



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

APPELLANT: Timothy Wade Squibb
DOCKET NO.: 24-02852.001-I-1
PARCEL NO.: 11-00-019-282

The parties of record before the Property Tax Appeal Board are Timothy Wade Squibb, the appellant; and the Marion 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 **Marion** County Board of Review is warranted. The correct assessed valuation of the property is:

LAND: \$34,600
IMPR.: \$63,130
TOTAL: \$97,730

Subject only to the State multiplier as applicable.

Statement of Jurisdiction

The appellant timely filed the appeal from a decision of the Marion 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 industrial building of steel exterior construction with 56,432 square feet of building area. The building is approximately 49 years old. Features include 3,520 square feet of office area, 52,912 square feet of warehouse area, 11 loading docks, and a 20 foot ceiling height. The property has a 150,718 square foot site, has a land to building ratio of 2.67:1, and is located in Salem, Salem Township, Marion County.

The appellant contends both overvaluation and assessment inequity with regard to the subject's land as the bases of the appeal. In support of the overvaluation argument, the appellant submitted information on three comparable sales of vacant land located from 1.50 to 2.52 miles from the subject. The comparables sold from September 2022 to July 2024 for prices of \$50,000 and \$210,000 or from \$0.08 to 0.21 per square foot of land area. The appellant reported two comparables are within an industrial park and the comparables are from 0.25 of a mile to 1.00

mile from I-57. The appellant reported comparable #1 was a sale from the City of Salem to Ameren and comparable #2 is commercial land that was listed for sale for 25 years.

The appellant also submitted information on six land equity comparables located from 0.09 of a mile to 13.56 miles from the subject. The parcels range in size from 57,060 to 1,280,664 square feet of land area. The comparables have land assessments ranging from \$23,780 to \$323,200 or from \$0.14 to \$0.49 per square foot of land area. The appellant noted comparables #1 and #2 are located in an industrial park, comparables #3 and #4 have access to I-57, and comparables #5 and #6 are in close proximity to the subject.

Based on this evidence, the appellant requested a reduction in the subject's land assessment to \$8,651 or \$0.06 per square foot of land area, which would reflect a market value of \$25,956 or \$0.17 per square foot of land area when applying 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 \$97,730. The subject's assessment reflects a market value of \$293,219 or \$5.20 per square foot of building area, land included, or \$1.95 per square foot of land area, building included, when using the statutory level of assessment of 33.33%.¹ The subject has a land assessment of \$34,600 or \$0.23 per square foot of land area.

In support of its contention of the correct assessment the board of review submitted information on four comparables, three of which are located from 0.50 of a mile to 2.30 miles from the subject. The parcels range in size from 83,030 to 522,720 square feet of land area. Three comparables are improved with one to four 1-story buildings ranging in combined size from 7,296 to 93,876 square feet of building area and ranging in age from 1 to 55 years old. Two comparables are reported to have 2,520 or 5,550 square feet of office area, one comparable is reported to have 15,245 square feet of warehouse area, and one comparable is reported to have 88,326 square feet of manufacturing area. The comparables have land assessments ranging from \$83,030 to \$132,040 or from \$0.25 to \$1.00 per square foot of land area. Two comparables sold in July 2023 and November 2024 for prices of \$548,000 and \$1,375,000 or \$75.11 and \$77.40 per square foot of building area, including land, or \$1.05 and \$5.13 per square foot of land area, buildings included. Comparable #3 sold in December 2023 for a price of \$325,000 or \$3.91 per square foot of land area.

The board of review submitted a brief critiquing the appellant's comparables. With regard to the sales, the board of review contended the appellant's comparable #1 sold to an adjacent owner for expansion of the electrical grid. The board of review argued this sale was for less than market value to assist in expanding electricity supply to allow future development in the area. With regard to the appellant's comparable #2, the board of review asserted this property sold in June 2022 and was split into two parcels after a manufacturing facility was built. The facility is the board of review's comparable #2. The board of review contended the appellant's comparable #3

¹ Section 1910.50(c)(1) of the Board's procedural rules 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 § 1910.50(c)(1). As of the development of this Final Administrative decision, the Department of Revenue has not published figures for tax year 2024.

is classified as residential and consists of dense trees that would require excavation for development and is located near a new residential subdivision.

