



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

APPELLANT: Steel City Properties, LLC
DOCKET NO.: 15-00399.001-R-1
PARCEL NO.: 30-07-05-201-019-0000

The parties of record before the Property Tax Appeal Board are Steel City Properties, LLC, 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: \$5,350
IMPR.: \$23,850
TOTAL: \$29,200

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 2015 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 one-story dwelling of frame construction with 832 square feet of living area. The dwelling was constructed in 1949. Features of the property include an unfinished basement, central air conditioning and a detached garage with 240 square feet of building area. The property has a 5,227 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 located from .03 to .77 of a mile from the subject property. The comparables consist of one-story dwellings of frame exterior construction that were 71 to 82 years old. The homes range in size from 820 to 1,092 square feet of living area. Comparable #1 has a full basement with finished area. Three homes have central air conditioning and one has a "window" air conditioner. Each of the comparables has a garage

ranging in size from 240 to 440 square feet of building area. The comparables sold between March 2014 and October 2014 for prices ranging from \$57,500 to \$68,000 or from \$58.61 to \$74.65 per square foot of living area, including land.

Based on this evidence, the appellant requested a total assessment of \$21,166 which would reflect a market value of approximately \$63,504 or \$76.33 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 \$29,200. The subject's assessment reflects a market value of \$87,820 or \$105.55 per square foot of living area, land included, when using the 2015 three year average median level of assessment for Will County of 33.25% as determined by the Illinois Department of Revenue.

In response to the appeal, the board of review submitted a memorandum and data gathered by James A. Brenczewski, Joliet Township Assessor. The assessor contended that the appellant presented sales from "two different neighborhoods." The assessor also noted that appellant's comparable #1 "resold" in 2015 for \$128,000 or \$156.10 per square foot of living area, including land.¹ The assessor also summarily asserted the appellant "is listing old 2014 sales."

In support of its contention of the correct assessment the board of review through the township assessor submitted information on four comparable sales "from the same neighborhood." The comparables consist of one-story dwellings of frame exterior construction that were 62 to 69 years old. The homes range in size from 784 to 875 square feet of living area, each comparable has a full unfinished basement, central air conditioning and a garage ranging in size from 308 to 420 square feet of building area. The comparables sold between September 2014 and December 2015 for prices ranging from \$110,000 to \$128,500 or from \$128.50 to \$146.86 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 parties submitted a total of eight comparable properties with ten different sales to support their respective positions before the Property Tax Appeal Board. The Board finds appellant's

¹ The assessor did not set forth the data in the memorandum, but the assessor reiterated the appellant's comparables sales with the latest sales data. According to the assessor's grid, appellant's comparable #3 also resold in October 2014 for \$81,000 or \$93.75 per square foot of living area, including land.

comparables #2, #3 and #4 were inferior to the subject in foundation as compared to the subject's full basement. Therefore, the Board gives less weight to appellant's comparable #2, #3 and #4 in its analysis.

The Board finds the best evidence of market value to be appellant's comparable sale #1 along with the board of review comparable sales. These five most similar comparables sold on six different occasions between June 2014 to December 2015 for prices ranging from \$57,500 to \$128,500 or from \$70.12 to \$156.10 per square foot of living area, including land. The subject's assessment reflects a market value of \$87,820 or \$105.55 per square foot of living area, including land, which is within the range established by the best comparable sales in this record. Based on this evidence 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



Member

Acting 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: August 18, 2017



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.