



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

APPELLANT: Community First Bank of the Heartland
DOCKET NO.: 23-06060.001-C-1
PARCEL NO.: 07-29-352-017

The parties of record before the Property Tax Appeal Board are Community First Bank of the Heartland, the appellant, by attorney David L. Piercy, of Howard, Leggans, Piercy & Howard LLP in Mount Vernon; and the Jefferson 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 **Jefferson** County Board of Review is warranted. The correct assessed valuation of the property is:

LAND: \$100,322
IMPR.: \$130,063
TOTAL: \$230,385

Subject only to the State multiplier as applicable.

Statement of Jurisdiction

The appellant timely filed the appeal from a decision of the Jefferson 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 part 1-story and part 3-story office building of brick exterior construction with a total of 23,073 square feet of building area and a 1-story building with 630 square feet of building area, for a combined total of 23,703 square feet of building area.¹ The building was constructed in 1954. Features include a basement, central air conditioning, and a 3,264 square foot drive-up window and canopy area. The property has an approximately 55,193 square foot, or 1.27 acre, site and is located in Mt. Vernon, Mt. Vernon Township, Jefferson County.

¹ The parties differ regarding the subject's building size. The Board finds the best evidence of building size is found in the board of review's evidence which includes sketches with measurements of the subject's buildings. The Board has calculated the above building sizes from the sketches and measurements presented by the board of review.

The appellant contends overvaluation as the basis of the appeal. In support of this argument the appellant submitted an appraisal estimating the subject property had a market value of \$489,000 as of December 31, 2023. The appraisal was prepared by Ronald W. Reeder, a certified general real estate appraiser, for ad valorem tax purposes.

Under the income approach, the appraiser selected three rent comparables located in Mt. Vernon. The comparables range in size from 700 to 1,600 square feet of rentable office area and have rents ranging from \$12.00 to \$14.63 per square foot. The appraiser adjusted the comparables by 75% for unit size to conclude adjusted rents ranging from \$3.00 to \$3.66 per square foot and estimated market rent for the subject of \$3.25 per square foot, resulting in potential gross income of \$73,320. The appraiser deducted 5% or \$3,666 for vacancy to arrive at effective gross income of \$69,654. The appraiser next deducted expenses of \$11,841, not including real estate taxes, to arrive at net operating income of \$57,813. For the capitalization rate, the appraiser developed a rate of 7.00% based on range from 7.00% to 8.42% derived from market sales of office buildings and the band of investment method. Based on a loaded capitalization rate of 10.23% the appraiser concluded a value for the subject of \$566,000, rounded, under the income approach.

Under the sales comparison approach, the appraiser selected three comparable sales located in Mt. Vernon. The comparables are improved with 2-story or 6-story office or mixed-use buildings ranging in size from 5,244 to 70,060 square feet of building area. The buildings range in age from 23 to 127 years old, with the two older buildings reported to have been updated, resulting in effective ages ranging from 10 to 25 years old. One comparable has a drive-up window and canopy. The parcels range in size from 2,922 to 47,916 square feet of land area. The comparables sold from January to September 2022 for prices ranging from \$320,000 to \$627,500 or from \$8.92 to \$61.02 per square foot of building area, including land. The appraiser adjusted the comparables for differences from the subject, including adjustments from -35% to +50% for building size and adjustments from -40% to -10% for effective age based on an effective age of 30 years old for the subject, to arrive at adjusted prices ranging from \$10.70 to \$37.60 per square foot. The appraiser concluded a value for the subject of \$24.37 per square foot or \$489,000, rounded, under the sales comparison approach.

In reconciliation, the appraiser gave the most weight to the sales comparison approach in estimating a value for the subject of \$489,000 as of December 31, 2023.

Based on this evidence the appellant requested a reduction in the subject's assessment to reflect the appraised value conclusion.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$230,385. The subject's assessment reflects a market value of \$675,022 or \$33.62 per square foot of building area, land included, when using the 2023 three-year average median level of assessment for Jefferson County of 34.13% as determined by the Illinois Department of Revenue.

In support of its contention of the correct assessment, the board of review submitted a sketch with measurements of the subject's buildings with cost computations for these improvements. The board of review requested the subject's assessment be sustained.

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 appellant presented an appraisal and the board of review presented cost calculations for the subject. The Board gives less weight to the cost calculations presented by the board of review, for which no supporting evidence was provided. The Board also gives less weight to the appraised value conclusion as the appraiser did not report the correct building size for the subject, resulting in flawed adjustments to the rent comparables and comparable sales for building size. Moreover, for the income approach, the appraiser selected rent comparables that are significantly smaller than the subject requiring large adjustments to these comparables. Although the appraiser stated the purpose of the appraisal was for ad valorem tax purposes, the appraisal states a value conclusion as of December 31, 2023 rather than the January 1, 2023 assessment date. For these reasons, the Board finds the appraisal states a less credible and/or reliable opinion of value and the Board will instead consider the raw sales presented in the appraisal.

The Board finds the best evidence of market value to be appraisal sales #2 and #3, which sold proximate in time to the assessment date and are more similar to the subject in design, building size, location, effective age, and some features. The Board gave less weight to appraisal sale #1, which differs significantly from the subject in design and total building size. The two best comparables sold for prices of \$320,000 and \$376,000 or \$61.02 and \$41.78 per square foot of building area, including land, respectively. The subject's assessment reflects a market value of \$675,022 or \$33.62 per square foot of building area, including land, which is above the two best comparable sales in terms of total market value and below the best comparables on a per square foot basis, which is logical given the subject is a substantially larger building than the two best comparables in this record. Based on this evidence and after considering appropriate 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: June 17, 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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APPELLANT

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