

# FINAL ADMINISTRATIVE DECISION ILLINOIS PROPERTY TAX APPEAL BOARD

APPELLANT: Zhiyu Quan

DOCKET NO.: 22-02331.001-R-1 PARCEL NO.: 44-20-17-329-034

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

**LAND:** \$18,260 **IMPR.:** \$145,910 **TOTAL:** \$164,170

Subject only to the State multiplier as applicable.

## **Statement of Jurisdiction**

The appellant timely filed the appeal from a decision of the Champaign County Board of Review pursuant to section 16-160 of the Property Tax Code (35 ILCS 200/16-160) challenging the assessment for the 2022 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 vinyl siding and brick/stone exterior construction with 2,708 square feet of living area. The dwelling was constructed in 2021. Features of the home include a basement with finished area, central air conditioning, a fireplace and a 688 square foot garage. The property has a 9,583 square foot site and is located in Champaign, Champaign Township, Champaign 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 four equity comparables located within 0.5 of a mile from the subject. The comparables are improved with 2-story homes of frame or frame and stucco exterior construction ranging in size from 2,497 to 3,001 square feet of living area. The dwellings were built in 2015 or 2017. Each home has a basement with finished area, central air conditioning, a fireplace, and a garage ranging in size

from 772 to 874 square feet of building area. The comparables have improvement assessments ranging from \$114,920 to \$133,910 or from \$43.03 to \$48.71 per square foot of living area.

The appellant disclosed the subject sold in March 2022 for a price of \$492,500 or \$181.87 per square foot of living area, including land. The appellant submitted a brief contending that the appellant overpaid for the subject due to a need to move quickly to the United States.

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 \$164,170. The subject property has an improvement assessment of \$145,910 or \$53.88 per square foot of living area.

In support of its contention of the correct assessment the board of review submitted information on four equity comparables located within 0.2 of a mile from the subject. The comparables are improved with 1-story or 2-story homes of vinyl siding and stone/brick exterior construction ranging in size from 2,011 to 2,983 square feet of living area. The dwellings were built from 2016 to 2022. Each home has a basement with finished area, central air conditioning, a fireplace, and a garage ranging in size from 678 to 792 square feet of building area. The comparables have improvement assessments ranging from \$116,390 to \$178,660 or from \$57.88 to \$66.64 per square foot of living area.

The board of review submitted a brief arguing that the appellant's contention that a higher price was paid for the subject is not supported. The board of review presented a listing sheet for the subject's sale indicating it was listed for 178 days for a price of \$498,900 and sold for \$492,500 on March 3, 2022.

Based on this evidence, the board of review requested confirmation of the subject's assessment.

#### **Conclusion of Law**

The taxpayer 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 a total of eight equity comparables for the Board's consideration. The Board gives less weight to the board of review's comparable #4, which is a dissimilar 1-story home that substantially smaller home than the subject.

The Board finds the best evidence of assessment equity to be the appellant's comparables and the board of review's comparables #1, #2 and #3, which are relatively similar to the subject in

dwelling size, age, design, location, and features. These comparables have improvement assessments that range from \$114,920 to \$178,660 or from \$43.03 to \$66.64 per square foot of living area. The subject's improvement assessment of \$145,910 or \$53.88 per square foot of living area falls within the range established by the best comparables in this record. Based on this record and after considering appropriate adjustments to the best comparables for differences from 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.

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Member	Member
Dan De Kinin	Swan Bokley
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.

January 16, 2024
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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 <u>PETITION AND EVIDENCE</u> 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**

Zhiyu Quan 4812 Oakdale Dr. Champaign, IL 61822

# **COUNTY**

Champaign County Board of Review Champaign Co Brookens Admin Cntr 1776 East Washington Street Urbana, IL 61802