



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

APPELLANT: Gerald N. Polykandriotis
DOCKET NO.: 18-02988.001-R-1
PARCEL NO.: 30-07-16-308-020-0000

The parties of record before the Property Tax Appeal Board are Gerald N. Polykandriotis, the appellant, by attorney Jessica Hill-Magiera in Lake Zurich; 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: \$2,611
IMPR.: \$24,218
TOTAL: \$26,829

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 2018 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 is improved with a one-story dwelling of frame construction containing 960 square feet of living area. The dwelling was built in 1920. Features of the home include a full basement and one bathroom. The property has a 2,613 square foot site and is located in Joliet, Joliet Township, Will County.

The appellant's appeal is based on overvaluation. In support of this argument the appellant submitted evidence disclosing the subject property was purchased on February 14, 2020 for a price of \$45,000. The seller was identified on the closing statement as Ronald J. Orloff, L.L.C. and the appellant indicated the parties were not related. The appellant further indicated that the property was sold through a Realtor and had been exposed on the open market through the Multiple Listing Service (MLS). To document the transaction the appellant submitted a copy of the closing statement, disclosing a commission was paid, and a copy of the MLS listing of the

subject property. The listing indicated an asking price of \$49,000 and that the property had been on the market one day. The listing indicates the property does not have central air conditioning. Based on this evidence, the appellant requested a reduction in the subject's assessment to reflect the purchase price.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$26,829. The subject's assessment reflects a market value of \$80,543 or \$83.90 per square foot of living area, land included, when using the 2018 three-year average median level of assessment for Will County of 33.31% as determined by the Illinois Department of Revenue.

The board of review submitted a copy of the subject's property record card containing a description of the dwelling, which indicated the subject dwelling has central air conditioning. In support of its contention of the correct assessment the board of review submitted information on four comparable sales identified by the township assessor improved with one-story dwellings of frame or masonry construction that range in size from 840 to 942 square feet of living area. The homes were built from 1900 to 1925. Each property has a full or partial basement, two comparables have full or partial basements and three comparables have detached garages ranging in size from 400 to 520 square feet of building area. These properties have sites ranging in size from 4,356 to 5,662 and are located in the same subdivision as the subject property. The sales occurred from October 2016 to September 2018 for prices ranging from \$88,000 to \$122,000 or from \$90.91 to \$129.15 per square foot of living area, including land.

The assessor provided a written statement that the subject's assessment was reduced to \$14,999 in 2017, which was 1/3 of the purchase price. The 2018 assessment was based on market value derived from comparable sales because the subject property was remodeled and rented as of January 1, 2018.

In rebuttal the appellant's counsel asserted that the board of review did not provide any evidence that the sale was invalid.

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 best evidence of market value in the record to be the comparable sales submitted by the board of review. These comparables are relatively similar to the subject in location, style, construction, features, and age with the primary difference being that three of the comparables have a garage and each has a larger site than the subject property. These properties sold from October 2016 to September 2018 for prices ranging from \$88,000 to \$122,000 or from \$90.91 to \$129.15 per square foot of living area, including land. The subject's assessment reflects a market value of \$80,543 or \$83.90 per square foot of living area, including land, which

is below the range established by the best comparable sales in this record. The Board gave less weight to the subject's sale price in establishing market value as of the assessment date due to the assessor's assertion that following the purchase the subject property was remodeled and rented as of January 1, 2018. This may explain the fact that the listing indicated the subject property did not have central air conditioning while the grid analysis provided by the board of review indicates the subject has central air conditioning. Nevertheless, the appellant did not rebut or refute the assessor's statement regarding the dwelling being remodeled. Based on this record 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.



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: February 16, 2021



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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