



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

APPELLANT: Shree Jee Hospitality Inc.
DOCKET NO.: 19-09551.001-C-2
PARCEL NO.: 06-14-351-031

The parties of record before the Property Tax Appeal Board are Shree Jee Hospitality Inc., the appellant, by Robert W. McQuellon III, Attorney at Law, in Peoria; and the Williamson 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 **Williamson** County Board of Review is warranted. The correct assessed valuation of the property is:

LAND: \$270,580
IMPR.: \$326,820
TOTAL: \$597,400

Subject only to the State multiplier as applicable.

Statement of Jurisdiction

The appellant timely filed the appeal from a decision of the Property Tax Appeal Board pursuant to section 16-185 of the Property Tax Code (35 ILCS 200/16-185) 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 two-story, 64-unit hotel of frame construction that was built in 1993. The building contains 40,114 square feet of building area and is situated on a 125,543 square foot site with a land to building ratio of 3.13:1. The subject property is located in West Marion Township, Williamson County.

The appellant contends overvaluation as the basis of the appeal.¹ In support of this argument, the appellant submitted three comparable sales. The comparables consist of two-story or four-story hotels of frame construction that were built from 1977 to 2008. The building range in size from 45,104 to 64,146 square feet of building and contain from 104 to 121 units. The improvements are situated on sites that range in size from 77,537 to 165,528 square feet of land area resulting in

¹The appellant initially requested an evidentiary hearing in this matter. By letter dated June 9, 2022, the appellant requested the Board issue a decision based on the evidence in the record.

land to building ratios from 1.72:1 to 2.58:1. The comparables sold from February 2017 to July 2018 for prices ranging from \$1,600,000 to \$3,400,000 or from \$13,333 to \$28,099 per unit or from \$24.94 to \$68.00 per square foot of building area including land.

The appellant also submitted the 2020 property tax bill for the subject property. The document shows the subject has a final equalized assessment for the 2019 tax year of \$775,500. The subject's assessment reflects an estimated market value of \$2,361,450 or \$36,898 per unit or \$58.57 per square foot of building area including land when applying the 2019 three-year average median level of assessment for Williamson County of 32.84%. Based on this evidence, the appellant requested a reduction in the subject's assessment.

The board of review did not timely submit its "Board of Review Notes on Appeal" or any evidence in support of its assessment of the subject property as required by section 1910.40(a) of the rules of the Property Tax Appeal Board. 86 Ill.Admin.Code §1910.40(a). Therefore, the board of review was found to be in default pursuant to section 1910.69(a) of the rules of the Property Tax Appeal Board. 86 Ill.Admin.Code §1910.69(a).

Conclusion of Law

The taxpayer argued 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). The Board finds the appellant met this burden of proof and a reduction in the subject's assessment is warranted.

The appellant submitted three comparable sales to support the contention that the subject property is overvalued. The Board finds the board of review did not submit any evidence in support of the correct assessment of the subject property or to refute the value evidence submitted by the appellant. 86 Ill.Admin.Code §1910.40(a). Therefore, the board of review was found to be in default pursuant to section 1910.69(a) of the rules of the Property Tax Appeal Board. 86 Ill.Admin.Code §1910.69(a). The comparable sales submitted by the appellant have varying degrees of similarity when compared to the subject and sold from February 2017 to July 2018 for prices ranging from \$1,600,000 to \$3,400,000 or from \$13,333 to \$28,099 per unit or from \$24.94 to \$68.00 per square foot of building area including land. The subject's assessment reflects an estimated market value of \$2,361,450 or \$36,898 per unit or \$58.57 per square foot of building area including land, which falls within the range established by the only comparable sales contained in the record on an overall basis and per square foot basis, but above the range on a per unit basis. After considering adjustments to the comparables for differences when compared to the subject in land area, age, story height and number of units, the Board finds the subject's estimated market value as reflected by its assessment is excessive and a reduction is 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:

August 23, 2022



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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APPELLANT

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COUNTY

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