

Bond Case Briefs

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POLITICAL SUBDIVISIONS - WYOMING

Wyoming Jet Center, LLC v. Jackson Hole Airport Board

Supreme Court of Wyoming - January 15, 2019 - P.3d - 2019 WL 192338 - 2019 WY 6

Requestor filed petition for access to records held by airport board.

The District Court entered summary judgment for the board, and requestor appealed.

The Supreme Court of Wyoming held that:

- Special District Act did not operate to limit the records airport board was required to retain or make available for public inspection, but rather, required that certain documents be made readily accessible for public review, and
- Airport board was a political subdivision subject to the Wyoming Public Records Act (WPRA).

Special District Act did not operate to limit the records airport board was required to retain or make available for public inspection, but rather, required that certain documents be made readily accessible for public review, providing options for ensuring that such review was possible; record retention was governed by a separate set of statutes that defined what constituted a public record for retention purposes, and the Special District Act directed that the Wyoming Public Records Act (WPRA) would control the obligations of disclosure of listed documents, incorporated the WPRA, and declared its requirements controlled in the event of a conflict.

Airport board was a political subdivision subject to the Wyoming Public Records Act (WPRA); the board was created to perform a single public function under statutory authority of municipalities and counties to operate a local airport, which made it a special district over which the WPRA controlled.