



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

APPELLANT: Illinois Real Estate Portfolio LLC
DOCKET NO.: 24-03117.001-R-1
PARCEL NO.: 07-07.0-201-003

The parties of record before the Property Tax Appeal Board are Illinois Real Estate Portfolio 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: \$2,442
IMPR.: \$6,963
TOTAL: \$9,405

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 dwelling of frame exterior construction with 625 square feet of living area. The dwelling was constructed in 1930 and is approximately 94 years old. Features of the home include a crawl space foundation, a 192 square foot garage, a 192 square foot carport and two sheds.¹ The property has an approximately 21,000 square foot site and is located in Cahokia, Centreville Township, St. Clair County.

The appellant contends overvaluation as the basis of the appeal. In support of this argument the appellant submitted a grid analysis and Multiple Listing Service (MLS) sheets with information on three comparable sales located in East St. Louis and Cahokia Heights and within 4.70 miles from the subject property. The comparables have sites that range in size from 6,970 to 8,276

¹ The Board finds the best description of the subject property was found in its property record card submitted by the appellant.

square feet of land area and are improved with 1-story dwellings of frame exterior construction ranging in size from 895 to 1,232 square feet of living area. The dwellings are 66 or 67 years old. Each comparable has a concrete slab foundation and central air conditioning.² One comparable has a 336 square foot garage. The properties sold in April and September 2024 for prices ranging of \$20,000 and \$21,500 or from \$17.45 to \$22.35 per square foot of living area, land included.

The MLS sheets submitted by the appellant depict comparable #1 as needing rehabilitation and the sale was “part of a package deal.” Comparable #2 was described as needing “a lot of TLC” while comparable #3 was sold in “as is” condition. Based on this evidence, the appellant requested the subject’s total assessment be reduced to \$4,300 which reflects a market value of \$12,901 or \$20.64 per square foot of living area, land included, 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 \$9,405 after equalization. The subject's assessment reflects a market value of \$28,218 or \$45.15 per square foot of living area, land included, when using the statutory level of assessment of 33.33%.³

In support of its contention of the correct assessment the board of review submitted information on four comparable sales located in the same assessment neighborhood code as the subject, where one comparable is also located on the same street as the subject property. The comparables have sites that range in size from 8,276 to 21,344 square feet of land area and are improved with 1-story dwellings of frame, masonry or frame and masonry exterior construction ranging in size from 925 to 1,732 square feet of living area. The homes were built from 1954 to 1978. Each comparable has central air conditioning and one comparable has a 528 square foot garage. The properties sold from September 2022 to July 2024 for prices ranging from \$53,500 to \$85,000 or from \$43.30 to \$88.65 per square foot of living area, land included. Based on this evidence, the board of review requested the subject’s assessment be confirmed.

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 parties submitted seven comparable sales for the Board’s consideration. The Board gives less weight to appellant comparable #1 which, based on its MLS sheet, indicated the property

² Some property descriptive details for the appellant’s comparables have been corrected or amended with information disclosed in their respective MLS sheets as they were omitted from the Section V grid by counsel.

³ 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.

may have been part of a multi-parcel sale. The Board gives less weight to appellant comparables #2 and #3 which are located more than four miles from the subject property. The Board gives less weight to appellant comparable #3 and board of review comparables #1 and #4 which sold in 2022, less proximate to the January 1, 2024 assessment date and are also less similar to the subject in age and/or dwelling size.

The Board finds the best evidence of market value to be board of review comparables #2 and #3 which sold proximate to the assessment date at issue in this appeal and are located closest in proximity to the subject. However, these properties present varying degrees of similarity to the subject in their smaller site sizes, newer age, larger dwelling size and other features, suggesting adjustments are needed to make these properties more equivalent to the subject. Nevertheless, these two comparables sold in January and July 2024 for prices of \$53,500 and \$82,000 or \$57.84 and \$88.65 per square foot of living area, including land. The subject's assessment reflects a market value of \$28,218 or \$45.15 per square foot of living area, including land, which falls below the two best comparable sales in this record. After considering appropriate adjustments to the best comparables for differences from the subject, the Board finds the subject's assessment is justified 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: March 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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