



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

APPELLANT: Illinois Investment Properties, LLC  
DOCKET NO.: 23-03378.001-R-1  
PARCEL NO.: 12-645-037-00

The parties of record before the Property Tax Appeal Board are Illinois Investment Properties, LLC, the appellant, by attorney Doug Stewart of Stewart Law Group, in Fairview Heights; and the Logan 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 **Logan** County Board of Review is warranted. The correct assessed valuation of the property is:

**LAND:** \$6,620  
**IMPR.:** \$2,547  
**TOTAL:** \$9,167

Subject only to the State multiplier as applicable.

**Statement of Jurisdiction**

The appellant timely filed the appeal from a decision of the Logan 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 subject property consists of a one-story dwelling of brick and frame construction with vinyl siding exterior that was constructed in 1930. The dwelling has 780 square feet of living area that is situated on a 20,473 square foot site. The dwelling has a partial unfinished basement and two, detached garages that contain 440 and 480 square feet of building area, respectively. <sup>1</sup> The subject property is located in West Lincoln Township, Logan County.

The appellant submitted evidence before the Property Tax Appeal Board claiming the market value of the subject property is not accurately reflected in its assessment. In support of this argument, the appellant submitted three comparable sales located from .9 to 14.5 miles from the subject. The comparables are comprised of one and one-half or two-story frame dwellings that

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<sup>1</sup> The appellant did not disclose or refute the subject property has a partial unfinished basement and is improved with two garages.

were constructed from 1853 to 1897. The dwellings range in size from 1,663 to 3,078 square feet of living area and are situated on sites that contain from 8,554 to 20,200 square feet of land area. The appellant did not disclose the dwellings' foundation type or if the properties are improved with central air conditioning, a fireplace or a garage. The comparables sold from November 2020 to September 2022 for prices ranging from \$17,580 to \$20,000 or from \$6.50 to \$10.96 per square foot of living area including land. Based on this evidence, the appellant requested the subject's assessment be reduced to \$6,667.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the subject's final assessment of \$9,167. The subject's assessment reflects an estimated market value of \$27,504 or \$35.26 per square foot of living area including land using the statutory level of assessment of 33.33%. In support of the subject's assessment, board of review submitted four comparable sales located from 200 feet to .3 of a mile from the subject property. The comparables are comprised of one-story dwellings of frame construction with aluminum siding exteriors that were constructed from 1937 to 1960. The dwellings range in size from 578 to 1,232 square feet of living area and are situated on sites that contain from 5,663 to 8,276 square feet of land area. One comparable has a crawl space foundation; one comparable has a concrete slab foundation; and two comparables have an unfinished basement. Three comparables have central air conditioning and two comparables have a garage or carport. The comparables sold from October 2022 to September 2023 for prices ranging from \$30,000 to \$65,000 or from \$28.41 to \$112.46 per square foot of living area including land. The board of review also presented documentation disclosing the subject property was listed for sale through Zillow at \$28,900.

### **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). National City Bank of Michigan/Illinois v. Illinois Property Tax Appeal Board, 331 Ill.App.3d 1038 (3<sup>rd</sup> Dist. 2002). 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 failed to meet this burden of proof and no reduction in the subject's assessment is warranted.

The parties in this appeal submitted seven suggested comparable sales for the Board's consideration. The Board gave no weight to the comparables submitted by the appellant. Each of the appellant's comparables are considerably older in age, larger in dwelling size and are of a dissimilar design when compared to the subject. In addition, appellant's comparable #3 is not located in close proximity being 14.5 miles from the subject. Finally, comparables #2 and #3 sold in 2020, which are dated since the transactions occurred over two years prior to the subject's January 1, 2023, assessment date to be a reliable or credible indicator of market value. The Board gave less weight to comparable #3 submitted by the board of review due to its newer age and larger dwelling size when compared to the subject.

The Board finds the best evidence of market value contained in this record are comparable sales #1, #2 and #4 submitted by the board of review. These comparables sold more proximate in time

to the assessment date are most like the subject in location, age, design, dwelling size and most features. However, each comparable requires an upward adjustment for their smaller site sizes and smaller or lack of a garage; and comparables #1 and #4 requires an upward adjustment for their inferior foundation types. These most similar comparables sold from March 2023 to September 2023 for prices ranging from \$30,000 to \$65,000 or from \$32.47 to \$112.46 per square foot of living area including land. The Board placed most weight on comparable #2 submitted by the board of review as this property is overall most similar to the subject. Board of review comparable #2 sold in March 2023 for \$37,000 or \$57.45 per square foot of living area including land. The subject property's assessment reflects an estimated market value of \$27,504 or \$35.26, less than the most similar comparable sales contained in this record on an overall basis but within the range on a per square foot basis. After considering adjustments to the comparables for differences when compared to the subject as discussed above and giving some consideration to the subject's listing price of \$28,900, the Board finds the subject property's estimated market value as reflected by its assessment is supported by a preponderance of the evidence in the record. Therefore, no change in the assessment of the subject property'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: \_\_\_\_\_

October 15, 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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