STATE TAX COMMISSION OF MISSOURI

ROY JOHNSON,	)	
	)	
Complainant(s),	)	
	)	Appeal No. 25-64500
v.	)	
	)	
CRAIG WILLIAMS, ASSESSOR, LAFAYETTE COUNTY, MISSOURI,	))	
Respondent.	)	

DECISION AND ORDER

Roy Johnson (Complainant) appealed the valuation of the subject personal property, specifically the 2019 Chevrolet Silverado 1500 (2019 Silverado) and the 2024 Chevrolet Silverado 1500 (2024 Silverado) determined by Craig Williams, Assessor, LaFayette County, Missouri (Respondent). The Respondent determined the true value in money (TVIM) of the 2019 Silverado was $29,746 with an assessed value of $9,920. The Respondent determined the TVIM of the 2024 Silverado was $44,422 with an assessed value of $14,810. Complainant appealed directly to the State Tax Commission (STC) after receiving notification of the valuation upon receiving the 2025 tax bill. 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, 2025.[1] Complainant participated in the hearing via Webex. Respondent was represented at the hearing by counsel, Dawn Boyer.

Subject Property.

The subject property is a 2019 Silverado and a 2024 Silverado.

Respondent & Board of Equalization (BOE)

Respondent determined the TVIM of the 2024 Silverado was $44,422 with an assessed value of $14,810. Respondent determined the TVIM of the 2024 Silverado to be $29,746 with an assessed value of $9,920. Respondent used the wholesale valuations from the October 1, 2024 issue of Price Digest. The Board of Equalization did not consider this matter.

Complainant's Evidence.

Complainant submitted the following Exhibits:

Exhibit	Description	Ruling
A	Collective Exhibit of 22 photos (total) of the 2019 and the 2024 Silverado	Admitted
B	Email of Purchase Offer from CarMax with an acceptance	Objection based upon relevance. Sustained due

[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.

	expiration date of 12/2/25 for the 2024 Silverado	to timeliness, Not Admitted
C	Edmunds Appraisal of 2019 Silverado dated November of 2025	Objection based upon relevance. Sustained because appraisal is untimely, Not Admitted
D	Kelly Blue Book Appraisal of the 2019 Silverado dated November of 2025	Objection based upon relevance. Sustained because appraisal is untimely, Not Admitted

Complainant testified that the Respondent's valuation seems to be inflated due to relying upon Price Digest trade-in values. Complainant argues that the valuations from Price Digest were considerably higher than the tools that he was able to access. Specifically, Complainant testified that the Assessor's assessed value of his 2024 Silverado was $14,810 and calculated that the trade-in value was $44,474. Complainant believes that an assessed value of $12,324 and a corresponding trade-in value of $37,009 is appropriate for the 2024 Silverado. Complainant testified that his proposed valuations were derived from averaging values from Kelly Blue Book and Edmunds. Complainant also proposed an assessed value of $6,862 and a trade-in value of $20,607 for the 2019 Silverado based upon values from Kelly Blue Book. Complainant argues that the difference between his research and the data utilized by the Respondent demonstrate that Price Digest, which is the valuation publication the Respondent used, is incorrect. Complainant testified that he did not have access to the National Automobile Dealers Association information while researching the value of the subject property. Complainant offered to use the valuations from the National Automobile Dealers Association if the Respondent could provide them.

Complainant offered three exhibits, to which the Respondent objected to their admission. *Exhibit B* contains an Edmunds appraisal for the 2024 Silverado from November of 2025. Respondent's objection was based upon the lack of relevance due to the lack of timeliness because the information was from November of 2025 instead of October of 2024. The objection was taken under advisement during the evidentiary hearing and the Complainant was permitted to refer to the exhibit during his proof. Complainant testified that he attained the Edmunds appraisal as quickly as possible after receiving notice of his taxes. The objection is sustained due to the timeliness of the exhibit. *Exhibits C and D* were offered by the Complainant and the Respondent objected based upon relevancy due to the timeliness of the information contained in the exhibits. Specifically, using valuations from November of 2025 instead of October of 2024 as required by statute. These objections were also taken under advisement during the evidentiary hearing but Complainant was allowed to refer to them during the hearing. The Respondent's objections are sustained and Exhibits B and C are not admitted based upon lack of relevance.

