



STATE TAX COMMISSION OF MISSOURI

CHRISTOPHER GREENLEY,)	Appeal No. 23-10048
)	Parcel No. 24N140950
Complainant(s),)	
)	
v.)	
)	
JAKE ZIMMERMAN, ASSESSOR,)	
ST. LOUIS COUNTY, MISSOURI,)	
)	
Respondent.)	

DECISION AND ORDER

Christopher Greenley (Mr. Greenley) appeals the St. Louis County Board of Equalization's (BOE) decision finding the true value in money (TVM) of the subject property on January 1, 2023, was \$515,000. Mr. Greenley alleges overvaluation and claims that the TVM as of that date should be lower than \$515,000.¹ Mr. Greenley did not produce substantial and persuasive evidence of overvaluation. The BOE decision is affirmed. The TVM of the subject property on January 1, 2023, was \$515,000.

¹ Complainant timely filed a complaint for review of assessment. The State Tax Commission (STC) has authority to hear and decide Complainant's appeal. Mo. Const. art. X, sec. 14; Section 138.430.1, RSMo 2000. All statutory citations are to RSMo 2000, as amended.

The evidentiary hearing was held on February 25, 2025, via Webex. Mr. Greenley appeared *pro se*. Respondent Jake Zimmerman, Assessor, St. Louis County, Missouri, was represented by counsel, Steve Robson who appeared via Webex. The appeal was heard and decided by Hearing Officer Samuel Knapper.

FINDINGS OF FACT

1. The Subject Property. The subject residential real property is located at 1527 Coulter Forest, St. Louis, Missouri with a Parcel ID of 24N140950. The subject property consists of a .35 acres lot and a two-story single-family home. The house has approximately 2,830 square feet of living space and includes four bedrooms and two and a half bathrooms.

2. Assessment and Valuation. Respondent classified the subject property as residential and determined the TVM on January 1, 2023, was \$549,500. The BOE independently determined the TVM of the subject property as of January 1, 2023, was \$515,000.

3. Complainant's Evidence. Mr. Greenley introduced several Exhibits which were admitted without objection. They are described as follows:

Label	Description
A	1 Photo of Window Shade in Breakfast Nook
B	1 Photo of Stains on Kitchen Ceiling
C	1 Photo of Carpet in Family Room
D	1 Photo of Damage to Kitchen Floor

E	1 Photo of Stains on Laundry Room Ceiling
F	1 Photo of Garage Floor
G	1 Photo of Chimney
H	1 Photo of Chimney (Different Photo than Exhibit G)
I	1 Photo of Primary Bathroom Floor

Mr. Greenley testified that the subject property should receive the lowest classification due to the condition of the home but did not opine as to a specific sum of value as of January 1, 2023. Mr. Greenley testified that the subject property was purchased in June of 1995 and that no major maintenance has been performed since the purchase other than a poorly constructed finished basement. Mr. Greenley testified that the home has original siding, windows, roof, flooring and carpet. Mr. Greenley believes that the Assessor overvalued the property because of the several condition issues, including but not limited to (1) the shade covering the window near the breakfast nook is in need of replacement (*Exhibit A*), (2) the family room carpet is worn, frayed and tearing (*Exhibit C*) as is the carpet in many other rooms of the house, (3) stains on the kitchen ceiling due to plumbing issues on the second floor (*Exhibit B*), (4) stain around toilet of primary bathroom (*Exhibit I*), (5) water stains on the laundry room ceiling (*Exhibit E*), (6) rebar exposure on garage floor (*Exhibit F*), (7) roof gutter on rear of house is falling off over the breakfast nook creating water damage underneath, (8) woodpeckers continue to nest and cause damage to chimneys (*Exhibits G & H*), (9) original roof is missing shingles and is in need of replacement, and (10) black mold in the basement due to sump pump malfunctions. Mr.

Greenley submitted pictures of many of these condition issues and testified that the subject property value should be lower due to the continued deterioration of the residence. Mr. Greenley believes that the subject property is an anomaly in terms of value within the vicinity of the house due to the condition of the home.

