



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

APPELLANT: Timothy Stumpf  
DOCKET NO.: 24-03178.001-R-1  
PARCEL NO.: 07-1-11-13-05-101-009

The parties of record before the Property Tax Appeal Board are Timothy Stumpf, the appellant; and the Madison 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 **Madison** County Board of Review is warranted. The correct assessed valuation of the property is:

**LAND:** \$4,050  
**IMPR.:** \$27,970  
**TOTAL:** \$32,020

Subject only to the State multiplier as applicable.

**Statement of Jurisdiction**

The appellant timely filed the appeal from a decision of the Madison 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 dwelling of frame exterior construction with 957 square feet of living area. The dwelling is 79 years old. Features of the home include a full basement, central air conditioning, and a 720 square foot garage.<sup>1</sup> The property has an 11,900 square foot site and is located in Edwardsville, Edwardsville Township, Madison County.

The appellant's appeal is based on overvaluation. In support of this argument the appellant submitted evidence disclosing the subject property was purchased on September 29, 2023 for a price of \$60,000. The appellant did not complete Sec. IV – Recent Sale Data of the appeal petition. The appellant submitted a copy of the settlement statement associated with the sale listing the seller as Justin Stumpf. The settlement statement did not reveal any realtor commissions having been disbursed. Based on this evidence, the appellant requested a reduction

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<sup>1</sup> The Board finds the property record card submitted by the board of review to be the best evidence of the subject's features.

in the subject's assessment to \$28,560, which would reflect a market value of \$85,689 or \$89.54 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." The appellant submitted a copy of the board of review final decision disclosing the total assessment for the subject of \$32,020. The subject's assessment reflects a market value of \$96,070 or \$100.39 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 one comparable sale and four equity comparables.<sup>3</sup> The comparable sale is a 2-story dwelling of frame exterior construction containing 754 square feet of living area. The dwelling is 70 years old and has central air conditioning, a 336 square foot garage, and a 10,000 square foot parcel. The comparable sold in March 2022 for a price of \$60,000 or \$79.58 per square foot of living area, including land. The board of review also submitted a copy of the real estate transfer declaration, which disclosed the subject property was not advertised for sale. Based on this evidence, the board of review requested confirmation of the subject's assessment.

In rebuttal, the appellant argued that the subject property does not contain a garage. The appellant further argued that the subject was advertised for sale via a sign in the front yard.

### **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 evidence of the subject's sale and the board of review submitted one comparable sale to support their respective positions before the Board. The appellant submitted a copy of the settlement statement, and the board of review submitted a copy of the transfer declaration, associated with the subject's sale. The Board gave greater weight to the transfer declaration, which was recorded and signed under penalty of perjury. The Board finds that the property was not advertised for sale or exposed on the open market, and therefore the sale lacks the elements of an arm's length transaction. Further, the Board notes that the parties to the transaction share the same last name, calling into question whether the purchase price was reflective of market value. Based on this limited record, the Board finds that the appellant has not proven, by a preponderance of the evidence, that the subject is overvalued, and a reduction in the subject's assessment is not warranted.

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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 §1910.50(c)(1). Prior to the drafting of this decision, the Department of Revenue has yet to publish figures for tax year 2024.

<sup>3</sup> The Board finds that the submission of equity comparables is not responsive to the appellant's market value claim, and the equity evidence presented by the board of review will not be further analyzed on this record.

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: \_\_\_\_\_

November 25, 2025



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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