

799 P.2d 533
 245 Mont. 100, 799 P.2d 533
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Samples of effect on residential appraised values used in Area
 2.1 Analysis

1989 <u>Appraised Value</u>	Sale <u>Price</u>	<u>Ratio</u>	1990 <u>Adjusted Appraised Value</u>
46,497	24,000	1.937 4	61,346
18,383	10,000	1.838 3	23,848
30,920	21,600	1.431 5	40,196
101,947	100,000	1.019 5	132,531
23,944	23,500	1.018 9	31,127
16,953	17,000	0.997 2	22,039
13,604	27,000	0.503 9	17,685
12,543	24,900	0.503 7	16,306
21,386	42,600	0.502 0	27,802

(The first three samples were at the top of the overappraised scale; the middle three samples were appraised approximately at their sales value; the last three samples are at the bottom of the underappraised scale.)

****538 *108** It may be demonstrated by the above samples that equalization is not achieved by the application of the 30% factor but rather that any inequality of appraisal is exacerbated by the factor. For example, the first property, which sold for \$24,000 in 1989 but was appraised for \$46,497 is now assessed after the application of the factor, at \$61,346. That same property was overappraised in relation to its sales price at 193% before the application of the factor, but is overappraised 255% after its application.

Examples of unfairness are demonstrated by those prop-

erties which were in 1989 appraised at or near their actual sales value. The property whose sales price was \$100,000 but was appraised at \$101,947 was 100.9% overappraised in 1989, but will be 132% overappraised in 1990.

Strangely, the underappraised properties fare better in comparison to others when the 30% factor is applied. The last property, whose sales price was \$42,600, was appraised at \$21,386, or at 50% of its value. After the application of the 30% factor, the increase in its appraised value results only in the figure of 65% of its actual sales price.