



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

APPELLANT: Alma Perry
DOCKET NO.: 16-05200.001-C-1
PARCEL NO.: 07-2-13824-000

The parties of record before the Property Tax Appeal Board are Alma Perry, the appellant; and the Coles County Board of Review.

Based on the facts and exhibits presented in this matter, the Property Tax Appeal Board hereby finds **A Reduction** in the assessment of the property as established by the Coles County Board of Review is warranted. The correct assessed valuation of the property is:

LAND: \$2,000
IMPR.: \$18,667
TOTAL: \$20,667

Subject only to the State multiplier as applicable.

Statement of Jurisdiction

The appellant timely filed the appeal from a decision of the Coles 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, 4-unit, multi-family dwelling of frame construction with 3,000 square feet of living area. The dwelling was constructed in 1954.¹ Features of the dwelling include a slab foundation and central air conditioning. The property has a 12,459 square foot site and is located in Mattoon, Mattoon Township, Coles County.

The appellant contends overvaluation as the basis of the appeal. In support of this argument the appellant submitted an appraisal estimating the subject property had a market value of \$62,000 as of January 11, 2017. The appellant's appraisal was completed using the sales comparison and income approaches in estimating a market value for the subject property.

¹ The appellant's appraiser reports the subject dwelling is 22 years old with an effective age of 25 years old. The board of review reports the dwelling was built in 1954 with an effective age of 62 years old. The Board finds the parties' discrepancy in age will not impact the Board's decision for this appeal.

Although the appraiser did not develop a cost approach for the subject's improvements, due to a high degree of accrued depreciation, the appraiser did estimate the subject's land value based on two commercial land sales located in Mattoon. The comparables had land sizes of 36,105 and 10,000 square feet of land area and had sale dates of April 2002 and July 2002. The comparables sold for prices of \$60,000 and \$35,000 or \$1.66 and \$3.50 per square foot of land area, respectively. After adjusting the comparables for their larger lot sizes, the appraiser estimated the subject's 12,459 square foot site has a value of \$.50 per square foot or \$6,000, rounded.

Under the sales comparison approach, the appellant's appraiser selected three comparable properties that were similar two-story multi-family dwellings, with 4 or 5-apartment units, that ranged in size from 2,918 to 4,557 square feet of living area. The comparables ranged in age from 95 to 115 years old. The comparables had other features with varying degrees of similarity to the subject. The comparables had sale dates ranging from February 2014 to May 2015 and sold for prices ranging from \$55,000 to \$110,000 or from \$18.85 to \$24.14 per square foot of living area, including land. Based on the sale prices, the comparables had apartment unit prices ranging from \$11,000 to \$22,000 per apartment unit, including land. Based on this sales analysis, the appraiser estimated the subject would have a value of \$20.00 per square foot of living area, including land, or \$60,000 total market value. The appraiser estimated the subject's apartments would have a value of \$16,000 per apartment unit, including land, or \$64,000 total market value. The appraiser reconciled the two analyses and estimated a value for the subject by the sales comparison approach of \$62,000.

The appraiser also calculated the comparables gross rent multiplier's (GRM's) ranging from 28.65 to 47.02.

Under the income approach, the appellant's appraiser disclosed that three of the subject's apartments have a monthly rent of \$450.00 and the fourth is rented by a relative. Using the subject's actual rental income, plus an equal amount for the relative's rent, the appraiser calculated a monthly potential gross income for the subject of \$1,800. The appraiser also disclosed that the tenants pay utilities and the owner pays all other expenses. The appraiser estimated a GRM of 35., that was derived from the comparables used in the sales comparison approach. The appraiser then multiplied the subject's monthly income of \$1,800 by the GRM of 35 to arrive at an estimated value for the subject by the income approach of \$63,000.

Under reconciliation, the appraiser placed strong weight on both approaches and estimated the subject property had a market value of \$62,000 as of January 11, 2017.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$28,670. The subject's assessment reflects a market value of \$86,355 or \$21,589 per apartment or \$28.79 per square foot of living area, land included, when using the 2016 three-year average median level of assessment for Coles County of 33.20% as determined by the Illinois Department of Revenue.

As to the appellant's appraisal, the board of review submitted a brief from their representative critiquing the appraisal. The representative argued that, since the sales comparison and income approaches from the appraisal were incomplete, the board of review calculated an estimated sale

price and GRM for the subject from recent sales of apartments in Mattoon, excluding student-oriented housing.

In support of its contention of the correct assessment the board of review submitted an analysis containing information on 15 comparable sales. Three of the comparables were also used by the appellant's appraiser. The comparable properties had from 3 to 16 apartments and were built from 1880 to 2001. The comparables had other features with varying degrees of similarity to the subject. The comparables had sale dates ranging from July 2004 to April 2016 for prices ranging from \$39,000 to \$500,000 or from \$9,750 to \$39,375 per apartment unit, including land.

Based on this evidence, the board of review requested that the subject's 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 met this burden of proof and a reduction in the subject's assessment is warranted.

The Board finds the best evidence of market value to be the appraisal submitted by the appellant estimating the subject property had a market value of \$62,000 as of January 11, 2017. The subject's assessment reflects a market value of \$86,355 or \$21,589 per apartment, including land, which is above the best evidence of market value in the record. The Board recognizes that the appraisal date is 12 months subsequent to the assessment date at issue and the income approach, calculated by the appellant's appraiser, did not use market rents. However, the Board finds only one of the 15 comparables submitted by the board of review, not including the three comparables submitted by the appellant, was truly comparable to the subject. This comparable sold in July 2015 for \$62,000 or \$15,500, which supports the appellant's appraisal evidence. The Board gave less weight to the remaining comparable sales submitted by the board of review, due to their differing number of apartments, when compared to the subject. Based on this evidence, the Board finds a reduction in the subject's assessment commensurate with the appellant's request 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: January 21, 2020



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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COUNTY

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