



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

APPELLANT: David Nobbe  
DOCKET NO.: 19-09427.001-R-1  
PARCEL NO.: 07-25-201-019-000

The parties of record before the Property Tax Appeal Board are David Nobbe, the appellant, and the Monroe County Board of Review.

Based on the facts and exhibits presented in this matter, the Property Tax Appeal Board hereby finds **a reduction** in the assessment of the property as established by the **Monroe** County Board of Review is warranted. The correct assessed valuation of the property is:

**LAND:** \$13,080  
**IMPR.:** \$20,054  
**TOTAL:** \$33,134

Subject only to the State multiplier as applicable.

**Statement of Jurisdiction**

The appellant timely filed the appeal from a decision of the Monroe County Board of Review pursuant to section 16-160 of the Property Tax Code (35 ILCS 200/16-160) challenging the assessment for the 2019 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 1.5-story dwelling of aluminum exterior construction with 2,212 square feet of living area.<sup>1</sup> The dwelling was constructed in 1924 and is approximately 95 years old. Features of the home include an unfinished basement and central air conditioning. The property has an approximately 13,034 square foot site based on the subject's property record card<sup>2</sup> and is located in Waterloo, Monroe County.

The appellant contends overvaluation as the basis of the appeal. In support of this argument the appellant submitted an appraisal estimating the subject property had a market value of \$100,000 as of March 26, 2020. The property rights appraised were fee simple and the intended use of the appraisal was for a tax appeal. The appellant's appraiser inspected the interior and exterior of

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<sup>1</sup> The parties differ as to the size of the subject dwelling. The Board finds the best evidence of the subject's size was found in the appraisal which contained a building sketch with dimensions and area calculations.

<sup>2</sup> The appellant's appraiser reported a lot size of 15,190 square feet with no supporting evidence.

the subject property on March 26, 2020 and observed that the subject “has not been updated in a couple of decades,” there are weak areas in the floor, the window in the main level bathroom is in bad condition (broken pane and rotting frame and sill), and the central air unit works on the main floor only. Additional observations included the poor condition of the landscaping and the incurable external obsolescence due to the view of the Gateway FS directly across the street. The appraiser also provided interior and exterior pictures of the subject property.

The appellant’s appraisal was completed using the sales comparison approach to value in estimating a market value for the subject property. The appellant’s appraiser selected five comparable properties that are located from .07 to .43 of a mile from the subject property. The comparables have sites ranging in size from 5,663 to 9,583 square feet of land area that are improved with traditional style dwellings that range in size from 1,427 to 2,210 square feet of living area. The homes range in age from 72 to 138 years old. Four comparables have unfinished basements and one comparable has a crawl space foundation. Each comparable has central air conditioning and three comparables have either a 2-car carport, a 2-car detached garage, or a 1-car attached garage. The comparables sold from May 2017 to November 2018 for prices ranging from \$60,000 to \$151,900 or from \$36.52 to \$83.48 per square foot of living area, including land. The appraiser applied adjustments for financing concessions and differences in location, condition, room count, gross living area, basement, and other features. The comparables had adjusted sale prices ranging from \$82,444 to \$126,850 or from \$50.18 to \$85.06 per square foot of living area, including land. Based on these adjusted sale prices and giving varying weight to each of the comparable sales in the report, the appraiser arrived at an estimated market value for the subject of \$100,000 or \$45.21 per square foot of living area, including land.

Based on this evidence the appellant requested that the subject’s assessment be reduced to \$33,134 which would reflect a market value of \$102,582 when using the 2019 three year average median level of assessment for Monroe County of 32.30% as determined by the Illinois Department of Revenue.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$49,490. The subject's assessment reflects a market value of \$153,220 or \$69.27 per square foot of living area, land included, when using the 2019 three year average median level of assessment for Monroe County of 32.30% as determined by the Illinois Department of Revenue.

In response to the appeal, the board of review “disputes the evidence contained in the appraisal for the following reasons.” (1) the valuation date of report is March 26, 2020 and procedurally should have been January 1, 2019 for this appraisal and (2) gross adjustments ranging from 35.6% to 50.7% are excessive and indicate the comparables are dissimilar to the subject.

In support of its contention of the correct assessment the board of review submitted information on four comparable sales that are located within the same neighborhood code as the subject. The comparables have sites ranging in size from 7,250 to 12,197 square feet of land area and are improved with 1.5-story dwellings that range in size from 954 to 1,274 square feet of ground

floor living area.<sup>3</sup> The homes were built between 1900 to 1930. Two comparables have basements with one having a recreation room and two comparables have crawl space foundations. Each comparable has central air conditioning and three comparables have a 624 or a 720 square foot garage. Comparable #3 has an inground swimming pool. The comparables sold from January to October 2018 for prices ranging from \$174,900 to \$233,900 or from \$149.02 to \$183.60 per square foot of ground floor living area, including land. The board of review argued these 2018 comparables sales are closer in size to the subject with same neighborhood code and condition code as the subject. Based on this evidence, the board of review requests confirmation of the subject's assessment.

### **Conclusion of Law**

The appellant contends the market value of the subject property is not accurately reflected in its assessed valuation. When market value is the basis of the appeal the value of the property must be proved by a preponderance of the evidence. 86 Ill.Admin.Code §1910.63(e). Proof of market value may consist of an appraisal of the subject property, a recent sale, comparable sales or construction costs. 86 Ill.Admin.Code §1910.65(c). The Board finds the appellant met this burden of proof and a reduction in the subject's assessment is warranted.

The appellant submitted an appraisal and the board of review submitted criticisms of the appellant's appraisal along with four comparable sales to support their respective positions before the Property Tax Appeal Board.

As to the board of review comparables which are described as 1.5-story dwellings, the Board finds only the ground floor living area was reported based on their property record cards. Furthermore, while the board of review asserted its comparables are similar in condition to the subject, no documentary evidence was submitted to support this assertion. Thus, the Property Tax Appeal Board finds the record contains insufficient detail to perform a meaningful analysis of comparability of the subject to the board of review comparables. These comparables sold from January to October 2018 for prices ranging from \$174,900 to \$233,900 or from \$149.02 to \$183.60 per square foot of ground floor living area, including land, which are all substantially higher than the subject's estimated market value as reflected by its assessment.

On this record, the Board finds the best evidence of market value to be the appraisal submitted by the appellant, particularly given the descriptive and photographic evidence of condition issues related to the subject dwelling that were not at all refuted by the board of review and the adjustments applied to the comparables for differences from the subject. The subject's assessment reflects a market value of \$153,220 or \$69.27 per square foot of living area, including land, which is above the appraised value conclusion of \$100,000, including land. Based on this evidence, the Property Tax Appeal Board finds a reduction in the subject's assessment commensurate with the appellant's request is justified.

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<sup>3</sup> Contrary to the PTAB-6 form seeking total above ground living area, the Board finds the board of review's grid analysis reported only the ground floor area of the subject and each comparable based on their respective property record cards.

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.

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Chairman



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Member



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Member



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Member



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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: March 21, 2023



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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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