



STATE TAX COMMISSION OF MISSOURI

MARK PURK,	)	
	)	
Complainant(s),	)	
	)	Appeal No. 24-34002
v.	)	Parcel No. 11-2.0-0.42-0-000-002
	)	
ROBERT BOYER, ASSESSOR,	)	
JEFFERSON COUNTY, MISSOURI,	)	
	)	
Respondent.	)	

DECISION AND ORDER

Mark Purk (Complainant) appeals Jefferson County Board of Equalization's (BOE) decision finding the true value in money (TVM) of the subject property on January 1, 2024, was \$414,300 with a corresponding assessed value of \$76,800. Complainant alleges overvaluation and claims that the assessed value as of that date was \$74,100.¹ Complainant did not produce substantial and persuasive evidence of overvaluation. The BOE decision is affirmed. The TVM of the subject property on January 1, 2024, was \$414,300 with an assessed value of \$76,800.

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 via Webex and the Complainant failed to appear. Respondent Robert Boyer, Assessor, Jefferson County, Missouri, was represented by counsel, Floyd Norrick. The case was heard and decided by Hearing Officer Samuel Knapper.

FINDINGS OF FACT

1. The Subject Property. The subject residential real property is located at 3600 Upper Moss Hollow Rd., Jefferson County, Missouri with Parcel number 11-2.0-04.2-0-000-002.

2. Assessment and Valuation. Respondent classified the subject property as residential and determined the TVM on January 1, 2024, was \$414,300 with an assessed value of \$76,800. The BOE agreed with the Respondent and determined the TVM of the subject property as of January 1, 2024, was \$414,300 with an assessed value of \$76,800.

3. Complainant's Evidence. Complainant did not attend the hearing or introduce any evidence.

4. Respondent's Evidence. Respondent introduced six Exhibits which were admitted without objection. They are:

Exhibit	Description
1	BOE determination letter
2	Certificate of Service on Respondent's Discovery Requests
3	Respondent's Interrogatories
4	Respondent's Request for Production of Documents

5	County Records of Photos of Subject Property
6	Appraisal Report of Subject Property Prepared by Cody Tilley

Respondent called Cody Tilley (Mr. Tilley) as a witness. Mr. Tilley testified that he is a licensed appraiser in Missouri and was asked to perform an appraisal on the subject property. *See Exhibit 6.* Mr. Tilley testified that he sought to inspect the property for appraisal purposes but was denied access to the property; consequently, he utilized county records. Mr. Tilley agreed that he determined the above ground square footage to be 4,564 sq. ft. and the exterior building materials were brick, vinyl and shingle roofing. Mr. Tilley also testified that he found the following exterior attributes: (1) wooden deck, (2) concrete patio, (3) framed addition, (4) open porch and (5) a masonry fireplace. Mr. Tilley testified that the property was well maintained. Mr. Tilley testified that he used the cost approach and sales comparison approach in his appraisal report and determined the value of the subject property to be \$645,000. Mr. Tilley testified that the appraisal report contains the basis of his opinion of value of the subject property.

5. Value. The TVM of the subject property as of January 1, 2024, was \$414,300 with an assessed value of \$76,800.

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.

The Complainant did not attend the hearing or introduce any evidence; therefore, there was no substantial and persuasive evidence presented to justify modifying the BOE's determination of value.

CONCLUSION AND ORDER

The BOE decision is affirmed. The TVM of the subject property as of January 1, 2024, was \$414,300 with an assessed value of \$76,800.

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 Jefferson 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 September 15th, 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 September 18th, 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