



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

APPELLANT: Illinois State Dental Society C/O Eric Larson
DOCKET NO.: 24-04646.001-C-1
PARCEL NO.: 22-07.0-254-001

The parties of record before the Property Tax Appeal Board are Illinois State Dental Society C/O Eric Larson, the appellant; the Sangamon County Board of Review.

Based on the facts and exhibits presented in this matter, the Property Tax Appeal Board hereby finds **A Reduction** in the assessment of the property as established by the **Sangamon** County Board of Review is warranted. The correct assessed valuation of the property is:

LAND: \$47,566
IMPR.: \$112,449
TOTAL: \$160,015

Subject only to the State multiplier as applicable.

Statement of Jurisdiction

The appellant timely filed the appeal from a notice of equalization issued by the Sangamon 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-story commercial building of brick exterior construction with 5,088 square feet of building area. The building is approximately 32 years old. The property has a 28,314 square foot site and is located in Springfield, Capital Township, Sangamon 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 August 18, 2022 for a price of \$437,000 or \$85.89 per square foot of building area, including land. The appellant completed Section IV of the appeal petition disclosing the parties to the sale were not related, the property sold using a realtor and was advertised for sale through the Multiple Listing Service for 13 months, and the sale was not due to foreclosure or by contract for deed. In support of the sale, the appellant submitted copies of a purchase contract and a settlement statement depicting payment of realtors' commissions.

The appellant also submitted information on three comparable sales located 0.1 or 0.7 of a mile from the subject. The parcels range in size from 16,212 to 98,445 square feet of land area and are improved with 2-story or 3-story commercial buildings ranging in size from 14,000 to 32,500 square feet of building area. The comparables range in age from 21 to 39 years old and sold from September 2019 to April 2023 for prices ranging from \$975,000 to \$1,150,000 or from \$30.00 to \$82.14 per square foot of building area, including land.

Based on this evidence, the appellant requested a reduction in the subject's assessment to \$160,015 which would reflect a market value of \$480,093 or 94.36 per square foot of building area, including land, when applying the statutory level of assessment of 33.33%.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total equalized assessment for the subject of \$175,184. The subject's assessment reflects a market value of \$525,605 or \$103.30 per square foot of building area, land included, when using the statutory level of assessment of 33.33%. The board of review disclosed that the appellant did not file a complaint with the board of review, but filed this appeal directly to the Board following receipt of a notice of an equalization factor of 1.0948 for Capital Township which increased the subject's total assessment from \$160,015 to \$175,184. Also, as part of the "Board of Review Notes on Appeal," the board of review reported that 2023 was the first year of the general assessment cycle for the subject property.

In support of its contention of the correct assessment the board of review submitted information on four comparable sales located from 1.4 to 5 miles from the subject. The parcels range in size from 24,375 to 49,400 square feet of land area and are improved with 1-story commercial buildings ranging in size from 4,576 to 5,564 square feet of building area. The comparables range in age from 19 to 32 years old and sold from June 2023 to September 2024 for prices ranging from \$550,000 to \$610,000 or from \$106.03 to \$133.30 per square foot of building area, including land. With regard to the appellant's comparables, the board of review contended the comparables differ from the subject in design and building size. 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 met this burden of proof and a reduction in the subject's assessment is warranted.

As an initial matter, the record indicates that the appellant did not file a complaint with the board of review but appealed the subject's total assessment directly to the Property Tax Appeal Board based on a notice of an equalization factor. Since the appeal was filed after notification of an equalization factor, the amount of relief that the Property Tax Appeal Board can grant is limited. Section 1910.60(a) of the rules of the Board states in part:

If the taxpayer or owner of property files a petition within 30 days after the postmark date of the written notice of the application of final, adopted township equalization factors, the relief the Property Tax Appeal Board may grant is limited to the amount of the increase caused by the application of the township equalization factor. (86 Ill.Admin.Code §1910.60(a)).

Additionally, section 16-180 of the Property Tax Code provides in pertinent part:

Where no complaint has been made to the board of review of the county where the property is located and the appeal is based solely on the effect of an equalization factor assigned to all property or to a class of property by the board of review, the Property Tax Appeal Board shall not grant a reduction in the assessment greater than the amount that was added as the result of the equalization factor. (35 ILCS 200/16-180).

These provisions mean that where a taxpayer files an appeal directly to the Board after notice of application of an equalization factor, the Property Tax Appeal Board cannot grant an assessment reduction greater than the amount of increase caused by the equalization factor. Villa Retirement Apartments, Inc. v. Property Tax Appeal Bd., 302 Ill. App. 3d 745, 753, 706 N.E. 2d 76, 82, 235 Ill. Dec. 816, 822 (4th Dist. 1999). Thus, any reduction would be limited to the increase in the assessment caused by the application of the equalization factor.

The record contains seven comparable sales and evidence of an August 2022 sale of the subject for the Board's consideration. The Board gave less weight to the appellant's comparables, due to substantial differences from the subject in building size and/or site size. Moreover, two comparables sold in 2019 and 2021, less proximate in time to the January 1, 2024 assessment date. The Board also gave less weight to the board of review's comparables, which are located more than one mile from the subject.

The Board finds the best evidence of market value to be the purchase of the subject property in August 2022 for a price of \$437,000. The appellant provided evidence demonstrating the sale had the elements of an arm's length transaction. The appellant completed Section IV of the appeal petition disclosing the parties to the transaction were not related, the property was sold using a realtor, the property had been advertised on the open market with the Multiple Listing Service and it had been on the market for 13 months. In further support of the transaction the appellant submitted a copy of the purchase contract and settlement statement. The Board finds the purchase price is below the market value reflected by the assessment. The Board finds the board of review did not present any evidence to challenge the arm's length nature of the transaction or to refute the contention that the purchase price was reflective of market value.

Based on this record the Board finds a reduction in the subject's assessment is justified, but such reduction is limited to the increase in the assessment caused by the application of the equalization factor.

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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