



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

APPELLANT: American Homes 4 Rent (AH4R)
DOCKET NO.: 16-00198.001-R-1
PARCEL NO.: 07-02-176-006

The parties of record before the Property Tax Appeal Board are American Homes 4 Rent (AH4R), the appellant, by attorney Michael R. Davies of the Law Offices of Michael R. Davies, Ltd., in Oak Lawn; and the Boone 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 **Boone** County Board of Review is warranted. The correct assessed valuation of the property is:

LAND: \$ 8,072
IMPR.: \$18,821
TOTAL: \$26,893

Subject only to the State multiplier as applicable.

Statement of Jurisdiction

The appellant timely filed the appeal from a decision of the Boone County Board of Review pursuant to section 16-160 of the Property Tax Code (35 ILCS 200/16-160) challenging the assessment for the 2016 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-story dwelling that has 1,875 square feet of living area. The dwelling was constructed in 2004. Features include three bedrooms, three bathrooms and a 480-square foot attached garage. Neither party disclosed the subject's exterior construction, foundation type or other salient features. The subject has a 7,841-square foot site. The subject property is located in Flora Township, Boone County.

The appellant submitted evidence before the Property Tax Appeal Board claiming overvaluation as the basis of the appeal. In support of the overvaluation claim, the appellant submitted limited descriptive information for four comparable sales that were reported to be located from .23 to .79 of a mile from the subject.¹ The comparables were reported to consist of one-story or two-story

¹ The Board requested the appellant to complete the grid analysis in Section V of the appeal petition. The appellant failed to comply with the Board's request.

dwelling, but the story height for each particular dwelling was not disclosed. The dwellings were built from 1969 to 1999. The comparables have three bedrooms and two or three bathrooms. The appellant failed to disclose the comparables' exterior construction, foundation type or features such as central air conditioning, fireplaces or garages. The dwellings were reported to range in size from 1,834 to 2,074 square feet of living area and have sites that range in size from 6,970 to 10,454 square feet of land area. The comparables sold from January 2013 to January 2015 for prices ranging from \$50,500 to \$75,070 or from \$27.54 to \$40.00 per square foot of living area including land. Based on this evidence, the appellant requested a reduction in the subject's assessment.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$26,893. The subject's assessment reflects an estimated market value of \$80,158 or \$42.75 per square foot of living area including land when applying the 2016 three-year average median level of assessment for Boone County of 33.55%.

In support of the subject's assessment, the board of review submitted a recommendation from the Boone/Flora Township Assessor, Glen Gratz. The assessor claimed the appellant did not provide comparable sales. The assessor presented limited descriptive information on four comparable sales. Their proximate location in relation to the subject was not disclosed. The comparables were reported to be from 12 to 15 years old. The dwellings were reported to range in size from 1,358 to 1,833 square feet of living area, but their land sizes were not disclosed. The assessor failed to disclose the comparables' story height, exterior construction, foundation type and some features. The comparables sold from May 2013 to November 2014 for prices ranging from \$80,200 to \$117,000 or from \$55.65 to \$86.16 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 no reduction in the subject's assessment is warranted.

The record contains eight comparable sales for the Board's consideration. The Board gave less weight to the comparables submitted by the appellant. Three comparables are older in age than the subject and one comparable sold in 2013, which is dated and less indicative of market value as of the subject's January 1, 2016 assessment date. Similarly, the Board gave less weight to comparable #1 submitted by the board of review due its 2013 sale date. Based on the limited descriptive data submitted, the Board finds the three remaining comparables submitted by the board of review sold more proximate in time to the subject's assessment date and are similar in age and dwelling size. They sold from August 2014 to October 2014 for prices ranging from \$80,200 to \$102,000 or from \$55.65 to \$64.96 per square foot of living area including land. The subject's assessment reflects an estimated market value of \$80,158 or \$42.75 per square foot of living area including land, which falls below the range established by the more similar comparable sales contained in the record. After considering any adjustments to the comparables

for differences when compared to the subject, the Board finds the subject's estimated market value as reflected by its assessment is justified. Therefore, no reduction in the subject's assessment is warranted.

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(d) of the rules of the Property Tax Appeal Board (86 Ill.Admin.Code §1910.50(d)) 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



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: June 19, 2018



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

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APPELLANT

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COUNTY

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