



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

APPELLANT: Raven Securities Inc
DOCKET NO.: 24-03119.001-R-1
PARCEL NO.: 07-01.0-305-017

The parties of record before the Property Tax Appeal Board are Raven Securities Inc, 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: \$6,062
IMPR.: \$26,339
TOTAL: \$32,401

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 commercial office building of brick exterior construction with 1,293 square feet of above grade building area. The building was constructed in 1919 and is approximately 105 years old. The subject's property record card reports the property has an effective year built of 1985. Features of the home include a basement and central air conditioning. The property has an approximately 6,970 square foot site and is located in Belleville, Belleville 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 0.80 of a mile or 5.7 miles from the subject property.¹ The

¹ Property details for the appellant's comparables have been corrected or amended with information disclosed in their respective MLS sheets along with property record cards and PTAX-203 data submitted by the board of review.

comparables have sites ranging in size from 5,227 to 7,841 square feet of land area² and are improved with 1.5-story or 2-story buildings of frame or masonry exterior construction ranging in size from 1,102 to 1,500 square feet of building area. The buildings were built from 1876 to 1928. Comparables #2 and #3 each have central air conditioning and a fireplace. Comparable #2 has a 2-car garage. Comparable #1 includes two parcels and is a commercial property. Comparable #2 was sold as a residential property which was depicted in its MLS sheet to need cosmetic updates and minor repairs. Comparable #3 includes a second parcel and was marketed in its MLS as a residential property that was converted to office use and lacks a full bathroom. The properties sold from April to October 2024 for prices ranging from \$59,000 to \$64,000 or from \$36.36 to \$53.54 per square foot of building area, land included.

Based on this evidence, the appellant requested the subject's total assessment be reduced to \$20,000 which reflects a market value of \$60,006 or \$46.41 per square foot of building 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 \$32,401 after equalization. The subject's assessment reflects a market value of \$97,213 or \$75.18 per square foot of building area, land included, when using the statutory level of assessment of 33.33%.³

The board of review critiqued the appellant's comparables arguing comparable #1 is 43 years older than the subject and located outside of the subject's neighborhood; comparable #2 is located outside the neighborhood and is a residential property; and that comparable #3 includes two parcels.

In support of its contention of the correct assessment the board of review submitted information on three comparable sales located on the same street as the subject property, one of which is also located in the same assessment neighborhood code as the subject. The comparables have sites with 6,970 or 7,841 square feet of land area and are improved with 1.5-story buildings of vinyl or brick and vinyl exterior construction ranging in size from 1,554 to 3,723 square feet of building area. The improvements were built from 1925 to 1970, with the oldest property having an addition added in 1995. Each comparable has a basement, central air conditioning and a garage amenity. Comparables #1 and #2 are depicted as commercial properties while comparable #3 has a mixed commercial/residential use based on information contained in their respective property record cards, submitted by the board of review. The properties sold from May to October 2024 for prices ranging from \$50,000 to \$210,000 or from \$30.62 to \$56.90 per square foot of building area, land included. Based on this evidence, the board of review requested the subject's assessment be confirmed.

² The PTAX-203 Real Estate Transfer Declarations for appellant comparables #1 and #3 reported two parcels were included with these sales along with the site size of each parcel.

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.

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 six comparable sales for the Board's consideration. The Board gives less weight to appellant comparables #1 and #2 which are less similar to the subject in location, age and residential use. The Board gives less weight to board of review comparables #1 and #3 which differ from the subject in age and/or reflects a mixed-use property unlike the subject.

The Board finds the best evidence of market value to be appellant comparable #3 and board of review comparable #2 which are more similar to the subject in location, design, site size and commercial use. However, these properties present varying degrees of similarity to the subject in age, building size and garage amenity, suggesting adjustments are needed to make these properties more equivalent to the subject. These two comparables sold in April and October 2024 for prices of \$64,000 and \$210,000 or \$47.67 and \$56.90 per square foot of building area, including land. The subject's assessment reflects a market value of \$97,213 or \$75.18 per square foot of building area, including land, which is bracketed by the two best comparable sales in this record on an overall market value basis and above the two best comparables on a per square foot basis. Accepted real estate theory provides that, all things being equal, as the size of a property increases, the per unit value decreases. In contrast, as the size of a property decreases, the per unit value increases. Therefore, given the subject's smaller building size relative to the best comparables, a higher per square foot value appears logical. After considering appropriate adjustments to the best comparables for differences from the subject, the Board finds the subject's assessment appears supported and no reduction 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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