



**FINAL ADMINISTRATIVE DECISION
ILLINOIS PROPERTY TAX APPEAL BOARD**

APPELLANT: D. Schaefer, Trustee
DOCKET NO.: 15-05322.001-R-1
PARCEL NO.: 08-23.0-107-051

The parties of record before the Property Tax Appeal Board are D. Schaefer, Trustee, the appellant; and the St. Clair County Board of Review.

Based on the facts and exhibits presented in this matter, the Property Tax Appeal Board hereby finds **No Change** in the assessment of the property as established by the **St. Clair** County Board of Review is warranted. The correct assessed valuation of the property is:

LAND: \$ 6,093
IMPR.: \$15,348
TOTAL: \$21,441

Subject only to the State multiplier as applicable.

Statement of Jurisdiction

The appellant timely filed the appeal from a decision of the St. Clair County Board of Review pursuant to section 16-160 of the Property Tax Code (35 ILCS 200/16-160) challenging the assessment for the 2015 tax year. The Property Tax Appeal Board finds that it has jurisdiction over the parties and the subject matter of the appeal.

Findings of Fact

The subject property consists of a one-story dwelling of frame construction that has 1,048 square feet of living area. The dwelling is 77 years old. The dwelling features an unfinished basement, central air conditioning, a fireplace and a garage. The subject property is located in Belleville Township, St. Clair County, Illinois.

The appellant contends assessment inequity as the basis of the appeal. In support of the inequity claim, the appellant submitted a grid analysis of three assessment comparables located in close proximity along the same street as the subject. The comparables are comprised of one-story dwellings of frame construction that were 44 to 103 years old. Two comparables have unfinished basements, each comparable has central air conditioning, one comparable has a fireplace, and each comparable has a garage. The dwellings range in size from 890 to 1,400 square feet of living area and have improvement assessments ranging from \$6,781 to \$21,573 or

from \$7.62 to \$17.49 per square foot of living area. Based on this evidence, the appellant requested a reduction in the subject's improvement assessment.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the subject's final assessment of \$21,441. The subject property has an improvement assessment of \$15,348 or \$14.65 per square foot of living area. In support of the subject's assessment, the board of review submitted an appraisal of the subject property. The appraisal report conveyed an estimate of market value for the subject property of \$64,500 as of February 1, 2017. Based on this evidence, the board of review requested confirmation of the subject's assessment.

Under rebuttal, the appellant argued the appeal was based on equitable assessments. However, the board of review's evidence was an appraisal used by the appellant during a local board of review hearing. The appellant requested the Property Tax Appeal Board to disregard the board of review's evidence as it was not relevant to the appeal.

Conclusion of Law

The taxpayer argued assessment inequity as the basis of the appeal. When unequal treatment in the assessment process is the basis of the appeal, the inequity of the assessments must be proved by clear and convincing evidence. 86 Ill.Admin.Code §1910.63(e). Proof of unequal treatment in the assessment process should consist of documentation of the assessments for the assessment year in question of not less than three comparable properties showing the similarity, proximity and lack of distinguishing characteristics of the assessment comparables to the subject property. 86 Ill.Admin.Code §1910.65(b). The Board finds the appellant did not meet this burden of proof.

As an initial matter, the Board gave no weight to the appraisal of the subject property submitted by the board of review. The Board finds this evidence fails to address the appellant's assessment inequity claim.

The record contains assessment information on three suggested assessment comparables for the Board's consideration. The Board gave less weight to comparable #3 submitted by the appellant due to its older age, larger dwelling size and lack of a basement when compared to the subject. The Board finds the two remaining comparables are more similar when compared to the subject in location, design, age, dwelling size and features. They have improvement assessments of \$6,781 and \$16,651 or \$7.62 and \$17.49 per square foot of living area, respectively. The subject property has an improvement assessment of \$15,348 or \$14.65 per square foot of living area, which falls between the most similar assessment comparables contained in the record. After considering adjustments to the comparables for differences when compared to the subject, the Board finds the subject's improvement assessment is supported. Therefore, no reduction in the subject's improvement assessment is warranted.

This is a final administrative decision of the Property Tax Appeal Board which is subject to review in the Circuit Court or Appellate Court under the provisions of the Administrative Review Law (735 ILCS 5/3-101 et seq.) and section 16-195 of the Property Tax Code. Pursuant to Section 1910.50(d) of the rules of the Property Tax Appeal Board (86 Ill.Admin.Code §1910.50(d)) the proceeding before the Property Tax Appeal Board is terminated when the decision is rendered. The Property Tax Appeal Board does not require any motion or request for reconsideration.



Chairman



Member



Member



Member



Member

DISSENTING: _____

CERTIFICATION

As Clerk of the Illinois Property Tax Appeal Board and the keeper of the Records thereof, I do hereby certify that the foregoing is a true, full and complete Final Administrative Decision of the Illinois Property Tax Appeal Board issued this date in the above entitled appeal, now of record in this said office.

Date: April 17, 2018



Clerk of the Property Tax Appeal Board

IMPORTANT NOTICE

Section 16-185 of the Property Tax Code provides in part:

"If the Property Tax Appeal Board renders a decision lowering the assessment of a particular parcel after the deadline for filing complaints with the Board of Review or after adjournment of the session of the Board of Review at which assessments for the subsequent year or years of the same general assessment period, as provided in Sections 9-125 through 9-225, are being considered, the taxpayer may, within 30 days after the date of written notice of the Property Tax Appeal Board's decision, appeal the assessment for such subsequent year or years directly to the Property Tax Appeal Board."

In order to comply with the above provision, YOU MUST FILE A PETITION AND EVIDENCE WITH THE PROPERTY TAX APPEAL BOARD WITHIN 30 DAYS OF THE DATE OF THE ENCLOSED DECISION IN ORDER TO APPEAL THE ASSESSMENT OF THE PROPERTY FOR THE SUBSEQUENT YEAR OR YEARS. A separate petition and evidence must be filed for each of the remaining years of the general assessment period.

Based upon the issuance of a lowered assessment by the Property Tax Appeal Board, the refund of paid property taxes is the responsibility of your County Treasurer. Please contact that office with any questions you may have regarding the refund of paid property taxes.

PARTIES OF RECORD

AGENCY

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