



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

APPELLANT: Douglas W. & Angela Gray  
DOCKET NO.: 19-00330.001-R-1  
PARCEL NO.: 08-25-305-005

The parties of record before the Property Tax Appeal Board are Douglas W. & Angela Gray, the appellants, and the Peoria 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 **Peoria** County Board of Review is warranted. The correct assessed valuation of the property is:

**LAND:** \$18,540  
**IMPR.:** \$101,707  
**TOTAL:** \$120,247

Subject only to the State multiplier as applicable.

**Statement of Jurisdiction**

The appellants timely filed the appeal from a decision of the Peoria 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 consists of a two-story single-family dwelling of aluminum/vinyl siding exterior construction with 3,011 square feet of living area. The dwelling was constructed in 2006. Features of the home include a basement with a 650 square foot recreation room, central air conditioning, a fireplace and a three-car garage containing 784 square feet of building area. The property has an approximately 10,019 square foot or .23-acre site and is located in Dunlap, Radnor Township, Peoria County.

The appellants contend overvaluation as the basis of the appeal. In support of this argument, the appellants submitted information on three comparable sales located within a block of the subject property and each of which is located in the same assessment neighborhood code as is assigned to the subject. The comparable parcels range in size from .25 to .33-acres and have each been improved with either a 1.5-story or a 2-story dwelling of frame, aluminum/vinyl or partial brick exterior construction. The homes are either 9 or 12 years old and range in size from 2,455 or

2,737 square feet of living area, including land. Each dwelling has a basement with finished area ranging in size from 825 to 1,157 square feet of finished area, central air conditioning, a fireplace and a garage ranging in size from 657 to 849 square feet of building area. The comparables sales sold in either September 2018 or June 2019 for prices ranging from \$289,000 to \$355,000 or from \$110.15 to \$129.70 per square foot of living area, including land.

Based on the foregoing evidence, the appellants request a reduced total assessment of \$107,282 which would reflect a market value of \$321,878 or \$106.90 per square foot of living area, including land.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$132,370. The subject's assessment reflects a market value of \$397,746 or \$132.10 per square foot of living area, land included, when using the 2019 three year average median level of assessment for Peoria County of 33.28% as determined by the Illinois Department of Revenue.

In response to the appeal, the board of review submitted a memorandum noting the construction grade and condition of the subject dwelling along with remarks noting the similar characteristics of the appellants' comparables.

In support of its contention of the correct assessment, the board of review submitted information on three comparable sales, where board of review comparable #2 is the same property as appellants' comparable #1. The board of review submission includes property record cards for the subject and the comparables, but only two of which present lot sizes of .30 and .64-acres of land area; no lot size is depicted for board of review comparable #1 on the property record card. The comparables each consist of either 1.5-story or 2-story dwellings of aluminum/vinyl exterior construction that were built from 2003 to 2013. The homes range in size from 2,519 to 3,159 square feet of living area and feature basements, two of which have recreation rooms of 1,157 and 2,000 square feet, respectively. Each dwelling has central air conditioning, one or two fireplaces and a garage ranging in size from 692 to 849 square feet of building area. The comparables sold from June to October 2018 for prices ranging from \$339,900 to \$400,000 or from \$126.62 to \$134.93 per square foot of living area, including land.

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

### **Conclusion of Law**

The appellants contend 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 appellants met this burden of proof and a reduction in the subject's assessment is warranted.

The parties submitted a total of five comparable sales, with one common property, presented for the Board's consideration. The Board has given reduced weight to board of review comparable #1 due to its newer date of construction when compared to the subject.

The Board finds the best evidence of market value to be the appellants' comparable sales along with board of review comparable sales #2 and #3, where there is one common property presented. The comparables present varying degrees of similarity to the subject in design, exterior construction, size and/or some features. Two of the four comparables have significantly more finished basement area than the subject which would necessitate downward adjustments. Three of the four comparables have less living area than the subject dwelling and would necessitate downward adjustments on a per-square-foot basis given the principle of the economies of scale. Accepted real estate valuation theory provides that all factors being equal, as the size of the property increases, the per unit value decreases. In contrast, as the size of a property decreases, the per unit value increases. These four most similar comparables sold from September 2018 to June 2019 for prices ranging from \$289,000 to \$400,000 or from \$110.05 to \$129.70 per square foot of living area, including land. The subject's assessment reflects a market value of \$397,746 or \$132.10 per square foot of living area, including land, which is within the range established by the best comparable sales in this record in terms of overall value but above the range on a per-square-foot basis which is not logical given the subject's larger dwelling size compared to three of the best comparables and the subject's smaller recreation room area as compared to all four comparables. Based on this evidence and after considering appropriate adjustments to the best comparables for differences 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: November 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

Douglas W. & Angela Gray  
3816 W Hearthwood Dr  
Dunlap, IL 61525

COUNTY

Peoria County Board of Review  
Peoria County Courthouse  
324 Main Street  
Peoria, IL 61602