



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

APPELLANT: Illini Home Buyers, LLC
DOCKET NO.: 23-00256.001-R-1
PARCEL NO.: 20-03-34-476-004

The parties of record before the Property Tax Appeal Board are Illini Home Buyers, LLC, the appellant, by Kevin H. Luebchow, Attorney at Law in Urbana; and the Champaign 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 **Champaign** County Board of Review is warranted. The correct assessed valuation of the property is:

LAND: \$4,910
IMPR.: \$21,746
TOTAL: \$26,656

Subject only to the State multiplier as applicable.

Statement of Jurisdiction

The appellant timely filed the appeal from a decision of the Champaign County Board of Review pursuant to section 16-160 of the Property Tax Code (35 ILCS 200/16-160) challenging the assessment for the 2023 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 parties appeared before the Property Tax Appeal Board for a hearing at the Champaign County Board of Review Office in Urbana pursuant to a prior written notice. Appearing on behalf of the appellant was Kevin Leubchow, Attorney at Law and Zach Morrison, the owner of Illini Home Buyers LLC, and appearing on behalf of the Champaign County Board of Review were members Chris Diana and Susan Frobish.

The subject property consists of one parcel improved with two 1-story dwellings. The dwellings have 576 and 1,072 square feet of living area and were constructed in 1920 and 1950, respectively. Features include a 1-car garage. The property has a 7,500 square foot site and is located in Rantoul Township, Champaign County.

The appellant's appeal is based on overvaluation. In support of this argument the appellant submitted completed Section IV – Recent Sale Data disclosing the subject property was purchased in July 2023 for a price of \$80,000; the sale of the property was not a transfer between family member or related corporations; the property was sold by the owner and advertised for sale through the Facebook marketplace with 4,500/5,100 members for a period of one week. The appellant further disclosed \$10,000 of renovations were made to the property before the buyer occupied the property. To document the sale the appellant submitted the Settlement Statement, PTAX-203 Illinois Real Estate Transfer Declaration, and the Contract for Sale of Real Estate. The documents disclosed that the sale price of \$110,000 contains two parcels where parcel # 20-03-34-476-004 sold for \$80,000 and parcel #20-03-34-476-003 sold for \$30,000. The appellant also submitted exterior photographs of the subject property. The appellant also submitted the Settlement Statement associated with the sale of the subject property.

The appellant testified that he is the owner of Illini Homebuyers and has been buying, selling, and renting properties on contract for about 18 years and participates in about thirty closings per year as either the buyer or seller. The appellant stated he purchased the subject property (107 W. Letchworth) along with 109 W. Letchworth in June 2023 for \$45,000. The breakdown was \$30,000 for 107 W. Letchworth, which is the subject property that contains 2 houses and \$15,000 for 109 W. Letchworth. To document this sale transaction the appellant submitted the Settlement Sheet. The appellant further stated that after the purchase the subject property's roof was replaced, and the property was cleaned up. After the repairs, the property was put for sale through Facebook Marketplace which is a method he has been using for years. Several potential buyers viewed the subject property. He eventually sold the subject property for \$80,000 on contract with \$10,000 paid up front. The appellant stated the PTAX-203 form for this transaction does not get recorded until the contract is paid off in full and his attorney handles all the transactions. Lastly, the appellant argued both sales of the subject property were below the subject's current market value as reflected by the assessment.

Based on this evidence, the appellant requested a reduction in the subject's assessment to reflect the purchase price of \$80,000.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$33,490. The subject's assessment reflects a market value of \$100,510 when using the 2023 three-year average median level of assessment for Champaign County of 33.32% as determined by the Illinois Department of Revenue.

In response to the appeal, the board of review asserted the appellant did not provide any evidence that indicates the sale of the subject was an arm's length transaction. The board of review further noted the appellant did not submit any evidence to support that the subject was listed through Facebook Marketplace. Based on this evidence the board of review contends the subject's assessment should be sustained.

When questioned by the Administrative Law Judge, the board of review stated that no market value of evidence was submitted to support 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 Board finds the best and only evidence of market value to be the purchase of the subject property in July 2023 for a price of \$80,000. The appellant provided evidence demonstrating the sale had the elements of an arm's length transaction. The appellant completed Section IV - Recent Sale Data of the appeal disclosing the parties to the transaction were not related, the property was sold by the owner, the property had been advertised for sale through the Facebook Marketplace for a period of one week. In further support of the transaction the appellant submitted a copy of the settlement statement and the purchase contract. The Board finds the owner originally purchased the subject property for \$30,000 and then cleaned up the property and made \$10,000 worth of repairs before advertising and selling it through Facebook Marketplace for \$80,000. The Illinois Supreme Court has defined fair cash value as what the property would bring at a voluntary sale where the owner is ready, willing, and able to sell but not compelled to do so, and the buyer is ready, willing and able to buy but not forced to do so. *Springfield Marine Bank v. Property Tax Appeal Board*, 44 Ill.2d. 428, (1970). A contemporaneous sale of property between parties dealing at arm's-length is a relevant factor in determining the correctness of an assessment and may be practically conclusive on the issue of whether an assessment is reflective of market value. *Rosewell v. 2626 Lakeview Limited Partnership*, 120 Ill.App.3d 369 (1st Dist. 1983), *People ex rel. Munson v. Morningside Heights, Inc*, 45 Ill.2d 338 (1970), *People ex rel. Korzen v. Belt Railway Co. of Chicago*, 37 Ill.2d 158 (1967); and *People ex rel. Rhodes v. Turk*, 391 Ill. 424 (1945). The Board finds the purchase price is below the market value reflected by the assessment. The Board finds the board of review did not present any sufficient evidence to challenge the arm's length nature of the transaction or to refute the contention that the purchase price was reflective of market value. Based on this record the Board finds the subject property had a market value of \$80,000 as of January 1, 2023. Since market value has been determined the 2023 three-year average median level of assessment for Champaign County of 33.32% shall apply. 86 Ill.Admin.Code §1910.50(c)(1).

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 15, 2025



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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