



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

APPELLANT: Illinois Realty Group Holdings
DOCKET NO.: 24-02629.001-R-1
PARCEL NO.: 10-27-200-009

The parties of record before the Property Tax Appeal Board are Illinois Realty Group Holdings, the appellant, by attorney Patrick Sullivan, of PRDS Law, LLC in Belleville; and the Greene 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 **Greene** County Board of Review is warranted. The correct assessed valuation of the property is:

LAND: \$7,451
IMPR.: \$20,882
TOTAL: \$28,333

Subject only to the State multiplier as applicable.

Statement of Jurisdiction

The appellant timely filed the appeal from a decision of the Greene County Board of Review pursuant to section 16-160 of the Property Tax Code (35 ILCS 200/16-160) challenging the assessment for the 2024 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 1-story dwelling of frame exterior construction with 1,749 square feet of living area. The dwelling was constructed in 2009 and is approximately 15 years old and features two bathrooms. The property has an approximately 301,871 square feet of land or 6.93 acres and is located in Greenfield, Rubicon Township, Greene 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 from 16.5 to 17.0 miles from the subject property. The comparables have sites that range in size from 6,534 to 15,682 square feet of land area or .15 to .36 of an acre and are improved with 1-story, 1½-story or part 1-story and part 2-story dwellings¹ of frame exterior construction ranging in size from 1,500 to 1,700

¹ Some descriptive details for the appellant's comparables not reported in the grid analysis were found in either a Multiple Listing Service sheet or print out from an online real estate website.

square feet of living area. The dwellings were built from 1838 to 1927. Each comparable has one or 1½ bathrooms. One dwelling has a partial basement and one comparable has a crawl space foundation. One home has central air conditioning and one comparable has a fireplace. The properties sold from February 2023 to January 2025 for prices ranging from \$78,500 to \$83,500 or from \$47.35 to \$52.65 per square foot of living area, land included.

The appellant also submitted exterior and interior photographs of the subject property depicting the property appears to be in process of renovation. The front exterior photograph depicts insulation/house wrap and/or wood boards on exterior walls. The interior photographs depict construction materials and an unfinished ceiling with exposed wall joists.

Based on this evidence, the appellant requested the subject's total assessment be reduced to \$28,333 which reflects a market value of \$85,008 or \$48.60 per square foot of living area, land included, when applying the statutory level of assessment of 33.33%.

The appellant submitted the final decision issued by the Greene County board of review. The subject has an assessed value of \$38,696 which reflects a market value of \$116,100 or \$66.38 per square foot of living area, land included when applying the statutory level of assessment of 33.33%². The board of review did not submit its "Board of Review Notes on Appeal" or any evidence in support of its assessment of the subject property as required by section 1910.40(a) of the rules of the Property Tax Appeal Board. 86 Ill.Admin.Code §1910.40(a). By letter dated August 28, 2025 the board of review was found to be in default pursuant to section 1910.69(a) of the rules of the Property Tax Appeal Board. 86 Ill.Admin.Code §1910.69(a).

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 appellant submitted three comparable sales for the Board's consideration.

The Board finds the only evidence of market value to be appellant comparables #1, #2 and #3 which are similar to the subject in dwelling size, however, the board finds adjustments to the comparables would have to be considered for differences from the subject in location, site size, age, condition and other features. These comparables sold from February 2023 to January 2025 for prices ranging from \$78,500 to \$83,500 or from \$47.35 to \$52.65 per square foot of living area, including land. The subject's assessment reflects a market value of \$116,100 or \$66.38 per

² 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 2024.

square foot of living area, including land, which falls above the range established by the best comparable sales in this record. After considering appropriate adjustments to the comparables for differences from the subject, the Board finds the subject's assessment is excessive and a reduction in the subject's assessment is warranted.

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 21, 2026



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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