Upon cross examination Complainant testified that he did not prepare *Exhibit A, B or C* and that he did know the methodologies used by Kelly Blue Book or Edmunds to ascertain the values of the subject property. Complainant also testified that he did not attempt to get an offer of purchase for the subject property from a local dealership. Complainant further testified that he believes that Price Digest provides incorrect values because the valuation of the 2019 Silverado was $3,000 higher than what he paid for the vehicle during the first tax cycle for that vehicle.

Respondent's Evidence.

Respondent submitted the following Exhibits during the hearing:

Exhibit	Description	Ruling
1	Price Digest vehicle information sheet as of October 1, 2024 corresponding to the 2024 Silverado with the Complainant's VIN	Admitted
2	J. D. Power vehicle information sheet as of October 1, 2024 corresponding to the 2019 Silverado with the Complainant's VIN	Admitted

Craig Williams (Mr. Williams), Assessor of LaFayette County Missouri, testified on behalf of the Respondent. Mr. Williams testified that LaFayette County relies upon Price Digest for all accounts, 15,000 to 16,000, to perform mass appraisal. Mr. Williams testified that mass appraisal does not take condition and mileage into consideration for valuation purposes. Mr. Williams testified that reliance upon this system for all vehicles ensures fair and equitable treatment of all taxpayers.

Mr. Williams testified that Missouri law orders him (as Assessor) to use values from October of 2024 to assess value for the 2025 tax year. Mr. Williams testified that tangible personal property, such as the subject property, are assessed at *33 & 1/3*% of their TVIM. Mr. Williams testified that *Exhibit 1* and *Exhibit 2* are the publications that the Respondent used to find the TVIM of the subject property. Mr. Williams testified that the same source, Price Digest, was used for all the vehicles in the county. Mr. Williams testified that the Respondent has the means to verify the mass appraisal system produces an accurate TVIM of personal property by directly entering the VIN number of personal property when necessary. This action was performed for the 2019 Silverado and the 2024 Silverado. *Exhibits 1 & 2* are the products of that work performed by the Respondent.

Mr. Williams testified that he uses the ‘wholesale’ value in *Exhibits 1 & 2* because it is representative of trade-in value while the ‘retail’ value in the exhibits references a typical sale price between private parties. Mr. Williams testified that Missouri law requires him (as Assessor) to use wholesale value because it is akin to trade-in value.

Mr. Williams testified that he believes both vehicles in the current dispute were valued as prescribed by Missouri law. Mr. Williams testified that he selected Price Digest in his role as Assessor due to the cost of data from different sources. Mr. Williams testified that the assessed value for the 2019 Silverado was $9,920 and $14,810 for the 2024 Silverado.

Upon cross examination Mr. Williams testified that he was not aware of the publications used by other Missouri counties. Mr. Willimas testified that he selected Price Digest because it contained reliable data and a better price for the county. Mr. Williams testified that the county used to subscribe to another publication that was affiliated with the National Automobile Dealers Association (NADA) but switched to Price Digest approximately three years ago.

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. …".

In this case, neither the Complainant nor the Respondent submitted the trade-in value published in the October issue of the National Automobile Dealers' Association Official Used Car Guide, or its successor publication. Consequently, the hearing officer has considered the evidence that was submitted for the purpose of determining value.

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 Failed to Prove Overvaluation.

The Complainant’s proof does not provide substantial and persuasive proof of a valuation different from the Respondent. There are two main deficiencies in the Complainant’s proof which lead to this decision.

First, the Complainant’s alternative valuation data were published long after October of the year preceding the applicable tax year. Complainant’s alternative valuations (*Exhibits B, C & D)* ranged from 13 to 14 months after October of 2024. This time discrepancy renders the valuations less persuasive that Respondent’s valuations.

Complainant’s argument that the Respondent’s failure to utilize a NADA publication for valuation purposes does render the Respondent’s valuations invalid. As stated above, the statutorily prescribed valuation source is the NADA (or its successor) publication, but in a case such as this where neither party used the statutorily prescribed valuation source, then the hearing office must decide the case based upon the evidence that was submitted. Mr. Williams' testimony provided evidence that the alternative publication, Price Digest, provides reliable data for assessment purposes. Mr. Williams further testified as to measures taken to ensure the accuracy of the data provided by Price Digest and its application to the subject property on the valuation date of January 1, 2025.

CONCLUSION AND ORDER

The TVIM of the 2019 Silverado is $29,746 as of January 1, 2025 with an assessed value of $9,914. The TVIM of the 2024 Silverado is $44,422 as of January 1, 2025 with an assessed value of $14,805.

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 LaFayette 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 September 17th, 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 Ingle
Legal Assistant