



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

APPELLANT: Land Trust 275 1000 0353  
DOCKET NO.: 13-04965.001-R-1  
PARCEL NO.: 30-07-09-400-005-0000

The parties of record before the Property Tax Appeal Board are Land Trust 275 1000 0353, the appellant, by Patrick A. Meszaros, of the Law Offices of Patrick A. Meszaros in Joliet, and the Will 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 **Will County Board of Review** is warranted. The correct assessed valuation of the property is:

**LAND:** \$5,158  
**IMPR.:** \$24,219  
**TOTAL:** \$29,377

Subject only to the State multiplier as applicable.

**Statement of Jurisdiction**

The appellant timely filed the appeal from a 2012 tax year decision of the Property Tax Appeal Board pursuant to section 16-185 of the Property Tax Code (35 ILCS 200/16-185) in order to challenge the assessment for the 2013 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 two-unit apartment building of two-story design with frame exterior construction. The structure contains approximately 1,896 gross square feet of building area with 2 two-bedroom units.<sup>1</sup> The building was constructed in 1900. Features include a full unfinished basement. The property has an approximately 5,663 square foot site and is located in Joliet, Joliet Township, Will County.

The appellant contends overvaluation as the basis of the appeal. In support of this argument the appellant submitted information on four comparable sales along with Multiple Listing Service data sheets, printouts from the Supervisor of Assessments and printouts from the township assessor with characteristics information. The comparables were said to be from .25 to .72 of a

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<sup>1</sup> The appellant reported a dwelling size of 2,042 square feet, but provided documentation from the assessing officials with a total living area of 1,896 square feet.

mile from the subject property. The comparables consist of two-story frame or stucco dwellings that were 107 to 134 years old. The comparables range in size from 1,850 to 2,288 square feet of living area and feature full unfinished basements. Three of the comparables have garages of 400 or 800 square feet of building area. The sales occurred between January 2011 and November 2012 for prices ranging from \$52,000 to \$90,000 or from \$22.73 to \$45.95 per square foot of living area, including land.

Based on this evidence, the appellant requested a total assessment of \$19,860 which reflects a market value of approximately \$59,580 or \$31.42 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 \$29,377. The subject's assessment reflects a market value of \$88,512 or \$46.68 per square foot of living area, land included, when using the 2013 three year average median level of assessment for Will County of 33.19% as determined by the Illinois Department of Revenue.

In rebuttal the board of review submitted a statement from James A. Brenczewski, Joliet Township Assessor, grid analyses which reiterated the appellant's four comparable sales and set forth sales to support the assessment along with property record cards for both parties' comparables. The assessor noted that appellant's comparable #3 was a 1.5-story dwelling that sold March 2013 for \$74,000 or for \$40.00 per square foot of living area, rather than the January 2011 sale which the appellant reported for \$85,000.

The property record cards for the subject and each of the appellant's comparables reflect the dwelling as an apartment building or "apartment house" whereas the board of review's comparable properties are single-family dwellings.

In support of its contention of the correct assessment the board of review through the township assessor submitted information on three comparable sales located within .5 of a mile of the subject. The comparables consist of a two-story and two, part two-story and part one-story dwellings of frame construction that were 91 to 135 years old. The comparables range in size from 1,456 to 1,664 square feet of living area and feature partial unfinished basements. Two of the comparables have garages of 576 and 648 square feet of building area. The properties sold between September 2012 and July 2013 for prices ranging from \$70,000 to \$115,000 or from \$48.08 to \$69.11 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 seven suggested comparable properties to support their respective positions before the Property Tax Appeal Board. The Board has given reduced weight to all three of the board of review comparables as these appear to be single-family dwellings as described on the respective property record cards, as compared to the subject and appellant's comparables which are all apartment buildings.

The Board finds the best evidence of market value to be appellant's four comparable sales along with the board of review's information that appellant's comparable #3 sold more recently in March 2013 for \$74,000. The comparables presented by the appellant are apartment buildings that sold on five occasions between January 2011 and March 2013 for prices ranging from \$52,000 to \$90,000 or from \$22.73 to \$45.95 per square foot of living area, including land. The subject's assessment reflects a market value of \$88,512 or \$46.68 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 only slightly above the range on a per-square-foot basis. After considering adjustments and the differences in the best comparables when compared to the subject property, the Board finds the subject's estimated market value based on its assessment is supported by the most comparable properties and 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.



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Chairman



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Member



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Member

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Member



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Acting 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: September 23, 2016



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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.