



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

APPELLANT: Illinois Investment Properties LLC
DOCKET NO.: 24-03107.001-R-1
PARCEL NO.: 02-10.0-303-040

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

LAND: \$1,270
IMPR.: \$16,377
TOTAL: \$17,647

Subject only to the State multiplier as applicable.

Statement of Jurisdiction

The appellant timely filed the appeal from a decision of the St. Clair 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 duplex dwelling of masonry exterior construction with 2,100 square feet of living area. The dwelling was constructed in 1960 and is approximately 64 years old.¹ Features of the home include a crawl space foundation. The property has a 5,662 square foot site and is located in East St. Louis, Canteen Township, St. Clair 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 1.7 to 13.8 miles from the subject. The parcels range in size from 6,969 to 21,344 square feet of land area and are improved with 1.5-story single-family homes ranging in size from 1,155 to 1,456 square feet of

¹ The Board finds the best evidence of the subject's age and features is found in its property record card presented by the appellant.

living area.² The dwellings range in age from approximately 109 to 136 years old. Each home has a basement and one home has central air conditioning. Two comparables each have a 360 or a 660 square foot garage. The appellant reported the comparables sold in December 2023 and July 2024 for prices ranging from \$4,500 to \$20,000 or from \$2.60 to \$14.45 per square foot of living area, including land. The appellant presented listing sheets for each of these sales, with comparable #1 reported to have sold on December 29, 2023 as a short sale for \$4,500, comparable #2 reported to have sold on July 31, 2024 for \$14,000; and comparable #3 reported to have sold on December 22, 2023 for \$20,000.

The appellant submitted a final decision of the board of review disclosing the total equalized assessment for the subject of \$17,647. The subject's assessment reflects a market value of \$52,946 or \$25.21 per square foot of living area, land included, when using the statutory level of assessment of 33.33%.³ Based on this evidence, the appellant requested a reduction in the subject's assessment.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$17,198 prior to equalization. In support of its contention of the correct assessment the board of review submitted information on three equity comparables with no sales data reported for any of the comparables. The Board finds this evidence is not responsive to the appellant's overvaluation argument and the Board will not further consider these comparables.

The board of review also submitted information on the appellant's comparables. The board of review asserted the appellant's comparable #1 was not a qualified sale and submitted a copy of a recorded Real Estate Transfer Declaration for this sale indicating the property was advertised for sale and had a sale price of \$3,000, a different sale price than reported by the appellant. The board of review asserted the appellant's comparable #2 was not a qualified sale and submitted a copy of a recorded Real Estate Transfer Declaration for this sale indicating the property was advertised for sale, was a Bank REO sale, and had a sale price of \$37,250, which is different than the sale price reported by the appellant. The board of review contended the appellant's comparable #3 was not a qualified sale and submitted a copy of a recorded Real Estate Transfer Declaration for this sale indicating the property was not advertised for sale and had a sale price of \$30,000, which is different than the sale prices reported by the appellant. Based on this evidence, 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

² The Board finds the best evidence of these comparables' features is found in their property record cards presented by the board of review, which were not refuted by the appellant.

³ 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.

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 record contains a total of three comparable sales presented by the appellant. The Board finds the best evidence of these sales to be the recorded Real Estate Transfer Declarations presented by the board of review. The Board gives less weight to the appellant's comparable #3, which was not an arm's length sale as shown in its Real Estate Transfer Declaration indicating it was not advertised for sale. Although the board of review contended the appellant's comparables #1 and #2 were not qualified sales as a short sale and Bank REO sale, respectively, the Board finds board of review did not present any evidence to demonstrate these sales were not arm's length sales reflective of market value and their recorded Real Estate Transfer Declarations indicate they were advertised for sale.

The Board finds the best evidence of market value to be the appellant's comparables #1 and #2, which have varying degrees of similarity to the subject in site size, design, dwelling size, age, location, and features. These comparables have larger sites than the subject and are improved with 1.5-story single-family homes compared to the subject's 1-story duplex that are much smaller than the subject and are significantly older than the subject, suggesting adjustments to these comparables would be needed to make them more equivalent to the subject.

These two most similar comparables sold for prices of \$3,000 and \$37,250 or \$2.60 and \$25.58 per square foot of living area, including land, respectively. The subject's assessment reflects a market value of \$52,946 or \$25.21 per square foot of living area, including land, which is above the best comparable sales in terms of total market value and bracketed by the best comparables on a per square foot basis. Based on this evidence and after considering appropriate adjustments to the best comparables for differences from the subject, such as their significantly older ages compared to 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

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:

February 17, 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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