

FINAL ADMINISTRATIVE DECISION ILLINOIS PROPERTY TAX APPEAL BOARD

APPELLANT: John Laidley DOCKET NO.: 24-01237.001-R-1

PARCEL NO.: 16-05-11-105-004-0000

The parties of record before the Property Tax Appeal Board are John Laidley, the appellant, by attorney Kristin Kladis, of Kladis Law, PC in Chicago; 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: \$22,736 **IMPR.:** \$102,754 **TOTAL:** \$125,490

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 2024 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 one-story dwelling of brick exterior construction with 2,125 square feet of living area. The dwelling was constructed in 1992 and is 32 years old. Features of the home include a basement, central air conditioning, a fireplace, and a 507 square foot garage. The property has a 16,364 square foot site and is located in Homer Glen, Homer Township, Will County.

The appellant's appeal is based on both unequal treatment in the assessment process as well as overvaluation concerning the subject property. In support of these arguments the appellant submitted information on three comparables located within the subject's subdivision. The comparables consist of one-story dwellings of brick exterior construction containing either 1,988 or 2,466 square feet of living area. The homes range in age from 30 to 36 years old. Each dwelling has central air conditioning, a fireplace, a basement, a garage containing either 425 or 470 square feet of building area. The comparables have improvement assessments ranging from

\$103,530 to \$116,702 or from \$45.97 to \$52.08 per square foot of living area. Comparable #1 sold in December 2021 for a price of \$355,000 or \$178.57 per square foot of living area, including land. Based on this evidence, the appellant requested a reduced improvement assessment of \$100,151 or \$47.13 per square foot of living area and a reduced total assessment of \$122,887, for an estimated market value of \$368,698 or \$173.50 per square foot of living area, including land, when applying 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 \$125,490. The subject property has an improvement assessment of \$102,754 or \$48.35 per square foot of living area. The subject's assessment reflects a market value of \$376,508 or \$177.18 per square foot of living area, land included, when using the statutory level of assessment of 33.33%.¹

In support of its contention of the correct assessment the board of review submitted information on eight comparables located from .06 of a mile to 1.78 miles from the subject, five of which are located within the subject's subdivision. The comparables consist of one-story dwellings ranging in size from 1,985 to 2,375 square feet of living area. The dwellings were built from 1989 to 1997. Each dwelling has central air conditioning, a fireplace, a basement, and a garage ranging in size from 425 to 781 square feet of building area. Comparable #8 has an inground swimming pool. The parcels range in size from 11,613 to 20,520 square feet of land area. The comparables have improvement assessments ranging from \$97,553 to \$137,358 or from \$48.79 to \$66.52 per square foot of living area. Four comparables sold from August 2021 to January 2023 for prices ranging from \$386,000 to \$500,000 or from \$194.16 to \$210.53 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 taxpayer contends, in part, 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 eleven equity comparables to support their respective positions before the Property Tax Appeal Board. The Board has given reduced weight to the appellant's comparables #2 and #3, which differ from the subject in dwelling size. The Board also gives less weight to board of review comparables #6, #7, and #8, which are located more than one mile

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 §1910.50(c)(1). Prior to the drafting of this decision, the Department of Revenue has yet to publish figures for tax year 2024.

from the subject and outside of the subject's subdivision. Additionally, board of review comparable #8 has an inground swimming pool, a feature the subject lacks.

The Board finds the best evidence of assessment equity to be the appellant's comparable #1 along with board of review comparables #1 through #5, which are similar to the subject in age, location, dwelling size, and features. These comparables have improvement assessments that range from \$97,553 to \$117,792 or from \$48.79 to \$59.25 per square foot of living area. The subject's improvement assessment of \$102,754 or \$48.35 per square foot of living area falls within the range established by the best comparables in this record overall and below the range on a per-square-foot basis. 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 based on inequity.

The appellant also 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 parties submitted a total of five comparable sales to support their respective positions before the Property Tax Appeal Board. The Board gives less weight to board of review comparables #6, #7, and #8, which are located more than one mile from the subject and outside of the subject's subdivision. Additionally, board of review comparable #8 has an inground swimming pool, a feature the subject lacks.

The Board finds the best evidence of market value to be the appellant's comparable #1 and board of review comparable #5, which are similar to the subject in dwelling size, age, location, and features despite their more remote sale dates. These two most similar comparables sold for prices of \$355,000 and \$386,000 or for \$178.57 and \$194.16 per square foot of living area, including land. The subject's assessment reflects a market value of \$376,508 or \$177.18 per square foot of living area, including land, which is bracketed by the two best comparable sales in this record overall and is below the two best comparables on a price per-square-foot basis. Based on this evidence and after considering adjustments to the best comparables for differences when compared to the subject, the Board finds a reduction in the subject's assessment is not justified on market value grounds.

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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	Chairman
	Robert Stoffen
Member	Member
Dan Dikini	Sarah 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.

Date:	October 21, 2025	
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	Clerk of the Property Tax Appeal Board	

Section 16-185 of the Property Tax Code provides in part:

IMPORTANT NOTICE

"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

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COUNTY

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