



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

APPELLANTS: Brian and Sharon Brace
DOCKET NO.: 24-03407.001-R-1
PARCEL NO.: 13-2-21-04-05-102-011

The parties of record before the Property Tax Appeal Board are Brian and Sharon Brace, the appellants; 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: \$17,650
IMPR.: \$83,290
TOTAL: \$100,940

Subject only to the State multiplier as applicable.

Statement of Jurisdiction

The appellants timely filed the appeal from a notice of equalization issued by the Madison County Board of Review pursuant to section 16-160 of the Property Tax Code (35 ILCS 200/16-160) in order to challenge the equalized assessment for the 2024 tax year. The Property Tax Appeal Board finds that it has limited jurisdiction over the parties and the subject matter of the appeal.

Findings of Fact

The subject property consists of a one-story dwelling of vinyl and brick exterior construction with 1,606 square feet of living area. The dwelling was constructed in 2012 and is approximately 12 years old. Features of the home include a basement, central air conditioning, a fireplace, a deck and a garage with 788 square feet of building area. The property has an approximately 11,000 square foot site and is located in Glen Carbon, Collinsville Township, Madison County.

The appellants contend overvaluation as the basis of the appeal.¹ In support of this argument the appellants submitted information on three comparables sales that are located within .50 of a mile from the subject property, one of which has the same assessment neighborhood code as the

¹ Although, the appellants marked "recent appraisal" as a basis of the appeal, the Board finds no appraisal was submitted as evidence but instead the appellants submitted a comparative market analysis.

subject. The comparables have sites that range in size from 11,326 to 74,923 square feet of land area. The comparables are improved with one-story dwellings of vinyl and brick or stone and vinyl exterior construction ranging in size from 1,770 to 2,290 square feet of living area. The dwellings range in age from 22 to 52 years old. The comparables each have a basement, two of which have finished area. Each comparable has central air conditioning, a fireplace and a garage, where comparables #1 and #2 have either 499 or 564 square feet of building area. Comparable #1 has a two-tier deck, comparable #2 has an enclosed porch and comparable #3 has a gazebo, a shed and two patios. The comparables sold from July 2001 to February 2025 for prices ranging from \$190,800 to \$298,000 or from \$107.80 to \$133.90 per square foot of living area, including land.

The appellants also submitted a comparative market analysis prepared by Sharon Brace on April 3, 2025 using three comparables sales. Comparable sales #2 and #3 in the market analysis are the same properties as comparables #2 and #3 contained in the appellants' comparable sales grid analysis, which were previously described. Comparable sale #1 is described as containing 10,890 square feet of land area that is improved with a one-story dwelling with 1,145 square feet of living area. The dwelling is 41 years old and features a finished lower level, central air conditioning and a one-car garage. The three comparables sold from April 2024 to February 2025 for prices ranging from \$234,255 to \$298,000 with an average sale price of \$260,752. After analyzing the subject property, comparable properties currently on the market, recent sale and comparable properties that failed to sale, Brace concluded that in the current market, the subject property is most likely to sell for \$260,000.

The appellants submitted a copy of the board of review final decision disclosing the board of review increased the subject's assessment from \$93,430 to \$100,940 through the application of a township equalization factor of 1.0804.

Based on this evidence the appellants requested the subject's assessment be reduced to \$90,000, which reflects a market value of \$270,027 or \$168.13 per square foot of living area, when applying the statutory level of assessment of 33.33%.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the final equalized assessment of the subject property of \$100,940, which reflects a market value of \$302,850 or \$188.57 per square foot of living area, when applying the statutory level of assessment of 33.33%.²

In response to the appellants' evidence, the board of review argued that the appellants' comparable sale #1 has a sale date in 2001 and the three comparables in the market analysis have dwellings that are 48, 52 and 41 years old, when compared to the subject's 12-year-old dwelling.

In support of its contention of the correct assessment, the board of review submitted information on three comparables sales that have the same assessment neighborhood code as the subject and

² Section 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. Adm. 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.

from .08 to .2 of a mile from the subject property. The comparables have sites that range in size from 11,530 to 14,200 square feet of land area. The comparables are improved with one-story dwellings of frame and brick exterior construction ranging in size from 1,652 to 1,732 square feet of living area. The dwellings are 22 or 23 years old. The comparables each have a basement, two of which have finished area. Each comparable has central air conditioning, one or two fireplaces and a garage containing 462 or 758 square feet of building area. Comparable #2 has an open frame porch and a deck and comparable #3 has an inground swimming pool. The comparables sold from March 2022 to May 2025 for prices ranging from \$240,000 to \$380,000 or from \$145.28 to \$224.06 per square foot of living area, including land.

The board of review adjusted the comparables for differences from the subject in basement finish, fireplace count, garage size and other features to arrive at adjusted prices ranging from \$183,321 to \$368,611.

Based on this evidence, the board of review requested confirmation of the subject's assessment.

Conclusion of Law

The appellants contend 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 appellants did not meet this burden of proof and a reduction in the subject's assessment is not warranted.

The appellants submitted three comparable sales and a comparative market analysis, and the board of review submitted three comparables sales to support their respective positions before the Property Tax Appeal Board. The Board has given less weight to the sales provide by the appellants and those contained in the appellants' comparative market analysis due to substantial differences from the subject dwelling in age and/or dwelling size. Additionally, the appellants' comparable #3 has a substantially larger site size, when compared to the subject.

The Board finds the best evidence of market value to be the three comparables submitted by the board of review, which are overall more similar to the subject in location, site size, dwelling size and design. However, the Board finds all three dwellings are inferior to the subject in age and have features with varying degrees of similarity, when compared to the subject, suggesting adjustments would be required to make the comparables more equivalent to the subject. The Board also recognizes that comparable #1 sold 21 months prior to the assessment date at issue and comparables #2 and #3 sold 11 months and 17 months after the January 1, 2024 assessment date, respectively. Nevertheless, these three best comparables sold for prices ranging from \$240,000 to \$380,000 or from \$145.28 to \$224.06 per square foot of living area, including land. The Board has given most weight to board of review comparable #2 which sold most proximate to the lien date at issue for \$380,000 or \$224.06 per square foot of living area, including land and is most similar to the subject in site size, dwelling size, design and most features. The subject's assessment reflects an estimated market value of \$302,850 or \$188.57 per square foot of living area, including land, which falls within the range established by the best comparables in the record and is well supported by the most similar comparable, board of review comparable #2.

After considering adjustments to the best comparables for differences from the subject, the Board finds the subject's estimated market value as reflected by its assessment is supported 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

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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