



## FINAL ADMINISTRATIVE DECISION ILLINOIS PROPERTY TAX APPEAL BOARD

APPELLANT: Gerald L. & Kendra J. Harris  
DOCKET NO.: 24-04868.001-R-1  
PARCEL NO.: 10-01-117-031-000

The parties of record before the Property Tax Appeal Board are Gerald L. & Kendra J. Harris, the appellants, and the Monroe County Board of Review.

Based on the facts and exhibits presented in this matter, the Property Tax Appeal Board hereby finds **A Reduction** in the assessment of the property as established by the **Monroe** County Board of Review is warranted. The correct assessed valuation of the property is:

**LAND:** \$15,360  
**IMPR.:** \$68,630  
**TOTAL:** \$83,990

Subject only to the State multiplier as applicable.

### **Statement of Jurisdiction**

The appellants timely filed the appeal from a decision of the Monroe 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 single-family dwelling of frame exterior construction with 1,596 square feet of living area. The dwelling was constructed in 1993 and is approximately 31 years old. Features of the home include a full basement with a recreation room, central air conditioning, a fireplace, and a 506 square foot garage. The property has an approximately 17,860 square foot site and is located in Waterloo, T3S R10W Township, Monroe County.

The appellants contend assessment inequity concerning both the land and the improvement assessments as the bases of the appeal. In support of these arguments, the appellants submitted information on three equity comparables located within close proximity to the subject. Each comparable is located on the same street as the subject with similar assigned parcel numbers and within Vanderbrook Estates.

The appellants' comparable parcels range in size from approximately 18,731 to 30,928 square feet of land area. These properties have land assessments ranging from \$15,860 to \$17,220 or from \$0.55 to \$0.85 per square foot of land area. Based on this evidence, the appellants requested a reduced land assessment for the subject of \$11,970 or \$0.67 per square foot of land area.

The comparable parcels presented by the appellants are each improved with either a one-story or a two-story dwelling of frame exterior construction. The homes are 30 to 33 years old and range in size from 1,520 to 1,920 square feet of living area. Each dwelling has a full basement, two of which have finished area. Features include central air conditioning, a fireplace and a garage ranging in size from 576 to 750 square feet of building area. The comparables have improvement assessments ranging from \$59,060 to \$82,560 or from \$32.96 to \$45.70 per square foot of living area. Based on this evidence, the appellants requested a reduced improvement assessment for the subject of \$68,630 or \$43.00 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 \$98,950.<sup>1</sup> The subject property has a land assessment of \$16,250 or \$0.91 per square foot of land area and an improvement assessment of \$82,700 or \$51.82 per square foot of living area.

As part of its submission, the board of review assert the appellants' comparable data does "not conform to the BOR rules of evidence." In this regard, the board of review noted one dwelling differs from the subject in story height and is "also in a different assessment neighborhood." In addition, two of the comparables have "\$0 in Miscellaneous value and are on Override" which was not further explained. Finally, appellants' comparable #2 is asserted to be 'out of range' in dwelling size as the "BOR rules require square footage to be within ±200 square feet of the subject."

In support of its contention of the correct assessment, the board of review submitted information on three equity comparables which the board of review stated are in the same neighborhood as the subject.<sup>2</sup> Lot size data was drawn from attached documentation as this portion of the grid analysis was not completed by the board of review. The parcels range in size from 8,276 to 10,019 square feet of land area with land assessments ranging from \$15,060 to \$15,300 or from \$1.53 to \$1.82 per square foot of land area.

The parcels are each improved with one-story dwellings of frame and masonry exterior construction which are either 25 or 27 years old. The homes range in size from 1,594 to 1,603 square feet of living area. Features include full basements with finished area, central air conditioning, a fireplace, and a garage of either 484 or 552 square feet of building area. The

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<sup>1</sup> The Property Tax Appeal Board takes notice that the Monroe County Board of Review failed to utilize the current PTAB-6 form. In accordance with the Board's procedural rules and guidance issued by the Board, Monroe County is advised to utilize the current Notes on Appeal form(s) available on the Board's website and/or e-filing portal. (86 Admin. Code Sec. 1910.40 and 1910.80).

