



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

APPELLANT: The Great American Land Company
DOCKET NO.: 19-00551.001-C-1
PARCEL NO.: 11-0-02716-000

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: \$875
IMPR.: \$23,183
TOTAL: \$24,058

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 10,500 square foot site improved with two structures. The first structure, (hereinafter the “office building”), consists of a 1-story building with 1,548 square feet of building area² of frame construction and vinyl siding exterior. The building has a crawl space foundation and features an open clerical area, three offices, a file room, a break room, and a bathroom. The second structure, (hereinafter the “pole building”), was built in 1980 and consists of a 1-story building of galvanized steel exterior and roof with 3,306 square feet of building area. The pole building is built on a concrete slab foundation and features a 14-foot wall height on one

¹ Coles County Board of Review initially requested a hearing before the Property Tax Appeal Board, but subsequently waived said 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 appellant disclosed in rebuttal that the original office building consisting of 588 square feet of building area was built in 1912 and was completely remodeled from 2003 to 2004, with a 960 square foot addition being built in 2017. This was not contested by the board of review.

side of the building, a warehouse area, a shop area, and an open storage area. The mechanicals of the pole building include a 200-amp electrical service and shop light fixtures. The mechanicals of the office building include a 100-amp electrical service, plumbing, central air conditioning, and heat. The property has a 10,500 square foot site with a land-to-building ratio of 2.16:1 and 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 \$52,000 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. The purpose of the appraisal was to develop a market value opinion of the subject property for a real estate tax appeal. In estimating the market value of the subject property, the appellant's 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 analyzing four comparable land sales located in Oblong, Brocton, Watson, and Cooks Mills. The appraiser noted that there were no recent comparable land sales in the city of Trilla, therefore he considered sales in similar small communities that occurred over the last three years and that were similar in zoning and utilities to the subject site. After making size and location adjustments to the comparables for differences from the subject, the appraiser arrived at the market value for the subject's site of \$2,600. Next, the appraiser calculated the replacement cost new for the office building and the pole building together of \$142,086. After deducting \$99,252 for physical and external obsolescence, the appraiser arrived at the depreciated cost for the two buildings of \$42,834. To this amount, the appraiser added the contributory value of the driveways (\$2,000) and the site value (\$2,600) to arrive at the subject's value of \$47,434 (or \$47,500 rounded) under the cost approach to value.

Under the sales comparison approach, the appraiser utilized five comparable sales³ located in Beecher City, Oakland, Charleston, Mattoon, and Humboldt. Comparable #1 is a 1-story frame building containing 1,491 square feet of building area; comparable #2 consists of one multi-use building and one storage building; comparable sale #3 consists of three pole frame buildings; comparable sale #4 is a 1-story frame building; and comparable #5 is a 1-story masonry storage building. The comparables (including ones with multiple buildings) range in size from 1,320 to 9,440 square feet of total combined building area and range in age from 27 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 \$60,000 or from \$1.79 to \$32.19 per square foot of building area, including land. The appraiser made adjustments to the comparables for differences from the subject including location, site size, age, and finished office area, to arrive at adjusted prices for the office building ranging from \$21.07 to \$27.36 per square foot of building area, (page 42 of the appraisal) and adjusted prices for the pole building ranging from \$2.51 to \$10.30 per square foot of building area (page 48 of the appraisal). From this information, the appraiser estimated the value of the office building to be \$38,700 or \$25.00 per square foot of building area, land included, and the value of the pole building to be \$16,530 or

³ The appraiser utilized comparable sales #1 and #2 solely for the subject's office building and comparable sales #3 through #5 were compared solely to the subject's pole building. (See appraisal pages 42 and 48).

\$5.00 per square foot of building area, land included. The appraiser estimated the market value for the subject property to be \$55,000, rounded, or \$11.33 per square foot of combined building area under the sales comparison approach to value. 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 \$52,000 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 \$24,058. The subject's assessment reflects an estimated market value of \$72,969 or \$15.03 per square foot of total combined 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 four comparable sales located within 10 miles of the subject property. The comparables have lots ranging in size from 7,000 to 149,411 square feet of land area and are improved with 1-story buildings with steel, wood, or vinyl exterior construction ranging in size from 1,500 to 5,600 square feet of building area. The comparables were built from 1984 to 2007. The comparables each feature central air conditioning and heating, with comparable #3 additionally having two detached garages. The sales occurred from May 2018 to June 2020 for prices ranging from \$61,000 to \$310,000 or from \$40.67 to \$69.93 per square foot of total combined building area, including land.

