



STATE TAX COMMISSION OF MISSOURI

GARY FRANK SINGLETON,	)	Appeal No. 23-10728
	)	Parcel No. 24N120747
	)	
Complainant(s),	)	
	)	
v.	)	
	)	
JAKE ZIMMERMAN, ASSESSOR,	)	
ST. LOUIS COUNTY, MISSOURI,	)	
	)	
Respondent.	)	

DECISION AND ORDER

Gary Frank Singleton (Complainant) 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 \$303,800. Complainant alleges overvaluation and claims that the TVM as of that date was \$229,000.¹ Complainant 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 \$303,800.

¹ Complainants timely filed a complaint for review of assessment. The State Tax Commission (STC) has authority to hear and decide Complainants' 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 May 1, 2025, via Webex. Complainant appeared *pro se* via Webex. Respondent Jake Zimmerman, Assessor, St. Louis County, Missouri, was represented by counsel, Kevin Wyatt, who appeared via Webex. The appeal was heard and decided by Senior Hearing Officer Samuel Knapper.

FINDINGS OF FACT

1. The Subject Property. The subject residential real property is located at 1326 Craig Dr., St. Louis, Missouri with a Parcel ID of 24N120747. The home on the subject property is 1950's era ranch-style home.

2. Assessment and Valuation. Respondent classified the subject property as residential and determined the TVM on January 1, 2023, was \$303,800. The BOE independently determined the TVM of the subject property as of January 1, 2023, was \$303,800.

3. Complainant's Evidence. Complainant introduced three pdf documents and several photos which were treated as a collective exhibit. The exhibits were admitted without objection. They are described as follows:

Label	Description
A	PDF of appraisal values of the subject property from 2013-2023
B	PDF of online listing information of comparable sales
C	PDF of Memo from city of Ladue Public Works informing citizens re Prop S
D	14 Photos of property: (1) 1 photo of bathroom, (2) 1 photo of second bathroom, (3) 1 photo of kitchen, (4) 1 photo of hanging tools and workbench,

	(5) 1 photo of interior utility pipe, (6) 1 photo of fuse box, (7) 1 photo of cracks in exterior foundation, (8) one photo of stains on ceiling, (9) 1 photo of siding, (10) 1 photo of roof, (11) 1 photo of chimney, (12) 1 photo of driveway, (13) two photos of portions of the lot on the subject property
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Complainant called his brother, Frank Singleton (Mr. Singleton), as a witness.² Mr. Singleton testified that he thought the TVM of the subject property was \$229,000 as of January 1, 2023. Mr. Singleton testified that his opinion was based on the lack of improvements to the home on the subject property and an overvaluation of the land on the subject property.

Mr. Singleton testified that the home has the following issues: (1) kitchen fixtures from the 1950's, (2) bathroom fixtures from the 1950's, (3) foundation cracks, (4) 25-year-old roof, and (5) an original fuse box. Mr. Singleton then referred to *Exhibit A* and testified that the county had reduced the appraised value of the improvements to the subject property from 2013 to 2021; however, the county then reversed course and assigned a much greater value to the improvements of the property in 2023. Mr. Singleton testified that this action seemed to lack a justification. Mr. Singleton testified that he questioned the county regarding the increase in the appraised value to the improvements at the BOE hearing and was informed that the increase stems from a renewed interest in the type of home on the subject property. Mr. Singleton also referred to *Exhibit B* while testifying in regard to the

² This Decision and Order will refer to the Complainant, Gary Frank Singleton, as 'Complainant' and refer to the Complainant's brother, Frank Singleton, as 'Mr. Singleton.'

appraised value of the improvements to the subject property. Mr. Singleton testified that the online descriptions of the comparable sales while on the market include information that demonstrates that the condition of the home on the subject property is very different than the homes of the comparable sales. Some of the differences include but are not limited to: (1) new roofs, (2) new fuse box, (3) new kitchen appliances, (4) replaced windows, and (5) new kitchen counter tops. Mr. Singleton believes that the differences in the features between the home of the subject property and the homes of the comparable sales render using such comparable sales useless in determining the TVM of the subject property. Upon cross examination Mr. Singleton testified that he is not a certified appraiser and does not have any training or education in making adjustments to properties when analyzing comparative sales.

Mr. Singleton also testified regarding the appraised value of the land on the subject property. Mr. Singleton testified that the lot of the subject property is slightly larger than the other lots of the subdivision. Mr. Singleton also testified that the lot of the subject property sits lowest of the subdivision lots and that water runoff flows from the upper lots and through the lot of the subject property on its way to Sugar Creek. Mr. Singleton referred to *Exhibit C* while testifying about this issue.

Complainant testified that a representative from the county came to the subject property at his request pursuant to the notice he was given due to TVM of the subject property increasing over 15%. A representative came to the subject property and took measurements and photos; however, Complainant testified that the county representative was not an appraiser. The representative completed the measurements and photos and

informed the Complainant they were leaving; however, the Complainant wanted the representative to remain and take more photos. The representative declined to remain and take additional photos. Complainant testified that the photos and measurements were not shared with him when he had his hearing with the BOE. Complainant testified that the County had his photos but seemed unprepared due to not sharing the photos and measurements of the county representative.

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 \$303,800.

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.

Complainant did not produce substantial and persuasive evidence rebutting the presumptively correct BOE value. Complainant did not produce substantial and persuasive evidence to support his opinion of value of \$229,000 for the subject property as of January 1, 2023. Complainant 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).

Complainant testified about the several condition issues for the subject and the needed updates and repairs that are needed for the property. Specifically, Mr. Singleton testified regarding dated fixtures, the aged roof and fuse box, and the foundation. Pictures of these issues were submitted by Complainant evidencing the alleged problems with the home. However, Complainant 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. This same analysis holds true with the Complainant's claim regarding the overvaluation of the land on the subject property.

The lack of evidence relating to a recognized valuation method renders Complainant'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). Complainant 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 \$303,800.

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 October 15, 2025.

STATE TAX COMMISSION OF MISSOURI

Samuel Knapper
Senior 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 October 17th, 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