



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

APPELLANT: Shil Patel SSP Hospitality LLC
DOCKET NO.: 21-00684.001-C-3
PARCEL NO.: 23-7-0688-010-00

The parties of record before the Property Tax Appeal Board are Shil Patel SSP Hospitality LLC, the appellant, by Robert W. McQuellon III, Attorney at Law in Peoria; and the Adams 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 **Adams** County Board of Review is warranted. The correct assessed valuation of the property is:

LAND: \$179,560
IMPR.: \$187,070
TOTAL: \$366,630

Subject only to the State multiplier as applicable.

Statement of Jurisdiction

The appellant timely filed the appeal from a decision of the Adams County Board of Review pursuant to section 16-160 of the Property Tax Code (35 ILCS 200/16-160) challenging the assessment for the 2021 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 known as the AmericInn consists of a three-story hotel with 58 rooms of frame exterior construction with 26,175 square feet of building area. The building was constructed in 1991. The property has a 161,608 square foot site and is located in Quincy, Quincy Township, Adams County.

The appellant appeared before the Property Tax Appeal Board through counsel contending overvaluation as the basis of the appeal. In support of this argument the appellant submitted information on three comparable hotel sales.

The appellant's counsel had an opening statement describing the subject property as a prior Comfort Suites and that the property sold in 2021 for \$1,100,000 which has since been remodeled based on the property being closed for virtually the entire year of 2021.

Robert McQuellon Jr. was called as a witness.

McQuellon Jr. testified that comparable #1 is the First Western Inn located in Fairmont City, Illinois. This property has 32 units and sold in January 2020 for a price of \$670,000 or \$20,937 per unit. McQuellon Jr. testified that comparable #2 is the Centerstone Inn located in Carlyle, Illinois. This property has 41 units and sold in August 2019 for \$825,000 or \$20,121 per unit. Comparable #3 is the Rodeway Inn, located at Urbana, Illinois has 67 units and sold in November 2018 for \$1,100,000 or \$16,417 per unit.

Based on the evidence, the appellant is requesting that the subject property be reduced to \$275,000 reflecting a market value of approximately \$823,083 at the statutory level of assessments of 33.33%.

Under cross-examination, McQuellon Jr. acknowledged that appellant's sale #1 was a fulfillment of an installment contract from 2010. McQuellon Jr. agreed that appellant's comparable #2 is located in Carlyle, Illinois which has a population of approximately 3,900. McQuellon Jr. testified that the subject property sold in January 2021 for \$1,100,000 and approximately \$700,000 was put back in the property for renovations.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$650,540. The subject's assessment reflects a market value of \$1,950,060 or \$33,622 per unit, or \$74.50 per square foot of building area, land included, when using the 2021 three year average median level of assessment for Adams County of 33.36% as determined by the Illinois Department of Revenue. Todd Eyler, First Assistant States Attorney, represented the board of review.

In a written memorandum submitted by the board of review, the board of review states that appellant's comparable #1 was not advertised and was the fulfillment of an installment contract from 2010 and comparable #2 is located in Carlyle, Illinois.

In support of its contention of the correct assessment the board of review submitted an article about renovations for the newly acquired hotel, a PTAX-203 Illinois Real Estate Transfer Declaration for appellant's comparable sale #1, and an assessment grid analysis of eight additional hotels in Quincy which include the market value per room for each property. There was no sales information included for these eight comparables.

Eyler called Lisa Gasko, Quincy Township Assessor, as the witness for the board of review

Gasko testified that she submitted that article about the subject property for the appeal but had no information about the subject's sale because it was a sheriff's sale.

Under cross-examination, Gasko testified that the date of the assessment was January 1, 2021, and the appellant had not put the \$700,000 in the property as of the assessment date. Gasko acknowledged that the hotel being closed would impact value.

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 parties submitted the sale of the subject property and three comparable sales for the Board's consideration. The Board gave less weight to the appellant's comparable sale #1 as this sale was a fulfillment of a 2010 installment contract, which is dated and less likely to be reflective of fair cash value as of January 1, 2021. The Board gave less weight to appellant's comparable #2 as this property is located in Carlyle, Illinois with a population of approximately 3,900 when compared to the location of the property in Quincy, Illinois with a population of approximately 40,000. The Board gave less weight to the appellant's sale #3 that sold in 2018, as this property sold less proximate in time to the assessment date at issue than the best sale in the record. The Board gave less weight to the board of review grid analysis based on the equity argument being nonresponsive to the appellant's market value argument.

The Board finds the best evidence of market value to be the sale of the subject property. This hotel sold January 2021 for a price of \$1,100,000 and then was closed for the remainder of the year for renovations of \$700,000. The subject's assessment reflects a market value of \$1,950,060 or \$33,622 per unit, or \$74.50 per square foot of building area, land included, which is above the subject's purchase price in January 2021. Based on this evidence the Board finds a reduction in the subject's assessment 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: January 16, 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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COUNTY

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