



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

APPELLANT: SSM Properties & Investments LLC  
DOCKET NO.: 24-03142.001-R-1  
PARCEL NO.: 07-2-13007-000

The parties of record before the Property Tax Appeal Board are SSM Properties & Investments LLC, 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.:** \$31,512  
**TOTAL:** \$34,695

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 ranch-style dwelling of frame exterior construction with approximately 1,440 square feet of living area. The dwelling is approximately 46 years old with a reported effective age of 40 years. Features include a crawl space foundation, two bathrooms, an enclosed frame porch and a two-car garage with 624 square feet of building area.<sup>1</sup> The property has an approximately 7,000 square foot site and is located in Mattoon, Mattoon Township, Coles County.

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<sup>1</sup> The parties differ as to whether the subject has central air conditioning. The Board finds the appellant's appraiser describes the subject with no central air conditioning and is further supported by the photographs included in the appraisal report which depict a window air conditioning unit. The board of review described the subject with central air conditioning in the grid analysis, whereas the subject's property record card submitted by the board of review indicates the subject dwelling is warmed and cooled but does not describe the dwelling with central air conditioning.

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 \$35,000 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 on August 29, 2024 for \$55,000.

The appraiser reported having inspected the exterior of the subject dwelling on November 1, 2024. As part of the appraisal with an extraordinary assumption<sup>2</sup> that the condition of the interior of the subject is similar to the exterior condition, Finley described the dwelling to be in below average 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 original, dated and show wear. The appraiser stated the home is vacant and had not been lived in for several years prior to purchase. Finley stated the rear enclosed patio area has a sagging ceiling, the roof is older, the kitchen needs updated and the bathroom needs remodeled. There are broken windows, flooring needs to be replaced, walls and ceilings need minor repairs and the entire interior needs painted. Utilities and mechanicals will need to be checked and repaired if needed and the attached garage has no door that goes directly into the house.

Using the sales comparison approach, Finley selected three comparable sales located in Mattoon which were from .90 of a mile to 2.35 miles from the subject property. The parcels range in size from 4,200 to 7,150 square feet of land area and are improved with bungalow or ranch dwellings ranging in age from 68 to 122 years old. The homes range in size from 925 to 1,836 square feet of living area. Comparables #1 and #2 are reportedly in average condition and comparable #3 is reported to be in below average condition. The comparables each have one or two bathrooms and either a one-car or a two-car garage. Comparable #1 has a stoop, comparable #2 has central air conditioning and a porch and comparable #3 has a stoop and a patio. The comparables sold from October 2021 to August 2022 for prices ranging from \$30,000 to \$61,200 or from \$32.43 to \$34.08 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, bathroom count, central air conditioning and garage amenity to arrive at adjusted sales prices ranging from \$33,000 to \$42,200. 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.” Using this data, the appraiser arrived at an estimated market value for the subject of \$35,000 or \$24.31 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.”

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<sup>2</sup> 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”).

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 \$34,695. The subject's assessment reflects a market value of \$104,095 or \$72.29 per square foot of living area, land included, when using the statutory level of assessment of 33.33%.<sup>3</sup>

In response to the appellant's appraisal evidence, the board of review stated that two of the appraisal sales were not recognized as valid sales by the Illinois Department of Revenue. The board of review provided copies of the Illinois Real Estate Transfer Declarations PTAX-203 for appraisal sales #1 and #3. Each of those documents depict the properties were advertised prior to sale. Also depicted is that one property transferred via Executor's Deed, and one property transferred via an Administrator's Deed. Neither document specifically depicted the sales as having been found "not valid" by the Illinois Department of Revenue. Additionally, the board of review provided a copy of the Illinois Real Estate Transfer Declaration associated with the sale of the subject property in August 2024 for \$55,000 disclosing the subject was not advertised for sale, which was not refuted by the appellant in rebuttal.

In support of its contention of the correct assessment, the board of review submitted information on four comparable sales located in Mattoon and from .15 of a mile to 1.5 miles from the subject along with copies of the applicable property record cards. The parcels range in size from 7,500 to 8,802 square feet of land area and are improved with one-story dwellings of wood siding, wood siding and brick or vinyl siding and brick exterior construction. The homes range in age from 55 to 63 years old. The homes range in size from 1,328 to 1,484 square feet of living area. Each comparable has a crawl space foundation, central air conditioning, from one to two bathrooms and a garage ranging in size from 264 to 576 square feet of building area. Comparable #1 has an enclosed frame porch and a shed, comparable #2 has an open frame porch and a patio, comparable #3 has an open frame porch, a patio and a shed, and comparable #4 has a patio. The comparables sold from January 2021 to June 2022 for prices ranging from \$102,000 to \$135,000 or from \$68.73 to \$101.66 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 that all sales used as comparables were reported through the Multiple Listing Service (MLS) realtor system which indicates realtor involvement for marketing and listing the property with well informed sellers and buyers. None of the appraisal comparables were reported as being a "quick sale or non-typical sale due to the seller's position."

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<sup>3</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.

### **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. Additionally, the parties both disclosed the subject property was purchased in August 2024 for \$55,000.

As an initial matter, the Board has given no weight to the sale of the subject property since the board of review provided a copy of the real estate transfer declaration disclosing the property was not advertised for sale, which was not refuted by the appellant. Thus, the Board finds the sale does not meet one of the key fundamental elements of an arms-length transaction.

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 appraiser chose three comparables that differ significantly from the subject dwelling in age and appraisal comparables #1 and #3 differ substantially from the subject dwelling in size, when there were other sales available that were more similar to the subject dwelling in age and size. Lastly, the appraisal comparables #1 and #3 are located more than two miles away from the subject. 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 which differ substantially from the subject in age and/or dwelling size and/or are located more than two miles away from the subject. The Board has given less weight to board of review comparables #2 and #3, which are located more than one mile away from the subject.

The Board finds the best evidence of market value to be board of review comparables #1 and #4, which are overall most similar to the subject in location, dwelling size, design, age and some features. These two comparables sold in October 2021 and June 2022 for prices of \$110,000 and \$112,000 or for \$79.55 and \$82.34 per square foot of living area, including land. The subject's assessment reflects a market value of \$104,095 or \$72.29 per square foot of living area, including land, which falls below the two 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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