



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

APPELLANT: Patel Vijay  
DOCKET NO.: 14-01135.001-R-1  
PARCEL NO.: 30-07-13-107-019-0000

The parties of record before the Property Tax Appeal Board are Patel Vijay, the appellant; and the Will 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 Will County Board of Review is warranted. The correct assessed valuation of the property is:

**LAND:** \$5,750  
**IMPR.:** \$9,250  
**TOTAL:** \$15,000

Subject only to the State multiplier as applicable.

**Statement of Jurisdiction**

The appellant timely filed the appeal from a decision of the Will County Board of Review pursuant to section 16-160 of the Property Tax Code (35 ILCS 200/16-160) challenging the assessment for the 2014 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 is improved with a one-story dwelling of frame construction with 1,200 square feet of living area. The dwelling was constructed in 1947. Features of the home include a slab foundation. The property has a 9,148 square foot site and is located in Joliet, Joliet Township, Will 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 April 1, 2013 for a price of \$45,000. The appellant completed Section IV – Recent Sale Data of the appeal disclosing the parties to the transaction were not related. The appellant also indicated the property was advertised with a sign, internet and/or auction. The appellant submitted a copy of the settlement statement documenting the subject's sale. Based on this evidence, the appellant requested a reduction in the subject's assessment to reflect the purchase price.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$23,850. The subject's assessment reflects a market value of \$71,772 or \$59.81 per square foot of living area, land included, when using the 2014 three year average median level of assessment for Will County of 33.23% as determined by the Illinois Department of Revenue.

In support of its contention of the correct assessment the board of review submitted information on four comparable sales identified by the township assessor improved with one-story dwellings of frame construction that ranged in size from 884 to 1,296 square feet of living area. The dwellings ranged in age from 41 to 130 years old. Three of the comparables have a basement, two comparables have central air conditioning and each comparable has a garage ranging in size from 552 to 1,440 square feet of building area. Their sites ranged in size from 7,405 to 23,522 square feet of land area. These properties sold from March 2013 to August 2014 for prices ranging from \$67,000 to \$100,000 or from \$75.79 to \$80.65 per square foot of living area, including land.

The board of review submission also included copies of the PTAX-203 Illinois Real Estate Transfer Declaration associated with sale of the subject property and the comparable sales identified by the township assessor. The transfer declarations indicated that the subject property as well as each of the comparable sales were advertised for sale or sold using a real estate agent.

The board of review requested the subject's assessment be confirmed.

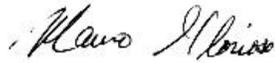
### **Conclusion of Law**

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.

The Board finds the best evidence of market value to be the purchase of the subject property in April 2013 for a price of \$45,000. The appellant provided evidence demonstrating the sale had the elements of an arm's length transaction. The appellant completed Section IV - Recent Sale Data of the appeal disclosing the parties to the transaction were not related and the property had been advertised on the open market. In further support of the transaction the appellant submitted a copy of the settlement statement. Additionally, the board of review provided a copy of the subject's PTAX-203 Illinois Real Estate Transfer Declaration disclosing the subject property had been advertised for sale. The Board finds the purchase price is below the market value reflected by the subject's 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. The board of review did provide information on four comparable sales but these properties are superior to the subject property in features in that three comparables have basements, two comparables have central air conditioning, one comparable has a fireplace and each comparable has a garage. Furthermore, three of the comparables each had a larger site than the subject property. After considering the negative adjustments to these

comparables for their superior features in comparison with the subject property, these sales tend to demonstrate the subject's purchase price is indicative of the property's fair cash value. Based on this record the Board finds a reduction in the subject's assessment is 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



Member



Member

Member



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



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.