



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

APPELLANT: Garry D. Cochran  
DOCKET NO.: 09-05552.001-R-1  
PARCEL NO.: 09-19-06-208-004

The parties of record before the Property Tax Appeal Board are Garry D. Cochran, the appellant; and the Edgar County Board of Review.

Based on the facts and exhibits presented, the Property Tax Appeal Board hereby finds no change in the assessment of the property as established by the **Edgar** County Board of Review is warranted. The correct assessed valuation of the property is:

**LAND:** \$7,330  
**IMPR.:** \$73,160  
**TOTAL:** \$80,490

Subject only to the State multiplier as applicable.

**ANALYSIS**

The subject property consists of a 0.66-acre parcel improved with a five year-old, one-story style frame dwelling that contains 2,696 square feet of living area. Features of the home include central air conditioning, a full unfinished basement and a three-car garage. The subject is located in Paris, Paris Township, Edgar County.

The appellant submitted evidence to the Property Tax Appeal Board claiming overvaluation as the basis of the appeal. In support of this argument, the appellant submitted an appraisal of the subject property wherein the appraiser used the cost and sales comparison approaches to estimate the subject's market value at \$234,000 as of the report's effective date of May 28, 2010. In the cost approach, the appraiser estimated the subject's site value at \$25,000, which was its 2003 purchase price, based on "lots in subdivisions on the edge of town ranging from \$13,000 to \$35,000." Based on local market cost data, the appraiser estimated the subject dwelling's replacement cost new at \$283,062. Depreciation of \$55,887 was subtracted from this figure, resulting in a depreciated cost of improvements of

\$227,175. After adding back the lot value, the appraiser estimated the subject's value by the cost approach at \$252,175.

In the sales comparison approach, the appraiser examined eight comparable properties located 0.14 mile to 2.94 miles from the subject. The comparables consist of six, ranch style dwellings and two, two-story dwellings. The comparables have frame, brick, frame and brick, or frame and stone exteriors, range in age from 7 to 45 years and range in size from 1,617 to 2,550 square feet of living area. Features of the comparables include central air conditioning and two-car or three-car garages. Seven comparables have a fireplace and three have basements that are partially finished. Five comparables have crawl-space foundations. The comparables sold between March 2007 and April 2010 for prices ranging from \$129,900 to \$260,000 or from \$73.64 to \$115.86 per square foot of living area including land. The appraiser adjusted the comparables' sales prices for differences which compared to the subject, such as repairs, site, room count, living area, basement and basement finish and garage size. After adjustments, the comparables had adjusted sales prices ranging from \$186,400 to \$246,100 or from \$88.69 to \$115.28 per square foot of living area including land. The appraiser estimated the subject had a market value under the sales comparison approach of \$234,000. In reconciling the two approaches to value, the appraiser gave more credence to the sales comparison approach and estimated the subject property had a market value of \$234,000 as of May 28, 2010. Based on this evidence the appellant requested the subject's total assessment be reduced to \$78,000, reflecting a market value of \$234,000 or \$86.80 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 \$80,490 was disclosed. The subject has an estimated market value of approximately \$238,348 or \$88.41 per square foot of living area including land, as reflected by its assessment and the Edgar County 2009 three-year median level of assessments of 33.77%.

In support of the subject's assessment, the board of review submitted a letter, property record cards and a grid analysis of six comparable properties located 0.16 mile to 4.82 miles from the subject. The comparables consist of one-story, one and one-half-story, or one-story with finished attic dwellings that range in age from 3 to 14 years and range in size from 1,732 to 2,993 square feet of living area. The comparables are of vinyl, frame, or brick and vinyl exterior construction and have features that include central air conditioning and garages that contain from 576 to 1,200 square feet of building area, one of which has an attic. Three comparables have one or two fireplaces and four have full basements, three of which have finished areas ranging from 936 to 1,961 square feet. The comparables sold between December 2008 and October 2010 for prices ranging from \$230,000 to \$354,525 or from \$90.63 to \$154.16 per square foot of living area including land. The board of review's letter described the various locational settings of the comparables, comparing and

contrasting them to the subject, which was described as "on a dead end street close to a golf course in a very quiet neighborhood."

In rebuttal, the appellant challenged the board of review's initial reporting of the subject's lot size and some features.

The board of review responded to the appellant's rebuttal, wherein the board acknowledged the subject lot is 0.66 acre and has no basement finish.

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 no reduction in the subject property's assessment is warranted.

The appellant contends overvaluation as the basis of the appeal. When market value is the basis of the appeal, the value 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). After analyzing the market evidence submitted, the Board finds the appellant has failed to meet this burden.

The Board finds the appellant submitted an appraisal of the subject property with a market value estimate of \$234,000, as of the report's effective date of May 28, 2010, while the board of review submitted six comparable sales. The Board gave less weight to the value conclusion in the appellant's appraisal because the effective date of the report was May 28, 2010, approximately 17 months after the subject's January 1, 2009 assessment date at issue in this appeal. The Board will, however, consider the raw comparable sales data in the appellant's appraisal, as well as the comparable sales submitted by the board of review. The Board gave less weight to the appellant's appraisal comparables #2, #3, #4, #5 and #6 and the board of review's comparables #1, #4, #5 and #6 because these homes differed significantly in age, living area, or design when compared to the subject. The Board also gave less weight to the appellant's comparables #7 and #8 and the board of review's comparable #3 because their crawl space foundations differed from the subject's full basement. The Board finds the appellant's comparable #1 and the board of review's comparable #2 were similar to the subject in terms of design, living area and most features and sold for prices of \$260,000 and \$354,525 or \$115.86 and \$118.46 per square foot of living area including land. The subject's estimated market value as reflected by its assessment of \$238,348 or \$88.41 per square foot of living area including land is supported by the two most representative comparables in this record. As a final note, the Board finds the subject's per square foot value as reflected by the assessment of \$88.41 falls below all eight of the appellant's appraisal comparables after the appraiser made his adjustments.

In conclusion, the Board finds the appellant has failed to prove overvaluation by a preponderance of the evidence and the subject's assessment as determined by the board of review is correct and no 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.

*Donald R. Cuit*

Chairman

*K. L. Fern*

Member

*Frank A. Huff*

Member

*Mario Morris*

Member

*J.R.*

Acting 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: December 23, 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.