



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

APPELLANT: Robb Caputo  
DOCKET NO.: 18-04163.001-F-1  
PARCEL NO.: 26-39-316-000

The parties of record before the Property Tax Appeal Board are Robb Caputo, the appellant; and the LaSalle 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 **LaSalle** County Board of Review is warranted. The correct assessed valuation of the property is:

<b>F/Land:</b>	\$4,908
<b>Homesite:</b>	\$15,274
<b>Residence:</b>	\$64,772
<b>Outbuildings:</b>	\$14,282
<b>TOTAL:</b>	\$99,236

Subject only to the State multiplier as applicable.

**Statement of Jurisdiction**

The appellant timely filed the appeal from a decision of the LaSalle 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 brick exterior construction with 1,794 square feet of living area. The dwelling was constructed in 2005.<sup>1</sup> Features of the home include a full finished basement, with a walkout, central air conditioning, a fireplace, a 2-car garage and three farm pole buildings. The property has a 25.62-acre site, of which 2.1 acres is being assessed as a homesite, and is located in Streator, Vermillion Township, LaSalle County.

The appellant contends overvaluation as the basis of the appeal. In support of this argument the appellant submitted an appraisal estimating the subject property had a market value of \$275,000

---

<sup>1</sup> The parties reported different ages for the subject's dwelling, however, the Board finds the discrepancy will not impact its decision for this appeal.

as of February 1, 2018. The intended use of the appraisal was "Market Value Purposes to Estimate the market value for the purposes of protesting property taxes."

The appellant's appraisal was completed using the cost approach and the sales comparison approach to value property in estimating a market value for the subject property.

Under the cost approach, the appraiser estimated the subject had a site value of \$80,000, which was extracted from the local market. The appraiser estimated a cost new for the subject's dwelling of \$240,030, plus \$86,400 for the farm buildings, for a total improvement cost new of \$326,430. The appraiser then subtracted approximately 38% or \$125,121 for depreciation, to arrive at a depreciated cost of the improvements of \$201,309. The appraiser added \$1,000 for site improvements to arrive at a total value for the subject property under the cost approach of \$282,309.

Under the sales comparison approach, the appraiser selected nine comparable properties that were located from 1.16 to 24.65 miles from the subject property. The comparables had sites ranging in size from 1.50 to 33.1 acres of land area that were improved with ranch style dwellings of frame or log construction. The homes ranged in size from 1,344 to 2,360 square feet of living area and ranged in age from 12 to 80 years old. The comparables had other features with varying degrees of similarity to the subject. The comparables had sale dates ranging from February 2016 to September 2017 and sold for prices ranging from \$186,000 to \$360,000 or from \$84.55 to \$208.33 per square foot of living area, including land. After adjustments, the comparables had adjusted sale prices ranging from \$239,060 to \$322,660 or from \$110.13 to \$215.11 per square foot of living area, including land.

Based on this evidence, the appellant requested that the subject's total assessment be reduced to \$91,667.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$99,236. The subject has a \$4,908 preferential farmland assessment for 23.52 acres and a \$14,282 preferential farm building assessment for the three farm pole buildings. The subject's 2.1 acre homesite and dwelling have assessments that total \$80,046, which reflect a market value of \$241,904 or \$134.84 per square foot of living area, land included, when applying the 2018 three-year average median level of assessment for LaSalle County of 33.09% as determined by the Illinois Department of Revenue.

In response to the appellant's appraisal, the board of review argued that the appellant's appraiser's estimate of the subject's land value, in the cost approach of \$80,000 or \$3,123 per acre, did not support the appraiser's \$500 per acre adjustment for the comparables in the appraisal's sales comparison approach. In support of its contention that the appraiser underestimated the subject's land value, the board of review submitted four vacant land sales that were located within a ten-mile radius of the subject. The comparables ranged in size from 7.63 to 78.71 acres of land area and sold from May 2015 to August 2017 for prices ranging from \$5,015 to \$17,628 per area of land area. The board of review adjusted the appraiser's comparable sales using \$6,000 per acre to arrive at adjusted prices ranging from \$276,120 to \$422,085.

Based on this evidence the board of review requested confirmation of the subject's assessment.

