



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

APPELLANT: American Homes 4 Rent Pro  
DOCKET NO.: 16-00661.001-R-1  
PARCEL NO.: 05-06-03-118-013-0000

The parties of record before the Property Tax Appeal Board are American Homes 4 Rent Pro, the appellant, by attorney Michael R. Davies, of Ryan Law LLP, in Chicago, 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:** \$12,450  
**IMPR.:** \$38,300  
**TOTAL:** \$50,750

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 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 of frame construction with 1,352 square feet of living area. The dwelling was constructed in 2002. Features of the home include a full basement, central air conditioning and a 440 square foot garage. The property has an 8,089 square foot site and is located in Joliet, Troy Township, Will County.

The appellant contends overvaluation as the basis of the appeal. In support of this argument the appellant submitted four sales in the Section V grid analysis that occurred from November 2015 to June 2016 for prices ranging from \$140,000 to \$240,000. The comparables range in size from 1,832 to 2,209 square feet of living area and were built between 1992 and 2004. Each home has central air conditioning, a fireplace and a garage ranging in size from 400 to 529 square feet of building area. The appellant provided no story height or basement finish information for the comparables. While the appellant was requested to provide additional information to complete

the appeal, by letter dated November 30, 2017 by the Property Tax Appeal Board, the appeal was accepted and the board of review was simultaneously, but separately, notified of its duty to respond to the appeal within 90 days. The appellant requested the subject's total assessment be reduced to \$49,138.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$50,750. The subject's assessment reflects a market value of \$152,586 or \$112.86 per square foot of living area, land included, when using the 2016 three-year average median level of assessment for Will County of 33.26% as determined by the Illinois Department of Revenue.

In response to the appeal, the board of review requested dismissal since the appellant did not respond to the incomplete checklist.

In support of its contention of the correct assessment the board of review submitted information on three comparable sales and the sale of subject in January 2015 for \$165,000. The three comparables are improved with two-story design frame dwellings that contain either 1,320 to 1,352 square feet of living area. The dwellings were constructed between 1996 and 2004. Two of the comparables have full basements. Each home has central air-conditioning and a 440 square foot garage. The properties sold in July and August 2015 for prices ranging from \$180,000 to \$205,000 or from \$136.36 to \$151.63 per square foot of living area, including land.

Based on the foregoing evidence and argument, the board of review requested an increase in the assessment of the subject property for a new total assessment of \$54,995 which would reflect a market value of \$165,349 or \$122.30 per square foot of living area, including land or the 2015 purchase price of the subject property.

### **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.

Little weight was given the appellant's evidence as it contained limited descriptive information about the dwellings and no information about location of these properties to allow the Property Tax Appeal Board to conduct a meaningful comparative analysis of the comparable sales to the subject property. The board of review reported the January 2015 purchase price of the subject property for \$165,000. The appellant did not respond or refute this evidence of a recent purchase price of the subject property. The board of review also provided three comparable sales to establish that the subject property was not overvalued.

The Property Tax Appeal Board finds the best evidence of market value to be the recent sale of subject property which is further supported by the board of review's comparable sales. The subject and these similar comparables sold between January and August 2015 for prices ranging

from \$122.04 to \$151.63 per square foot of living area, including land. The subject's assessment reflects a market value of \$112.86 per square foot of living area, including land, which is below the recent sale of the subject property and below the range established by the comparable sales submitted by the board of review.

As to the board of review request to increase the subject's assessment to reflect the recent purchase price, the Property Tax Appeal Board finds that none of the comparable sales presented by the board of review have been assessed to their recent purchase prices. As depicted in the grid analysis, the assessment of the comparables reflect market values ranging from \$147,600 to \$162,600 which are substantially below their respective 2015 purchase prices. The subject's current improvement assessment is within the improvement assessments of the board of review comparable sales. Although the Will County Board of Review has requested an increase in the subject's improvement assessment to reflect the recent purchase price of the subject, this would place the subject substantially above the three comparables presented by the board of review which are each under-valued based upon their respective assessments.

On this record, the Property Tax Appeal Board finds that the subject is not overvalued and no reduction in the assessment of the subject property 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.

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Chairman



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Member



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Member

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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: July 16, 2019



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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 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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