

SUMMARY STATEMENT

Hauser Lake Rod and Gun Club, Inc. v. City of Hauser
No. 44095

The Idaho Supreme Court reversed the district court’s denial of attorney fees under Idaho Code section 12-117 to Hauser Lake Rod and Gun Club, Inc. (Club). The City of Hauser (City) attempted to enforce its code on the Club, an entity located outside the City. After extensive administrative and legal proceedings, the Club prevailed against the City and requested attorney fees under section 12-117. The district court denied the Club’s request for fees, concluding the administrative tribunal that reviewed the dispute—the Kootenai County Joint Board of Commissioners (Joint Board)—did not constitute a “political subdivision” under section 12-117 because it was staffed with both City and County officials. On appeal, the Idaho Supreme Court reversed. The Court held that the Joint Board constituted a political subdivision because the ordinances creating the Joint Board provided that any decision of the Joint Board was in fact a decision of the Board of County Commissioners. Additionally, the Court concluded the City did not act with a reasonable basis in fact or law because longstanding, axiomatic legal standards showed that the City lacked jurisdiction to enforce its code on the Club, an entity located outside the City. The Court therefore reversed the district court and granted the Club’s request for attorney fees incurred at the administrative and district court levels and on appeal.