



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

APPELLANT: American Homes 4 Rent Pro
DOCKET NO.: 16-00806.001-R-1
PARCEL NO.: 10-11-20-106-013-0000

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: \$15,331
IMPR.: \$37,726
TOTAL: \$53,057

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 part split-level and part one-story dwelling of frame exterior construction with 1,796 square feet of living area.¹ The dwelling is 17 years old. Features of the home include a partial basement with finished area, central air conditioning and an 866 square foot garage. The property has an 11,543 square foot site² and is located in Jackson Township, Will 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

¹ The appellant's grid analysis was void of some pertinent descriptive data for the subject, which was drawn from the evidence provided by the board of review.

² The parties differ as to the size of the subject's site. The Board finds the discrepancy will not impact the Board's decision in this appeal.

descriptive information for four comparable properties. The appellant claims the comparables consist of a one-story, a one and a half-story and two, two-story dwellings. The appellant did not disclose the proximity to the subject, dwelling size, exterior construction or foundation type of the comparables. The dwellings were built from 1920 to 2004. The comparables have central air conditioning and one comparable has a fireplace. Two comparables have an attached garage. The comparables sold from February to June 2016 for prices ranging from \$84,900 to \$294,316. 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 \$53,057. The subject's assessment reflects a market value of \$159,522 or \$88.82 per square foot of living area, land included, when using the 2016 three-year average median level of assessment for Lake County of 33.26% as determined by the Illinois Department of Revenue.

With respect to the appellant's evidence, the board of review submitted a detailed grid analysis for the appellant's comparables disclosing the comparables consist of a one-story, a one and a half story, a part two-story and part one-story and a split-level dwelling ranging in age from 13 to 90 years old. The dwellings range in size from 1,144 to 2,286 square feet of living area and are situated on sites containing from 10,280 to 16,509 square feet of land area. Each comparable has an unfinished basement and a garage ranging in size from 400 to 598 square feet of building area. Three comparables have central air conditioning and two comparables have a fireplace. In addition, two properties are located outside the subject's neighborhood. The properties sold for prices ranging from \$84,900 to \$214,500 or from \$69.98 to \$127.45 per square foot of living area, including land.

In support of its contention of the correct assessment, the board of review submitted information on four comparable sales located in the same neighborhood as the subject property as defined by the local assessor. Board of review comparable #4 and the appellant's comparable #2 are the same property. The comparables consist of two, split-level and two, part split-level and part one-story dwellings of frame exterior construction ranging in age from 13 to 18 years old. The dwellings range in size from 1,626 to 2,001 square feet of living area and are situated on sites containing from 10,062 to 10,367 square feet of land area. The comparables each have a basement, three of which have finished area. Additionally, three comparables have central air conditioning and each comparable has a garage ranging in size from 376 or 520 square foot garage. The comparables sold from May 2014 to August 2016 for prices ranging from \$165,000 to \$183,000 or from \$86.21 to \$112.55 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 parties submitted seven suggested comparable sales for the Board's consideration with one comparable submitted by both parties. The Board gave less weight to the appellant's comparables #1, #3 and #4 due to their dissimilar designs, when compared to the subject. Moreover, comparables #1 and #3 are dissimilar in size; comparable #3 is older in age; and comparables #3 and #4 are located outside of the subject's neighborhood. The Board also gave less weight to board of review comparable #1 as its 2014 sale is dated and less likely to reflect the subject's market value as of the January 1, 2016 assessment date.

The Board finds the best evidence of market value to be the parties common comparable and the two remaining comparables submitted by the board of review. These three comparables are most similar to the subject in location, size, design, age and features. These comparables sold from February to August 2016 for prices ranging from \$165,000 to \$183,000 or from \$101.48 to \$112.55 per square foot of living area, including land. The subject's assessment reflects a market value of \$159,522 or \$88.82 per square foot of living area, including land, which falls below the range established by best comparable sales in this record. After considering 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 supported. 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



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: May 21, 2019



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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