



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

APPELLANT: Illinois Realty Group Holdings, LLC
DOCKET NO.: 24-03606.001-R-1
PARCEL NO.: 02-17.0-214-056

The parties of record before the Property Tax Appeal Board are Illinois Realty Group Holdings, LLC, the appellant, by attorney Patrick Sullivan, of PRDS Law, LLC in Belleville; 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: \$1,244
IMPR.: \$15,265
TOTAL: \$16,509

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 part 2-story part 1-story dwelling of frame exterior construction with 2,000 square feet of living area.¹ The dwelling was built in 1927 and is approximately 97 years old. Features of the home include a basement and a shed with 480 square feet of building area. The property has an approximately 8,080 square foot site and is located in East St. Louis, East St. Louis Township, St. Clair County.

The appellant contends overvaluation as the basis of the appeal. In support of this argument, the appellant submitted information on three comparable sales located from 1 to 14.6 miles from the subject property. The comparables have sites that range in size from 6,969 to 21,344 square feet of land area. The comparables are improved with 1.5-story dwellings of frame or frame and masonry exterior construction that range in size from 770 to 1,800 square feet of living area. The

¹ The Board finds the best description of the subject is found in the property record card provided by the board of review, that was not refuted by the appellant.

comparables range in age from 109 to 136 years old. Two comparables each have a basement and one comparable has a cellar. One comparable has central air conditioning and two comparables each have either a 1-car or 2-car garage. The comparables sold in December 2023 or July 2024 for prices ranging from \$4,500 to \$20,000 or from \$5.84 to \$11.11 per square foot of living area, including land. Based on this evidence, the appellant requested a reduction in the subject's assessment.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$16,509. The subject's assessment reflects a market value of \$49,532 or \$24.77 per square foot of living area, land included, when applying the statutory level of assessment of 33.33%.²

In response to the appeal, the board of review submitted a memorandum arguing that comparables #2 and #3 are located outside of the subject's neighborhood code and each of the comparables properties were unqualified sales and were not included in the Department of Revenue's study.

In support of its contention of the correct assessment, the board of review submitted information on three comparable sales. The comparables are located from .13 of a mile to 1 mile from the subject property. The comparables have sites ranging in size from 6,098 to 15,246 square feet of land area. The comparables are improved with 1-story dwellings of frame or masonry exterior construction ranging in size from 1,008 to 1,269 square feet of living area. The dwellings were built from 1927 to 1970. One comparable has a basement and two comparables each have a crawl space foundation. Two comparables each have central air conditioning and two comparables each have a garage containing 216 or 513 square feet of building area. The comparables sold from September 2022 to September 2024 for prices ranging from \$25,000 to \$68,000 or from \$24.80 to \$53.59 per square foot of living area, including land. Based on this evidence, the board of review requested confirmation of the subject's assessment.

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 parties submitted a total of six comparable sales for the Board's consideration. The Board has given less weight to the appellant's comparable sales as well as board of review comparable sale #3, due to their location of one mile or more away from the subject property.

² 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). As of the development of this Final Administrative decision, the Department of Revenue has not published figures for tax year 2024.

The Board finds the best evidence of market value to be board of review comparable sales #1 and #2. The Board finds that these two comparables are relatively similar to the subject in location and age. However, one of the comparable lacks a basement and each comparable is smaller in dwelling size and each features a garage, an amenity the subject lacks, suggesting adjustments would be required to make these two comparables more equivalent to the subject. Nevertheless, these two comparables sold in December 2023 and September 2024 for prices of \$27,000 and \$68,000 or \$25.96 and \$53.59 per square foot of living area, including land. The subject's assessment reflects a market value of \$49,532 or \$24.77 per square foot of living area, including land, which is bracketed by the two best comparable sales in this record on an overall market value basis but falls below on a price per square foot basis. Based on this record and after considering adjustments to the two best comparables for differences when compared to 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



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:

May 19, 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

State of Illinois
Property Tax Appeal Board
William G. Stratton Building, Room 402
401 South Spring Street
Springfield, IL 62706-4001

APPELLANT

Illinois Realty Group Holdings, LLC, by attorney:
Patrick Sullivan
PRDS Law, LLC
107 W Main
Belleville, IL 62220

COUNTY

St. Clair County Board of Review
St. Clair County Building
10 Public Square
Belleville, IL 62220