



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

APPELLANT: Jones Lease Properties, LLC
DOCKET NO.: 18-04046.001-R-1
PARCEL NO.: 06-11-151-016

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 **A Reduction** 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: \$ 3,379
IMPR.: \$ 9,181
TOTAL: \$12,560

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 one-story dwelling of vinyl siding exterior construction with 992 square feet of living area.¹ The dwelling was approximately 60 years old. Features of the home include a partial basement, central air conditioning and an attached one-car garage. The property has a 9,148 square foot or .21-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 information on three comparable sales located in either Alpha or Colona and were from .7 of a mile to 24.2-miles from the subject. The comparable parcels range in size from .21 to .41-acres and have been improved with either bungalow or ranch-style dwellings of

¹ All descriptive data for the subject has been drawn from the appellant's evidence as the board of review did not substantively respond to this appeal.

brick or vinyl siding exterior construction that were 70 to 81 years old. The dwellings range in size from 700 to 950 square feet of living area. One comparable has a partial basement, one comparable has a crawl-space foundation and no foundation data was provided for one of the comparables. Each dwelling has central air conditioning and two comparables each have two-car garages. The properties sold from December 2017 to August 2018 for prices ranging from \$23,000 to \$24,000 or from \$25.20 to \$32.86 per square foot of living area, including land.

Based on this evidence, the appellant requested a total reduced assessment of \$10,999 which would reflect a market value of \$33,000 or \$33.27 per square foot of living area, including land, at 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 \$14,850. The subject's assessment reflects a market value of \$44,581 or \$44.94 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 met this burden of proof and a reduction in the subject's assessment is warranted.

The Board finds the only evidence of market value in the record to be appellant's comparable sales. The Board has given reduced weight to appellant's comparable #1 which is located in Alpha and more than 20 miles distant from the subject property. The appellant's comparables #2 and #3 are located in closer proximity to the subject and consist of similarly designed dwellings to the subject. Each of these homes are older than the subject and each dwelling is smaller than the subject with inferior foundation types as compared to the subject's partial basement foundation. These most similar comparables sold in December 2017 and January 26, 2018, respectively, for prices of \$23,000 and \$24,000 or for \$28.24 and \$32.86 per square foot of living area, including land, respectively. The subject's assessment reflects a market value of \$44,581 or \$44.94 per square foot of living area, including land, which is above the best comparable sales in this limited record. After considering adjustments to the comparables for their inferior ages, smaller dwelling sizes and inferior foundation types when compared to the subject, the Board finds a reduction in the subject's 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.



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

APPELLANT

Jones Lease Properties, LLC, by attorney:
R. Nick Mason
Mason & Scott, P.C.
3610 - 25th Street
Moline, IL 61265

COUNTY

Henry County Board of Review
Henry County Courthouse
307 W Center Street
Cambridge, IL 61238