



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

APPELLANT: The Great American Land Company
DOCKET NO.: 19-00379.001-C-1
PARCEL NO.: 11-0-01772-000

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 **no change** 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: \$0
IMPR.: \$8,753
TOTAL: \$8,753

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 two wood frame buildings with galvanized steel exterior construction and two steel grain bins.² One of the buildings (hereinafter the “west” building) contains 1,856 square feet of building area was built in 1960 and was remodeled/upgraded in 2016.³ The second building (hereinafter the “east” building) contains 1,426 square feet of building area and was built in 1950. The two grain bins are each 18 feet in diameter, contain 255 square feet of building area, and were built in 1950. The west building has a 16-foot wall height,

¹ 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.

² The site on which the subject improvements are located is leased by the appellant and is not a subject matter of this appeal.

³ The property record card submitted by the board of review depicts the renovation/upgrades occurring in 2017. The appellant claims that this is an error and that the renovations occurred in 2016. The Board finds that this relatively minor factual dispute will not impact the Board’s analysis or its decision.

and the east building has a 12-foot wall height. Both buildings have concrete slab foundations, galvanized steel exterior walls and roof, and a gravel driveway. The property is located in Trilla, Pleasant Grove Township, Coles County.

The appellant contends overvaluation with respect to the improvements only 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 \$15,000 as of January 1, 2019. The appraisal was prepared by Stanley D. Gordon, an Illinois Certified General Real Estate Appraiser, and the property rights appraised were fee simple estate which the appraiser defined as “as estate without limitations to any particular class of heirs or undisclosed restrictions upon use...” The appraiser identified part of the subject property as “1.34 acres in Fickes Addition to Trilla, Coles County Illinois.” The purpose of the appraisal was to develop a market value opinion of the subject property including the “site, building and improvements” for ad valorem tax assessment. The appraiser also noted on page 22 of his report that the “subject site is leased land from the railroad with minimal rent on it.” 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 noted on page 28 of his report that new exterior siding has been put on the west building and that the east building is in need of repairs. Although the west building has a chronological age of 59 years old, and the east building has a chronological age of 69 years old, the appraiser estimated the effective age of both buildings to be 40 years old with a total economic life of 50 years. The appraiser estimated the effective age taking into account “physical depreciation” without allocating or differentiating for the conditions of each building.

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 estimated the value of the subject’s site by considering four comparable land sales. After making adjustments to the comparables for differences from the subject, the appraiser arrived at the market value for the subject’s site of \$5,800. Next, the appraiser calculated the replacement cost new for the east and the west buildings together of \$43,526. After deducting for depreciation in the amount of \$35,345, the appraiser arrived at the depreciated cost of the two buildings of \$8,181. To this amount, the appraiser added the contributory value of the two grain bins together in the amount of \$2,000, plus the value of the site in the amount of \$5,800 to arrive at the subject’s value of \$15,981 (or \$16,000 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. Each of the five 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 \$2.86 to \$10.30 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 and calculated the market value for the subject property to be \$14,769 (or \$15,000 rounded).⁴ The appraiser did not state whether or not the aforementioned market value includes land and improvements or improvements only. In reconciling the two approaches to value, the appraiser gave most weight to the sales comparison approach and arrived at the value for the subject property of \$15,000 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 \$8,753. The subject's assessment reflects an estimated market value of \$26,548 or \$7.00 per square foot of total 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, however, the attached 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.⁵ 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 west building that was recently remodeled. Instead, the appraiser applied the same effective age to both buildings in spite of their differing ages built and differing conditions. The board of review argued that the west building that was remodeled should have a newer effective age and thus a higher price per square foot. The board of review also argued that the appraiser included the site and appraised the land along with the improvements even though the land is leased by the appellant and not part of the subject property. 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 both east and west buildings were built in 1950 and that the west building was remodeled in 2016 (not 2017 as depicted on the property record card). The appellant attached two invoices depicting the date and expenses for the remodeling of the west building. The first invoice was in the amount of \$3,200 for replacing the bottom of wood posts with concrete columns and the second was in the amount of \$44,581 for the re-siding of the building and roof. The appellant asserted that the west building should have an effective age of 40 years and the remaining structures should have an effective age of 69 years old to reflect their

⁴ On page 44 of the appraisal report, the appraiser calculated the subject's market value based on a price per square foot of \$4.50 per square foot but inexplicably indicated that the subject has a value of \$4.00 per square foot.

