



STATE TAX COMMISSION OF MISSOURI

NAFEES AHMAD,)
)
 Complainant(s),)
) Appeal No. 23-112016
v.)
)
 JAKE ZIMMERMAN, ASSESSOR,)
 ST LOUIS, COUNTY, MISSOURI,)
 Respondent.)

DECISION AND ORDER

Nafees Ahmad (Complainant) appealed valuation of the subject personal property, specifically the 2021 Tesla Model Y Utility 4D Long Range AWD (Tesla), 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 \$53,200. 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, Kevin Wyatt.

Subject Property.

The subject property is a 2021 Tesla.

Respondent and BOE.

Respondent determined the trade-in value of the subject property on January 1, 2023, was \$53,200 for the 2021 Tesla. 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	Xcel spreadsheet Complainant made with information regarding Subject Property	Admitted
B	Complaint for Review of Assessment	Admitted
C	J.D. Power information regarding average price paid for Subject Property	Admitted
D	7 page Collective Exhibit of photos and info regarding the Subject Property	Admitted
E	Subject Property Tax Receipt for 2022	Admitted
F	Purchase Agreement of Subject Property	Admitted

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.

Complainant presented three arguments during his testimony to support his claim of overvaluation, they are: (1) the appreciation in the assessment of the 2021 Tesla from 2022 to 2023, (2) the purchase price of the 2021 Tesla compared to the 2023 assessment and (3) comparing the average price of what consumers paid for the subject property to the 2023 assessed value.

Complainant testified that the 2021 Tesla had an assessed value of \$13,330 in 2022. *See Exhibit E.* Complainant testified that the 2021 Tesla had an assessed value of \$17,330 in 2023. Complainant does not think it is fair or accurate for a typically depreciating asset, such as a vehicle, to increase in value for tax assessment purposes.

Complainant testified that he purchased the 2021 Tesla in May of 2021 for \$53,990. *See Exhibit F.* Complainant testified that the average trade-in value relied upon by Respondents seems inaccurate because it is only \$790 less than his purchase of the 2021 Tesla. Complainant's testimony again emphasized the depreciating nature of vehicles and that such a minor decrease in value since his date of purchase indicates an error in the valuation process.

Complainant testified that he researched and found the average price that consumers paid for the subject property. Complainant introduced *Exhibit C*, an estimate of the average price paid by consumers made by J.D. Power, and proposed the valuation of \$39,945 based upon the information it contained. Complainant then applied the 33.33% market valuation and proposed an assessed value of \$11,683. *See Exhibit A.* Complainant testified that he believes the Respondent's valuation is too high because it relied upon faulty data.

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 2021 Tesla	Admitted
3	J. D. Power vehicle information sheet as of October 1, 2022 pertaining to the VIN matching the Subject Property	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 2021 Tesla of \$53,200. After calculating one third of the average trade-in value for the vehicle as required by law, Respondent assessed the 2021 Tesla at \$17,730 rounded. *See Exhibit 2.* Ms. Strain also testified that Exhibit 3 indicates the average trade-in value indicated for the 2021 Tesla with the Complainants' VIN is \$61,000; however, Respondent elected to use the trade-in valuation contained in Exhibit 2.

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. Essentially, all three of Complainant's arguments seek to attack the statutory criteria to determine the true value in money of vehicles. Complainant presented three rationale and logical arguments (e.g. vehicular assessment appreciation, lack of depreciation from new purchase of vehicle, and assessment valuation higher than average purchase price); however, 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. The lack of foundation is evident because there is no indication that inappropriate values are being assessed on a consistent under the current system. Furthermore, it is speculative because there are many factors (supply costs, inflation, tariffs, etc.) that influence the trade-in value that were not addressed. Consequently, the Complainant failed 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 2021 Tesla as of January 1, 2023 was \$53,200 with an assessed value of \$17,730.

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