase price the value of personal property and the cost of new construction and improvements, pursuant to statute governing assessment of property in airport boundary.

The Circuit Court affirmed. Assessor and district appealed.

The Supreme Court held that:

- District did not have standing to challenge hotel's assessment value;
- As matter of first impression, assessor did not have standing to bring a claim under due process clause of state constitution;
- Assessor did not have standing to bring claim under constitutional provision barring enactment of laws making any irrevocable grant of special privileges or immunities;
- Assessor had standing to bring claims under constitutional provision barring tax exemptions and uniformity clause;
- Statute did not grant an unconstitutional tax exemption; and'
- Statute did not violate uniformity clause.