



## FINAL ADMINISTRATIVE DECISION ILLINOIS PROPERTY TAX APPEAL BOARD

APPELLANT: North Creek Investment & RE Holdings INC  
DOCKET NO.: 24-03091.001-R-1  
PARCEL NO.: 06-0-03543-000

The parties of record before the Property Tax Appeal Board are North Creek Investment & RE Holdings INC, the appellant, by attorney Lee Waite, of Dilsaver, Nelson & Waite, in Mattoon, and the Coles 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 **Coles** County Board of Review is warranted. The correct assessed valuation of the property is:

<b>LAND:</b>	\$2,089
<b>IMPR.:</b>	\$19,217
<b>TOTAL:</b>	\$21,306

Subject only to the State multiplier as applicable.

### **Statement of Jurisdiction**

The appellant timely filed the appeal from a decision of the Coles 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 one-story ranch-style dwelling of vinyl siding exterior construction with 1,225 square feet of living area. The dwelling is approximately 54 years old with a reported effective age of 30 years. Features include a concrete slab foundation, a full bathroom, and central air conditioning.<sup>1</sup> Outdoor amenities include a concrete patio and a stoop. The property has an approximately 7,150 square foot site and is located in Mattoon, Lafayette Township, Coles County.

The appellant contends overvaluation as the basis of the appeal. In support of this argument, the appellant submitted an appraisal prepared by Brian N. Finley, a Certified General Real Estate

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<sup>1</sup> The assessing officials indicate the property does not have central air conditioning. The appellant's appraiser reported the dwelling does have central air conditioning and used comparable sales with this feature, where no adjustments were applied as to this amenity.

Appraiser, estimating the subject property had a market value of \$15,000 as of January 1, 2024. The appraisal was prepared for tax appeal purposes with the assignment to develop the estimated fee simple market value of the subject. For sales history of the subject, Finley wrote the most recent transfer occurred on March 12, 2024 for \$0 (Sheriff's Sale).

The appraiser reported having inspected the exterior of the subject on February 11, 2024. As part of the appraisal with an extraordinary assumption<sup>2</sup> that the condition of the interior of the subject is similar to the exterior condition with addition of owner supplied photos. Finley characterized the subject in fair condition. Based upon a phone interview with the owner and the owner supplied interior photos included in the report, Finley opined the subject required repair or replacement of: flooring, walls (drywall), doors, kitchen cabinets, counter tops, landscaping around the home to divert the rainfall away from the home. There are 23 undated color photographs of the subject, besides two photos of the front and rear and street of the subject in the appraisal report. Five photos depict exterior portions of the property, each of which is identified "taken by buyer when purchased." Eleven photographs of the interior have the identical identifying statements and six photographs are identified either as cleaning up, cleaning out, and/or cleaning out/drywall removed. The dwelling was also described as being vacant at the time of valuation.

Using the sales comparison approach, Finley selected three comparable sales located in Mattoon which were from .13 to .37 of a mile from the subject property. The parcels range in size from 6,329 to 7,000 square feet of land area and were improved with ranch-style dwellings that were either 68 or 72 years old. The homes range in size from 626 to 960 square feet of living area. The comparables in numeric order of the sales were described as fair/average, fair, and average/below condition. Each dwelling has 1 full bathroom, central air conditioning and two comparables each have a one-car garage. Outdoor amenities consist of either a stoop or a porch/patio. The comparables sold from April to July 2022 for prices ranging from \$17,000 to \$28,000 or from \$17.71 to \$44.73 per square foot of living area, including land.

The appraiser made adjustments when compared to the subject where downward adjustments were made to comparables #1 and #3 to make them more equivalent to the subject's "fair" condition. Each comparable was given an upward adjustment to account for smaller living area square footage as compared to the subject. Comparables #2 and #3 were each reduced for garage features, which is not a feature of the subject. After adjustments, Finley set forth adjusted sales prices for the comparables ranging from \$12,500 to \$27,000.

Although an income approach was not performed, in that portion of the report, Finley stated, "As of the effective date of the appraisal report, 01/01/2024 the home is not occupied and uninhabitable with needed repair."

As part of the Addendum describing the reconciliation process, Finley reported that more weight was given to sale #1 with an adjusted price of \$12,500. Secondary weight was given to sale #2

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<sup>2</sup> An extraordinary assumption, directly related to a specific assignment, as of the effective date of the assignment results, which, if found to be false, could alter the appraiser's opinions or conclusions. Extraordinary assumptions presume as fact otherwise uncertain information about physical, legal, or economic characteristics of the subject property; or about conditions external to the property, such as market conditions or trends; or about the integrity of data used in an analysis. (See Appraisal "Assumptions, Limiting Conditions & Scope of Work").

with an adjusted price of \$17,700 and sale #3 with an adjusted price of \$27,000. From this data, Finley estimated a market value for the subject of \$15,000.