Upon cross examination Mr. Greenley testified that he is not a licensed appraiser in Missouri and that he has not attained any estimates or bids to cure the deficiencies of the property to which he testified.

4. Respondent's Evidence. Respondent introduced Exhibit 1, the BOE's October 17, 2023, Decision Letter. Complainant did not object. Respondent's Exhibit 1 was admitted into evidence.

5. Value. The TVM of the subject property as of January 1, 2023, was \$515,000.

CONCLUSIONS OF LAW

1. Assessment and Valuation. Pursuant to Article X, Sections 4(a) and 4(b), Mo. Const. of 1945 real property and tangible personal property is assessed at its value or such percentage of its value as may be fixed by law for each class and for each subclass. Article X, Sections 4(a) and 4(b), Mo. Const. of 1945. Residential real property is assessed at 19% of its TVM as of January 1 of each odd-numbered year. Section 137.115.5(1)(a). The TVM is "the fair market value of the property on the valuation date[.]" *Snider v. Casino Aztar/Aztar Mo. Gaming Corp.*, 156 S.W.3d 341, 346 (Mo. banc 2005) (internal quotation omitted). The fair market value is "the price which the property would bring from a willing buyer when offered for sale by a willing seller." *Mo. Baptist Children's Home v. State Tax Comm'n*, 867 S.W.2d 510, 512 (Mo. banc 1993). "True value in money is defined in terms

of value in exchange not value in use." *Tibbs v. Poplar Bluff Assocs. I, L.P.*, 599 S.W.3d 1, 7 (Mo. App. S.D. 2020) (internal quotation omitted). "Determining the true value in money is an issue of fact for the STC." *Cohen v. Bushmeyer*, 251 S.W.3d 345, 348 (Mo. App. E.D. 2008).

"For purposes of levying property taxes, the value of real property is typically determined using one or more of three generally accepted approaches." *Snider*, 156 S.W.3d at 346. The three generally accepted approaches are the cost approach, the income approach, and the comparable sales approach. *Id.* at 346-48. The STC has wide discretion in selecting the appropriate valuation method but "cannot base its decision on opinion evidence that fails to consider information that should have been considered under a particular valuation approach." *Id.*, at 348.

The comparable sales approach "is most appropriate when there is an active market for the type of property at issue such that sufficient data are available to make a comparative analysis." *Snider*, 156 S.W.3d at 348. For this reason, the comparable sales approach is typically used to value residential property. "The comparable sales approach uses prices paid for similar properties in arms-length transactions and adjusts those prices to account for differences between the properties." *Id.* at 347-48 (internal quotation omitted). "Comparable sales consist of evidence of sales reasonably related in time and distance and involve land comparable in character." *Id.* at 348.

2. Evidence. "Although technical rules of evidence are not controlling in administrative hearings, fundamental rules of evidence are applicable." *Mo. Church of Scientology v. State Tax Comm'n*, 560 S.W.2d 837, 839 (Mo. banc 1977). The hearing

officer is the finder of fact and determines the credibility and weight of the evidence. *Kelly v. Mo. Dep't of Soc. Servs., Family Support Div.*, 456 S.W.3d 107, 111 (Mo. App. W.D. 2015). "It is within the purview of the hearing officer to determine the method of valuation to be adopted in a given case." *Tibbs v. Poplar Bluff Assocs. I, L.P.*, 599 S.W.3d 1, 9 (Mo. App. S.D. 2020). The hearing officer "may inquire of the owner of the property or of any other party to the appeal regarding any matter or issue relevant to the valuation, subclassification or assessment of the property." Section 138.430.2. The Hearing Officer's decision regarding the assessment or valuation of the property may be based solely upon his inquiry and any evidence presented by the parties, or based solely upon evidence presented by the parties. *Id.*

