



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

APPELLANT: Serge Krasavin
DOCKET NO.: 12-00199.001-R-1
PARCEL NO.: 93-21-17-455-010

The parties of record before the Property Tax Appeal Board are Serge Krasavin, the appellant, and the Champaign County Board of Review.

Based on the facts and exhibits presented, the Property Tax Appeal Board hereby finds no change in the assessment of the property as established by the **Champaign** County Board of Review is warranted. The correct assessed valuation of the property is:

LAND: \$16,970
IMPR.: \$46,060
TOTAL: \$63,030

Subject only to the State multiplier as applicable.

Statement of Jurisdiction

The appellant timely filed the appeal from a decision of the Champaign County Board of Review pursuant to section 16-160 of the Property Tax Code (35 ILCS 200/16-160) challenging the assessment for the 2012 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 1.5-story dwelling of frame exterior construction with 2,565 square feet of above-grade

living area.¹ The dwelling was constructed in 1951. Features of the home include a partial unfinished basement, central air conditioning, a wood burning fireplace and a two-car garage. The property has a 12,216 square foot site and is located in Urbana, Cunningham Township, Champaign County.

The appellant contends overvaluation as the basis of the appeal. The appellant completed Section IV - Recent Sale Data and reported the November 2007 purchase of the subject property for \$90,000. The appellant reported the parties to the transaction were not related and the property was advertised in the local paper for 2 years. The appellant further reported that \$35,000 was expended to renovate the property after it was purchased and before the dwelling was occupied in June 2008.

In further support of the overvaluation argument, the appellant submitted information in the Section V grid analysis on three comparable sales located on the same street as the subject property. The comparables were described as one-story or two-story frame or stone dwellings that were 60 or 62 years old. The comparables reportedly range in size from 1,767 to 3,200 square feet of living area. The properties sold between October 1998 and June 2011 for prices ranging from \$107,900 to \$275,000 or from \$76.40 to \$89.25 per square foot of living area, including land. Based on this evidence, the appellant requested a total assessment of \$49,250 which would reflect a market value of approximately \$147,750 or \$57.60 per square foot of living area, including land.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$63,030. The subject's assessment reflects a market value of \$189,109 or \$73.73 per square foot of living area, land included, when using the 2012 three year average median level of assessment for Champaign County of 33.33% as determined by the Illinois Department of Revenue.

The board of review reported that the sale of the subject property in 2007 may not have been an "arm's length" transaction as the assessing officials could not find any listing history prior to the sale.

¹ The appellant reported the dwelling contains 1,946 square feet of living area, but provided no evidence to support that assertion. The board of review submitted a copy of the subject's property record card that includes a schematic drawing to support the stated dwelling size.

The board of review submitted a memorandum criticizing consideration of appellant's comparable sale #2 as a sale from October 1998 is not a "recent" sale that would assist in establishing the estimated fair market value of the subject property as of the assessment date of January 1, 2012. The board of review also reported that the subject property was listed at various times since 2011 for asking prices as high as \$220,000 before the property sold in June 2013 for \$197,500.

In support of its contention of the correct assessment the board of review submitted information on three comparable sales located on the same street as the subject property where comparables #2 and #3 were the same properties presented by the appellant as comparables #3 and #1, respectively. Contrary to the appellant's grid analysis, the board of review reported that the dwelling at 402 Pennsylvania contains 3,067 square feet of living area, not 3,600 square feet as reported by the appellant. As reported by the board of review, these three comparables consist of a one-story, a 1.5-story and a two-story dwelling that range in age from 43 to 69 years old. The homes range in size from 2,176 to 3,067 square feet of living area. Two comparables have basements, one of which has finished area. Two of the comparables have central air conditioning and each has a fireplace and a two-car or a three-car garage. These properties sold between April and August 2011 for prices ranging from \$168,000 to \$275,000 or from \$77.21 to \$89.66 per square foot of living area, including land.

Based on this evidence and argument, 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 Property Tax Appeal Board has given little weight to appellant's comparable #2 which is significantly smaller than the subject dwelling. In addition, as noted by the board of

review, this sale occurred in October 1998, a date remote in time to the valuation date at issue of January 1, 2012 and thus less likely to be indicative of the subject's estimated market value as of the assessment date.

The Board finds the best evidence of market value to be the board of review comparable sales. These comparables had varying degrees of similarity and dissimilarity to the subject dwelling and sold between April and August 2011 for prices ranging from \$168,000 to \$275,000 or from \$77.21 to \$89.66 per square foot of living area, including land. The subject's assessment reflects a market value of \$189,109 or \$73.73 per square foot of living area, including land, which is within the range established by the best comparable sales in this record in terms of overall value and below the range of the comparables on a square-foot basis. After considering adjustments and differences in the best comparables when compared to the subject, the Board finds 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.

Chairman

Klaus Albino

Member

[Signature]

Member

Member

Jerry White

Acting Member

DISSENTING: _____

C E R T I F I C A T I O N

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 24, 2015

[Signature]

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 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 the subsequent year 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.

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.