



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

APPELLANT: Jones Lease Properties, LLC
DOCKET NO.: 18-04059.001-R-1
PARCEL NO.: 16-26-201-005

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: \$6,363
IMPR.: \$25,093
TOTAL: \$31,456

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 frame exterior construction with 888 square feet of living area. The dwelling was constructed in 1966. Features of the home include a full basement with finished area, central air conditioning and a two-car garage containing 384 square feet of building area. The property has a 7,680¹ 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 evidence of the subject's site size is found in the property record card provided by the board of review which depicts the dimensions of subject site as 64' x 120' or 7,680 square feet of land area.

As to the purchase price, the appellant completed Section IV – Recent Sale Data reporting the subject property was purchased on June 24, 2016 for a price of \$65,000 or \$73.20 per square foot of living area, including land. The property was purchased from James M. Young Trustee of the Sandra J. Young Trust, 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 108 days. Copies of the Real Estate Purchase Agreement and Settlement Statement were submitted. The Settlement Statement disclosed a May 9, 2016 settlement date and reiterated the purchase price and that broker's commissions were distributed to two entities. In Section IV, the appellant further reported that after expenditure of \$29,103.60 for renovations, the property was occupied on October 1, 2017 which indicates a total investment for the subject property of \$94,103.60.

The appellant also submitted a grid analysis and photographs on three comparable sales located in either Milan or Rock Island and from 3.4 to 5.9 miles from the subject property. The comparables range in size from 7,055 to 11,461 square feet of land area. The comparables are improved with one-story dwellings of frame exterior construction ranging in size from 828 to 892 square feet of living area. The dwellings were built from 1950 to 1956. None of the comparables have a basement. The comparables each have central air conditioning, one comparable has a carport and two comparables each have either a one-car or a two and one-half car garage. Comparable #1 was noted as having a new roof in 2007; a new furnace and central air conditioning in 2010; new garage siding/roof in 2013; and new windows and bathroom update in 2015. The comparables sold from October 2017 to October 2018 for prices of \$63,000 and \$64,900 or from \$70.63 to \$77.26 per square foot of living area, including land.

Based on this evidence, the appellant requested that the subject's assessment be reduced to \$21,665 which would approximately reflect the May 2016 purchase price of \$65,000 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 \$31,456.² The subject's assessment reflects a market value of \$94,349 or \$106.25 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 comparable #3 is located outside the subject's subdivision in another township and city; appellant's comparable #2 is not located in the same township as the subject; and appellant's comparable #1 is not located in the same neighborhood as the subject. 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 13 comparable properties located in Milan. The comparables are improved

² The board of review notes on appeal depicts an incorrect assessment amount of \$36,120. The final decision issued by the board of review, as submitted by the appellant, shows a final assessment of \$31,456 for the 2018 tax year.

with one-story dwellings of frame or vinyl siding exterior construction ranging in size from 825 to 1,073 square feet of living area. The dwellings were built from 1966 to 1982. One comparable has a crawl space foundation and 12 comparables each have a basement with nine having finished area. Eleven comparables have central air conditioning, two comparables each have one fireplace and twelve comparables each have a garage ranging in size from 275 to 616 square feet of building area. The board of review did not provide the site sizes of the comparables nor did it disclose the comparables proximity in relation to the subject other than their location is in the same city and township as the subject. The comparables sold from April 2013 to June 2017 for prices ranging from \$90,500 to \$118,700 or from \$92.30 to \$133.21 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 May 9, 2016 for a price of \$65,000. The record indicated the property was advertised for sale for 108 days. In addition, the appellant reported that renovations were made to the property in the sum of \$29,103.60 before the property was occupied on October 1, 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 May 2016 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 16 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 comparables #2, #4, #5, #9, #10, #11, #12 and #13 which differ from the subject in dwelling size, age, features such as foundation type, central air conditioning, and garages, and/or have sale dates that occurred in 2013 and 2015 which are dated and less likely to be indicative of the subject's market value as of the January 1, 2018 assessment date.

Based on this record, the Board finds the best comparable sales are board of review comparables #1, #3, #6, #7 and #8. Despite the lack of site sizes, these properties are relatively similar to the subject in location, dwelling size, design, age and features. The properties sold from July 2016 to June 2017 for prices ranging from \$97,500 to \$118,700 or from \$109.52 to \$133.21 per square foot of living area, including land. The subject's assessment reflects a market value of \$94,349 or \$106.25 per square foot of living area, including land, which is below the best comparable sales in this record both in terms of overall value and on a square foot basis. 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

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

Rock Island County Board of Review
Rock Island County Building
1504 Third Avenue
Rock Island, IL 61201