



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

APPELLANT: The Great American Land Company
DOCKET NO.: 19-00378.001-C-1
PARCEL NO.: 11-0-02591-000

The parties of record before the Property Tax Appeal Board are The Great American Land Company, the appellant; and the Coles County Board of Review.¹

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 Coles County Board of Review is warranted. The correct assessed valuation of the property is:

LAND: \$500
IMPR.: \$2,962
TOTAL: \$3,462

Subject only to the State multiplier as applicable.

Statement of Jurisdiction

The appellant timely filed the appeal from a decision of the Coles 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 6,000 square foot site improved with a 1-story wood frame pole barn building with galvanized steel exterior construction and a steel roof. The building contains 2,688 square feet of building area and has a land-to-building ratio of 2.23:1. The building is 27 years old and features a concrete slab foundation, 14-foot wall height, wood truss roof/ceiling structure, a 14-foot sliding door and a gravel driveway. The property is located in Trilla, Pleasant Grove Township, Coles County.

The appellant contends overvaluation as the basis of the appeal. In support of this argument, the appellant submitted a retrospective appraisal report estimating the subject property had a market value of \$10,500 as of January 1, 2019. The appraisal was prepared by Stanley D. Gordon, an

¹ The Coles County Board of Review initially requested a hearing before the Property Tax Appeal Board, but subsequently waived said hearing request prior to the scheduled hearing in lieu of a written decision based on the documentary evidence that the parties submitted into the record.

Illinois Certified General Real Estate Appraiser, and the property rights appraised were fee simple. The purpose of the appraisal was to develop a market value opinion of the subject property for ad valorem tax assessment. In estimating the market value of the subject property, the appellant's appraiser developed the cost approach and the sales comparison approach to value. The appraiser stated in the report that his value opinion is based on personal inspection of the site and the building on December 13, 2019, in addition to research and analysis of supporting documentation, and consideration of factors affecting the value of the subject property. The appraiser characterized the subject improvement as "fair to average condition." He noted that the building has no insulation, plumbing, heat, or central air conditioning. Additionally, he noted that the subject has a gravel driveway and that there are no curbs, gutters, or public sidewalks along the street. Although the building has a chronological age of 27 years old, the appraiser estimated the effective age of the building to be 25 years old due to "remodeling" that reportedly occurred in 2009. The appraisal report is dated February 8, 2020, and the effective date of the appraisal is January 1, 2019.

In arriving at the value conclusion, the appraiser developed the cost approach and the sales comparison approach to value. Estimating the subject's value using the cost approach to value, the appraiser first developed the value of the subject's site by considering comparable land sales. Since there were no comparable land sales in the subject's neighborhood in Trilla, Illinois, the appraiser analyzed four land sales in similar smaller communities with varying degrees of similarity to the subject site in terms of being located in smaller community and having similar utilities, zoning, and lot size. After making adjustments to the comparables for differences from the subject, the appraiser arrived at the market value for the subject's site of \$1,800 or \$.30 per square foot of land area. Next, the appraiser calculated the replacement cost new for the improvement of \$11.00 per square foot, multiplied by the building area of 2,688 square feet resulting in the total replacement cost new of \$29,568. From this number, the appraiser deducted for depreciation the amount of \$18,628 (or 63%) for physical obsolescence, plus \$2,000 (or 25%) for external obsolescence, to arrive at the depreciated cost of the improvement of \$8,940. He then added the land value of \$1,800 to arrive at the subject's value of \$10,740 (or \$11,000, rounded) under the cost approach to value.

Under the sales comparison approach, the appraiser utilized three comparable sales located in Charleston, Mattoon, and Humboldt. Comparable sale #1 consists of three pole frame buildings; comparable sale #2 is a 1-story frame building; and comparable #3 is a 1-story masonry storage building. The five industrial buildings (including the three pole buildings that make up comparable #1) range in size from 1,320 to 9,440 square feet of building area and range in age from 40 to 60 years old. The comparables have sites ranging in size from 4,400 to 60,026 square feet of land area and have land-to-building ratios ranging from 1.56:1 to 19.75:1. The sales occurred from January 2017 to October 2019 for prices ranging from \$6,500 to \$35,000 or from \$1.79 to \$14.71 per square foot of building area, including land. The appraiser made adjustments to the comparables for differences from the subject including site size, age, and finished office area, to arrive at adjusted prices ranging from \$2.69 to \$8.09 per square foot of building area. From this information, the appraiser estimated the value of the subject property to be \$4.00 per square foot of building area, land included, which calculated to an estimated market value for the subject property of \$10,500, rounded, under the sales comparison approach to value. In reconciling the two approaches to value, the appraiser gave more weight to the sales

comparison approach and arrived at the value for the subject property of \$10,500 as of January 1, 2019. Based on this evidence, the appellant requested the subject's total assessment be reduced.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$4,765. The subject's assessment reflects an estimated market value of \$14,453 or \$5.38 per square foot of building area when using the 2019 three-year average median level of assessment for Coles County of 32.97% as determined by the Illinois Department of Revenue.