<sup>2</sup> The subject is located in Township 10 – T3S R10W whereas the board of review comparables are located in either Township 07 – T2S R10W or Township 08 – T2S R9W. Furthermore, supporting documentation set forth legal descriptions depicting the subject in Vanderbrook Estates, while the board of review comparables are located in either Parkwood Estates 3<sup>rd</sup> Addition or the Meadows.

comparables have improvement assessments ranging from \$79,180 to \$85,180 or from \$49.55 to \$53.44 per square foot of living area.

Based on the foregoing evidence and argument, the board of review requested confirmation of the subject's land and improvement assessments.

In rebuttal, the appellants asserted the board of review comparables are "irrelevant" as the appellants have not requested assessment equity with any of these three properties which present an average improvement assessment of \$51.82 per square foot of living area. The appellants reiterate their contention that reducing the subject's improvement assessment to \$43.00 per square foot, as compared to the average improvement assessment of \$40.55 per square foot of the appellants' comparables, would be fair.

### **Conclusion of Law**

Appeals pending before the Property Tax Appeal Board are governed by the provisions of the Illinois Property Tax Code, the procedural rules published by the Property Tax Appeal Board, the Illinois Administrative Code, and applicable court decisions or what would be termed 'case law.' In addition, besides the procedural rule concerning equity evidence found at section 1910.65(c)(4), the Board also publishes guidance above the grid analysis in Sec. V of the appeal petition outlining the necessity for comparable properties to be "similar to the subject in location, size, design, age, and amenities." (86 Ill.Admin.Code §1910.65(c)(4)).

For this appeal, the taxpayers contend assessment inequity concerning both the land and the improvement as the bases 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 appellants met this burden of proof and reductions in the subject's assessments for both land and improvement are warranted.

As depicted in this record, the parties submitted a total of six equity comparables to support their respective positions before the Property Tax Appeal Board. Concerning the land assessment argument, the Board has given reduced weight to the board of review comparables, as these parcels differ location when compared to the subject parcel.

Therefore, as to the land inequity argument, the Board finds the best evidence of land assessment equity consists of the appellants' comparables, which are all located in close proximity to the subject. These comparables have land assessments ranging from \$0.55 to \$0.85 per square foot of land area. The subject's land assessment of \$0.91 per square foot of land area is above the best land equity comparable in the record. In light of the foregoing analysis and giving greatest weight to appellants' comparable #1, the Board finds the subject parcel is inequitably assessed on this evidentiary record and a reduction is warranted.

As to the improvement assessment argument, again the parties submitted a total of six equity comparables to support their respective positions before the Property Tax Appeal Board. The Board has given reduced weight to appellants' comparable #2, due to the difference in dwelling size of approximately 20%, when compared to the subject dwelling.

The Board finds the remaining five improvement equity comparables presented by the parties have varying degrees of similarity to the subject dwelling. In its analysis, the Board has given greatest weight to the appellant's improvement comparables #1 and #3 and the Board has given lesser weight to the board of review improvement comparables, as these comparables as depicted in the record are more distant from the subject dwelling as compared to the appellants' comparables which are most proximate in location to the subject and on the same street as the subject. The appellants' comparables are more similar to the subject in age whereas the board of review comparables are either 4 or 6 years newer than the subject dwelling. Given the age differences, downward adjustments to the board of review comparable would be appropriate to make them more equivalent to the subject in the characteristic of age. On the other hand, the subject dwelling has more finished basement area than the five best improvement equity comparables in the record, indicating upward adjustments to the comparables would be warranted to make them more equivalent to the subject. These five best comparables have improvement assessments ranging from \$59,060 to \$85,180 or from \$32.96 to \$53.44 per square foot of living area. The subject's improvement assessment of \$82,700 or \$51.82 per square foot of living area falls within the broad range established by the five best comparables in this record both in terms of overall improvement assessment and on a per-square-foot of living area basis. However, when giving due consideration to the most similar comparables in location consisting of appellants' comparables #1 and #3 which present improvement assessments of \$32.96 and \$45.70 per square foot of living area, the subject's improvement assessment on a per-square-foot of living area basis is found to be excessive by the Board.

Based on this record and after considering appropriate adjustments to the best improvement equity comparables in the record when compared to the subject, the Board finds the appellants have demonstrated with clear and convincing evidence that the subject's improvement was inequitably assessed, and a reduction is justified in the subject's improvement assessment commensurate with the appellants' request.

In conclusion, the Board finds reductions for lack of assessment equity are warranted both as to the land and improvement assessments of the subject property.

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: \_\_\_\_\_

C E R T I F I C A T I O N

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 20, 2026



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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 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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