



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

APPELLANT: AMH 2015-1 Borrower LLC/A  
DOCKET NO.: 16-00855.001-R-1  
PARCEL NO.: 11-04-25-107-015-0000

The parties of record before the Property Tax Appeal Board are AMH 2015-1 Borrower LLC/A, 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:** \$15,923  
**IMPR.:** \$36,433  
**TOTAL:** \$52,356

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 one-half duplex of frame construction with 1740 square feet of living area. The dwelling was constructed in 2007. Features of the home include a basement, central air conditioning, a fireplace and a 400 square foot garage. The property has a 5,074 square foot site and is located in Lockport, Lockport Township, Will County.

The appellant contends overvaluation as the basis of the appeal. In support of this argument the appellant submitted limited information on four improved comparable sales in the Section V grid analysis of the appeal petition. The comparables sites range in size from 3,330 to 5,550 square feet of land area. The sales occurred from December 2015 to March 2016 for prices ranging from \$147,000 to \$177,000. The appellant requested the subject's total assessment be reduced to \$50,693.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$52,356. The subject's assessment reflects a market value of \$157,414 or \$90.47 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 information on four comparable sales identified by the township assessor as being the appellant's comparables. The four comparables are improved with two, one-story half-duplexes and two, two-story townhome dwellings of frame or frame and brick exterior construction. The comparables contain from 1,272 to 1,923 square feet of living area and have site sizes ranging from 3,070 to 4,356 square feet of land area. Comparables #2 and #3 are located within the subject's subdivision. The dwellings were constructed from 2004 to 2009. Two comparables have a basement. Each comparable has central air conditioning and a 420 square foot garage. Two comparables have a fireplace. These properties sold from December 2015 to March 2016 for prices ranging from \$147,000 to \$177,000 or from \$76.44 to \$133.65 per square foot of living area, land included. The board of review requested that the assessment be confirmed.

### **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 parties submitted evidence on four comparable sales. These comparables sold for prices ranging from \$147,000 to \$177,000 or from \$76.44 to \$133.65 per square foot of living area, including land. The subject's assessment reflects a market value of \$157,414 or \$90.47 per square foot of living area, including land, which is within the range established by the comparable sales in this record. After considering any necessary adjustments to the comparable sales for differences when compared to the subject, the Board finds the subject's estimated market value as reflected by its assessment is supported and no reduction 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



\_\_\_\_\_  
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: November 19, 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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