



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

APPELLANT: Lorrie Wu  
DOCKET NO.: 08-00860.001-R-1  
PARCEL NO.: 09-20-426-013

The parties of record before the Property Tax Appeal Board are Lorrie Wu, 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:** \$27,364  
**IMPR.:** \$68,403  
**TOTAL:** \$95,767

Subject only to the State multiplier as applicable.

**ANALYSIS**

The subject property consists of a 1.8-acre parcel improved with an eighteen year-old, 1.5-story brick and frame dwelling that contains 2,873 square foot of living area. Features of the home include central air conditioning, a fireplace, a 484 square foot garage and a full basement. The subject is located in Dunlap, Medina Township, Peoria County.

The appellant submitted evidence to the Property Tax Appeal Board claiming overvaluation and assessment inequity regarding the subject's land and improvements as the bases of the appeal. In support of the overvaluation argument, the appellant submitted Multiple Listing Service data sheets and a grid analysis of four comparable properties located near the subject. The comparables have lots that range in size from 0.93 acre to approximately 2.0 acres and are improved with 1.5-story brick and frame dwellings that were built between 1985 and 1993 and range in size from 3,100 to 4,905 square feet of living area. Features of the comparables include central air conditioning, one or two fireplaces, two-car or three-car garages and full or partial basements that have finished areas ranging from 509 to 1,850

square feet. Comparables #2 and #3 were reported to have walkout basements. The appellant's comparables were reported to have sold between February and October 2007 for prices ranging from \$300,000 to \$409,900 or from \$81.55 to \$116.71 per square foot of living area including land.

The appellant also submitted assessment data on the same four comparables used to support the inequity contention. These properties have improvement assessments ranging from \$83,110 to \$112,020 or from \$22.07 to \$31.89 per square foot of living area. The subject has an improvement assessment of \$86,190 or \$30.00 per square foot of living area.

The comparables have lots that range in size from 0.93-acre to approximately 2.0 acres and have land assessments ranging from \$19,600 to \$24,490 or from \$9,800 to \$21,120 per acre. The subject has a land assessment of \$29,220 or \$16,233 per acre. The appellant also submitted a letter claiming a water loss in 2003 caused "extensive damage and mold" to the subject dwelling and further claimed the subject lot is "literally washing away" from erosion. The appellant submitted no credible market evidence documenting any loss in value of the subject's lot or improvements in support of these aspects of the appeal. Based on this evidence the appellant requested the subject's land assessment be reduced to \$25,000, its improvement assessment be reduced to \$67,115 and its total assessment be reduced to \$92,115, reflecting a market value of approximately \$276,345 or \$96.19 per square foot of living area including land.

The board of review submitted its "Board of Review Notes on Appeal" wherein the subject's total assessment of \$115,410 was disclosed. The subject has an estimated market value of approximately \$348,355 or \$121.25 per square foot of living area including land, as reflected by its assessment and the Peoria County 2008 three-year median level of assessments of 33.13%.

In support of the subject's estimated market value as reflected by its assessment, the board of review submitted sales data on three comparables located in the same neighborhood code as the subject as determined by the township assessor. The comparables consist of 1.5-story frame dwellings that were built in 1987 or 1989 and range in size from 1,638 to 3,501 square feet of living area. Features of the comparables include central air conditioning, garages that contain from 440 to 814 square foot of building area and full or partial unfinished basements. Two comparables have a fireplace. The comparables sold between April and September 2007 for prices ranging from \$185,000 to \$335,000 or from \$85.01 to \$112.94 per square foot of living area including land.

In support of the subject's improvement assessment, the board of review submitted assessment data on the same three comparables used to support the subject's estimated market value. These properties have improvement assessments ranging from \$47,530 to \$86,880 or from \$24.82 to \$29.02 per square foot of living area.

In support of the subject's land assessment, the board of review submitted land assessments for the same three comparables used to support the subject's improvement assessment. While the board of review's grid did not depict the lot sizes of the comparables, the property record cards indicate these properties had lot sizes ranging from approximately 9,750 square feet (0.22 acre) to 1.68 acre. The board of review's comparables had land assessments ranging from \$9,610 to \$25,540 or \$15,202 to \$43,682 per acre. The board of review also submitted a proposed stipulation in which the board offered to reduce the subject's assessment to \$109,640. Based on this evidence, the board of review requested the subject's assessment be confirmed.

After reviewing the record and considering the evidence, the Property Tax Appeal Board finds that it has jurisdiction over the parties and the subject matter of this appeal. The Property Tax Appeal Board further finds that a reduction in the subject property's assessment is warranted.

The appellant first 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. National City Bank of Michigan/Illinois v. Illinois Property Tax Appeal Board, 331 Ill.App.3d 1038 (3<sup>rd</sup> Dist. 2002). The Board finds the appellant met this burden of proof and a reduction in the subject's assessment is warranted.

The Board finds the parties submitted seven comparable sales in support of their respective arguments. The Board gave less weight to the appellant's comparables #1, #2 and #3 and the board of review's comparables #1 and #3 because they differed significantly in living area when compared to the subject. The Board finds the appellant's comparable #4 and the board of review's comparable #2 were similar to the subject in design, age, size and most features. These properties sold for prices of \$85.01 and \$97.78 per square foot of living area including land. The subject's estimated market value as reflected by its assessment of \$121.25 per square foot of living area including land is not supported by the most similar comparables in this record. Therefore, the Board finds the evidence in the record supports a reduction in the subject's assessment.

The appellant also argued inequity regarding the subject's land and improvement assessments. After considering the reduction granted pursuant to the appellant's successful overvaluation argument, the Property Tax Appeal Board finds the subject's land and improvement assessments are supported by the best comparables in the record and no further reduction on the basis of assessment inequity is warranted.

In conclusion, the Board finds the appellant has overcome her burden of proving overvaluation by a preponderance of the

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evidence and the subject's assessment as determined by the board of review is incorrect and a reduction is warranted.

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: March 18, 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.