Based on the foregoing evidence, the appellant requested a total assessment reduction to \$5,000, which would reflect a market value of approximately \$15,000 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 \$21,306. The subject's assessment reflects a market value of \$63,924 or \$52.18 per square foot of living area, land included, when using the statutory level of assessment of 33.33%.<sup>3</sup>

In support of its contention of the correct assessment, the board of review submitted information on four comparable sales located within .3 of a mile from the subject along with copies of the applicable property record cards. The parcels range in size from 6,500 to 15,706 square feet of land area and are improved with one-story dwellings of either vinyl or wood siding exterior construction. The homes range in age from 54 to 67 years old. The homes range in size from 925 to 1,225 square feet of living area. The comparables have 1 or 1½ bathrooms, and three homes each have central air conditioning. The comparables sold from January 2021 to May 2022 for prices ranging from \$40,900 to \$77,000 or from \$44.22 to \$65.48 per square foot of living area, including land.

Based on the foregoing evidence and argument, the board of review requested confirmation of the subject's assessment.

### **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 submitted an appraisal of the subject property as of the lien date at issue and the board of review submitted four suggested comparable sales to support their respective positions before the Property Tax Appeal Board.

The Board has thoroughly reviewed the appellant's appraisal report and closely examined the interior and exterior undated photographs of the dwelling submitted to appraiser Finley by the property owner. The Board finds Finley viewed the subject from the exterior in February 2024 and as such, it is presumed the first three photos depicting the front, rear and street of the subject

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<sup>3</sup> 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 issuance of this decision, the Department of Revenue has yet to publish Table 3 with the figures for tax year 2024.

property were taken by Finley at the time of inspection. As shown in those photographs the exterior has been “cleaned up” and does not depict random planks, pieces of wood, plastic lawn chairs, hot tub, and other debris that is depicted in the multiple exterior photographs identified as “taken by buyer when purchased.” The interior photographs also depict clutter and/or boxed possessions that need to be removed. Besides necessary clean up, nothing in the appraisal report indicated that the property lacked either water, sewer and/or electrical service. Moreover, the last six interior photographs depict ‘progress’ on the necessary clean-up of the property. However, as Finley did not perform an interior inspection and the photographs provided to him by the owner lack any dates, it is unclear how the appraiser could assert that the dwelling was uninhabitable as of the valuation date when he failed to view the interior a mere month later in February 2024 which further detracts from the credibility of the conclusions of condition drawn by Finley in the report. Therefore, in light of these criticisms, the Board finds that the appraised value conclusion presented by the appellant is not a credible or reliable indication of the subject market value in part as the appraiser found the property to be in an uninhabitable condition as of the valuation date and failed to conduct an interior inspection, which wholly detracts from the value conclusion made by Finley and calls into question the entire bases of his analysis that the property was uninhabitable. As a consequence of having given little credence to the value conclusion of the appraisal, the Board will examine the raw sales data in the appraisal report.

The record evidence herein contains seven suggested comparable sales for consideration by the Property Tax Appeal Board. Each of the comparables are located within .37 of a mile from the subject and thus share a similar location to the subject with a similar story height and exterior construction. Board of review comparable #4 necessitates downward adjustment for its larger lot size when compared to the subject. Five of the seven comparables necessitate upward adjustments to account for their smaller dwelling sizes when compared to the subject. The comparables are 54 to 72 years old, necessitating adjustments to make them more equivalent to the subject’s age of 54 years. The dwellings range in size from 626 to 1,225 square feet of living area, which brackets the subject’s dwelling size of 1,225 square feet. The comparables sold from January 2021 to July 2022 for prices ranging from \$17,000 to \$77,000 or from \$17.71 to \$65.48 per square foot of living area, including land. The subject’s assessment reflects a market value of \$63,924 or \$52.18 per square foot of living area, including land, which is within the range of the comparable sales in the record both in terms of overall value and on a per-square-foot of living area basis, including land. Moreover, the subject’s estimated market value is well-supported by board of review comparable #1 which is most similar to the subject in age, bathroom count and dwelling size. This property sold in May 2021 for \$64,000, which supports the subject’s estimated market value as of January 1, 2024.

On this record and after considering appropriate adjustments to the comparable sales in the record to make them more equivalent to the subject, the Property Tax Appeal Board finds based on this evidence that 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: \_\_\_\_\_

C E R T I F I C A T I O N

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



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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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