



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

APPELLANT: The Meadows at Shadow Ridge, LLC
DOCKET NO.: 22-03207.001-C-3 through 22-03207.002-C-3
PARCEL NO.: See Below

The parties of record before the Property Tax Appeal Board are The Meadows at Shadow Ridge, LLC, the appellant, by attorney Lisa Ann Johnson, of Amundsen Davis, LLC in St. Louis; 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:

DOCKET NO	PARCEL NUMBER	LAND	IMPRVMT	TOTAL
22-03207.001-C-3	08-15.0-309-036	23,578	377,830	\$401,408
22-03207.002-C-3	08-15.0-309-037	60,403	961,693	\$1,022,096

Subject only to the State multiplier as applicable.

Statement of Jurisdiction

The appellant timely filed the appeal from notices of equalization issued by 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 2022 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 eight 2-story or 3-story apartment buildings of wood siding and brick exterior construction with a total combined 80,684 square feet of living area. The buildings range in age from 14 to 24 years old. Features include 97 apartment units, a club house, and an inground swimming pool. One building has an unfinished basement. The property has a total combined 5.05 acre site and is located in Belleville, Belleville Township, St. Clair County.

The appellant contends assessment inequity concerning the improvement as the basis of the appeal. In support of this argument the appellant submitted information on four equity comparables located from 3.8 to 16 miles from the subject. The comparables are improved with five to eight 2-story or 3-story apartment buildings of wood siding or wood siding and brick exterior construction ranging in total combined size from 80,014 to 141,967 square feet of living

area. The buildings range in age from 9 to 57 years old. The comparables have from 72 to 120 apartment units. Comparable #1 features fireplaces, decks, patios, and garages. Comparable #2 features a club house, office, move room, storage, computer room, fitness center, an inground swimming pool, garages, playgrounds, walking trails, and a lake area. Comparable #4 features washer and dryer hookups in every unit and an inground swimming pool. The comparables have improvement assessments ranging from \$749,056 to \$1,461,525, or from \$9.36 to \$12.62 per square foot of living area, or from \$6,936 to \$14,271 per apartment unit.

The appellant submitted copies of the notices of equalization issued by the board of review disclosing the property has a total combined equalized assessment of \$1,423,504 and a combined equalized improvement assessment of \$1,339,523, or \$16.60 per square foot of living area, or \$13,810 per apartment unit.

Based on this evidence, the appellant requested the subject's combined improvement assessment be reduced to \$862,109, or \$10.69 per square foot of living area, or \$8,888 per apartment unit.

The board of review did not submit its "Board of Review Notes on Appeal" nor any evidence in support of its assessed valuation of the subject property and was found in default by a letter issued on July 27, 2023.

Conclusion of Law

The appellant contends 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 and a reduction in the subject's assessment is not warranted.

The Board finds the only evidence of assessment equity to be the appellant's comparables. The Board gave less weight to comparables #1 and #3, which are located more than 12 miles from the subject. The Board finds comparables #2 and #4 are more similar to the subject in location but have varying degrees of similarity to the subject in building size, age, and features. These two comparables have improvement assessments of \$1,255,879 and \$1,461,525 or \$12.62 and \$10.29 per square foot of living area, or \$14,271 and \$12,179 per apartment unit, respectively. The subject's improvement assessment of \$1,339,523, or \$16.60 per square foot of living area, or \$13,810 per apartment unit, is bracketed by the best comparables in terms of total improvement assessment and on a per apartment unit basis, but falls above the two best comparables on a per square foot basis. However, the Board finds the subject's higher per square foot assessment is justified given these two comparables have larger total building sizes than the subject. The Board notes the principle of the economies of scale which generally provides that if all other things are equal, as the size of a property increases, the per unit value decreases. In contrast, as the size of a property decreases, the per unit value increases.

The board of review did not submit any evidence in support of its assessment of the subject property as required by section 1910.40(a) of the rules of the Property Tax Appeal Board and is found to be in default pursuant to section 1910.69(a) of the rules of the Property Tax Appeal Board. 86 Ill.Admin.Code §1910.40(a) & §1910.69(a). On this limited record, the Board has examined the evidence submitted by the appellant and finds that a reduction in the assessed valuation of the subject property is not 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:

April 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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