



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

APPELLANT: Contemporary Dental Properties
DOCKET NO.: 20-07534.001-C-1
PARCEL NO.: 18-12-201-005

The parties of record before the Property Tax Appeal Board are Contemporary Dental Properties, the appellant; and the LaSalle County Board of Review.

Based on the facts and exhibits presented in this matter, the Property Tax Appeal Board hereby finds **An Increase** in the assessment of the property as established by the **LaSalle** County Board of Review is warranted. The correct assessed valuation of the property is:

LAND: \$15,750
IMPR.: \$50,625
TOTAL: \$66,375

Subject only to the State multiplier as applicable.

Statement of Jurisdiction

The appellant timely filed the appeal from a decision of the LaSalle County Board of Review pursuant to section 16-160 of the Property Tax Code (35 ILCS 200/16-160) challenging the assessment for the 2020 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 is improved with a one-story pre-engineered steel constructed building containing 4,050 square feet of building area. The building was constructed in 2010. Features include insulated steel panel sidewalls, a central heating and cooling system, and a bathroom. The building is situated on a 2.53-acre site and is located in LaSalle, LaSalle Township, LaSalle County.

The appellant contends overvaluation as the basis of the appeal. In support of this argument the appellant submitted sales information on three comparable properties improved with one-story buildings of metal exterior construction ranging in size from 6,000 to 12,640 square feet of building area that are situated on sites that contain from .45 to 1.37-acres of land area. The buildings were constructed from 1973 to 1985. No other features or amenities were disclosed. The comparables sold from October 2018 to December 2019 for prices ranging from \$250,000 to \$270,000 or from \$20.60 to \$42.19 per square foot of building area including land. Based on

this evidence, the appellant requested a reduction in the subject's assessment to reflect an estimated market value of approximately \$142,000 or \$35.06 per square foot of building area including land.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$64,136. The subject's assessment reflects an estimated market value of \$192,948 or \$47.64 per square foot of building area including land when applying LaSalle County's 2020 three-year average median level of assessment of 33.24% as determined by the Illinois Department of Revenue.

With regard to the appellant's evidence, the board of review argued appellant's comparable #1 was discarded due to its older age, larger building size and average condition. The board of review argued similar sized buildings will not share the same value and therefore it is necessary to make market derived adjustments for measurable differences between the subject and comparables. The board of review submitted a grid analysis for appellant's comparables #2 and #3 and well as two additional comparable sales. The two additional properties are improved with one-story buildings of pre-engineered steel construction having 4,320 and 4,928 square feet of building area that are situated on sites that contains .99 and .73 of an acre of land area. The buildings were constructed in 1999 and 2009. The comparables sold in June 2018 and April 2018 for prices of \$240,000 and \$200,000 or \$55.56 and \$40.58 per square foot of building area including land, respectively. The board of review adjusted appellant's comparables #2 and #3 and its two comparables for differences to the subject in site size, building size, and condition to arrive at adjusted sale prices ranging from \$50.32 to \$65.01 per square foot of building area including land. After adjustments, the board of review argued the comparables provide a reconciled value for the subject of \$53.50 per square foot of building area including land or an estimated market value of \$216,675. However, for purposes of maintaining uniformity of assessments, the board of review requested an increase to the subject's assessment to \$66,375, which reflects an estimated market value of \$199,125 or \$49.17 per square foot of building area including land.

The appellant did not submit any rebuttal to refute the evidence or value conclusion presented by the board of review.

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). National City Bank of Michigan/Illinois v. Illinois Property Tax Appeal Board, 331 Ill.App.3d 1038 (3rd Dist. 2002). 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. The Board further finds the board of review met this burden of proof and in increase in the subject's assessment is justified.

The parties submitted information on five suggested comparable sales. The Board finds the comparable sales submitted by the appellant are dissimilar to the subject due to their considerably older age when compared to the subject. In addition, comparable #1 is

considerably larger in building size when compared to the subject. Notwithstanding the dissimilarities, the appellant's comparables sold for prices ranging from \$250,000 to \$270,000, considerably more than the subject's estimated market value of \$192,948. The Board finds the comparable sales submitted by the appellant do not support a reduction in the subject's assessment after considering adjustments for differences.

The Board finds the two comparable sales submitted by the board of review are more similar to the subject in location, design, age, building size and features. These comparables sold in June 2018 and April 2018 for prices of \$240,000 and \$200,000 or \$55.56 and \$40.58 per square foot of building area including land, respectively. After applying adjustments to the comparables for differences to the subject in site size, building size, and condition, the board of review calculated adjusted sale prices of \$65.01 and \$50.32 per square foot of building area. The subject's assessment reflects an estimated market value of \$192,948 or \$47.64 per square foot of living area including land, which is less than the most similar raw unadjusted sales on an overall basis and less on a per square foot basis as adjusted by the board of review, which was not refuted by the appellant. Based on this analysis, the Board finds an increase in the subject's assessment is justified commensurate with the board of review request based on a preponderance of the most credible market value evidence contained in the record.

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:

November 22, 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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