



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

APPELLANT: Petersen Health Care Marigold HCC LLC  
DOCKET NO.: 20-06852.001-C-1  
PARCEL NO.: 95-34-477-004

The parties of record before the Property Tax Appeal Board are Petersen Health Care Marigold HCC LLC, the appellant, by Robert W. McQuellon III, Attorney at Law in Peoria; and the Knox 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 **Knox** County Board of Review is warranted. The correct assessed valuation of the property is:

**LAND:** \$46,290  
**IMPR.:** \$1,463,710  
**TOTAL:** \$1,510,000

Subject only to the State multiplier as applicable.

**Statement of Jurisdiction**

The appellant timely filed the appeal from a decision of the Knox County Board of Review pursuant to section 16-160 of the Property Tax Code (35 ILCS 200/16-160) challenging the assessment for the 2020 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-story nursing home of frame exterior construction with 49,644 square feet of gross building area. The building was constructed in 1974 and has 172 units. The property has a 254,390 square foot site, has a land-to-building ratio of 5.12:1, and is located in Galesburg, Galesburg Township, Knox County.

The appellant contends overvaluation as the basis of the appeal. In support of this argument the appellant submitted information on three comparable sales in Decatur, Aviston, and Harrisburg. The parcels range in size from 27,443 to 315,810 square feet of land area and have land-to-building ratios ranging from 1.09:1 to 6.32:1. The comparables are improved with a 1-story assisted living facility, health care facility, or skilled nursing facility of frame exterior construction ranging in size from 25,248 to 50,000 square feet of gross building area. The buildings have from 97 to 142 units. The comparables sold from March 2017 to March 2020 for

prices ranging from \$1,600,000 to \$2,253,000, from \$40.81 to \$63.37 square feet of gross building area, or from \$15,866 to \$16,495 per unit, including land.

Based on this evidence the appellant requested a reduction in the subject's assessment to \$1,510,000, which would reflect a market value of \$4,530,453, or \$91.25 per square foot of gross building area, or \$26,340 per unit, including land, when applying the statutory level of assessment of 33.33%.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$1,604,790. The subject's assessment reflects a market value of \$4,799,013, or \$96.67 per square foot of gross building area, or \$27,901 per unit, land included, when using the 2020 three year average median level of assessment for Knox County of 33.44% as determined by the Illinois Department of Revenue.

In support of its contention of the correct assessment the board of review submitted information on six comparable sales.<sup>1</sup> The comparables are improved with nursing homes ranging in size from 26,138 to 101,969 square feet of gross building area. The buildings were constructed from 1913 to 1999, with comparables #1, #3, #4, and #5 having additions or additional buildings constructed from 1989 to 2015. Comparable #6 has seven buildings. The buildings have from 68 to 180 units. The comparables sold from February 2006 to April 2019 for prices ranging from \$2,317,000 to \$9,600,000, from \$53.87 to \$196.98 per square foot of gross building area, or from \$17,417 to \$77,479 per unit, including land.

The board of review submitted a letter contending that the appellant's comparables are not located proximate to the subject and questioned the similarity of these comparables to the subject in location and condition. The board of review asserted the subject has been valued on the low range of nursing homes in Galesburg. Based on this evidence the board of review requested 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.

As an initial matter, the Board notes the board of review questioned the similarity of the appellant's comparables to the subject in location. However, the board of review did not present any evidence of the locations of its comparables in relation to the subject. The Board also notes the appellant did not report the ages/effective ages of its comparables and the board of review did not report the site sizes of its comparables. Thus, on this limited record, the Board will consider both parties' comparables despite a lack of data regarding the locations, ages/effective ages, and site sizes compared to the subject.

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<sup>1</sup> The board of review presented sales data for only six of the seven comparables presented in its grid analysis.

The record contains a total of nine comparable sales for the Board's consideration. The Board gives less weight to the board of review's comparables #1, #2, and #3, which sold more remote in time from the assessment date than other comparables in this record. The Board gives less weight to the appellant's comparable #2 and the board of review's comparable #7, due to substantial differences from the subject in gross building area

The Board finds the best evidence of market value to be the appellant's comparables #1 and #3 and the board of review's comparables #4 and #5, which sold more proximate in time to the assessment date and are more similar to the subject in gross building area and number of units. These most similar comparables sold for prices ranging from \$1,883,000 to \$3,135,000, or from \$40.81 to \$75.21 per square foot of gross building area, or from \$15,866 to \$21,454 per unit, including land. The subject's assessment reflects a market value of \$4,799,013, or \$96.67 per square foot of gross building area, or \$27,901 per unit, including land, which is above the range established by the best comparable sales in this record. Based on this evidence after considering appropriate adjustments to the best comparables for differences when compared to the subject, the Board finds a reduction in the subject's assessment commensurate with the appellant's request is justified.

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:

August 22, 2023



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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