In support of its contention of the correct assessment, the board of review submitted a grid analysis containing information on three comparable sales located within 9 miles of the subject property. The comparables are improved with 1-story buildings with steel exterior construction ranging in age from 14 to 53 years old. The comparables are described to be in "good" condition. Comparables #1 and #2 have lots containing 14,000 and 7,000 square feet of land area, respectively. The site size of comparable #3 was not disclosed in the grid, but the property record card depicts a 3.43-acre site. The comparables range in size from 2,880 to 6,000 square feet of building area. Comparables #1 and #3 are described as featuring central air conditioning and heating, with comparable #3 having an additional 1,650 square foot office area.² The sales occurred from September 2016 to March 2020 for prices ranging from \$67,500 to \$310,000 or from \$23.43 to \$67.39 per square foot of building area, including land.

In further support of the assessment, the board of review submitted a memorandum arguing that the appellant's appraiser gave no consideration regarding the effective age of the subject due to recent remodeling. Based on this evidence and argument, the board of review requested that no change be made to the subject's assessment.

In rebuttal, the appellant argued that the subject's property record card incorrectly depicts "remodeling" in 2015 as the work was actually done in 2009. The appellant attached an itemization of expenses that was extracted from their accounting software which depicts that the vast majority of the materials purchased was for tin and lumber in order "to replace rotten ones." The appellant further argued that board of review comparables #1 and #3 are dissimilar to the subject due to both being storefronts with active businesses and offices located on a main commercial street in a larger town of Mattoon. Additionally, the appellant argued that these board of review comparables each have central air conditioning, heating, insulation, concrete parking lots, and bathrooms. Furthermore, appellant asserted that board of review comparable #2, although more similar to the subject in some respects than the other board of review comparables, based on the taxpayer's physical observation, this building has electricity, natural gas, concrete driveway, insulation, and is much newer in age when compared to the subject building which has no insulation, no utilities, i.e., no heating/cooling/plumbing, no electricity, and has a gravel driveway. The appellant stated that the subject building is used for storage of business supplies.

² The property record cards for the three comparables submitted by the board of review depict comparables #1 and #3 to be in a commercial zoning district and appear to be storefronts and/or commercial buildings based on the photograph and/or having an office area.

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.

The appellant submitted an appraisal report and the board of review submitted three comparable sales in support of their respective positions before the Property Tax Appeal Board. The Board finds the best evidence of market value to be the appraisal report provided by the appellant arriving at an estimated market value of \$10,500. The appellant's appraiser developed the cost approach and the sales comparison approach to value utilizing comparable sales that had varying degrees of similarity to the subject property. The Board finds that the appraiser also adjusted the comparables for differences from the subject property and the adjustments appear reasonable and logical. The Board finds the appraised value of \$10,500 is below the market value reflected by the subject's assessment of \$14,453.

The Board gave less weight to the board of review's unadjusted (raw) comparable sales. The board of review comparables #1 and #3 are dissimilar to the subject in that they appear to be commercial buildings that are larger in size relative to the subject, and they feature utilities such as electricity, plumbing, central air conditioning, heating, and office space, none of which are features of the subject building. As to the board of review comparable #2, the Board finds persuasive the appellant's uncontested rebuttal evidence that this building is much newer relative to the subject and features utilities (electricity, heating/cooling, and plumbing), as well as having a concrete driveway, and insulation, none of which are features of the subject building. The Board further finds that notwithstanding the differences from the subject, this single unadjusted (raw) sale comparable is much newer than the subject.³

As to the board of review's argument that the appraiser gave no consideration to the remodeling of the subject, the Board finds this argument unpersuasive. The appraiser expressly noted in his appraisal report (pages 25 and 26) the subject's chronological age of 27 years with an effective age of 25 years suggesting that he considered the repairs made in 2009. Additionally, the Board finds that based on the itemization of the costs and materials provided by the appellant, the "remodeling" appears to be, as the taxpayer asserted, merely a project to repair and replace deteriorating items rather than a true renovation, especially given that no actual utilities such as electricity, heating/cooling, plumbing, or insulation were added.

In conclusion, based on the evidence in this record, the Board finds that the unadjusted raw sales submitted by the board of review do not overcome what appears to be a credible appraisal report that utilized comparable properties similar to the subject with reasonable and logical adjustments made to the comparables for differences from the subject. Therefore, based on this record, the

³ The Board is cognizant of the fact that the appellant's appraiser did not utilize board of review comparable #2 in his report, however this is logical as the date of the appraisal report of February 8, 2020 predates the sale of comparable #2 that occurred in March 2020.

Board finds a reduction in the subject's assessment to reflect the appraised value is justified using the 2019 three-year average median level of assessment for Coles County of 32.97% as determined by the Illinois Department of Revenue.

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 21, 2023



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

The Great American Land Company
PO Box 6
Trillia, IL 62469

COUNTY

Coles County Board of Review
Coles County Courthouse
651 Jackson Avenue
Charleston, IL 61920