



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

APPELLANT: AMH 2014-2 Borrower LLC AT  
DOCKET NO.: 16-00852.001-R-1  
PARCEL NO.: 06-03-33-308-019-0000

The parties of record before the Property Tax Appeal Board are AMH 2014-2 Borrower LLC AT, the appellant, by attorney Michael R. Davies, of the Law Offices of Michael R. Davies, Ltd. in Oak Lawn; 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:** \$13,636  
**IMPR.:** \$54,130  
**TOTAL:** \$67,766

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 single-family dwelling of frame exterior construction with 1,968 square feet of living area.<sup>1</sup> The dwelling was constructed in 1998. Features of the home include a full unfinished basement, central air conditioning and a garage containing 440 square feet of building area. The property has an 8,150-square foot site and is located in Plainfield, Plainfield Township, Will County.

The appellant submitted evidence before the Property Tax Appeal Board claiming overvaluation as the basis of the appeal. The appellant did not challenge the subject's land assessment. In support of this argument, the appellant submitted limited information on four comparable sales

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<sup>1</sup> Appellant's grid analysis was void of some pertinent descriptive data for the subject which was drawn from the property record card provided by the board of review.

of undisclosed proximity to the subject.<sup>2</sup> Three comparables were described as two-story single-family dwellings and the rest of the comparables' design or exterior construction was not disclosed. The comparables range in size from 2,044 to 2,309 square feet of living area. The dwellings were constructed from 1996 to 2001. The comparables feature central air conditioning and a garage containing 441 or 428 square feet of building area. The comparables have site sizes ranging from 8,625 to 9,512 square feet of land area. The comparables sold from October 2015 to May 2016 for prices ranging from \$159,000 to \$236,000 or from \$68.86 to \$115.46 per square foot of living area, including land. Based on this evidence, the appellant requested a reduction in the subject's total assessment.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$67,766. The subject's assessment reflects a market value of \$203,746 or \$103.52 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 support of its contention of the correct assessment, the board of review submitted property record cards and a grid analysis on thirteen comparable sales located within the same neighborhood code as the subject property as defined by the local assessor. The comparables are improved with two-story single-family dwellings of frame exterior construction. The comparables all feature central air conditioning and eight comparables have a fireplace. Each property has a garage ranging in size from 400 to 440 square feet of building area. The comparables' site sizes range from 6,800 to 12,000 square feet of land area. The comparables sold from January 2015 to August 2016 for prices ranging from \$169,000 to \$269,000 or from 94.43 to \$127.90 per square foot of living area, including land.

The board of review submitted a brief challenging the appellant's comparable sales. Specifically, comparable #1 resold in July 2016 for \$214,000 or \$85.94 per square foot of living area, including land. Comparable #4 was located in a different subdivision from the subject. Finally, the board of review argued that the appellant used wrong dwelling size for the subject and comparables #1 through #3. Based on this evidence, the board of review requested a 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.

The Board finds the parties submitted for the Board's consideration a total of seventeen suggested sale comparables. The Board gave less weight to appellant's comparable #1 due to its

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<sup>2</sup> Some relevant information regarding the appellant's comparables was either missing or incorrect. The Board gleaned this information from the evidence provided by the board of review.

larger size when compared to the subject. The Board gave less weight to appellant's comparable #2 along with board of review comparables #7 through #10 due to lack of a basement unlike the subject. Finally, the Board gave less weight to appellant's comparables #3 and #4 due to being in a different subdivision and thus less proximate in distance from the subject. The Board finds the best evidence of market value to be appellant's comparable #2 along with the board of review comparables #1 through #6 and #13. These eight comparables are most similar to the subject in dwelling and lot size, design, age and most features. These most similar comparables sold from January 2015 to May 2016 for prices ranging from \$180,000 to \$236,000 or from \$94.43 to \$127.90 per square foot of living area, including land. The subject's assessment reflects a market value of \$203,746 or \$103.52 per square foot of living area, land included, which falls within the range established by the most similar comparable sales in this record. After considering adjustments to the comparables for differences in size and features when compared to the subject, the Board finds that the appellant did not demonstrate by a preponderance of the evidence that the subject was overvalued. Therefore, the Board finds that the subject's estimated market value as reflected by its assessment is supported. Based on this evidence, the Board finds a reduction in the subject's assessment is not justified.

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: May 21, 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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