



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

APPELLANT: Raven Securities Inc  
DOCKET NO.: 24-03120.001-R-1  
PARCEL NO.: 02-17.0-316-008

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 **A Reduction** 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:** \$432  
**IMPR.:** \$8,918  
**TOTAL:** \$9,350

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 1.5-story dwelling of masonry exterior construction with 1,080 square feet of living area.<sup>1</sup> The dwelling was constructed in 1925 and is approximately 99 years old. Features of the home include a basement and central air conditioning. The property has an approximately 4,792 square foot site and is located in Belleville, East St. Louis 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 0.90 of a mile or 1.80 miles from the subject property. The comparables have sites with 3,920 or 4,792 square feet of land area and are improved with 1-story or 1.5-story dwellings of masonry exterior construction

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<sup>1</sup> The Board finds the best description of the subject's dwelling size was found in its property record card, submitted by the board of review and not refuted by the appellant.

ranging in size from 988 to 1,388 square feet of living area. The dwellings are 50 to 103 years old and each have a basement. The properties sold from December 2024 to March 2025 for prices of \$15,000 or 17,000 or from \$12.25 to \$15.18 per square foot of living area, land included.

The appellant submitted a copy of the Multiple Listing Service (MLS) information sheets for each of the comparables. The MLS sheets indicated all three properties are being sold in "as is" condition. The MLS sheets disclosed comparable #1 needed a "full renovation," comparable #2 is a bank owned property that sold at auction while comparable #3 was listed as needing a contractor or skilled person to complete repairs. Based on this evidence, the appellant requested the subject's total assessment be reduced to \$3,600 which reflects a market value of \$10,801 or \$10.00 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 \$13,409 after equalization. The subject's assessment reflects a market value of \$40,231 or \$37.25 per square foot of living area, land included, when using the statutory level of assessment of 33.33%.<sup>2</sup>

In support of its contention of the correct assessment the board of review submitted information on three comparable sales located in the same neighborhood or less than one mile from the subject property. The comparables have sites with 6,098 or 6,534 square feet of land area and are improved with 1-story or 2-story dwellings of brick exterior construction ranging in size from 1,040 to 1,828 square feet of living area. The homes were built in 1927 or 1930. Each comparable has a basement and central air conditioning. The properties sold in March and September 2024 for prices ranging from \$27,000 to \$50,000 or from \$17.51 to \$38.23 per square foot of living area, land included.

The board of review also submitted the property record cards for the subject and both parties' comparables along with the PTAX-203 Real Estate Transfer Declarations for appellant comparables #1 and #3 and each of the board of review's comparables. The Real Estate Transfer Declarations for board of review comparables #2 and #3 disclosed these were not advertised sales. 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

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<sup>2</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 drafting of this decision, the Department of Revenue has yet to publish figures for tax year 2024.

construction costs. 86 Ill.Admin.Code §1910.65(c). The Board finds the appellant met this burden of proof and a reduction in the subject's assessment is warranted.

The parties submitted six comparable sales for the Board's consideration. The Board gives less weight to appellant comparable #1 which was identified as needing a full renovation and to appellant comparable #3 which is less similar to the subject in age and dwelling size. Furthermore, both of these properties are located more than one mile from the subject. The Board gives less weight to board of review comparables #2 and #3 which were not advertised for sale, calling into question the arm's length nature of these sales.

The Board finds the best evidence of market value to be appellant comparable #2 and board of review comparable #1 which are more similar to the subject in location, age, dwelling size and some features. These two comparables sold in September 2024 and February 2025 for prices of \$17,000 and \$27,000 or \$13.80 and \$25.96 per square foot of living area, including land. The subject's assessment reflects a market value of \$40,231 or \$37.25 per square foot of living area, including land, which falls above 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 excessive 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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