



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

APPELLANT: Illinois Investment Properties, LLC
DOCKET NO.: 20-07257.001-R-1
PARCEL NO.: 02-18.0-317-002

The parties of record before the Property Tax Appeal Board are Illinois Investment Properties, LLC, the appellant, by Thomas Benedick, Attorney at Law, in O'Fallon; 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: \$1,212
IMPR.: \$13,963
TOTAL: \$15,175

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 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 two-story dwelling of brick exterior construction with 2,752 square feet of living area. The dwelling was constructed in 1917. Features of the home include a basement, central air conditioning and "parking lot." The property has an approximately 6,093 square foot site and is located in East St. Louis, East St. Louis Township, St. Clair County.

The appellant contends overvaluation as the basis of the appeal. In support of this argument the appellant submitted information on three comparable sales located in Belleville. The comparables have sites that range in size from 4,362 to 55,321 square feet of land area and are improved with one-story or two-story buildings of brick exterior construction ranging in size from 1,380 to 3,140 square feet of building area. Comparable #1 is a commercial office building, comparable #2 is a mixed use office/residential building and comparable #3 is a former

bank building.¹ The buildings were constructed from 1950 to 1978. Two comparables have basements. Each property has central air conditioning and a parking lot. The properties sold from January to September 2020 for prices ranging from \$49,000 to \$72,000 or from \$22.52 to \$35.50 per square foot of living area, land included. Based on this evidence, the appellant requested the subject's total assessment be reduced to \$8,300 which reflects a market value of \$24,902 or \$9.05 per square foot of living area, land included, 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 equalized assessment for the subject of \$15,175 after application of the 0.9877 township factor. The subject's assessment reflects a market value of \$46,592 or \$16.93 per square foot of living area, land included, when using the 2020 three-year average median level of assessment for St. Clair County of 32.57% as determined by the Illinois Department of Revenue.

As part of the Notes on Appeal, the board of review proposed a reduction in the subject's total assessment to \$15,000. The appellant was sent a 30-day stipulation offer which was rejected. The board of review submitted no further evidence.

In rebuttal, the appellant further argued that, at a minimum, the board of review should submit comparable sales to support its proposed settlement offer.

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 did not meet this burden of proof and a reduction in the subject's assessment is not warranted.

The appellant submitted three market value sales for the Board's consideration. The Board finds these properties are located in Belleville, unlike the subject, and reflect the sale of commercial property, with comparable #2 appearing to have some residential use, while the subject property type is reportedly all residential. Nevertheless, these comparables sold from January to September 2020 for prices ranging from \$49,000 to \$72,000 or from \$22.52 to \$35.50 per square foot of building area, including land. The subject's equalized assessment reflects a market value of \$46,592 or \$16.93 per square foot of living area, including land, which falls below the range established by the comparable sales in this record which is logical given the subject was built in 1917 as compared to more recently constructed comparable properties. After considering appropriate adjustments to the comparable sales presented by the appellant, for differences from the subject, the Board finds the subject's assessment is supported and a reduction is not warranted.

¹ The Board finds the best description of the comparable properties was found in their respective Multiple Listing Service sheets submitted by the appellant.

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: February 20, 2024



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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