With regard to the board of review's comparables, the board of review argued comparable #1 is similar to the subject in location and in a better location than the subject; comparable #2 is a portion of the appellant's comparable #2; comparable #3 is a vacant commercial land sale within the city limits that shows prices have risen in the past several years; and comparable #4 is vacant concrete plant in a very good location.

Based on this evidence, the board of review requested the subject's assessment be sustained.

Conclusion of Law

The appellant contends in part 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 for overvaluation is not warranted.

The record contains a total of six comparable sales for the Board's consideration. The Board gives less weight to the appellant's comparables and the board of review's comparable #3, which are vacant land unlike the subject. The Board finds the subject parcel consists of real property including both land and improvements thereon. In *Showplace Theatre Co. v. Property Tax Appeal Bd.*, 145 Ill. App 3d 774 (2d Dist. 1986), the court held an appeal to the Board includes a review of both the land and improvements, which together constitute the assessment of a subject property, even though the appellant may only be seeking a reduction in the land assessment. *Id.* at 777.

The Board finds the best evidence of market value to be the board of review's comparables #1 and #4, which sold proximate in time to the assessment date and are relatively similar to the subject in age and some features, although these comparables differ from the subject in number of buildings, combined building size, location, and site size, suggesting adjustments to these comparables would be needed to make them more equivalent to the subject. These most similar comparables sold for prices of \$548,000 and \$1,375,000 or \$75.11 and \$77.40, per square foot of living area, including land, or \$1.05 and \$5.13 per square foot of land area, buildings included. The subject's assessment reflects a market value of \$293,219 or \$5.20 per square foot of building area, including land, or \$1.95 per square foot of land area, including building, which is below the two best comparable sales in this record in terms of total market value and on a per square foot of building area including land, basis. On a per square foot of land area, building included, basis, the subject's assessment is bracketed by 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 for overvaluation is not justified.

The appellant also contends assessment inequity as the basis of the appeal. When unequal treatment in the assessment process is the basis of the appeal, the inequity of the assessments must be proved by clear and convincing evidence. 86 Ill.Admin.Code §1910.63(e). Proof of unequal treatment in the assessment process should consist of documentation of the assessments for the assessment year in question of not less than three comparable properties showing the similarity, proximity and lack of distinguishing characteristics of the assessment comparables to the subject property. 86 Ill.Admin.Code §1910.65(b). The Board finds the appellant did not meet this burden of proof and a reduction in the subject's assessment is not warranted.

The record contains a total of ten land equity comparables for the Board's consideration. The Board gives less weight to the appellant's equity comparables #1, #3, #4, and #5 and to the board of review's comparables #2 and #4, due to significant differences from the subject in site size. Moreover, the appellant's comparables #1 and #2 are located more than 13 miles from the subject.

The Board finds the best evidence of assessment equity to be the appellant's comparables #3 and #6 and the board of review's comparables #1 and #3, which are more similar to the subject in site size and location. These most similar comparables range in size from 57,060 to 267,890 square feet of land area and have land assessments ranging from \$23,780 to \$132,040 or from \$0.42 to \$1.00 per square foot of land area. The subject's land assessment of \$34,600 or \$0.23 per square foot of land area falls within the range established by the best comparables on a total land assessment basis and below the range on a per square foot basis.

Based on this record, and after considering appropriate adjustments to the best comparables for differences from the subject, the Board finds the appellant did not demonstrate with clear and convincing evidence that the subject's land was inequitably assessed and a reduction in the subject's land 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: _____

January 20, 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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