



FINAL ADMINISTRATIVE DECISION ILLINOIS PROPERTY TAX APPEAL BOARD

APPELLANT: Revocable Trust Smyth Joint Tenancy
DOCKET NO.: 24-03285.001-R-1
PARCEL NO.: 15-2-09-26-04-402-005

The parties of record before the Property Tax Appeal Board are Revocable Trust Smyth Joint Tenancy, 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:	\$42,790
IMPR.:	\$194,670
TOTAL:	\$237,460

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 is improved with a part one-story and part two-story dwelling of brick and frame construction containing 2,711 square feet of living area. The dwelling was constructed in 2002 and is approximately 22 years old. Features of the home include a basement with finished area, central air conditioning, one fireplace, 4½ bathrooms, a garage with 925 square feet of building area, and an in-ground swimming pool.¹ The property has a site with approximately 40,180 square feet of land area located in Edwardsville, Fort Russell Township, Madison County.

The appellant's appeal is based on overvaluation. In support of this argument the appellant submitted information on five comparable sales described as being improved with a 1-story, 1.5-story, 2-story or split-level style dwellings of brick or brick and stone construction that range in

¹ The Board finds the best description of the subject property was provided by the board of review which was supported by a copy of the subject's property record card submitted by the board of review.

in size from 4,000 to 5,000 square feet of living area. The dwellings range in age from 17 to 46 years old. Each comparable has a partial basement with finished area, central air conditioning, three to five bathrooms, and a garage ranging in size from 308 to 829 square feet of building area. Four of the comparables have 1, 2 or 3 fireplaces. These properties have sites ranging in size from 19,549 to 33,977 square feet of land area. The comparables are located in Edwardsville from .2 of a mile to 7.9 miles from the subject property. The comparables sold from June 2024 to March 2025 for prices ranging from \$520,000 to \$699,000 or from \$118.09 to \$166.37 per square foot of living area. Based on this evidence, the appellant requested a reduction in the subject's total assessment to \$191,000. To document the descriptive information for the comparables the appellant submitted copies of pages from Zillow.

The appellant also submitted a copy of the Notice of Final Decision on Assessed Value by Board of Review dated March 4, 2025, disclosing the subject's total assessment increased from \$220,360 to \$237,460 through the application of a township equalization factor of 1.0776.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$237,460. The subject's assessment reflects a market value of \$712,451 or \$262.80 per square foot of living area, land included, when using the statutory level of assessment of 33.33%.²

The board of review provided a statement explaining the subject property is located in a subdivision with a golf course. The board of review further explained appellant's comparables #1, #3, #4 and #5 are located in different townships than the subject property. The board further stated the appellant used below ground square footage in their analysis, thus there was a discrepancy in numbers.

In support of its contention of the correct assessment the board of review submitted information on three comparable sales with comparable #2 being the same property as appellant's comparable #2. The board of review comparables are improved with 1-story or part 1-story and part 2-story dwellings of brick or brick and frame construction that range in size from 2,131 to 3,429 square feet of living area. The homes range in age from 17 to 24 years old. Each property has a basement with finished area, central air conditioning, one or two fireplaces, and a garage that range in size from 768 to 829 square feet of building area. The comparables have 3½, 4½ or 5½ bathrooms. Comparable #1 also has a swimming pool. These properties have sites ranging in size from 23,380 to 46,910 square feet of land area.³ The comparables are located within 465 feet of the subject property. The sales occurred from December 2022 to October 2024 for prices ranging from \$600,000 to \$1,237,150 or from \$281.56 to \$360.79 per square foot of living area, including land. The board of review adjusted the comparables for differences from the subject property to arrive at adjusted prices ranging from \$642,470 to \$1,257,090 or from \$301.49 to \$366.61 per square foot of living area, including land.

² Property Tax Appeal Board procedural rule section 1910.50(c)(1) provides that in all counties other than Cook, the three-year county wide assessment level as certified by the Illinois Department of Revenue (IDOR) will be considered. 86 Ill.Admin.Code §1910.50(c)(1). As of the development of this Final Administrative Decision, the IDOR has not published figures for tax year 2024.

³ The board of review submitted copies of the property record cards for the subject property and the three comparables sales from which the descriptive information was verified.

The board of review contends the subject's market value per square foot is below the range of the comparable sales and that a decrease in the subject's assessment is not warranted.

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 record contains seven comparable sales submitted by the parties to support their respective positions with one comparable being a duplicate. The Board finds the best evidence of market value to be the board of review comparable sales which also includes appellant's comparable #2 that is a duplicate of board of review comparable #2. The three comparables are similar to the subject in location and age, however, the comparables differ from the subject in site size, dwelling size, style and features. Nevertheless, these three comparables sold for prices ranging from \$600,000 to \$1,237,150 or from \$281.56 to \$360.79 per square foot of living area, including land. The comparable most similar to the subject property is comparable #1 that is improved with a part one-story and part two-story dwelling with 2,886 square feet of living area and has a 46,910 square foot site. Additionally, board of review comparable #1 has an in-ground swimming pool as does the subject property. This comparable sold in August 2023 for a price of \$983,100 or \$340.64 per square foot of living area, including land. The subject's assessment reflects a market value of \$712,451 or \$262.80 per square foot of living area, including land, which is within the overall price range but below the range on a per square foot of living area basis as established by the best comparable sales in this record. Additionally, the subject's assessment reflects a market value significantly below the purchase price of the overall best comparable sale in the record. Less weight is given appellant's comparables sales #1, #3, #4 and #5 due to differences from the subject in location. Based on this evidence the Board finds the subject's assessment is reflective of the property's market value and a reduction in the subject's assessment is not justified.

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: _____

C E R T I F I C A T I O N

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:

January 20, 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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