In further support of the assessment, the board of review submitted a memorandum contending that both the pole building and the office building were "recently completely remodeled" including a 960-square foot addition added to the office building. With regard to the appraisal report, the board of review argued that the appraiser erroneously used 30 years as the effective age for all buildings on the property despite the office building being completely renovated in 2017 that should result in an effective age of 2 years. The board of review further argued that as to the appraisal comparable #2, the structures were demolished after the sale and therefore the sale price was essentially for land only; appraisal comparable #3 is comprised of pole buildings that are in very poor condition and 50 years old; appraisal comparable #4 was "not a true sale," although the board of review did not provide any evidence or further explanation as to the reason for this; and appraisal comparable #5 is "a masonry building 60 years old." Based on submitted evidence and arguments, the board of review requested that no change be made to the subject's assessment.

In rebuttal, the appellant argued that the original office building containing 588 square feet of building area was built in 1912 and was renovated from 2003 to 2004 (not in 2017 as the board of review suggests). The 960 square foot addition was added in 2017. Therefore, appellant asserts that the office building would have an effective age of 16 years or older (not 2 years as asserted by the board of review). As to the pole building, the appellant argued that this building was not remodeled but was rather repaired in 2018 due to damaged and rusted metal siding and leaking roof. As to the board of review comparables, the appellant argued that the board of review utilized only comparables considered to be similar to the office building without considering the entirety of the subject property. Moreover, board of review comparables are

commercial properties much newer in age and located in the commercial districts in larger cities with comparables #2 and #4 being three times larger relative to the subject office building.

Conclusion of Law

The appellant contends the market value of the subject 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 four 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 \$52,000 as of January 1, 2019. With respect to the cost approach to value, the appraiser utilized the same percentage of physical and external obsolescence (60% and 25%, respectively) for both the office building and the pole building despite expressly describing the two buildings as varying in age and utility. (See page 26 and 27 of the appraisal report). As a result, this materially alters the calculation of the replacement cost new for the subject improvements and, therefore, the subject's ultimate market value under the cost approach to value. Moreover, as to the sales comparison approach to value, the appraiser utilized two comparable sales (comparables #1 and #2) for the office building, and three different comparable sales (comparables #3, #4, and #5) for the pole building, rather than comparing the subject property as a whole together with all improvements and applying appropriate adjustments as necessary for differences from the subject. The Board finds these inconsistencies problematic in that they undermine the appraiser's opinion of value and diminish the weight the Board gives to the appraiser's value conclusion. Nevertheless, the Board will consider the five comparable sales contained in the appraisal report.

The record contains a total of nine comparable sales, none of which are particularly similar to the subject in all aspects. The Board gave less weight to the appraiser's comparables #1, #4, and #5, along with board of review comparables #1, #2, and #4 as they each contain a single structure consisting of either an office building, a retail store, a storage building, or a warehouse, dissimilar to the subject property which is improved with both an office building and a pole building with differing utilities. In addition, board of review comparable #2 has a lot size that is almost 15 times larger than the subject's site and almost five times larger than the subject's office building. The Board also gave reduced weight to appraiser comparable #5 and board of review comparable #4 as these two comparables appear to be outliers based on their significantly differing sale prices of \$6,500 and \$210,000, respectively, when compared to the remaining sales in the record.

The Board finds the best evidence of the subject's market value to be appraisal comparable #2 and board of review comparable #3 which are most similar to the subject in terms of having multiple buildings of similar design and utility as the subject, although appraisal comparable #2 has a larger site and smaller office building and storage building relative to the subject's improvements. In addition, board of review comparable #3 is older in age and features two

detached garages which combined have a smaller building area when compared to the subject's pole building. This suggests that adjustments are needed to the two best comparables in the record for differences from the subject property in order to make them more equivalent to the subject. These two best comparables in the record sold in July 2017 and June 2020 for prices of \$60,000 and \$61,000 or for \$24.79 and \$18.80 per square foot of total combined building area, land included. The subject's estimated market value of \$72,969 or \$15.03 per square foot of total combined building area is slightly above the two best comparables in the record in terms of overall value and is below the two best comparables on a per square foot of total combined 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 recent renovations, additions and/or repairs to both structures, the Board finds that the appellant did not establish by a preponderance of the evidence that the subject property is 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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