



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

APPELLANT: Kelleen Stokes
DOCKET NO.: 24-03289.001-R-1
PARCEL NO.: 08-27.0-109-013

The parties of record before the Property Tax Appeal Board are Kelleen Stokes, the appellant; 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 **No Change** 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: \$1,855
IMPR.: \$18,548
TOTAL: \$20,403

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 brick exterior construction with 1,121 square feet of living area. The dwelling was constructed in 1846 and is approximately 178 years old. Features of the home include a crawl space foundation, central air conditioning and one bath. The property has approximately a 3,006 square foot site and is located in Belleville, Belleville Township, St. Clair County.

The appellant contends overvaluation as the basis of the appeal. In support of this argument the appellant submitted an appraisal estimating the subject property had a market value of \$45,000 as of April 15, 2025. The appraisal was prepared by Jason Leonard, Associate Real Estate Trainee Appraiser and Supervisory Appraiser, Charles A. Kukorola, Certified General Real Estate Appraisers. The property rights appraised were fee simple. The purpose of the appraisal was to estimate the market value of the subject for non-lender use. An exterior-only inspection of the subject property was made by just the trainee appraiser, Jason Leonard. The appraisers

described the subject to be in average condition and appears to be moderately maintained. The appraisers further disclosed this was a drive-by appraisal and there was no functional or external depreciation noted.

In estimating the market value of the subject property, the appraisers developed the sale comparison approach to value. Under the sales comparison approach, the appraiser provided three comparable sales located within .61 of a mile from the subject. The comparables have sites ranging in size from 5,227 to 7,405 square feet of land area and are improved with traditional homes of vinyl or brick exterior construction ranging in size from 994 to 1,250 square feet of living area. The dwellings are 101 to 127 years old. Two homes have basements and one home has crawl space foundation. Each home has central air conditioning and one bath. Two comparables each have a 1-car garage. The comparables sold in May or December 2024 for prices ranging from \$34,000 to \$55,500 or from \$36.56 to \$55.84 per square foot of living area, including land. The appraiser adjusted the comparables for differences from the subject to arrive at adjusted sale prices ranging from \$37,820 to \$52,540. The appraiser concluded a market value for the subject of \$45,000 as of April 15, 2025.

Based on this evidence, the appellant requested a reduction in the subject's assessment to reflect the appraised value conclusion.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$20,403. The subject's assessment reflects a market value of \$61,215 or \$54.61 per square foot of living area, land included, when using the statutory level of assessment of 33.33%.¹

In response to the appeal, the board of review submitted property record cards that disclosed appraisal comparable #1 has 1,491 square feet of living area and appraisal comparable #3 has 1,008 square feet of living area that was not refuted by the appellant.

In support of its contention of the correct assessment the board of review submitted information on four comparable sales located in the same neighborhood code as the subject. The comparables have sites ranging in size from 4,356 to 7,279 square and are improved with 1.5-story homes of brick or frame exterior construction ranging in size from 1,008 to 1,571 square feet of living area. The dwellings were constructed from 1862 to 1902. Three homes have basements, one of which has finished area and one home has a crawl space foundation. Each home has central air conditioning and one or two baths, one comparable has fireplace and one comparable has 288 square foot garage. The comparables sold from October 2022 to May 2024 for prices ranging from \$64,000 to \$147,500 or from \$62.68 to \$93.89 per square foot of living area, including land. Based on this evidence the board of review requests confirmation of the subject's assessment.

Conclusion of Law

¹Section 1910.50(c)(1) of the Board's procedural rules 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). As of the development of this Final Administrative decision, the Department of Revenue has not published figures for tax year 2024.

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 with an effective date of valuation of April 15, 2025, and the board of review submitted four comparable sales for the Board's consideration. The Board gives less weight to the appellant's appraisal which has a valuation date approximately 16 months after the January 1, 2024 assessment date and therefore, is less probative of the subject's market value as of that date. However, the Board will look at the raw sales.

The Board gives less weight to appraisal comparable #1 as well as board of review comparables #1 and #4 which have considerably larger dwelling sizes when compared to the subject.

The Board finds the best evidence of market value to be appraisal comparable sales #2 and #3 along with board of review comparable sales #2 and #3 which are more similar to the subject in dwelling size. However, downward adjustments to the comparables would have to be considered for differences from the subject in basement foundation, basement finish, bathroom count and/or garage amenity. These comparables sold for prices ranging from \$34,000 to \$99,900 or from \$36.56 to \$90.16 per square foot of living area, including land. The subject's assessment reflects a market value of \$61,215 or \$54.61 per square foot of living area, including land, which is within the range established by the best comparable sales in the record. After considering adjustments to the best comparables for differences from the subject, the Board finds 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: _____

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:

April 21, 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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