



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

AMENDED

APPELLANT: Sue Ciangi
DOCKET NO.: 16-01058.001-R-1
PARCEL NO.: 22-22-16-209-013-0000

The parties of record before the Property Tax Appeal Board are Sue Ciangi, the appellant, by attorney Nora Devine, of Steven B. Pearlman & Associates 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: \$12,499
IMPR.: \$57,839
TOTAL: \$70,338

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 vinyl and brick exterior construction with 2,705 square feet of living area. The dwelling was constructed in 2005. Features of the home include a full unfinished basement, central air conditioning, a fireplace and a three-car garage. The property has a 9,298-square foot site and is located in Beecher, Washington Township, Will County.

The appellant submitted evidence before the Property Tax Appeal Board claiming overvaluation as the basis of the appeal. Appellant is not contesting the land assessment. In support of this argument, the appellant submitted information on three comparable sales located in the same MLS code as the subject. One comparable is located in the same subdivision as the subject property. The comparables are described as two-story single-family dwellings of frame, brick and cedar, or

vinyl and brick exterior construction ranging in size from 1,916 to 2,549 square feet of living area. The dwellings range in age from 9 to 86 years old. Features of the comparables include full unfinished or partially finished basements. None of the dwellings have central air conditioning. Two comparables have a fireplace and each dwelling has a two-car or a four-car garage. The properties have sites ranging in size from 8,505 to 13,503 square feet of land area. The comparables sold between September 2015 and August 2016 for prices ranging from \$85,200 to \$126,000 or from \$37.66 to \$50.40 per square foot of living area including land. 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 \$70,338. The subject's assessment reflects a market value of \$211,479 or \$78.18 per square foot of living area including land when applying 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 the subject's assessment, the board of review submitted information on four comparable sales. The comparable properties are located within the same subdivision as the subject property. The comparables are improved with two-story single-family dwellings of brick and vinyl exterior construction that range in size from 2,596 to 2,991 square feet of living area. The dwellings were constructed from 2004 to 2006. Each comparable features a full unfinished basement, central air conditioning, one or two fireplaces and a garage ranging in size from 455 to 785 square feet of building area. The properties have sites ranging in size from 8,774 to 10,455 square feet of land area. The comparables sold from January 2015 to September 2016 for prices ranging from \$208,000 to \$221,000 or from \$73.55 to \$80.89 per square foot of living area including land. Board of review also submitted property record cards for the subject as well as the four comparable sales. Based on this evidence, the board of review requested that the subject property's assessment be confirmed.

In rebuttal, the appellant submitted MLS information for the board of review comparables along with a brief contending that some board of review comparables support a reduction and others are dissimilar or have superior features when compared to the subject.

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 seven suggested comparable sales. The Board gave less weight to appellant's comparables #1 and #2 due to their older age and lack of proximity to the subject property. In addition, appellant's comparable #1 is substantially smaller in size when compared to the subject.

The Board finds the best evidence of market value to be appellant's comparable sale #3 along with the four comparables submitted by the board of review. The Board finds these five comparables are most similar to the subject in location, dwelling size, age, design and most features. These comparables sold between January 2015 and September 2016 for prices ranging from \$126,000 to \$221,000 or from \$50.40 to \$80.89 per square foot of living area, including land. The subject's assessment reflects a market value of \$211,479 or \$78.18 per square foot of living area, including land which falls within the range established by the most similar comparables in this record. After considering adjustments to the comparables for differences in square footage of living area and some features when compared to the subject, the Board finds that the appellant has not demonstrated by a preponderance of the evidence that the subject was overvalued and therefore, a reduction in the subject's assessment is not 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



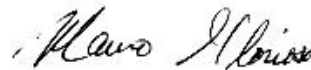
Member

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: August 20, 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

State of Illinois
Property Tax Appeal Board
William G. Stratton Building, Room 402
401 South Spring Street
Springfield, IL 62706-4001

APPELLANT

Sue Ciangi, by attorney:
Nora Devine
Steven B. Pearlman & Associates
350 West Hubbard Street
Suite 630
Chicago, IL 60654

COUNTY

Will County Board of Review
Will County Office Building
302 N. Chicago Street
Joliet, IL 60432