



STATE TAX COMMISSION OF MISSOURI

KEVIN KOVACK,)
)
 Complainant(s),)
) Appeal No. 23-110136
 v.)
)
 JAKE ZIMMERMAN, ASSESSOR,)
 ST LOUIS, COUNTY, MISSOURI,)
 Respondent.)

DECISION AND ORDER

Kevin Kovack (Complainant) appealed valuation of the subject personal property, specifically the 2022 Corvette Stingray Coupe 1LT (Corvette), determined by Jake Zimmerman, Assessor, St. Louis County, Missouri (Respondent). Complainant did not appeal to the St. Louis County Board of Equalization (BOE), but appealed directly to the State Tax Commission (STC) after receiving first notification of the valuation upon receiving the 2023 tax bill. Respondent determined the true value in money of the subject property to be \$78,500. Complainant claimed overvaluation but did not produce substantial and persuasive evidence establishing overvaluation. Respondent presented substantial and persuasive evidence to establish the true value in money of the subject

property as of January 1, 2023.¹ Complainant participated in the hearing via Webex and introduced evidence. Respondent was represented at the hearing by counsel, Steven Robson.

Subject Property.

The subject property is a 2022 Corvette.

Respondent and BOE.

Respondent determined the trade-in value of the subject property on January 1, 2023, was \$78,500 for the 2022 Corvette. Respondent used the October, 2022 issue of the National Automobile Dealers’ Association Official Used Car Guide or its successor publication pursuant to Section 137.115.9. There was no Board of Equalization decision regarding the property.

Complainant’s Evidence.

Complainant submitted the following Exhibit(s):

Exhibit	Description	Ruling
A	Bill of Sale for subject property, 2022 Corvette	Admitted

Complainant testified that he purchased the 2022 Corvette in March of 2022 for \$65,890, which was the MSRP. Complainant testified that a \$13,000 increase for assessment purposes in determining his tax burden was unfair, especially considering his lack of confidence in attaining the assessor’s valuation if he were to sell the subject

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, Section 14; section 138.430.1, RSMo 2000. All statutory citations are to RSMo 2000, as amended.

property on the open market. Complainant sold the subject property for approximately \$59,000 one year prior to the hearing. Complainant also testified that one of the reasons he sold the subject property was due to the tax burden. Complainant believes that there is an error in the valuation process for vehicular personal property in the reliance upon National Automobile Dealers' Association Official Used Car Guide or its successor publication pursuant to Section 137.115.9.

Respondent's Evidence.

Respondent submitted the following Exhibits:

Exhibit	Description	Ruling
1	Personal Property Individual Declaration	Admitted
2	J. D. Power vehicle information sheet as of October 1, 2022 pertaining to a 2022 Corvette	Admitted

Suzanne Strain, personal property manager in the St. Louis County Assessor's office for twelve years, testified that Respondent utilized the average trade-in value indicated for the 2022 Corvette. After calculating one third of the average trade-in value for the vehicle as required by law, Respondent assessed the 2022 Corvette at \$26,997, rounded.

Assessment and Valuation Principles

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. Personal property is assessed at 33.33% of its true value in money as of January 1 of each year. Section 137.115.5. Pursuant to Section 137.115.9 “[t]he assessor of each county and each city not within a county shall use the trade-in value published in the October issue of the National Automobile Dealers’ Association Official Used Car Guide, or its successor publication, as the recommended guide of information for determining the true value of the motor vehicles described in such publication. The assessor shall not use a value that is greater than the average trade-in value in determining the true value of the vehicle without performing a physical inspection of the motor vehicle. ...”.

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). 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.

Complainant’s Burden of Proof

The Complainant bears the burden of proving the vital elements of the case, i.e., the assessment was “unlawful, unfair, improper, arbitrary or capricious.” *Westwood Partnership*, 103 S.W.3d 152 (Mo. App. E.D. 2003); *Daly v. P.D. George Co.*, 77 S.W.3d 645 (Mo. App E.D. 2002); *Reeves v. Snider*, 115 S.W.3d 375 (Mo. App. S.D. 2003); *Industrial Development Authority of Kansas City v. State Tax Commission of Missouri*, 804 S.W.2d 387, 392 (Mo. App. W.D. 1991). The taxpayer's evidence must be both "substantial and persuasive." *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*, 722 S.W.2d at 77 (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").

Complainant Did Not Prove Overvaluation.

Complainant's evidence and testimony did not prove overvaluation. Complainant's bill of sale (*See Exhibit A*) does not provide substantial and persuasive evidence of the value of the 2022 Corvette. Additionally, Complainant's testimony that he sold the subject property for approximately \$59,000 does not provide substantial and persuasive evidence of the 2022 Corvette's value. Lastly, Complainant's legal argument that reliance upon the National Automobile Dealers' Association Official Used Car Guide or its successor publication pursuant to Section 137.115.9 is a flawed means to value property is without merit because the claim is speculative and lacks foundation. Based upon the reasoning above, Complainant fails to meet his burden of proof.

The testimony of Respondent's witness, Suzanne Strain, was credible. Respondent's evidence was substantial and persuasive in determining the true value in money of the subject property on the relevant date using the method prescribed by law.

CONCLUSION AND ORDER

The true value in money of the 2022 Corvette as of January 1, 2023 was \$78,500 with an assessed value of \$26,170.

Application for Review

A party may file with the Commission 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, 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, as well as 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 said taxes have been disbursed pursuant to a court order under the provisions of section 139.031.

So ordered February 20, 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 February 20, 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