



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

APPELLANT: Jones Lease Properties, LLC
DOCKET NO.: 18-04058.001-R-1
PARCEL NO.: 16-24-307-009

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 Rock Island 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 **Rock Island** County Board of Review is warranted. The correct assessed valuation of the property is:

LAND: \$3,775
IMPR.: \$16,606
TOTAL: \$20,381

Subject only to the State multiplier as applicable.

Statement of Jurisdiction

The appellant timely filed the appeal from a decision of the Rock Island 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 672 square feet of living area.¹ The dwelling was constructed in 1955. Features of the home include a crawl space foundation, central air conditioning and a 460 square foot garage. The property has a 7,000 square foot site and is located in Milan, Blackhawk Township, Rock Island County.

The appellant contends overvaluation as the basis of the appeal based upon the recent purchase price of the subject property and sales of comparable properties.

¹ The Board finds the best description of the subject property was found in the property record card provided by the board of review which contains the subject site dimensions and a schematic diagram of the subject dwelling and detached garage.

As to the purchase price, the appellant completed Section IV – Recent Sale Data reporting the subject property was purchased on February 28, 2017 for a price of \$38,000 or \$56.55 per square foot of living, including land. The property was purchased from Dakota Asset, the parties to the transaction were not related, the property sold through a realtor after being advertised on the open market with the multiple-listing service (MLS) for a period of 79 days. The appellant reported the property sold in settlement of a foreclosure action. Copies of the Real Estate Purchase Agreement and Settlement Statement were submitted reiterating the purchase price and that broker's commissions were distributed to two entities. In Section IV, the appellant further reported that after expenditure of \$22,000.20 for renovations, the property was occupied on May 12, 2017 which indicates a total investment for the subject property of \$60,000.20.

The appellant also submitted a grid analysis and photographs on three comparable sales located in either Moline or Rock Island and from 6.2 to 12.5 miles from the subject property. The comparables range in size from 5,961 to 7,828 square feet of land area. The comparables are improved with a one-story dwellings of frame exterior construction ranging in size from 672 to 762 square feet of living area. The dwellings were built from 1900 to 1958. Two comparables each have a basement with one having finished area. Each comparable has central air conditioning and a one-car or a two-car garage. The comparables sold from March to October 2018 for prices ranging from \$35,000 to \$38,000 or from \$48.23 to \$52.49 per square foot of living area, including land.

Based on this evidence, the appellant requested that the subject's assessment be reduced to \$12,665 which would approximately reflect the February 2017 purchase price of \$38,000 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 \$20,381. The subject's assessment reflects a market value of \$61,131 or \$90.97 per square foot of living area, land included, when using the 2018 three-year average median level of assessment for Rock Island County of 33.34% as determined by the Illinois Department of Revenue.

In response to the appeal, the board of review argued that the appellant's comparables are located in other townships and other cities. The board of review also argued that the appellant's third comparable is not the same story height. The board of review also argued that the appellant's grid does not report the subject property's 460 square foot garage. The board of review asserted that the appellant's comparison grid does not show properties that are comparable to the subject in condition or location. The board of review contends the appellant's grid should not be used to determine the subject's market value.

In support of its contention of the correct assessment, the board of review submitted information and photographs of four comparable properties located in Milan and from .04 to .12 of a mile from the subject property. The comparables each have sites that contain 7,000 square feet of land area. The comparables are improved with one-story dwellings of frame, vinyl or aluminum siding exterior construction with 672 or 776 square feet of living area. The dwellings were built from 1951 to 1955. One comparable has an unfinished basement, three comparables each have a crawl space foundation, two comparables have central air conditioning and each comparable has a garage ranging in size from 240 to 616 square feet of building area. The comparables sold

from August 2015 to September 2017 for prices ranging from \$60,000 to \$69,000 or from \$88.92 to \$96.73 per square foot of living area, including land. Based on this evidence, the board of review requested confirmation of the subject's assessment.

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 evidence in the record does not support a reduction in the subject's assessment.

The appellant provided evidence that the subject property was purchased on February 28, 2017 for a price of \$38,000. The record indicated the property was advertised for sale for 79 days but was a foreclosure. In addition, the appellant reported that renovations were made to the property in the sum of \$22,000.20 before the property was occupied on May 12, 2017. The Board gives little weight to the subject's sale price as the condition of the property changed after its sale due to renovations. Thus, the sale price in February 2017 does not reflect its condition as of the January 1, 2018 assessment date.

The appellant and the board of review submitted information on a total of seven comparable sales to support their respective positions before the Property Tax Appeal Board. The Board has given reduced weight to the appellant's comparables which differ from the subject in location, age and/or foundation type. The Board has given reduced weight to board of review comparable #1 as its sale in 2015 is dated and less likely to be indicative of the subject's market value as of the January 1, 2018 assessment date and board of review comparable #2 has a basement unlike the subject's crawl space foundation.

Based on this record, the Board finds the best comparable sales are board of review comparables #2 and #3. These properties are relatively similar to the subject in location, site size, design and age, though neither dwelling has central air conditioning, a feature the subject has. The properties sold in August and September 2017 for prices of \$69,000 and \$60,000 or for \$88.92 and \$89.29 per square foot of living area, including land, respectively. The subject's assessment reflects a market value of \$61,131 or \$90.97 per square foot of living area, including land, which is bracketed by the best comparable sales in the record in overall value but slightly above the comparables on a square foot basis. The subject's slightly higher square foot value appears to be justified given the subject's superior central air conditioning feature, thus, the Board finds the subject is not overvalued and 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: March 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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