



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

APPELLANT: Christopher Crandall
DOCKET NO.: 22-02619.001-R-1
PARCEL NO.: 09-35-453-014

The parties of record before the Property Tax Appeal Board are Christopher Crandall, the appellant, by Jessica Hill-Magiera, Attorney at Law in Lake Zurich; and the Kane 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 **Kane** County Board of Review is warranted. The correct assessed valuation of the property is:

LAND: \$33,203
IMPR.: \$91,785
TOTAL: \$124,988

Subject only to the State multiplier as applicable.

Statement of Jurisdiction

The appellant timely filed the appeal from a decision of the Kane 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 split-level dwelling of brick and frame exterior construction with 1,208 square feet of living area. The dwelling was constructed in 1976. Features of the home include a finished lower level, central air conditioning, a fireplace, and a 914 square foot detached garage with 1,014 square feet of building area.¹ The property has an 11,700 square foot site and is located in St. Charles, St. Charles Township, Kane County.

The appellant contends assessment inequity with respect to the improvement as the basis of the appeal. In support of this argument the appellant submitted information on eight equity comparables located within .34 of a mile of the subject. The comparables consist of split-level dwellings of wood siding or aluminum siding exterior construction ranging in size from 1,096 to

¹ Details not reported by the appellant were drawn from the subject's property record card and comparable grid submitted by the board of review, which were not refuted by the appellant in rebuttal.

1,315 square feet of living area. The homes were built from 1967 to 1976. Seven dwellings have central air conditioning, six comparables each have a fireplace, and each comparable has a garage ranging in size from 550 to 1,082 square feet of building area. The comparables have improvement assessments ranging from \$53,042 to \$62,320 or from \$45.37 to \$55.38 per square foot of living area. Based on this evidence, the appellant requested a reduced improvement assessment of \$57,977 or \$47.99 per square foot of living area.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$124,988. The subject property has an improvement assessment of \$91,785 or \$75.98 per square foot of living area.

In support of its contention of the correct assessment the board of review submitted information on seven equity comparables located within .76 of a mile of the subject. The comparables consist of split-level dwellings of frame or brick and frame exterior construction ranging in size from 1,052 to 1,270 square feet of living area. The homes were built from 1963 to 1979. Each dwelling has central air conditioning, a finished lower level, and a garage ranging in size from 331 to 612 square feet of building area. Two comparables each have a fireplace. The comparables have improvement assessments ranging from \$49,466 to \$58,484 or from \$45.80 to \$49.39 per square foot of living area. Based on this evidence, the board of review requested confirmation of the subject's assessment.

In rebuttal, the appellant argued that the board of review's comparables alone support a reduction to 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 parties submitted a total of 15 equity comparables to support their respective positions before the Property Tax Appeal Board. The Board finds the comparables are similar to the subject in age, location, and some features, but differ from the subject in total living area. The comparables have improvement assessments that range from \$53,042 to \$62,320 or from \$45.37 to \$55.38 per square foot of living area. The subject's improvement assessment of \$91,785 or \$41.31 per square foot of living area falls below the range established by the comparables in this record on a per-square-foot basis. While the subject's overall improvement assessment is above the comparables, the Board finds it logical given the subject's greater total living area. Based on this record and after considering 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.



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: April 16, 2024



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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