



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

APPELLANT: Harold Thompson  
DOCKET NO.: 15-02212.001-R-1  
PARCEL NO.: 11-02-378-026

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

**LAND:** \$1,880  
**IMPR.:** \$70,130  
**TOTAL:** \$72,010

Subject only to the State multiplier as applicable.

**Statement of Jurisdiction**

The appellant timely filed the appeal from a decision of the Knox 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 960 square feet of living area. The dwelling was constructed in 2015. Features of the home include a full finished basement, central air conditioning, a fireplace and a 480 square foot garage. The property has a 12,051 square foot site and is located in Dahinda, Persifer Township, Knox County.

The appellant contends overvaluation as the basis of the appeal. In support of this argument the appellant submitted information on three comparable sales. The comparables had varying degrees of similarity to the subject. The comparables had sale dates occurring from March 2013 to June 2014 for prices ranging from \$200,000 to \$242,000 or from \$156.25 to \$216.07 per square foot of living area, including land.

The appellant's evidence included lists of construction costs, pending costs and closing costs, however, no labor costs were included. The appellant also disclosed on his petition form that the subject is being marketed for \$200,000, but supplied no corroborating evidence in support.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$72,010. The subject's assessment reflects a market value of \$217,290 or \$226.34 per square foot of living area, land included, when using the 2015 three year average median level of assessment for Knox County of 33.14% as determined by the Illinois Department of Revenue.

In support of its contention of the correct assessment the board of review submitted information on three comparable sales, one of which was also submitted by the appellant. The comparables had varying degrees of similarity to the subject. The comparables had sale dates occurring from October 2013 to October 2015 for prices ranging from \$242,000 to \$360,000 or from \$216.07 to \$369.90 per square foot of living area, including land. The board of review also submitted a vacant land grid analysis containing four land sales, three of which were located in the same subdivision as the subject. The land sales were similar in size to the subject lot and sold from June 2015 to August 2016 for prices ranging from \$6,000 to \$90,000.

### **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.

As an initial matter regarding the appellant's lists of construction costs, sans labor costs, the Board finds this evidence will be given less weight. The courts have stated that where there is credible evidence of comparable sales these sales are to be given significant weight as evidence of market value. In Chrysler Corporation v. Property Tax Appeal Board, 69 Ill.App.3d 207 (1979), the court held that significant relevance should not be placed on the **cost approach** or income approach especially when there is market data available. In Willow Hill Grain, Inc. v. Property Tax Appeal Board, 187 Ill.App.3d 9 (1989), the court held that of the three primary methods of evaluating property for the purpose of real estate taxes, the preferred method is the sales comparison approach. Since there is credible market sales evidence contained in the record, the Board placed most weight on this evidence.

The Board finds the best evidence of market value to be the parties' common comparable and the board of review's comparable #1. These comparables were similar to the subject in location, size, age and also sold more proximate in time to the January 1, 2015 assessment date than did the parties' remaining comparables. The best comparables sold for prices ranging from \$216.07 to \$369.90 per square foot of living area, including land. The subject's assessment reflects a market value of \$226.34 per square foot of living area, including land, which is supported by the market values established by the best comparable sales in this record. The Board gave less weight to the parties' remaining comparables due to their sale dates occurring greater than 14

months prior to the assessment date at issue. 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. Pursuant to Section 1910.50(b) of the rules of the Property Tax Appeal Board (86 Ill.Admin.Code §1910.50(b)) 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



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: December 19, 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 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

State of Illinois  
Property Tax Appeal Board  
William G. Stratton Building, Room 402  
401 South Spring Street  
Springfield, IL 62706-4001

APPELLANT

Harold Thompson  
9089 Vineyard Road  
Toulon, IL 61483

COUNTY

Knox County Board of Review  
121 South Prairie Street, Suite 1  
Galesburg, IL 61401