



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

APPELLANT: Rolla Godfrey  
DOCKET NO.: 08-00570.001-R-1  
PARCEL NO.: 18-05-403-004

The parties of record before the Property Tax Appeal Board are Rolla Godfrey, the appellant; and the Peoria County Board of Review.

Based on the facts and exhibits presented, the Property Tax Appeal Board hereby finds a reduction in the assessment of the property as established by the Peoria County Board of Review is warranted. The correct assessed valuation of the property is:

**LAND:** \$2,710  
**IMPR.:** \$3,916  
**TOTAL:** \$6,626

Subject only to the State multiplier as applicable.

**ANALYSIS**

The subject property consists of 38 foot X 120 foot lot improved with a two-story, single-family dwelling that is 123 years old. It contains 1,374 square feet of living area. Features include a basement.

The appellant contends that the market value of the subject property is not accurately reflected in the property's assessed valuation as the basis of this appeal.

In support of the market value argument, the appellant submitted an appraisal estimating the subject property had a market value of \$20,000 as of September 10, 2008. The appraiser developed the sales comparison approach to value to estimating a value for the subject of \$20,000. The appraiser utilized three comparable sales that sold from April 2008 through July 2008 for prices that ranged from \$9,000 to \$24,000 or from \$6.42 to \$17.35 per square foot of living area, land included. They are located from 0.11 to 0.41 mile from the subject. The properties are improved with two-story, frame, single-family dwellings. The dwellings 83 or 100+ years old and have 1,383 or 1,402 square feet. After making

adjustments to the properties, the appraiser estimated the subject's market value by the sales approach to be \$20,000 as of September 10, 2008. The appraiser also used the cost approach to determine an indicated value of \$21,703. In reconciliation the appraiser concluded that the market value on September 10, 2008, was \$20,000.

The board of review submitted its "Board of Review Notes on Appeal" wherein the subject's total assessment of \$17,760 was disclosed. The subject's assessment reflects an estimated market value of \$53,607 or \$39.02 per square foot of living area including land using Peoria County's 2008 three-year median level of assessments of 33.13%.

The board of review submitted a total of three comparable sales. The properties were improved with two-story, frame, single-family dwellings. They ranged in age from 90 to 123 years and in size from 1,320 to 1,622 square feet of living area. They are located from 0.09 to 0.99 mile from the subject. The comparables sold from October 2006 to October 2007 for prices that ranged from \$54,900 to \$67,000 or \$33.85 to \$50.76 per square foot of living area including land. As a result of its analysis, the board of review requested confirmation of the subject's assessment.

After considering the evidence and reviewing the record, the Property Tax Appeal Board finds that it has jurisdiction over the parties and the subject matter of this appeal.

When market value is the basis of the appeal the value of the property must be proved by a preponderance of the evidence. National City Bank of Michigan/Illinois v. Illinois Property Tax Appeal Board, 331 Ill.App.3d 1038 (3<sup>rd</sup> Dist. 2002); Winnebago County Board of Review v. Property Tax Appeal Board, 313 Ill.App.3d 179 (2<sup>nd</sup> Dist. 2000). Proof of market value may consist of an appraisal, a recent arm's length sale of the subject property, recent sales of comparable properties, or recent construction costs of the subject property. 86 Ill.Admin.Code Sec. 1910.65(c). Having considered the evidence presented, the Property Tax Appeal Board finds that the evidence indicates a reduction is warranted.

In determining the fair market value of the subject property, the Property Tax Appeal Board finds the best evidence to be the appellant's appraisal. The appellant's appraiser utilized the sales comparison approach to value in determining the subject's market value. The appraiser's cost approach to value for the subject bolstered that conclusion of value. The comparables used by the appraiser were very close in size to the subject and were similar in amenities. Where a comparable's amenities differed from the subject, the appraiser made adjustments to match the comparable to the subject. The board of review's comparable #1 is somewhat larger than the subject, comparable #2 is located nearly a mile away on the other side of an interstate highway and #3 enjoys central air conditioning and a garage the subject lacks.

Therefore, the Property Tax Appeal Board finds that the subject property had a market value of \$20,000 as of January 1, 2008. Since the market value of the subject has been established, the three-year median level of assessment as established by the Illinois Department of Revenue for Peoria County of 33.13% shall apply.

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.

*Ronald R. Cuit*

Chairman

*K. L. Fern*

Member

*Frank A. Huff*

Member

*Mario Morris*

Member

*Shawn R. Lerbis*

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 21, 2011

*Allen Castrovillari*

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 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 the subsequent year 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.

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.