



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

APPELLANT: Marcus Sheldon
DOCKET NO.: 23-03886.001-R-1
PARCEL NO.: 08-31-126-003

The parties of record before the Property Tax Appeal Board are Marcus Sheldon, the appellant; and the Peoria 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 **Peoria** County Board of Review is warranted. The correct assessed valuation of the property is:

LAND: \$16,810
IMPR.: \$88,270
TOTAL: \$105,080

Subject only to the State multiplier as applicable.

Statement of Jurisdiction

The appellant timely filed the appeal from a decision of the Peoria 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 2-story dwelling of frame exterior construction with 2,910 square feet of living area. The dwelling was constructed in 1980. Features of the home include a 1,683 square foot basement with 567 square feet of finished area, central air conditioning, a fireplace and a 1,152 square foot garage. The property has a 3.4 acre or 148,104 square foot site and is located in Edwards, Radnor Township, Peoria 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 1.96 to 3.8 miles from the subject property. The comparables have sites with either .72 or .77 of an acre and are improved with bi-level or conventional 2-story dwellings of frame or aluminum/vinyl exterior construction ranging in size from 2,240 to 3,384 square feet of living area. The dwellings were constructed in 1977 and have basements ranging in size from 784 to 1,640, two of which have 1,344 or 1,640 square feet of finished area. Each comparable has central air conditioning and a garage with

either 572 or 780 square feet of building area. Comparable #3 has one fireplace. The comparables sold from April 2019 to August 2021 for prices ranging from \$142,500 to \$241,000 or from \$63.62 to \$71.22 per square foot of living area, including land. The appellant completed Section IV – Recent Sale data that disclosed the subject sold in December 2019 for \$287,500; the property was sold by a realtor; and the property was advertised for sale through the Multiple Listing Service for a period of two years. Based on this evidence the appellant requested a reduction in the subject's total assessment to \$80,890, which reflects an estimated market value of \$242,694 or \$83.40 per square foot of living area, including land, when using the statutory level of assessment of 33.33%.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$105,080. The subject's assessment reflects a market value of \$315,272 or \$108.34 per square foot of living area, land included, when using the statutory level of assessment of 33.33%.¹

In support of its contention of the correct assessment the board of review submitted information on five comparable sales located from .16 of a mile to 3.91 miles from the subject property. The comparables have sites ranging in size from 1.16 to 2.33 acres and are improved with 1.5-story or 2-story dwellings of aluminum/vinyl or wood exterior construction ranging in size from 2,288 to 3,516 square feet of living area. The dwellings were constructed from 1978 to 1994 and have basements ranging in size from 968 to 1,758, two of which have 500 or 793 square feet of finished area. Each comparable has central air conditioning, one or three fireplaces and a garage ranging in size from 576 to 1,200 square feet of building area. The comparables sold from July 2021 to September 2022 for prices ranging from \$319,900 to \$475,000 or from \$118.18 to \$139.82 per square foot of living area, including land. Based on this evidence the board of review requested confirmation of the subject's assessment.

In written rebuttal, the appellant argued the board of review comparables have features or are in highly desirable neighborhoods that make them substantially more valuable than his property. The appellant submitted a word document noting the features of these comparables and provided photographic evidence where possible.

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.

¹ Procedural rule Sec. 1910.50(c)(1) provides that in all counties other than Cook, the three-year county wide assessment level as certified by the Department of Revenue will be considered. 86 Ill.Admin.Code Sec. 1910.50(c)(1). Prior to the drafting of this decision, the Department of Revenue has yet to publish figures for tax year 2023.

The record contains eight comparable sales for the Board's consideration. The Board has given less weight to the appellant's comparables due to differences in site size and/or dwelling size when compared to the subject. In addition, comparables #1 and #3 have sale dates that occurred in 2019, less proximate in time to the January 1, 2023, assessment date than are the comparable sales submitted by the board of review. The Board has given reduced weight to board of review comparables #1, #2 and #5 due to differences from the subject in dwelling size.

The Board finds the best evidence of market value to be board of review comparables #3 and #4, which sold more proximate in time to the lien date at issue and are similar to the subject in dwelling size, design and some features. However, the Board finds both comparables have varying degrees of similarity to the subject in site size, age, and basement finish, suggesting adjustments would be required to make them more equivalent to the subject. These two comparables sold in November and October 2021 for prices of \$375,000 and \$381,000 or for \$125.67 and \$118.18 per square foot of living area, including land, respectively. The subject's assessment reflects a market value of \$315,272 or \$108.34 per square foot of living area, including land, which falls below the two best comparable sales in the record and appears logical given these comparables features as described the appellant and not refuted by the board of review. Based on this record and after considering adjustments to the best comparables for differences from the subject, the Board finds a reduction in the subject's assessment 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: _____

December 17, 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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APPELLANT

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COUNTY

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