⁵ 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.

chronological age. 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, is much newer in age when compared to the subject buildings. The appellant acknowledged that the site where the subject improvements are located is leased from a railroad company and that the appraiser should not have included the site in his appraisal.

Conclusion of Law

The appellant contends the market value of the subject improvements 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.

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. Initially, the Board gives little weight to the value conclusion stated in the appraisal report arriving at an estimated market value of \$15,000. First, the appraiser included the value of the site upon which the subject improvements are located as part of the subject's overall market value. The appraiser expressly identified the site as "1.34 acres in Fickes Addition to Trilla, Coles County Illinois" and noted on page 22 of his report that the "subject site is leased land from the railroad." He also stated that the property rights appraised were fee simple estate which the appraiser himself defined "as estate without limitations to any particular class of heirs or undisclosed restrictions upon use" yet included the site which, as leased, is not a fee simple estate. The appellant also acknowledged in rebuttal that the site is leased and should not have been included in the overall value of the subject property. Furthermore, the Board finds there are inconsistencies and material errors in the appraisal report. The appraiser noted the renovations done to the west building making its effective age newer than the east building (which did not undergo renovations) yet the appraiser estimated the effective age of both buildings to be 40 years old with a total economic life of 50 years for the two buildings combined. Furthermore, in calculating the subject's market value of the improvements on a price per square foot, the appraiser indicated that the subject has a value of \$4.00 per square foot on page 44 of his report but inexplicably utilized \$4.50 per square foot in calculating the full value of the buildings. The Board finds that these errors and/or inconsistencies undermine the appraiser's opinion of value and diminish the weight the Board gives to the appraiser's value conclusion. The Board will, however, consider the three raw sales contained in the appraisal report.

The record contains a total of six comparable sales submitted by the parties in support of their respective positions before the Property Tax Appeal Board, none of which are particularly similar to the subject in all respects. The Board gave less weight to the board of review comparables #1 and #3 which are dissimilar to the subject in that they appear to be commercial buildings with office space, are larger in size relative to the subject, and they feature utilities

such as plumbing, central air conditioning, and heating, which are not features of the subject buildings. The Board also gave less weight to appraisal comparable sale #3 as this sale appears to be an outlier given its low sale price of \$6,500 compared to the remaining comparables in the record. Finally, the Board gave less weight to appraisal comparable #2 based on its sale date in January 2017 which is less proximate in time to the subject's January 1, 2019 assessment date at issue than the remaining comparables in the record and therefore less likely to accurately reflect the subject's market value as of said lien date.

The Board finds the best evidence of the subject's market value is appraisal comparable #1 and board of review comparable #2 which sold more proximate in time to the lien date at issue and are relatively similar to the subject in design and utility, although they each have sites included in their overall value, unlike the subject and also differ from the subject in the number of structures and/or age. These two best comparables in the record sold in April 2018 and March 2020 for prices of \$35,000 and \$67,500 or for \$1.79 and \$23.43 per square foot of building area, land included. However, the appellant's comparable #1 includes three pole frame buildings and the board of review comparable #2 is comprised of one steel building that is newer in age when compared to the subject's two frame and steel buildings and two grain bins, suggesting that adjustments are needed to these best comparables in the record for their differences from the subject. The subject's estimated market value of \$26,548 or \$7.00 per square foot of building area as reflected by its assessment is lower than the two best comparables in the record in terms of overall value and is on the lower end of the two best comparables on a per square foot of total building area basis. Based on this record and after making appropriate adjustments to the comparables for differences from the subject such as the subject's lack of land area, the Board finds that the appellant did not establish by a preponderance of the evidence that the subject improvements are overvalued and, therefore, 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.

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

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