



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

APPELLANT: Jones Lease Properties, LLC
DOCKET NO.: 18-04044.001-R-1
PARCEL NO.: 06-12-432-003

The parties of record before the Property Tax Appeal Board are Jones Lease Properties, LLC, the appellant, by attorney R. Nick Mason, of Mason & Scott, P.C. in Moline, and the Henry 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 **Henry** County Board of Review is warranted. The correct assessed valuation of the property is:

LAND: \$ 6,876
IMPR.: \$45,099
TOTAL: \$51,975

Subject only to the State multiplier as applicable.

Statement of Jurisdiction

The appellant timely filed the appeal from a decision of the Henry 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 split-foyer dwelling of frame and brick exterior construction with 1,802 square feet of living area.¹ The dwelling was approximately 39 years old. Features of the home include a full basement with finished area, central air conditioning and an attached two-car garage containing 400 square feet of building area. The property has a .32-acre site and is located in Colona, Colona Township, Henry County.

The appellant contends overvaluation as the basis of the appeal. In support of this argument the appellant submitted a spreadsheet with information on three comparable sales located from close proximity to 11.4-miles from the subject. The parcels contain either .20 or .21 of an acre sites that have been improved with ranch-style dwellings that were 24 to 52 years old. The dwellings

¹ Descriptive data for the subject was drawn solely from the appellant's submission as the board of review did not substantively respond to this pending appeal.

range in size from 1,015 to 1,192 square feet of living area. One comparable has a full unfinished basement, one comparable has a crawl-space foundation and no foundation information was provided for one of the comparables. Each dwelling has central air conditioning and a two-car garage, one of which was noted as heated. The comparables sold from February to July 2018 for prices ranging from \$98,000 to \$105,000 or from \$82.21 to \$103.45 per square foot of living area, including land.

Based on this evidence, the appellant requested a reduced total assessment of \$35,871 which reflects a market value of \$107,624 or \$59.72 per square foot of living area, including land, when applying 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 \$51,975. The subject's assessment reflects a market value of \$156,034 or \$86.59 per square foot of living area, land included, when using the 2018 three year average median level of assessment for Henry County of 33.31% as determined by the Illinois Department of Revenue.

On November 13, 2019 in response to the board of review's request for an extension of time, the Property Tax Appeal Board issued a 30-day extension of time to submit evidence. The board of review failed to file any evidence within the additional time period in which it was authorized to do so.

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 only evidence of market value in the record to be the appellant's comparable sales. The Board has given reduced weight to appellant's comparable #3 which is located more than 11 miles distant from the subject property. The Board finds on this limited record that the best evidence of the subject's estimated market value are appellant's comparables #1 and #2. These comparables were located in closer proximity to the subject and had varying degrees of similarity to the subject property. These most similar comparables sold in February and April 2018 for prices of \$98,000 and \$101,500 or for \$82.21 and \$91.94 per square foot of living area, including land. The subject's assessment reflects a market value of \$156,034 or \$86.59 per square foot of living area, including land, which is above the best comparable sales in this record in terms of overall value but bracketed and, thus, well-supported by the best comparables on a per-square-foot basis. Furthermore, the subject's higher overall value appears to be logical given the subject's substantially larger dwelling size of 1,802 square feet as compared to the best comparables that contain 1,104 and 1,192 square feet of living area, respectively. Based on this evidence and after considering adjustments to the comparables for differences from the subject, 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

State of Illinois
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APPELLANT

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COUNTY

Henry County Board of Review
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