FINAL ADMINISTRATIVE DECISION
ILLINOIS PROPERTY TAX APPEAL BOARD

APPELLANT: Ron Cadwalader
DOCKET NO.: 25-00166.001-R-1
PARCEL NO.: 02-02-19-103-004

The parties of record before the Property Tax Appeal Board are Ron Cadwalader, the appellant; and the Tazewell 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 **Tazewell** County Board of Review is warranted. The correct assessed valuation of the property is:

LAND:	$14,370
IMPR.:	$127,245
TOTAL:	$141,615

Subject only to the State multiplier as applicable.

Statement of Jurisdiction

The appellant timely filed the appeal from a decision of the Tazewell County Board of Review pursuant to section 16-160 of the Property Tax Code (35 ILCS 200/16-160) challenging the assessment for the 2025 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 2-story dwelling of frame exterior construction with 2,342 square feet of living area. The dwelling was constructed in 2024. Features of the home include a basement with 265 square feet of finished area, central air conditioning, and an 858 square foot garage. The property has a 12,604 square foot site and is located in Washington, Washington Township, Tazewell County.

The appellant's appeal is based on both overvaluation and assessment inequity. In support of the overvaluation argument, the appellant submitted evidence disclosing the subject property was purchased on August 23, 2024 for a price of $424,844. The appellant disclosed the sale was not between related parties, the property sold by owner and was not advertised for sale, and the sale was not due to foreclosure or by contract for deed. In support of the sale, the appellant submitted copies of a settlement statement, indicating a price of $424,843.82 and payment of a realtor's commission to Re/Max; a Warranty Deed; and a Real Estate Transfer Declaration, reporting the property was advertised for sale.

The appellant also submitted information on five comparables within 4 blocks from the subject, together with a map depicting the locations of these properties in relation to the subject. The parcels range in size from 12,467 to 15,240 square feet of land area[1] and are improved with 1-story or 2-story homes ranging in size from 2,042 to 3,803 square feet of living area.[2] The dwellings are from approximately 2 to 16 years old. Each home has a basement with 944 to 2,418 square feet of finished area, central air conditioning, and a garage ranging in size from 669 to 886 square feet of building area. The comparables sold from June 2024 to September 2024 for prices ranging from $434,500 to $519,900 or from $179.70 to $242.36 per square foot of living area, including land. The comparables have land assessments ranging from $16,370 to $31,800 or from $1.26 to $1.92 per square foot of land area and have improvement assessments ranging from $120,410 to $148,940 or from $51.08 to $72.13 per square foot of living area.

The appellant submitted a brief contending that the assessment reflects a market value higher than the subject's purchase price. The appellant argued the comparables have assessments that reflect market values equal to or below their purchase prices.

Based on this evidence, the appellant requested a reduction in the subject's assessment to $141,615.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of $153,070. The subject's assessment reflects a market value of $459,256 or $196.10 per square foot of living area, land included, when using the statutory level of assessment of 33.33%. The subject has a land assessment of $14,370 or $1.14 per square foot of land area and an improvement assessment of $138,700 or $59.22 per square foot of living area.

In support of its contention of the correct assessment the board of review submitted information on four comparables located 0.1 of a mile from the subject. Comparables #1 and #4 are the same sales as the appellant's comparables #1 and #4 described above. However, the board of review reported comparable #1 has an indoor pool. Comparables #2 and #3 have 11,761 and 12,196 square foot sites that are improved with 1.5-story or 2-story homes with 2,607 and 3,216 square feet of living area. The dwellings are from 14 and 19 years old. Each home has a basement with 1,013 or 1,227 square feet of finished area, central air conditioning, and a 746 or a 792 square foot garage. These two comparables have land assessments of $19,830 and $23,440 or $1.69 and $1.92 per square foot of land area and improvement assessments of $119,160 and $134,210 or $45.71 and $41.73 per square foot of living area, respectively.

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

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[1] The Board finds comparable #1 has a site size of 13,939 square feet of land area as reported by the board of review. The Board notes the appellant reported comparable #5 has a 100,623 square foot site but the assessment records presented by the appellant report 0.34 of an acre or 14,810 square feet.

[2] The Board finds comparable #1 has a dwelling size of 2,694 square feet as shown in the property record card presented by the board of review.

Conclusion of Law

The appellant contends in part 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.

The record contains evidence of an August 2024 sale of the subject and five comparable sales, two of which are common to both parties, for the Board's consideration. The Board finds the best evidence of market value to be the purchase of the subject property in August 2024 for a price of $424,844, which occurred proximate in time to the assessment date. The appellant provided evidence demonstrating the sale had the elements of an arm's length transaction. The appellant disclosed the parties to the transaction were not related and submitted copies of a Real Estate Transfer Declaration and settlement statement for the sale, indicating the property sold using a realtor and was advertised for sale. 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. The Board finds the comparable sales, which sold proximate in time to the assessment date, are similar to the subject in location and site size, and have varying degrees of similarity to the subject in design, dwelling size, age, and other features, do not overcome the demonstrated arm's length sale of the subject. Based on this record, the Board finds a reduction in the subject's assessment for overvaluation commensurate with the appellant's request is warranted.

The appellant also contends assessment inequity as the basis of the appeal. When unequal treatment in the assessment process is the basis of the appeal, the inequity of the assessments must be proved by clear and convincing evidence. 86 Ill.Admin.Code §1910.63(e). Proof of unequal treatment in the assessment process should consist of documentation of the assessments for the assessment year in question of not less than three comparable properties showing the similarity, proximity and lack of distinguishing characteristics of the assessment comparables to the subject property. 86 Ill.Admin.Code §1910.65(b). The Board finds the appellant did not meet this burden of proof and a further reduction in the subject's assessment for assessment inequity is not justified.

The record contains seven equity comparables, with two common comparables, for the Board's consideration. With regard to land assessment equity, the Board finds the comparables are similar to the subject in location and site size. The comparables have land assessments ranging from $16,370 to $31,800 or from $1.26 to $1.92 per square foot of land area. The subject's land assessment of $14,370 or $1.14 per square foot of land area falls below the comparables in this record. Based on this evidence, the Board finds the appellant did not demonstrate with clear and convincing evidence that the subject's land was inequitably assessed and a reduction in the subject's land assessment is not warranted.

With regard to improvement assessment equity, the Board finds the comparables are similar to the subject in location but have varying degrees of similarity to the subject in design, dwelling size, age, and features, suggesting adjustments to these comparables would be needed to make them more equivalent to the subject. The comparables have improvement assessments ranging from $119,160 to $148,940 or from $41.73 to $72.13 per square foot of living area. The subject's improvement assessment of $127,245 or $54.33 per square foot of living area, as reduced for overvaluation, falls within the range established by the comparables in this record. Based on this evidence, the Board finds a reduction in the subject's improvement assessment for assessment inequity 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: ________ ________

<u>C E R T I F I C A T I O N</u>

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: July 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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