



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

APPELLANT: Stephanie Woodward
DOCKET NO.: 23-03259.001-R-1
PARCEL NO.: 19-09-35-301-006-0000

The parties of record before the Property Tax Appeal Board are Stephanie Woodward, the appellant, 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: \$40,250
IMPR.: \$172,285
TOTAL: \$212,535

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 2023 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 brick exterior construction with 4,114 square feet of living area. The dwelling was constructed in 2005 and is approximately 18 years old. Features of the home include a full unfinished basement, 3½ bathrooms, central air conditioning and an 878 square foot garage. The property is improved with an inground swimming pool, has a 26,718 square foot site and is located in Frankfort, Frankfort Township, Will County.

The appellant contends overvaluation as the basis of the appeal. In support of this argument, the appellant submitted information on three comparable sales located in the same subdivision as the subject and within .4 of a mile from the subject. The parcels range in size from 15,726 to 18,710 square feet of land area and are each improved with a two-story dwelling of brick, stone and siding exterior construction. The homes are either 3 or 18 years old and range in size from 3,723 to 4,067 square feet of living area. Each comparable has a basement, one of which has finished

area. Features include 4 or 4½ bathrooms, central air conditioning, a fireplace and a garage ranging in size from 665 to 791 square feet of building area. Comparable #3 has an inground swimming pool. The comparables sold in either November 2020 or May 2021 for prices of \$559,000 or \$580,455 or from \$137.45 to \$155.91 per square foot of living area, including land.

Based on this evidence, the appellant requested a reduced total assessment of \$191,666 which would reflect a market value of approximately \$575,000 or \$139.77 per square foot of living area, including land.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$212,535. The subject's assessment reflects a market value of \$637,669 or \$155.00 per square foot of living area, land included, when using the level of assessment of 33.33%.¹

In a letter from Dale Butalla, Supervisor of Assessments, the comparable sales basis of this appeal is acknowledged but the letter proceeds to argue that since like property is to be assessed in a like manner, greater weight should be given to the board of review comparables which demonstrate a greater degree of similarity to the subject than the properties submitted by the appellant.

In support of its contention of the correct assessment, the board of review submitted information on three comparable sales with supporting documentation, where board of review comparable #3 is the same property as appellant's comparable #3. The comparables are each located in the same subdivision as the subject. The parcels range in size from 17,293 to 19,811 square feet of land area and are each improved with either a 1.5-story or a 2-story dwelling of brick exterior construction. The homes are each 16 years old and contain either 3,785 or 3,921 square feet of living area. Each comparable has a basement, one of which has finished area. Features include from 2½ to 4½ bathrooms, central air conditioning and a garage ranging in size from 665 to 798 square feet of building area. Comparable #3 has a fireplace and each comparable has inground swimming pool. The comparables sold from May 2021 to February 2023 for prices ranging from \$580,455 to \$825,000 or from \$155.91 to \$210.40 per square foot of living area, including land. Based on this evidence, the board of review requested confirmation of the subject's assessment.

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.

¹ Procedural rule Sec. 1910.50(c)(1) provides that in all counties other than Cook, the three-year county wide assessment level as certified by the Department of Revenue will be considered. 86 Ill.Admin.Code Sec. 1910.50(c)(1). Prior to the issuance of this decision, the Department of Revenue has yet to publish Table 3 with the figures for tax year 2023.

The parties submitted a total of five comparable sales, one of which was common to both parties, to support their respective positions before the Property Tax Appeal Board. The Board has given reduced weight to the appellant's comparables #1 and #2 which each sold in November 2020, approximately 25 months prior to the lien date at issue herein of January 1, 2024 in addition to these homes each being newer construction at 3 years old as compared to the subject which is approximately 18 years old.

The Board finds the best evidence of market value to be appellant's comparable sale #3 along with the board of review comparable sales, which includes the parties' common comparable. The dwellings are similar in location, age, exterior construction and dwelling size when compared to the subject. Each comparable has a basement, although one necessitates downward adjustment for having finished area which is not a feature of the subject. Likewise, adjustments for differences in fireplace and/or garage size are necessary to make the comparables more equivalent to the subject property. These most similar comparables sold from May 2021 to February 2023 for prices ranging from \$580,455 to \$825,000 or from \$155.91 to \$210.40 per square foot of living area, including land. The subject's assessment reflects a market value of \$637,669 or \$155.00 per square foot of living area, including land, which is within the range established by the best comparable sales in this record in terms of overall market value and below the range on a per-square-foot of living area basis.

Based on this evidence and after considering adjustments to the best comparable sales when compared to the subject, 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: _____

October 15, 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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