



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

APPELLANT: Gerald N. Polykandriotis
DOCKET NO.: 19-00623.001-R-1
PARCEL NO.: 30-07-16-308-020-0000

The parties of record before the Property Tax Appeal Board are Gerald N. Polykandriotis, the appellant, by Jessica Hill-Magiera, Attorney at Law in Lake Zurich; and the Will 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 **Will County Board of Review** is warranted. The correct assessed valuation of the property is:

LAND: \$2,922
IMPR.: \$13,078
TOTAL: \$16,000

Subject only to the State multiplier as applicable.

Statement of Jurisdiction

The appellant 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 frame exterior construction with 960 square feet of living area. The dwelling was constructed in 1920. Features of the home include a full unfinished basement and central air conditioning. The property has a 2,613 square foot site and is located in Joliet, Joliet Township, Will County.

The appellant contends overvaluation as the basis of the appeal. In support of this argument the appellant submitted information on five comparable sales located from .37 to .64 of a mile from the subject property, one of which is within the subject's neighborhood. The comparables are improved with one-story dwellings that range in size from 864 to 1,012 square feet of living area. The dwellings were built from 1902 to 1924. Each comparable has a full basement and two comparables each have a garage with either 720 or 960 square feet of building area. The appellant did not provide the site size, exterior construction or basement finish, if any, of the

comparables. The properties sold from September 2018 to March 2019 for prices ranging from \$20,000 to \$47,000 or from \$20.24 to \$54.40 per square foot of living area, including land. Based on this evidence, the appellant requested that the subject's assessment be reduced to \$12,015, which would reflect a market value of \$36,049 or \$37.55 per square foot of living area, including land, when using the statutory level of assessment of 33.33%.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$17,853. The subject's assessment reflects a market value of \$53,500 or \$55.73 per square foot of living area, land included, when using the 2019 three-year average median level of assessment for Will County of 33.37% as determined by the Illinois Department of Revenue.

In response to the appeal, the board of review submitted a letter prepared by the Joliet Township Assessor. The assessor argued that only one of the appellant's comparables are in the subject's neighborhood.

In support of its contention of the correct assessment the board of review, through the township assessor, submitted information on four comparable sales located within the subject's neighborhood. The comparables have sites that range in size from 4,356 to 7,405 square feet of land area. The comparables are improved with two-story dwellings of frame or frame and masonry exterior construction that range in size from 768 to 1,068 square feet of living area. The dwellings were built from 1900 to 1993. Two comparables have unfinished partial basements, two comparables have concrete slab foundations, two comparables have central air conditioning, one comparable has a fireplace and three comparables each have a garage that ranges in size from 231 to 506 square feet of building area. The properties sold from June 2018 to September 2019 for prices ranging from \$95,000 to \$135,000 or from \$114.18 to \$126.40 per square foot of living area, including land. As part of its submission, the board of review noted the subject was purchased in February 2017 for a price of \$45,000. Based on this evidence, the board of review requested confirmation of the subject's assessment.

In written rebuttal, counsel for the appellant critiqued the board of review comparables for various differences when compared to the subject. Counsel asserted that none of the properties are comparable to the subject. In a rebuttal grid analysis, counsel reiterated that the appellant's comparable sales #1, #2 and #3, are the best comparable sales in the record and contended the subject's assessment should be reduced.

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 parties submitted nine suggested comparable sales to support their respective positions before the Property Tax Appeal Board. The record also disclosed the subject property was

purchased in February 2017 for a price of \$45,000 which was unrefuted by the appellant. The Board gives less weight to the appellant's comparables #3 and #4, as well as the four comparables provided by the board of review which differ from the subject in age, foundation type and/or they have a garage, unlike the subject.

The Board finds the best evidence of market value to be appellant's comparable sales #1, #2 and #3. Despite the fact that none of these comparables have central air conditioning, a feature the subject enjoys, these comparables are relatively similar to the subject in location, dwelling size, design and age. These most similar comparables sold from September 2018 to January 2019 for prices ranging from \$20,000 to \$47,000 or from \$20.33 to \$54.40 per square foot of living area, including land. The subject's assessment reflects a market value of \$53,500 or \$55.73 per square foot of living area, including land, which is above the range established by the best comparable sales in this record. After giving some consideration to the subject's slightly dated 2017 sale price of \$45,000 and considering adjustments to the comparables for differences from the subject, the Board finds the subject's assessment is excessive. Based on this evidence 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: August 24, 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

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