



STATE TAX COMMISSION OF MISSOURI

SARAH DUVERNELL,)	Appeal No. 23-10424
)	Parcel No. 32X320025
Complainant(s),)	
)	
v.)	
)	
JAKE ZIMMERMAN, ASSESSOR,)	
ST. LOUIS COUNTY, MISSOURI,)	
)	
Respondent.)	

DECISION AND ORDER

Sarah Duvernell (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 \$100,000. Complainant alleges overvaluation and claims that the TVM as of that date was \$91,500.¹ 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 \$100,000.

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 April 3, 2025, via Webex. Complainant appeared *pro se* via phone. 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 Hearing Officer Samuel Knapper.

FINDINGS OF FACT

1. The Subject Property. The subject residential real property is located at 6510 Horneker Rd., St. Louis County, Missouri with a Parcel ID of 32X320025. The subject property consists of a lot and single-family residence.

2. Assessment and Valuation. Respondent classified the subject property as residential and determined the TVM on January 1, 2023, was \$150,100. The BOE independently determined the TVM of the subject property as of January 1, 2023, was \$100,000.

3. Complainant's Evidence. Complainant introduced an Exhibit which was admitted without objection. It is described as follows:

Label	Description
A	Pdf of slide deck (19 slides) prepared by Complainant

Complainant testified that her opinion of value as of January 1, 2023, for the subject property is \$91,500. Complainant testified that she believes that the Assessor overvalued her property because of the several issues with the subject property. The issues are: (1) unreliable internet service, (2) bridge closure, (3) delayed response time for emergency

services, (4) lack of road maintenance, (5) flooding, (6) the interior condition of home and (7) the exterior condition of the home.

Complainant testified that unreliable internet service decreases her property value due to the demand for remote workers and daily tasks which require internet service. Complainant testified that she experiences 12-14 internet outages per year. *See slide(s) 2 of Exhibit A.* Complainant also testified the bridge closure near the Pacific, Missouri exit near Interstate 44 caused significant delay and disruption. *See slide(s) 3 of Exhibit A.* Complainant testified that the response times for Emergency Medical Services, the police, and the fire department is approximately 16 minutes without unforeseen complications while in transit. *See slide(s) 4-6 of Exhibit A.* Complainant further testified that the county maintenance of roads in her area is minimal. Complainant related her daughter's experience of sliding on a patch of ice and sustaining major vehicular damage on January 25, 2025 after a snowstorm occurred on January 6th and 7th. *See slide(s) 7 & 8 of Exhibit A.* Complainant testified as to the frequent flooding of Hornecker Road and Hunters Ford Road. *See slide(s) 9 of Exhibit A.* The frequent flooding stops service of school busses and deliveries. *See slide(s) 10 & 11 of Exhibit A.* Complainant testified that the flooding prevents her family from attending school and work unless they make alternative arrangements. *See slide(s) 12 of Exhibit A.* Complainant testified that the flooding has left her property without power for 27 hours and creates conditions of isolation. *See slide(s) 13 of Exhibit A.* Complainant testified as to numerous power outages and a lack of perceived transparency in billing from Ameren. *See slide(s) 14 & 15 of Exhibit A.* Complainant testified that the interior of the home experienced flooding during the 27-hour power outage

causing damage and requiring replacement of the drywall and carpet of the living room and kitchen. *See slide(s) 17 of Exhibit A.* Complainant also testified as to the kitchen lacking cabinets and baseboards and cracks in the ceiling of the drywall. Complainant testified as to a crack on the west side of the foundation of the home and that the front door is broken and not trimmed out. *See slide(s) 16 of Exhibit A.* Complainant closed her testimony by providing assessments for comparison. *See slide(s) 18 of Exhibit A.*

Complainant argues that all the factors described in the slides she demonstrates that the value of her property is \$91,500. Additionally, Complainant does not believe that she should be taxed a high amount when the county provides very little service to the area near her property. Upon cross examination Complainant testified that she is not a licensed real estate appraiser and has not received any such training or education of that nature.

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 \$100,000.

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.

Complainant did not produce substantial and persuasive evidence rebutting the presumptively correct BOE value. Complainant did not produce substantial and persuasive evidence to support her opinion of value of \$91,500 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 several condition issues for the subject property and the needed updates and repairs. However, Complainant offered no professional analysis

completed by someone trained to analyze such condition issues and to show the impact they had on the property value on the assessment date, January 1, 2023. Complainant testified that she presented these issues to the BOE. The BOE reduced the TVM to \$100,000 from the Assessor's original \$150,100 which tends to show that the BOE did take the condition of the home and its surrounding area into consideration when reaching its value.

Complainant also presented arguments that her property's valuation should be lower due to the services she receives from the county and based upon assessments of other properties. Neither of these valuation methods are recognized in Missouri and cannot serve as a basis to modify the BOE's valuation.

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 \$100,000.

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 January 8, 2026.

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 January 9th, 2026, 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