The appellant submitted a letter from the appraiser in rebuttal. The appraiser argued his low land value adjustment was based on the large amount of the subject's land being located within a flood plain. The appraiser further writes, "The property is improved with the residence including garage, buildings and improvements which are mentioned in the original appraisal report. The bulk of the above mentioned improvements are situated on approximately 2.0 +/- acres thereby making the additional acreage what is considered to be defined by the "Appraisal of Real Estate Dictionary" published by The Appraisal Institute as "Excess Land." Excess Land is land that does not contribute or minimally contributes to the value of the subject property. (whole)" The appraiser also critiqued the board of review's land sales and opines that the board of review's \$6,000 an acre adjustment is excessive.

### **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.

As an initial matter regarding the appellant's appraisal, the Board gave less weight to the value conclusion due to the appraiser's market value estimate of the subject's total land and improvements in support a property tax complaint. The Board finds an Ad Valorem appraisal would have an effective date of January 1, 2018, which is the assessment date at issue. Furthermore, the subject's 2.1-acre homesite and dwelling would have a value based on market value, however, the remaining 23.52 acres and three pole buildings have preferential farm assessments based on their productivity index and their contributory value to the farm.

With respect to the cost approach, the Board finds the appellant's appraiser understated the value of the subject property. The appraiser estimated the subject's 25.62 acres had a value of \$80,000 or approximately \$3,123 per acre. The record contains no support for this estimated land value. The board of review evidence had four land sales ranging in price from \$5,015 to \$17,628 per acre. Accepting the board of review adjustment factor of \$6,000 per acre, the subject property would have an indicated land value under the cost approach of \$153,720, and a revised estimate under the cost approach to value of \$356,000, rounded. Although the cost approach may have been given secondary consideration by the appraiser, the fact that the value conclusion is understated detracts from the weight given the appraisal.

The subject property has 23.52 acres of land that has a preferential farmland assessment and is not being contested by the appellant. However, the appellant is contesting the assessment of the three farm pole buildings. The Board finds the best evidence of the contributory value of these buildings was within the appellant's appraisal. The appraisal estimated the buildings would have a cost new of \$86,400, minus approximately 38% depreciation or \$32,832, to arrive at a depreciated cost new of the buildings of \$53,568. The buildings contributory value of \$53,568 would reflect an assessment of \$17,854, when applying the statutory level assessment of 33.33%,

as preferential farm assessments are not subject to equalization. The subject's three farm pole buildings have an assessment of \$14,282, which falls below the best evidence of their contributory value to the farm and appear to be underassessed.

The Board finds the best evidence of market value of the subject's homesite and dwelling to be the appellant's appraisal comparables #3, #4, #6, #7 and #9. These comparables were similar to the subject in location, style, age, size and some features. However, the comparables had differing lot sizes, when compared to the subject's 2.1-acre homesite and the appraisal did not disclose whether any of the comparables had preferential farm assessments, like the subject. Nevertheless, the best comparables sold for prices ranging from \$186,000 to \$360,000 or from \$84.55 to \$208.33 per square foot of living area, including land. Furthermore, comparables #3, #7 and #9 have sites relatively similar to the subject property's homesite. These three comparables sold for prices ranging from \$186,000 to \$279,000 which also support the subject's assessment when adjusting these properties for the contributory value of the three farm buildings these comparables don't have. The subject's homesite and dwelling's assessments reflect a market value of \$241,904 or \$134.84 per square foot of living area, including land, which is within the range established by the best comparable sales in this record. After considering adjustments to the comparables for differences when compared to the subject, the Board finds the subject's homesite and dwelling's assessments are supported. The Board gave less weight to the appellant's appraisal comparables #1, #2 and #5 due to their larger lot sizes when compared to the subject's homesite. The Board also gave less weight to the appellant's appraisal comparable #8 due to its significantly older dwelling, when compared to the subject. Based on the evidence in this record, 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: April 20, 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

Robb Caputo  
1820 E 1325 Rd  
Streator, IL 61364

COUNTY

LaSalle County Board of Review  
LaSalle County Government Center  
707 Etna Road  
Ottawa, IL 61350