



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

APPELLANT: Jacob Coetzer
DOCKET NO.: 23-04523.001-R-1
PARCEL NO.: 20-08-178-003

The parties of record before the Property Tax Appeal Board are Jacob Coetzer, the appellant, by attorney Andrew J. Rukavina of The Tax Appeal Company in Mundelein; and the McHenry 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 **McHenry** County Board of Review is warranted. The correct assessed valuation of the property is:

LAND: \$45,629
IMPR.: \$166,275
TOTAL: \$211,904

Subject only to the State multiplier as applicable.

Statement of Jurisdiction

The appellant timely filed the appeal from a decision of the McHenry 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 frame exterior construction with 3,885 square feet of living area.¹ The dwelling was constructed in 1995 and is approximately 28 years old. Features of the home include a walk-out basement with finished area, central air conditioning, four full bathrooms, one half bathroom, two fireplaces and a garage with 660 square feet of building area. The property has an 86,287 square foot or 1.98-acre site and is located in Cary, Algonquin Township, McHenry County.

The appellant contends overvaluation as the basis of the appeal. In support of this argument, the appellant submitted information on three comparable properties, one of which is on the same street as the subject property. The appellant did not provide the assessment neighborhood codes

¹ The Board finds the best description of the subject is found in the property record card provided by the board of review, which was not refuted by the appellant.

or the proximity of the comparables in relation to the subject. The comparables have sites that range in size from 1 to 2.47 acres of land area. The comparables are improved with two-story dwellings of frame exterior construction ranging in size from 3,316 to 4,608 square feet of living area. The dwellings were built in 1994 or 1998. Each comparable has a basement with finished area, central air conditioning, three or four full bathrooms, two fireplaces and a garage ranging in size from 693 to 812 square feet of building area. The comparables sold in March or May 2021 for prices ranging from \$525,000 to \$555,000 or from \$120.44 to \$158.32 per square foot of living area, including land. The appellant also disclosed the subject property was purchased in May 2022 for \$680,000 or \$175.03 per square foot of living area, including land.

Based on this evidence, the appellant requested the subject's total assessment be reduced to \$163,630, which would reflect a market value of \$490,939 or \$126.37 per square foot of living area, including land, when using the statutory level of assessment of 33.33%.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$211,904. The subject's assessment reflects a market value of \$635,776 or \$163.65 per square foot of living area, land included, when using the statutory level of assessment of 33.33%.²

In the "Notes on Appeal," the board of review argued that the comparable sales submitted by the appellant occurred in early 2021, whereas the board of review comparable sales are more in line with the January 1, 2023 assessment date.

In support of its contention of the correct assessment, the board of review submitted information on three comparable properties that have the same assessment neighborhood code as the subject and are located from .12 to .37 of a mile from the subject property. The board of review's evidence included an additional grid analysis of these same three comparables that was prepared by the township assessor. The comparables have sites that range in size from 44,129 to 44,242 square feet or 1.01 and 1.02 acres of land area, where reportedly comparable #2 backs to a cemetery and comparable #3 has a busy road influence. The comparables are improved with two-story dwellings of frame or frame and brick exterior construction ranging in size from 3,222 to 4,470 square feet of living area. The dwellings were built from 1999 to 2004 and are from 19 to 24 years old. The comparables each have a basement with finished area, one of which is a walk-out and one is a partially exposed basement. Each comparable has central air conditioning, three or four full bathrooms, one or two half bathrooms, one or two fireplaces and a garage ranging in size from 689 to 864 square feet of building area. Comparable #3 has an inground swimming pool. The comparables sold from March 2022 to June 2023 for prices ranging from \$655,000 to \$721,406 or from \$161.39 to \$212.60 per square foot of living area, including land. The board of review also revealed the subject was purchased in May 2022 for \$680,000 or \$175.03 per square foot of living area, including land.

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

² 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 drafting of this decision, the Department of Revenue has yet to publish figures for tax year 2023.

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 record contains six comparable sales for the Board's consideration. Additionally, both parties disclosed the subject property was purchased in May 2022 for \$680,000 or \$175.03 per square foot of living area, including land. The Board has given less weight to the appellant's comparables which sold in 2021, less proximate to the January 1, 2023 assessment date than the sales provided by the board of review and the sale of the subject property. The Board has given reduced weight to board of review comparable #3 as it has an inground swimming pool, unlike the subject.

The Board finds the best evidence of market value to be the sale of the subject property, along with board of review comparables #1 and #2, which sold more proximate in time to the assessment date at issue. The two comparables are similar to the subject in location, age and some features. However, both comparables have smaller site sizes and smaller dwelling sizes when compared to the subject, suggesting upward adjustments would be required to make the comparables more equivalent to the subject. Nevertheless, these two comparables sold in June 2023 and May 2022 for prices of \$685,000 and \$655,000 or for \$212.60 and \$184.87 per square foot of living area, including land, respectively. The subject's assessment reflects a market value of \$635,776 or \$163.65 per square foot of living area, including land, which falls below the two best comparable sales in the record and well below the subject's May 2022 purchase price of \$680,000 or \$175.03 per square foot of living area, including land.³ Based on this record, the Board finds the appellant failed to demonstrate the subject property was overvalued based on a preponderance of the evidence. Therefore, no reduction in the subject's assessment is warranted.

³ This evidence suggests the subject property may be under-assessed. However, the board of review did not request an increase in the subject's assessment.

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: _____

January 21, 2025



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

JACOB COETZER, by attorney:
Andrew J. Rukavina
The Tax Appeal Company
28643 North Sky Crest Drive
Mundelein, IL 60060

COUNTY

McHenry County Board of Review
McHenry County Government Center
2200 N. Seminary Ave.
Woodstock, IL 60098