3. Complainant's Burden of Proof. The taxpayer bears the burden of proof and must show by a preponderance of the evidence that the property was overvalued. *Westwood P'ship v. Gogarty*, 103 S.W.3d 152, 161 (Mo. App. E.D. 2003). The BOE's valuation is presumptively correct. *Tibbs*, 599 S.W.3d at 7. The "taxpayer may rebut this presumption by presenting substantial and persuasive evidence that the valuation is erroneous." *Id.* (internal quotation omitted). The taxpayer also must prove "the value that should have been placed on the property." *Id.*

"Substantial evidence is that evidence which, if true, has probative force upon the issues, and from which the trier of fact can reasonably decide the case on the fact issues." *Savage v. State Tax Comm'n*, 722 S.W.2d 72, 77 (Mo. banc 1986) (internal quotation omitted). Evidence is persuasive when it has "sufficient weight and probative value to convince the trier of fact." *Daly v. P.D. George Co.*, 77 S.W.3d 645, 651 (Mo. App. E.D.

2002); *see also White v. Dir. of Revenue*, 321 S.W.3d 298, 305 (Mo. banc 2010) (noting the burden of persuasion is the "party's duty to convince the fact-finder to view the facts in a way that favors that party").

4. Complainant Did Not Produce Substantial and Persuasive Evidence of Overvaluation.

Mr. Greenley did not produce substantial and persuasive evidence rebutting the presumptively correct BOE value. He did not produce substantial and persuasive evidence to support his opinion of value lower than \$515,000 for the subject property as of January 1, 2023. Mr. Greenley did not produce evidence comprising of a comparable sales approach, income approach, or cost approach to value.

The comparable sales approach is typically used to value residential properties improved with a single-family home. "The comparable sales approach uses prices paid for similar properties in arms-length transactions and adjusts those prices to account for differences between the properties." *Snider*, 156 S.W.3d at 347-48 (internal quotation omitted).

Mr. Greenley testified about the several condition issues for the subject and the needed updates and repairs that are needed for the property. Pictures of the subject were submitted evidencing the alleged problems with the home. However, Mr. Greenley offered no professional analysis completed by someone trained to analyze such condition issues and to show the deleterious effect they had on the property on the assessment date, January 1, 2023. The BOE reduced the TVM to \$515,000 from the Assessor's original \$549,500 which tends to show that the BOE did take the condition of the home into consideration

when reaching its value.

The lack of evidence relating to a recognized valuation method renders Mr. Greenley's proposed value speculative and unpersuasive. *See Cohen*, 251 S.W.3d at 349 (holding an opinion of value loses probative value when based on an improper foundation). Mr. Greenley did not produce substantial and persuasive evidence showing the BOE overvalued the subject property and "the value that should have been placed on the property." *Tibbs*, 599 S.W.3d at 7.

CONCLUSION AND ORDER

The BOE decision is affirmed. The TVM of the subject property as of January 1, 2023, was \$515,000.

Application for Review

A party may file an application for review of this decision within 30 days of the mailing date set forth in the certificate of service for this decision. The application "shall contain specific detailed grounds upon which it is claimed the decision is erroneous." Section 138.432. The application must be in writing, and may be mailed to the State Tax Commission of Missouri, P.O. Box 146, Jefferson City, MO 65102-0146, or emailed to Legal@stc.mo.gov. A copy of the application must be sent to each person listed below in the certificate of service. ***Failure to state specific facts or law upon which the application for review is based will result in summary denial.*** Section 138.432.

Disputed Taxes

The Collector of St. Louis County, and the collectors of all affected political subdivisions therein, shall continue to hold the disputed taxes pending the possible filing

of an application for review, unless the disputed taxes have been disbursed pursuant to a court order under the provisions of section 139.031.

SO ORDERED August 26, 2025.

STATE TAX COMMISSION OF MISSOURI

Samuel Knapper
Hearing Officer

Certificate of Service

I hereby certify that a copy of the foregoing has been electronically mailed and/or sent by U.S. Mail on August 29th, 2025, to: Complainant(s) and/or Counsel for Complainant(s), the County Assessor and/or Counsel for Respondent and County Collector.

Stacy M. Ingle
Legal Assistant