



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

APPELLANT: James Gribble
DOCKET NO.: 21-05734.001-R-1
PARCEL NO.: 07-01-19-201-002-0000

The parties of record before the Property Tax Appeal Board are James Gribble, the appellant, by attorney Brian S. Maher, of Weis, DuBrock, Doody & Maher in Chicago; and the Will 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 **Will** County Board of Review is warranted. The correct assessed valuation of the property is:

LAND: \$20,051
IMPR.: \$88,679
TOTAL: \$108,730

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 2021 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 split-level dwelling of frame exterior construction with 1,332 square feet of living area. The dwelling was constructed in 1989. Features of the home include a basement with finished area, central air conditioning, a fireplace, a 1,311 square foot garage, and an inground swimming pool.¹ The property has a 43,650 square foot site and is located in Plainfield, Wheatland Township, Will County.

The appellant contends assessment inequity concerning the improvement assessment as the basis of the appeal. In support of this argument the appellant submitted information on three equity comparables located within the same assessment neighborhood code as the subject. The

¹ The parties differ regarding the subject's features and amenities. The Board finds the best evidence of the subject's features and amenities is found in its property record card presented by the board of review, which was not refuted by the appellant in written rebuttal.

comparables are improved with split-level or ranch-style homes of frame exterior construction² ranging in size from 2,170 to 2,414 square feet of living area. The dwellings were built from 1988 to 1993. Each home has a basement, central air conditioning, a fireplace, and a garage ranging in size from 582 to 1,067 square feet of building area. The comparables have improvement assessments ranging from \$84,621 to \$96,503 or from \$38.99 to \$42.40 per square foot of living area. Based on this evidence the appellant requested a reduction in the subject's improvement assessment.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$108,730. The subject property has an improvement assessment of \$88,679 or \$66.57 per square foot of living area. In support of its contention of the correct assessment the board of review submitted information on three equity comparables, which are the same comparables presented by the appellant. The board of review also submitted a letter from the township assessor's office contending the subject has an inground swimming pool and finished basement area unlike the comparables and has a larger garage than the comparables. Based on this evidence the board of review requested confirmation of the subject's assessment.

Conclusion of Law

The appellant contends assessment inequity as the basis of the appeal. When unequal treatment in the assessment process is the basis of the appeal, the inequity of the assessments must be proved by clear and convincing evidence. 86 Ill.Admin.Code §1910.63(e). Proof of unequal treatment in the assessment process should consist of documentation of the assessments for the assessment year in question of not less than three comparable properties showing the similarity, proximity and lack of distinguishing characteristics of the assessment comparables to the subject property. 86 Ill.Admin.Code §1910.65(b). The Board finds the appellant did not meet this burden of proof and a reduction in the subject's assessment is not warranted.

The record contains three equity comparables, which are common to both parties, for the Board's consideration. These comparables are similar to the subject in age, location, and some features, although these comparables are much larger homes with smaller garages than the subject, these comparables lack finished basement area and an inground swimming pool that are features of the subject, and two comparables are ranch-style homes compared to the subject's split-level design, suggesting adjustments to these comparables would be needed to make them more equivalent to the subject. The comparables have improvement assessments ranging from \$84,621 to \$96,503 or from \$38.99 to \$42.40 per square foot of living area. The subject's improvement assessment of \$88,679 or \$66.57 per square foot of living area falls within the range established by the best comparables in terms of total improvement assessment and above the range on a per square foot basis, which is logical given the subject is a significantly smaller home than the comparables. 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.

² Additional details regarding the comparables not reported by the appellant are found in the board of review's evidence and were not refuted by the appellant in written rebuttal.

Based on this record and after considering appropriate adjustments to the comparables for differences when compared to the subject, the Board finds the appellant did not demonstrate with clear and convincing evidence that the subject's improvement was inequitably assessed and 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: July 18, 2023



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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