



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

APPELLANT: Illinois Realty Group Holdings, LLC
DOCKET NO.: 24-04906.001-R-1
PARCEL NO.: 07-28-401-033

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 Jefferson 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 **Jefferson** County Board of Review is warranted. The correct assessed valuation of the property is:

LAND: \$9,015
IMPR.: \$16,421
TOTAL: \$25,436

Subject only to the State multiplier as applicable.

Statement of Jurisdiction

The appellant timely filed the appeal from a decision of the Jefferson 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 dwelling of frame construction with 1,372 square feet of living area.¹ The dwelling was constructed in 1972 and is approximately 52 years old. Features of the home include 1 bathroom, central air conditioning, an attached garage with 392 square feet of building area, and a detached garage containing 352 square feet of building area. The property has a 56,192 square foot site and is located in Mt. Vernon, Mt. Vernon Township, Jefferson County.

¹ The parties disagree as to some descriptive information with the appellant claiming the subject has 1,568 square feet of living area and no garage, and the board of review contending that the subject has 1,372 square feet of living area, a 392-square foot attached garage, and a 352-square foot detached garage which was not contested by the appellant via a rebuttal filing. As the board of review submitted the subject's property record card, and aerial views of the subject property, the Board finds the board of review's description more probative.

The appellant contends overvaluation as the basis of the appeal. In support of this argument, the appellant submitted a grid analysis with information on three comparable sales located either 2.9 or 14.1 miles from the subject property. The comparables have sites ranging in size from 13,068 to 43,560 square feet of land area that are improved with a 1-story, a 1.5-story, or a 2-story dwelling of frame construction. The comparables range in size from 1,150 to 1,288 square feet of living area and range in age from 83 to 105 years old. One comparable features an unfinished basement;² one comparable has 1 fireplace; and each comparable has central air conditioning. The comparables are reported to have sold from November 2022 to January 2024 for prices of either \$42,000 or \$48,500 or from \$33.33 to \$37.66 per square foot of living area, including land. In addition, the appellant submitted exterior and interior photographs of the subject dwelling depicting the interior to be in very poor condition with a large hole in the ceiling, debris-filled kitchen floor, and questionably functional toilet. Next, the appellant submitted a copy of the final administrative decision of the Property Tax Appeal Board for the 2020 tax year lowering the subject's total assessment to \$11,291. Finally, the appellant submitted information on each of the three comparable properties extracted from an online real estate website. Based on this evidence, the appellant requested the subject's total assessment be reduced.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$25,436. The subject's assessment reflects a market value of \$76,316 or \$55.62 per square foot of living area, land included, when using the statutory level of assessment of 33.33%.³

The board of review submitted a memorandum, property record cards for the subject property as well as all the comparable properties in the record, aerial photograph of the subject property, and Illinois Real Estate Transfer Declaration (PTAX-203) forms associated with all the sales in the record. In the memorandum, the board of review argued that appellant's comparable #1 is located too remote from the subject, being more than 14 miles in distance from the subject property. More importantly, however, the board of review contended that this comparable was not a sale as there is no Illinois Real Estate Transfer Declaration (PTAX-203) form on file, but instead only a recorded memorandum of contract for deed. As to appellant's comparable #2, board of review argued that this sale was not an arm's-length transaction as evidenced by the PTAX-203 form associated with this sale which depicts that this property was not advertised for sale and was a fulfillment of an installment contract. Lastly, the board of review argued that the listing sheet associated with the sale of appellant's comparable #3 discloses that this dwelling has a basement, contrary to the appellant's grid data.

In support of its contention of the correct assessment, the board of review submitted a grid analysis with information on eight comparable sales located from .1 to .7 of a mile from the subject property. The comparables have parcels ranging in size from 9,953 to 27,917 square feet of land area that are improved with 1-story dwellings of frame construction ranging in size from 888 to 1,456 square feet of living area. The dwellings were built from 1947 to 1970. Each

² Although the appellant reported that comparable #3 lacks a basement, the board of review submitted the property record card for this comparable establishing that this dwelling has a basement.

³ 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). Prior to the drafting of this decision, the Department of Revenue has yet to publish figures for tax year 2024.

dwelling features central air conditioning; one comparable has a fireplace; comparable #2 has an attached and a detached garage containing 288 and 720 square feet of building area, respectively; comparable #8 has a 338-square foot garage and a 192-square foot carport; and four comparables have either a garage or a carport ranging in size from 288 to 352 square feet of building area. The comparables sold from July 2022 to December 2024 for prices ranging from \$50,000 to \$137,500 or from \$52.08 to \$129.50 per square foot of living area, including land.

Based on this evidence, the board of review requested affirmation 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 eleven comparables for the Board's consideration. After analyzing the evidence submitted, the Board gave less weight to appellant's comparable #1 which was not a sale but rather a recorded memorandum of contract for deed. The Board gave less weight to appellant's sale #2 which is not an arm's-length transaction given that it was not advertised for sale and was a fulfillment of an installment contract. Appellant's comparable #3 has a basement, unlike the subject dwelling, and was therefore given reduced weight. As to the board of review comparables, the Board gave less weight to board of review comparables #3 through #8 which differ from the subject property in lacking a garage, unlike the subject's two garages, having a smaller dwelling size relative to the subject, being older in age relative to the subject, and/or having sold in 2022 which is too remote in time to accurately reflect the subject's market value given the more recent sales in the record.

On this record, the Board finds the best evidence of market value to be board of review comparables #1 and #2. These two comparables are most similar to the subject in location, design, age, dwelling size, and features. However, each of these comparables has a lot that is significantly smaller than the subject parcel, meaning that upward adjustments are needed to the comparables for this difference in order to make them more equivalent to the subject. On the other hand, each of these comparables appear to be superior in condition given their descriptions, aerial photos, and highest sale prices of all comparables in the record, thus requiring downward adjustments to the comparables for this difference from the subject. The two best comparables in the record sold in June and October 2023 for prices of \$130,000 and \$137,500 or for \$98.34 and \$103.38 per square foot of living area, land included, respectively.

The subject's assessment reflects a market value of \$76,316 or \$55.62 per square foot of living area, including land, is below the best comparable sales in this record both in terms of overall value and on a price per square foot of living area basis. However, the subject's lower assessment appears logical given the photographs of the subject's interior depicting its poor condition.

Based on this record and after considering adjustments to the best comparables in this record for differences from the subject, the Board finds that the appellant did not establish by a preponderance of the evidence that the subject property is overvalued. Therefore, the Board finds that 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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APPELLANT

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COUNTY

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