



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

APPELLANT: Zachary Hoffman  
DOCKET NO.: 20-07567.001-C-1 through 20-07567.002-C-1  
PARCEL NO.: See Below

The parties of record before the Property Tax Appeal Board are Zachary Hoffman, the appellant; and the Sangamon 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 **Sangamon** County Board of Review is warranted. The correct assessed valuation of the property is:

DOCKET NO	PARCEL NUMBER	LAND	IMPRVMT	TOTAL
20-07567.001-C-1	22-04.0-280-004	39,083	81,364	\$120,447
20-07567.002-C-1	22-04.0-280-006	24,408	0	\$24,408

Subject only to the State multiplier as applicable.

**Statement of Jurisdiction**

The appellant timely filed the appeal from notices of equalization issued by the Sangamon 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 consists of two parcels improved with a commercial building of metal exterior construction with 28,400 square feet of building area. The building was constructed in 1956 and additions were constructed in 1965, 1980, and 1983. Features of the building include 21,996 square feet of warehouse area, office and shop areas, an enclosed loading bay, 2 loading docks, a concrete slab foundation, and wall heights ranging from 8 to 20 feet. The property has a 92,709 square foot site and is located in Springfield, Capital Township, Sangamon County.

The appellant contends overvaluation as the basis of the appeal. In support of this argument the appellant submitted an appraisal estimating the subject property had a market value of \$380,000 as of July 9, 2020. The appraisal was prepared by Gregory L. Kienzler, an Illinois certified general appraiser, for the purpose of a mortgage finance transaction. The appraiser inspected the subject property on July 9, 2020. The appraiser stated that personal property was not included in the value conclusion. The appraiser developed the cost approach and sales comparison

approach, but did not develop the income approach due to the subject's configuration as a single-tenant property.

Under the cost approach to value, the appraiser first developed a value conclusion for the subject's land. The appraiser presented six vacant land sales located in Springfield and ranging in size from 38,830 to 173,804 square feet of land area. These comparables sold from January to November 2019 for prices ranging from \$20,100 to \$158,400 or from \$0.46 to \$2.57 per square foot of land area. The appraiser considered five of these comparables with adjustments for differences from the subject, such as location and utility, to compute adjusted sale prices from \$0.36 to \$0.64 per square foot of land area. Based on the foregoing, the appraiser opined the subject's site had a value of \$64,896 (rounded to \$65,000) or \$0.70 per square foot of land area.

The appraiser next examined costs and indicated economic life under the Marshall Valuation Service for a Good Storage Warehouse Class S, an Average Storage Warehouse Class S, and a Low Cost Storage Warehouse Class S to compute a replacement cost new of \$1,198,000 for the subject building and loading amenities and to compute depreciation of 80% or \$958,000, resulting in a depreciated replacement cost of \$240,000. The appraiser also computed the cost of other improvements, such as parking areas, lighting, and landscaping, at \$90,000 and computed depreciation of 50% or \$45,000, resulting in depreciated site improvements of \$45,000. Based on the foregoing depreciated replacement costs and site value, the appraiser opined a value of \$350,000 for the subject property under the cost approach.

Under the sales comparison approach to value, the appraiser examined thirteen comparable sales located in Springfield. The comparables are improved with one or two commercial buildings for single-tenant or multi-tenant use ranging in size from 10,000 to 22,000 square feet of building area, with office and/or warehouse, retail and warehouse, manufacturing, or other mixed commercial uses. The comparables sold from June 2018 to April 2020 for prices ranging from \$145,000 to \$830,000 or from \$10.34 to \$59.00 per square foot of building area, including land. The appraiser considered seven of these comparables with adjustments for differences from the subject, such location, condition, and utility, to compute adjusted sale prices from \$11.11 to \$16.02 per square foot of building area. Based on the foregoing, the appraiser opined a value for the subject of \$379,400 (rounded to \$380,000) or \$14.00 per square foot of building area, including land.

In reconciling these two approaches to value, the appraiser placed the most weight on the sales comparison approach despite stating the comparables required extensive adjustments, and gave little to no weight to the value conclusion developed under the cost approach.

Based on this evidence the appellant requested a reduction in the subject's assessment.

The board of review submitted two sets of its "Board of Review Notes on Appeal" disclosing the total combined assessment for the subject of \$145,362. The subject's assessment reflects a market value of \$438,762 or \$15.45 per square foot of living area, land included, when using the 2020 three year average median level of assessment for Sangamon County of 33.13% as determined by the Illinois Department of Revenue.

The board of review further indicated in its "Board of Review Notes on Appeal" that the appellant did not file a complaint with the board of review, but filed this appeal directly to the Board following receipt of notices of an equalization factor of 1.0035 for Capital Township which increased the subject's total assessment from \$144,855 to 145,362.

Based on this evidence the board of review requested the subject's total assessment be sustained.

### **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 Board finds the only evidence of market value to be the appellant's appraisal of the subject property with a final value conclusion of \$380,000 as of July 9, 2020. The board of review did not submit any evidence in support of its assessment of the subject property. On this record, the Board has examined the evidence submitted by the appellant and finds that a reduction in the assessed valuation of the subject property is warranted.

However, the record indicates that the appellant did not file a complaint with the board of review but appealed the subject's total assessment directly to the Board based on notices of an equalization factor. Since the appeal was filed after notification of an equalization factor, the amount of relief that the Board can grant is limited. Section 1910.60(a) of the rules of the Board states in part:

If the taxpayer or owner of property files a petition within 30 days after the postmark date of the written notice of the application of final, adopted township equalization factors, the relief the Property Tax Appeal Board may grant is limited to the amount of the increase caused by the application of the township equalization factor. (86 Ill.Admin.Code §1910.60(a)).

Additionally, section 16-180 of the Property Tax Code provides in pertinent part:

Where no complaint has been made to the board of review of the county where the property is located and the appeal is based solely on the effect of an equalization factor assigned to all property or to a class of property by the board of review, the Property Tax Appeal Board may not grant a reduction in the assessment greater than the amount that was added as the result of the equalization factor. (35 ILCS 200/16-180).

These provisions mean that where a taxpayer files an appeal directly to the Board after notice of application of an equalization factor, the Board cannot grant an assessment reduction greater than the amount of increase caused by the equalization factor. Villa Retirement Apartments, Inc. v. Property Tax Appeal Board, 302 Ill.App.3d 745, 753 (4<sup>th</sup> Dist. 1999). Based on a review of the

evidence contained in the record, the Board finds a reduction in the assessment of the subject property is supported, but such reduction is limited to the increase in the assessment caused by the application of the equalization factor.

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.



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Chairman



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Member



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Member



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Member

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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



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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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