



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

APPELLANT: FJ Ventures, LLC
DOCKET NO.: 21-05948.001-R-1
PARCEL NO.: 18-15-139-020

The parties of record before the Property Tax Appeal Board are FJ Ventures, LLC, the appellant, by attorney Abby L. Strauss, of Schiller Law P.C. in Chicago; 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: \$2,461
IMPR.: \$20,990
TOTAL: \$23,451

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 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 2-story dwelling of brick construction with 2,050 square feet of living area.¹ The dwelling was constructed in 1916 and is approximately 105 years old. Features of the home include a basement, central air conditioning, and a fireplace. The property has a 4,800 square foot site and is located in LaSalle, LaSalle Township, LaSalle County.

The appellant's appeal is based on overvaluation. In support of this argument the appellant submitted evidence disclosing the subject property was purchased on June 6, 2019 for a price of \$45,000. The appellant completed Section IV – Recent Sale Data of the appeal petition disclosing the sales was not between related parties, the subject was sold though a realtor, the

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

subject was advertised for sale through the Multiple Listing Service, and the sale was not due to foreclosure. In support of the transaction the appellant submitted a copy of a settlement statement indicating a purchase price of \$45,000 and payment of a realtor's commission. Based on this evidence, the appellant requested a reduction in the subject's assessment to reflect the purchase price.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$23,451. The subject's assessment reflects a market value of \$70,508 or \$34.39 per square foot of living area, land included, when using the 2021 three year average median level of assessment for LaSalle County of 33.26% as determined by the Illinois Department of Revenue.

In support of its contention of the correct assessment the board of review submitted information on six comparable sales located in LaSalle. The comparables are improved with 2-story homes of brick, stucco, vinyl siding, or stone and vinyl siding exterior construction ranging in size from 1,540 to 3,048 square feet of living area. The dwellings were built from 1841 to 1930. Each home has a basement and a garage ranging in size from 240 to 480 square feet of building area. Three homes each have central air conditioning and two homes each have a fireplace. Comparable #2 has finished attic area and comparable #3 has a 171 square foot carport. The comparables sold from December 2018 to July 2020 for prices ranging from \$81,000 to \$103,000 or from \$33.79 to \$61.30 per square foot of living area, including land.

The board of review submitted a brief contending that the subject's assessment was revised for the 2021 tax year "for the front porch, land and for equity of similar homes." The board of review submitted photographs of the subject home and indicated the front porch was repaired after the appellant's purchase. The board of review submitted assessor's notes indicating that the subject was re-assessed to reflect uniformity due to a home remodel. The board of review also submitted a copy of the Real Estate Transfer Declaration for the subject's 2019 sale, disclosing this sale was a short sale. Based on this evidence the board of review requested the subject's assessment be sustained.

In written rebuttal, the appellant argued the subject's 2019 sale is better evidence of the subject's market value than the comparables 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). 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 Board finds the best evidence of market value in the record to be the board of review's comparables #1 and #5, which are relatively similar to the subject in dwelling size, age, location, and some features. The Board gave less weight to the board of review's comparables #2, #3, #4, and #6, due to substantial differences from the subject in dwelling size and/or which sold less

proximate in time to the assessment date than other comparables in this record. The two most similar comparables sold for prices of \$85,000 and \$95,000 or for \$41.83 and \$43.36 per square foot of living area, including land, respectively. The subject's assessment reflects a market value of \$70,508 or \$34.39 per square foot of living area, including land, which is below the best comparable sales in this record.

The Board gave less weight to the subject's sale due to the fact that the subject property had repairs and remodeling since the appellant's purchase, which was not refuted by the appellant in written rebuttal. Based on this record, and after considering appropriate adjustments to the best comparables for differences from the subject, the Board finds the subject's assessment is reflective of market value 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

State of Illinois
Property Tax Appeal Board
William G. Stratton Building, Room 402
401 South Spring Street
Springfield, IL 62706-4001

APPELLANT

FJ Ventures, LLC, by attorney:
Abby L. Strauss
Schiller Law P.C.
33 North Dearborn
Suite 1130
Chicago, IL 60602

COUNTY

LaSalle County Board of Review
LaSalle County Government Center
707 Etna Road
Ottawa, IL 61350