



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

APPELLANT: Guy Andreoni
DOCKET NO.: 23-04158.001-R-1
PARCEL NO.: 10-2-16-15-06-101-012

The parties of record before the Property Tax Appeal Board are Guy Andreoni, the appellant, and the Madison 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 **Madison** County Board of Review is warranted. The correct assessed valuation of the property is:

LAND: \$29,830
IMPR.: \$125,370
TOTAL: \$155,200

Subject only to the State multiplier as applicable.

Statement of Jurisdiction

The appellant timely filed the appeal from a decision of the Madison 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 is improved with a part two-story and part one-story dwelling of frame with brick trim exterior construction containing 2,218 square feet of living area. The dwelling was constructed in 2004 and is approximately 19 years old. Features of the home include a full basement that is partially finished, central air conditioning, one fireplace, 3½ bathrooms, and a three-car attached garage with 792 square feet of building area. The property also has an inground swimming pool. The property has a site with approximately 87,830 square feet of land area located in Edwardsville, Pin Oak Township, Madison County.

The appellant contends overvaluation as the basis of the appeal. In support of this argument the appellant submitted information on four comparable sales improved with one-story or two-story dwellings of vinyl siding, brick, or brick and siding exterior construction that range in size from 1,728 to 3,014 square feet of living area. The homes range in age from approximately 2 to 38 years old. Each comparable has a basement with two having finished area, central air

conditioning, 2 to 3½ bathrooms, and a two-car or a three-car garage. Three comparables have one or two fireplaces. Comparable #1 is also described as having a three-car outbuilding and comparable #4 has an inground swimming pool. The comparables have sites ranging in size from 15,000 to 572,000 square feet of land area and are located from approximately 5 to 10 miles from the subject property. The sales occurred from May 2023 to March 2024 for prices ranging from \$425,000 to \$675,000 or from \$141.01 to \$390.63 per square foot of living area, including land.

The appellant submitted a copy of the “Notice of Final Decision on Assessed Value by Board of Review” disclosing the subject’s assessment had been increased by the board of review from \$140,720 to \$155,200 by the application of a township equalization factor of 1.1029. The appellant requested the subject’s total assessment reduced to \$140,720.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total pre-equalized assessment for the subject of \$140,720. The property has total equalized assessment of \$155,200 which reflects a market value of \$465,647 or \$209.94 per square foot of living area, including land, when applying the statutory level of assessment of 33 1/3%.¹

In support of its contention of the correct assessment the board of review submitted information on four comparable sales improved with part two-story and part one-story dwellings of frame with brick trim exterior construction that range in size from 2,009 to 2,652 square feet of living area. The homes range in age from 19 to 21 years old. Each property has a basement with finished area, one fireplace, 2½ or 3½ bathrooms, and a garage ranging in size from 484 to 826 square feet of building area. Comparables #1 and #2 both have an inground swimming pool. The comparables have sites ranging in size from 11,300 to 94,356 square feet of land area and are located from across the street to approximately 3.75 miles from the subject property. These properties sold from April 2021 to August 2023 for prices ranging from \$417,700 to \$525,000 or from \$168.56 to \$252.88 per square foot of living area, including land.

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.

The parties submitted information on eight comparable sales to support their respective positions. The board gives less weight to appellant’s comparable sales #1, #2 and #3 as these properties sold in 2024 from approximately 14 to 15 months after the assessment date at issue as well as being improved with homes that differ from the subject in style and/or size. The Board

¹ Property Tax Appeal Board procedural rule section 1910.50(c)(1) provides that in all counties other than Cook, the three-year county wide assessment level as certified by the Illinois Department of Revenue (IDOR) will be considered. 86 Ill.Admin.Code §1910.50(c)(1). As of the development of this Final Administrative Decision, the IDOR has not published figures for tax year 2023.

gives less weight to board of review comparables #2 and #3 as these properties sold in April and September 2021, not as proximate in time to the assessment date as the best sales in this record. The Board finds the best evidence of market value to be appellant's comparable sale #4 as well as board for review comparables #1 and #4. These comparables sold most proximate in time to the assessment date and are improved with homes similar to the subject in age, style, and size. The comparables are similar to the subject in most features with the exception board of review comparable #4 does not have an inground swimming pool as does the subject property suggesting this comparable may require an upward adjustment to make it more similar to the subject for this feature. These three comparables sold for prices ranging from \$425,000 to \$515,000 or from \$180.54 to \$252.88 per square foot of living area, including land. The comparable most similar to the subject in location, board of review comparable #1, sold in November 2021 for a price of \$515,000 or \$221.03 per square foot of living area, including land. The subject's assessment reflects a market value of \$465,647 or \$209.94 per square foot of living area, including land, which is within the range established by the best comparable sales in this record and is below the price of the most similar comparable in terms of location. Based on this evidence the Board finds the subject's assessment is reflective of the property's fair cash value and 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: _____

November 19, 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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