



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

APPELLANT: Kenneth L. Corcoran  
DOCKET NO.: 18-03007.001-R-1  
PARCEL NO.: 05-06-09-301-044-0000

The parties of record before the Property Tax Appeal Board are Kenneth L. Corcoran, the appellant, by Jessica Hill-Magiera, Attorney at Law 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:** \$14,550  
**IMPR.:** \$48,250  
**TOTAL:** \$62,800

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 consists of a one-story dwelling of frame exterior construction with 1,711 square feet of living area. The dwelling was constructed in 1984. Features of the home include a crawl space foundation, central air conditioning and a 484 square foot garage. The property has an 11,223 square foot site and is located in Shorewood, Troy Township, Will County.

The appellant contends overvaluation as the basis of the appeal. In support of this argument, the appellant submitted information on three comparable sales located from .30 of a mile to 1.07 miles from the subject property. The comparables are improved with one-story dwellings ranging in size from 1,799 to 1,992 square feet of living area. The dwellings were built from 1975 to 1999. One comparable has a crawl space foundation and two comparables each have a partial or full basement. Each comparable has central air conditioning, one comparable has a fireplace and each comparable has a garage that ranges in size from 400 to 528 square feet of

building area. The appellant did not provide the exterior construction or site sizes of the comparables. The comparables sold from March to October 2017 for prices ranging from \$140,000 to \$175,000 or from \$77.26 to \$97.28 per square foot of living area, land included. Based on this evidence, the appellant requested the subject's assessment be reduced to \$46,950 reflecting a market value of approximately \$140,864 or \$82.33 per square foot of living area including land, when using the statutory level of assessment of 33.33%.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$62,800. The subject's assessment reflects a market value of \$188,532 or \$110.19 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.

In response to the appeal, the board of review submitted a letter from the Troy Township Assessor. The assessor argued that none of the appellant's comparables are located in the subject's neighborhood. The assessor asserted that appellant's comparable #1 is located in a different elementary and high school district and the property was previously tax exempt; appellant's comparable #2 is in a subdivision that consists of model-style homes located in a different high school district and was a bank REO sale; and appellant's comparable #3 was a bank REO and is located in a neighboring subdivision. The assessor provided the real estate transfer declarations associated with each of these sales.

In support of its contention of the correct assessment the board of review, through the township assessor, submitted information on four comparable sales located within blocks of the subject property, two of which are within the subject's subdivision. The comparables have sites that range in size from 11,561 to 21,338 square feet of land area. The comparables are improved with one-story dwellings of frame exterior construction ranging in size from 1,475 to 2,122 square feet of living area. The dwellings were built from 1967 to 1979. One comparable has a crawl space foundation and three comparables each have a partial or full unfinished basement. Each comparable has central air conditioning, two comparables each have one or two fireplaces and each comparable has a garage that ranges in size from 420 to 528 square feet of building area. The comparables sold from August 2015 to April 2018 for prices ranging from \$196,000 to \$235,000 or from \$110.74 to \$149.08 per square foot of living area, land included. Based on this evidence, the board of review requested no change in the subject's assessment.

In written rebuttal, counsel for the appellant critiqued the comparables submitted by the board of review. Counsel argued that board of review comparables #1, #3 and #4 sold in 2015 and 2016 which are too remote in time to establish market value as of the January 1, 2018 assessment date. Counsel noted that board of review comparable #2 was an acceptable comparable. In a rebuttal grid analysis, counsel reiterated that the appellant's three comparables, along with board of review comparable #2 are the best comparable sales in the record and contended the subject's assessment should be reduced.

### **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 record contains seven suggested comparable sales for the Board's consideration. The Board gave less weight to the appellant's comparable #1 due to its distant location from the subject being more than one mile away. The Board also gave less weight to appellant's comparable #2 due to its newer age when compared to the subject. The Board gave reduced weight to board of review comparables #1, #3 and #4 as their sales occurred in 2015 and 2016 which are dated and less likely to be indicative of the subject's market value as of the January 1, 2018 assessment date.

The Board finds the best evidence of market value to be the appellant's comparable #3 and board of review comparable #2. These two comparables are relatively similar to the subject in location, dwelling size and design, though each is slightly older in age with varying degrees of similarity in features when compared to the subject. They sold in March 2017 and April 2018 for prices of \$164,000 and \$219,900 or for \$82.33 and \$149.08 per square foot of living area, including land, respectively. The subject's assessment reflects a market value of \$188,532 or \$110.19 per square foot of living area, land included, which is bracketed by the two best comparable sales in this record. After considering adjustments to the comparable sales for differences when compared to the subject, the Board finds no reduction in the subject's estimated market value as reflected by its assessment is 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: January 19, 2021



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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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