



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

APPELLANT: Ahmed Syed Farhan
DOCKET NO.: 16-00815.001-R-1
PARCEL NO.: 07-01-29-201-004-0000

The parties of record before the Property Tax Appeal Board are Ahmed Syed Farhan, 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: \$31,356
IMPR.: \$102,600
TOTAL: \$133,956

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 exterior construction with 4,133 square feet of living area. The dwelling was constructed in 2012. Features of the home include an unfinished basement, central air conditioning, a fireplace and a 467 square foot garage. The property has a 9,940 square foot site and is located in Wheatland 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 descriptive information for four comparable properties. The appellant did not disclose the comparables' proximity to the subject, exterior construction and foundation type. The appellant also failed to disclose the dwelling size, design and age of comparable #3. Three comparables consist of two-story dwellings ranging in size from 1,909 to 3,976 square feet of living area. These three dwellings were built in 2004 or 2006. Two comparables have central air

conditioning and three comparables have a fireplace. Additionally, three comparables have a garage ranging in size from 390 to 708 square feet of building area. The comparables have sites ranging in size from 9,620 to 14,075 square feet of land area. The comparables sold from August 2015 to July 2016 for prices ranging from \$267,000 to \$463,216, three of which sold from \$106.88 to \$139.86 per square foot of living area, land included. 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 \$133,956. The subject's assessment reflects a market value of \$402,754 or \$97.45 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.

The board of review submitted a letter from the Wheatland Township Assessor's Office along with additional data. The assessor asserts the appellant's comparables #1 and #3 proves the subject's current market value based on the 2016 assessment is fair. The assessor also claims that comparable #4 is a dissimilar townhouse design unlike the subject's single-family design.

In support of its contention of the correct assessment, the board of review submitted information on four comparable sales located in the same neighborhood code as the subject property as defined by the local assessor. The comparables consist of two-story dwellings of frame or brick and frame exterior construction ranging in size from 4,006 to 4,342 square feet of living area. The dwellings were built from 2003 to 2016. Each comparable has an unfinished basement, central air conditioning, a fireplace and a garage ranging in size from 431 to 733 square feet of building area. The dwellings are situated on sites containing either 10,500 or 10,780 square feet of land area. The comparables sold from June 2015 to July 2016 for prices ranging from \$385,000 to \$463,216 or from \$90.81 to \$115.63 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 eight suggested comparable sales for the Board's consideration. The Board gave less weight to the comparables submitted by the appellant since the appellant's attorney failed to provide specifics regarding the comparables' locations, designs, exterior construction and foundation type for a comparative analysis, which detracts from the weight of the evidence.

The Board finds the best evidence of market value to be the comparables submitted by the board of review. These four comparables are most similar to the subject in location, size, design, age and features. These comparables sold from June 2015 to July 2016 for prices ranging from

\$385,000 to \$463,216 or from \$90.81 to \$115.63 per square foot of living area, including land. The subject's assessment reflects a market value of \$402,754 or \$97.45 per square foot of living area, including land, which falls within the range established by the most similar comparable sales in this record. After considering adjustments to the comparable sales for differences when compared to the subject, the Board finds the estimated market value as reflected by the assessment is supported and 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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