



STATE TAX COMMISSION OF MISSOURI

ROBERT KRAWCZYK,)
)
 Complainant(s),)
) Appeal No. 24-32502
 v.)
)
 TRAVIS WELGE, ASSESSOR,)
 ST CHARLES, COUNTY,)
 MISSOURI,)
 Respondent.)

DECISION AND ORDER

Robert Krawczyk (Complainant) appealed the valuation of the subject personal property, specifically the 2022 Porsche 911 Coupe 2D Carrera 3.0L H6 Turbo (2022 Porsche), determined by Travis Welge, Assessor, St. Charles County, Missouri (Respondent). Complainant appealed to the St. Charles County Board of Equalization (BOE) and subsequently appealed to the State Tax Commission (STC) after receiving notification of the valuation upon receiving the 2024 tax bill. Respondent determined the true value in money of the subject property to be \$119,525 for the 2022 Porsche. 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, 2024.¹ Complainant participated in the hearing via Webex. Respondent was represented at the hearing by counsel, Michael Mueth.

Subject Property.

The subject property is a 2022 Porsche.

Respondent and BOE.

Respondent determined the trade-in value of the subject property on January 1, 2024, was \$119,525 for the 2022 Porsche. Respondent used the October, 2023 issue of the National Automobile Dealers' Association Official Used Car Guide or its successor publication pursuant to Section 137.115.9. The Board of Equalization independently considered this matter and found the same valuation for the subject property.

Complainant's Evidence.

Complainant testified that he purchased the 2022 Porsche for \$109,000 and then sold the subject property in 2024 for \$94,000.

Respondent's Evidence.

Respondent submitted the following Exhibits:

Exhibit	Description	Ruling
1	Personal Property County Record & J. D. Power vehicle information sheet as of October 1, 2023 corresponding to the 2022 Porsche with the Complainant's VIN	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.

Michele Baumgartner, personal property manager in the St. Charles County Assessor's office for eleven years, testified that Respondent utilized the average trade-in value indicated for the 2022 Porsche was \$119,525. *See Exhibit 1.* Ms. Baumgartner testified the average trade-in value was based on the October, 2023 issue of the National Automobile Dealers' Association Official Used Car Guide or its successor publication pursuant to Section 137.115.9. Ms. Baumgartner further testified that calculating one third of the average trade-in value for the vehicles as required by law, Respondent assessed the 2022 Porsche at \$39,838, 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 testimony did not prove overvaluation because providing the sums of the purchase and selling of the 2022 Porsche fails to provide substantial and persuasive evidence of the value as of January 1, 2024.

The testimony of Respondent's witness, Michele Baumgartner, 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 Porsche as of January 1, 2024 was \$119,525 with an assessed value of \$39,838, rounded.

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 Charles 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 18, 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