



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

APPELLANT: Stephanie Woodward
DOCKET NO.: 19-00249.001-R-1
PARCEL NO.: 19-09-35-301-006-0000

The parties of record before the Property Tax Appeal Board are Stephanie Woodward, the appellant, and the Will 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 Will County Board of Review is warranted. The correct assessed valuation of the property is:

LAND: \$39,339
IMPR.: \$125,661
TOTAL: \$165,000

Subject only to the State multiplier as applicable.

Statement of Jurisdiction

The appellant timely filed the appeal from a decision of the Will County Board of Review pursuant to section 16-160 of the Property Tax Code (35 ILCS 200/16-160) challenging the assessment for the 2019 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 is improved with a two-story dwelling of brick construction with 4,114 square feet of living area. The dwelling was constructed in 2005 and is approximately 14 years old. Features of the home include an unfinished basement, central air conditioning, two fireplaces and a two-car attached garage with approximately 795 square feet of building area. The subject property also has an inground swimming pool. The property has a 26,718 square foot site and is located in Frankfort, Frankfort Township, Will County.

The appellant contends overvaluation as the basis of the appeal. In support of this argument the appellant submitted information on four comparable sales improved with two-story dwellings of brick, stone and siding construction ranging in size from 3,446 to 4,425 square feet of living area. The homes were built from 2006 to 2017 and range in age from two to fourteen years old. Each home has an unfinished basement, central air conditioning, one fireplace and a three-car garage. The comparables have sites ranging in size from 15,127 to 22,004 square feet of land

area and are located within the same neighborhood as the subject property. These properties sold from April 2017 to October 2018 for prices ranging from \$405,000 to \$482,000 or from \$103.10 to \$139.87 per square foot of living area, including land. To document the appeal the appellant provided copies of Frankfort Township Property Information sheets for the subject property and each comparable as well photographs of each property. Based on this evidence the appellant requested the subject's assessment be reduced to \$163,188.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$183,556. The subject's assessment reflects a market value of \$550,063 or \$133.71 per square foot of living area, land included, when using the 2019 three-year average median level of assessment for Will County of 33.37% as determined by the Illinois Department of Revenue.

In support of its contention of the correct assessment the board of review submitted information on four comparables with comparable #1 being the same property as appellant's comparable sale #2. The board of review reported the comparables as being similar to the subject dwelling in design and construction. The homes range in size from 3,615 to 4,270 square feet of living area and in age from 9 to 13 years old. Each comparable has an unfinished basement, central air conditioning, and an attached garage ranging in size from 552 to 660 square feet of living area. The comparables have sites ranging in size from 15,982 to 19,810 square feet of land area and are located in the same neighborhood as the subject property. The comparables have land assessments ranging from \$31,423 to \$47,829 or from \$1.78 to \$2.51 per square foot of land area. The comparables have improvement assessments ranging from \$133,992 to \$162,296 or from \$37.07 to \$39.42 per square foot of living area. The subject has a land assessment of \$39,339 or \$1.47 per square foot of land area, and an improvement assessment of \$144,217 or \$35.06 per square foot of living area. The board of review provided no sales data with respect to these comparables.

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.

Initially, the Board finds only one comparable provided by the board of review had sold, and this comparable was also used by the appellant as her comparable sale #2. The remaining comparables provided by the board of review were submitted to support the contention the subject was being uniformly assessed, however, this evidence does not address the appellant's market value argument and is, therefore, given little weight.

The comparable sales provided by the appellant had varying degrees of similarity to the subject property. None of the comparables have an inground swimming pool as does the subject suggesting an upward adjustment to the comparables' sales prices may be necessary of for this feature. The two comparables most similar to the subject in size are appellant's comparables #1

and #3 that sold for prices of \$456,200 and \$405,000 or \$103.01 and \$106.70 per square foot of living area, including land, respectively. However, both of these properties are improved with homes that are 12 and 9 years newer than the subject dwelling. The comparables slightly more similar to the subject in age sold for prices of \$480,000 and \$482,000 or for \$132.78 and \$139.87 per square foot of living area, including land, respectively. However, these homes are approximately 12% and 16% smaller than the subject dwelling, respectively, suggesting the subject property would have a lower price per square foot of living area considering economies of scale. The subject's assessment reflects a market value of \$550,063 or \$133.71 per square foot of living area, including land, which is above the overall price range established by the sales in this record, but within the range on a square foot basis. However, due to the subject dwelling's size and age relative to the sales in this record, 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: June 8, 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

Stephanie Woodward
8706 Greystone Ct
Frankfort, IL 60423

COUNTY

Will County Board of Review
Will County Office Building
302 N. Chicago Street
Joliet, IL 60432