



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

APPELLANT: SSM Properties & Investments LLC Ser 1
DOCKET NO.: 24-03140.001-R-1
PARCEL NO.: 07-2-13008-000

The parties of record before the Property Tax Appeal Board are SSM Properties & Investments LLC Ser 1, 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:

LAND: \$3,183
IMPR.: \$14,338
TOTAL: \$17,521

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 bungalow-style dwelling of frame exterior construction with approximately 768 square feet of living area. The dwelling is approximately 73 years old with a reported effective age of 50 years. Features include a crawl space foundation, one bathroom, a concrete stoop and a one-car garage with 360 square feet of building area. The property has an approximately 7,000 square foot site and is located in Mattoon, Mattoon 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 Appraiser, estimating the subject property had a market value of \$7,000 as of January 1, 2024. The appraisal was prepared for the client for private purposes as stated on page 1 of the report. On page 2 of the Supplemental Addendum, the appraisal was to be used for tax appeal purposes

as of the valuation date based on a hypothetical condition. Finley also reported that the subject was purchased with two other properties for a total of \$54,000.

The appraiser reported having inspected the exterior of the subject dwelling on November 1, 2024. As part of the appraisal with an extraordinary assumption¹ that the condition of the interior of the subject is similar to the exterior condition, Finley described the dwelling to be in poor condition. Based upon a phone interview with the owner along with owner supplied interior photos included in the report, Finley opined the interior finishes are dated and show wear, deferred maintenance items, where the bathroom fixtures and plumbing need repair, the walls and ceilings need repair and painting and flooring are needed. There are five undated color interior photographs in the appraisal report. Photos of the living room, kitchen, bathroom, bedroom and mechanical/laundry room depict the lack of appliances, furniture and some plumbing fixtures. The appraiser stated in the subject section on page 1 of the appraisal report that the subject was owner occupied but then described the subject to be in a non-livable condition in the last section of page 1.

Using the sales comparison approach, Finley selected three comparable sales located in Mattoon which were from 1.26 to 2.05 miles from the subject property. The parcels contain 7,000 or 9,500 square feet of land area and are improved with Bungalow dwellings ranging in age from 112 to 135 years old. The homes range in size from 972 to 1,026 square feet of living area. Comparables #1 and #2 are reportedly in poor condition and comparable #3 is reported to be in fair condition. Two comparables each have a one-car garage, one comparables has a deck and two comparables each have a porch. The comparables sold from February to November 2022 for prices ranging from \$5,000 to \$15,000 or from \$4.99 to \$15.43 per square foot of living area, including land. The appraiser made adjustments to the comparables for differences from the subject in site size, condition, dwelling size and garage amenity to arrive at adjusted sales prices ranging from \$5,100 to \$7,400. The appraiser indicated in the supplemental addendum that more weight was given to “comparable sales one and two due to similar features with secondary weight given to sale three and four.” Using this data, the appraiser arrived at an estimated market value for the subject of \$7,000 or \$9.11 per square foot of living area, including land, as of January 1, 2024.

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.”

Based on this evidence, the appellant requested a reduction in the subject’s total assessment reflective of the appraised value.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$17,521. The subject's assessment reflects a market value of

¹ 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”).

\$52,568 or \$68.45 per square foot of living area, land included, when using the statutory level of assessment of 33.33%.²

In response to the appeal, the board of review submitted a copy of the 2024 General Homestead Exemption-Leasehold Application for the subject property that was filed on June 12, 2024 seeking an exemption for 2024 on the property as occupied by a tenant as of January 1, 2024. The application states the applicants attest that the subject property was leased and occupied as a primary residence as of January 1, 2024. Thus, contrary to the appraisal indicating the property was vacant and uninhabitable, the appellant had previously submitted a request for a leasehold exemption on the property for tax year 2024.

In support of its contention of the correct assessment, the board of review submitted information on four comparable sales located in Mattoon and from 1.6 to 3 miles from the subject along with copies of the applicable property record cards. The parcels range in size from 6,500 to 8,250 square feet of land area and are improved with one-story dwellings of wood or vinyl siding exterior construction. The homes range in age from 68 to 74 years old. The homes range in size from 704 to 875 square feet of living area. Each comparable has a crawl space or a concrete slab foundation and central air conditioning. Comparable #1 has two concrete patios, one of which has a canopy, comparable #2 has a wood deck and a shed, comparable #3 has a 288 square foot carport and a 440 square foot garage, and comparable #4 has a shed. The comparables sold from December 2021 to December 2024 for prices ranging from \$42,000 to \$86,500 or from \$57.93 to \$102.98 per square foot of living area, including land. Based on this evidence, the board of review requested confirmation of the subject's assessment.

In rebuttal, counsel for the appellant stated, "whether the subject property was occupied when appraised would have no bearing on the fair market value determined by the appraiser as this value is based upon the physical condition of the property."

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.

² 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.

The Board has thoroughly reviewed the appellant's appraisal report and examined the interior undated photographs of the dwelling submitted to appraiser Finley by the property owner. The appraiser relied solely upon the owner's photographic evidence and description along with an extraordinary assumption that the interior has a condition similar to the exterior condition of the dwelling. The Board finds it problematic that the appraiser stated that the subject property was uninhabitable as of the effective date of the appraisal report, which is contradicted by the appellant's application for a 2024 General Homestead Exemption-Leasehold wherein the applicants attested that the subject property was leased and occupied as a primary residence as of January 1, 2024. The Board finds the appraiser opined a market value for the subject property of \$7,000 as of January 1, 2024, in primary reliance upon comparable sales #1 and #2, with secondary reliance on comparables #3 and #4, however the Board finds there are only three comparable sales in the report. Lastly, the Board finds that appraisal sales are substantially larger in size and older in age when compared to the subject dwelling. The Board finds these factors undermine the credibility of the appraiser's conclusion of value. Therefore, the Board will analyze the raw sales data in the appraisal.

The Board has given less weight to the appellant's appraisal comparables, due to their larger dwelling sizes and older ages, when compared to the subject. The Board has given less weight to board of review comparable #3 which sold in 2021, less proximate in time to the lien date at issue than other sales in the record.

The Board finds the best evidence of market value to be board of review comparables #1, #2 and #4, which are located in Mattoon, like the subject and are overall most similar to the subject in dwelling size, design and age. However, the Board finds the comparables have varying degrees of similarity when compared to the subject in features, suggesting adjustments would be required to make the comparables more equivalent to the subject. These three comparables sold from May 2022 to December 2024 for prices ranging from \$42,000 to \$86,500 or from \$57.93 to \$102.98 per square foot of living area, including land. The subject's assessment reflects a market value of \$52,568 or \$68.45 per square foot of living area, including land, which falls at the lower end of the range established by the best comparable sales in the record both in terms of overall value and on a price per-square-foot of living area basis, including land. Based on this record and after considering adjustments to the best comparables for differences from the subject, the Board finds a reduction in the subject's assessment is not 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

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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