



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

APPELLANT: Lawrence E. & Carol Brown  
DOCKET NO.: 19-00376.001-R-1  
PARCEL NO.: 06-03-22-108-012-0000

The parties of record before the Property Tax Appeal Board are Lawrence E. & Carol Brown, the appellants; and the Will 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 Will County Board of Review is warranted. The correct assessed valuation of the property is:

**LAND:** \$23,227  
**IMPR.:** \$78,780  
**TOTAL:** \$102,007

Subject only to the State multiplier as applicable.

**Statement of Jurisdiction**

The appellants 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 consists of a one-story dwelling of brick construction containing 1,873 square feet of living area. The dwelling was constructed in 2001. Features of the home include a full basement, central air conditioning, a fireplace, a 320 square foot unheated addition and a 717 square foot garage.<sup>1</sup> The property is located in Plainfield, Plainfield Township, Will County.

The appellants contend assessment inequity with respect to the subject's improvement as the basis of the appeal. In support of this argument the appellants submitted information on four equity comparables that are not located within the same neighborhood code as the subject. The comparables are one-story dwellings of brick construction that range in size from 1,702 to 2,319 square feet of living area. The homes are either 27 or 29 years old and have other features with

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<sup>1</sup> The board of review reports the subject has an unfinished basement; however, the Board finds the appellants failed to disclose whether the subject has finished basement area in Section III-Description of Property on the appeal form.

varying degrees of similarity to the subject. The comparables have improvement assessments ranging from \$64,573 to \$73,986 or from \$31.90 to \$37.90 per square foot of living area.

Based on this evidence the appellants requested that the subject's total assessment be reduced to \$89,718.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$102,007. The subject property has an improvement assessment of \$78,780 or \$42.06 per square foot of living area. In support of its contention of the correct assessment the board of review submitted information on four equity comparables that are located within the same neighborhood code as the subject. The comparables are one-story dwellings of brick construction that range in size from 1,707 to 2,010 square feet of living area. The homes range in age from 17 to 24 years old and have other features with varying degrees of similarity to the subject. The comparables have improvement assessments ranging from \$71,952 to \$86,062 or from \$41.58 to \$42.82 per square foot of living area.

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

### **Conclusion of Law**

The taxpayers contend improvement assessment inequity as the basis of the appeal. When unequal treatment in the assessment process is the basis of the appeal, the inequity of the assessments must be proved by clear and convincing evidence. 86 Ill.Admin.Code §1910.63(e). Proof of unequal treatment in the assessment process should consist of documentation of the assessments for the assessment year in question of not less than three comparable properties showing the similarity, proximity and lack of distinguishing characteristics of the assessment comparables to the subject property. 86 Ill.Admin.Code §1910.65(b). The Board finds the appellants did not meet this burden of proof and a reduction in the subject's assessment is not warranted.

The parties submitted a total of eight comparable properties for the Board's consideration. The Board gives less weight to the appellants' comparables due to their locations outside of the subject's neighborhood code. In addition, comparable #1 is considerably larger than the subject and comparables #2 #3 and #4, are considerably older when compared to the subject. The Board finds the board of review's comparables are more similar to the subject in location, style, age size and features. These comparables have improvement assessments ranging from \$71,952 to \$86,062 or from \$41.58 to \$42.82 per square foot of living area. The subject's improvement assessment of \$78,780 or \$42.06 per square foot of living area falls within the range established by the best comparables in the record. After considering adjustments to the best comparables for differences when compared to the subject, such as their lack of a 320 square foot unheated addition, the Board finds the subject's improvement assessment is well justified. Based on this record, the Board finds the appellants did not demonstrate with clear and convincing evidence that the subject's improvement is inequitably assessed and a reduction in the subject's assessment is not warranted.

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.



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Chairman



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Member

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Member



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Member



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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: August 24, 2021



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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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