



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

APPELLANT: AMH 2015-1 Borrower LLC  
DOCKET NO.: 16-00663.001-R-1  
PARCEL NO.: 05-06-03-209-005-0000

The parties of record before the Property Tax Appeal Board are AMH 2015-1 Borrower LLC, 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:** \$13,850  
**IMPR.:** \$41,100  
**TOTAL:** \$54,950

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 split-level dwelling of frame construction with 2,094 square feet of living area. The dwelling was constructed in 2003. Features of the home include a finished lower level, central air conditioning and a 380 square foot garage. The property has an 8,832 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 one sale in the Section V grid analysis that occurred in April 2016 for \$114,204 or for \$62.47 per square foot of living area, including land. The comparable contains 1,828 square feet of living area and was built in 1987. The home has central air conditioning and a 528 square foot garage. The appellant provided no story height or basement finish information for the comparable. While the appellant was requested to provide additional information to complete the appeal including more than one comparable sale, 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 \$53,204.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$54,950. The subject's assessment reflects a market value of \$165,213 or \$78.90 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 reported the January 2014 sale of subject for \$190,000. The three comparables are improved with a part two-story and part one-story and two, split-level frame dwellings that contain either 1,868 or 2,287 square feet of living area. The dwellings were constructed in 2000 or 2003. Two of the comparables have finished lower levels. Each home has central air-conditioning, one has a fireplace and each has a garage of 440 or 523 square feet of building area. The properties sold between April 2014 and June 2015 for prices ranging from \$165,000 to \$189,000 or from \$82.64 to \$90.20 per square foot of living area, including land.

Based on the foregoing 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.

Little weight was given the appellant's evidence as it contained limited descriptive information about the single suggested comparable dwelling and no information about location of the property to allow the Property Tax Appeal Board to conduct a meaningful comparative analysis of the comparable sale to the subject property. The board of review reported the January 2014 purchase price of the subject property for \$190,000. 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 board of review's comparable sales. The comparables sold between April 2014 and June 2015 for prices ranging from \$165,000 to \$189,000 or from \$82.64 to \$90.20 per square foot of living area, including land. The subject's assessment reflects a market value of \$165,213 or \$78.90 per square foot of living area, including land, which is within the range established by the

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comparable sales in terms of overall market value and below the range on a per-square-foot basis.

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



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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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