



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

APPELLANT: Wesley Kostellic
DOCKET NO.: 20-07603.001-R-1
PARCEL NO.: 18-25-304-044

The parties of record before the Property Tax Appeal Board are Wesley Kostellic, 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 **No Change** 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: \$7,060
IMPR.: \$102,655
TOTAL: \$109,715

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 consists of a 1.5-story dwelling of vinyl siding exterior construction with 3,435 square feet of living area. The dwelling was constructed in 1996. Features of the home include a full basement with finished area, central air conditioning, a fireplace, and a 2-car garage. The property has a 3.39 acre site and is located in Oglesby, LaSalle Township, LaSalle County.

The appellant contends overvaluation as the basis of the appeal. In support of this argument the appellant submitted information on three comparable sales. The parcels range in size from 0.26 of an acre to 2.5 acres of land area and are improved with 2-story homes of vinyl siding, brick and vinyl siding, or dryvit and stone exterior construction ranging in size from 2,618 to 2,862 square feet of living area. The dwellings were built from 1997 to 2008. Each home has a full basement, one of which has finished area, central air conditioning, a fireplace, and a 2-car or a 3-car garage. The comparables sold from April 2018 to October 2019 for prices ranging from

\$263,000 to \$305,000 or from \$98.39 to \$106.87 per square foot of living area, including land. Based on this evidence the appellant requested a reduction in the subject's assessment to \$92,935 which would reflect a market value of \$278,833 or \$81.17 per square foot of living area, land included, when applying 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 \$109,715. The subject's assessment reflects a market value of \$330,069 or \$96.09 per square foot of living area, land included, when using the 2020 three year average median level of assessment for LaSalle County of 33.24% 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 of the appellant's comparables, together with their property record cards and a map depicting the locations of these comparables in relation to the subject. The board of review also submitted a brief contending that the appellant's comparables are 2-story homes compared to the subject 1.5-story home and the appellant's comparables #1 and #2 are in different townships than the subject. Based on this evidence the board of review requested the subject's 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 did not meet this burden of proof and a reduction in the subject's assessment is not warranted.

The only evidence of market value in this record are the appellant's three comparables sales, which are much smaller homes than the subject dwelling. Moreover, two comparables are located in a different township and are much newer homes than the subject and two comparables lack finished basement area which is a feature of the subject. Nonetheless, these comparables sold from April 2018 to October 2019 for prices ranging from \$263,000 to \$305,000 or from \$98.39 to \$106.87 per square foot of living area, including land. The subject's assessment reflects a market value of \$330,039 or \$96.08 per square foot of living area, including land, which is above the range established by the best comparable sales in terms of total market value and below the range on a price per square foot basis, which is logical given that the subject is a larger home than the comparables. Furthermore, the subject's overall value above the range also appears supported given the subject's larger site size, larger dwelling size, and finished basement feature when compared to the only market value comparables in this record. The Board notes the principle of the economies of scale which generally provides that if all other things are equal, as the size of a property increases, the per unit value decreases. In contrast, as the size of a property decreases, the per unit value increases. Based on this evidence and after considering appropriate adjustments to the comparables for differences from the subject, such as dwelling size, age, and basement finish, the Board finds a reduction in the subject's assessment is not 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:

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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COUNTY

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