

City of Detroit – Board of Review

Coleman A. Young Municipal Center

2 Woodward Ave., Suite 824

Detroit, MI 48226

**Re:** Protest of Property Tax Assessment

Homeowner: {{ owner }}

Parcel Identification: {{ pin }}  
{{ address }}

Board of Review:

This protest is submitted on behalf of {{ formal\_owner }} by [HIS/HER] authorized representative, the Property Tax Appeal Project (“PTAP”) at the Institute for Law and Organizing. (See attached: Representation Agreement)

**Summary of the Argument**

* Current assessed value: {{ target.assessed\_value}}
* {%p if has\_primary %}
* Comparable sales: **The assessed value should be no more than {{ contention\_sev }}** based on the most similar recent sale of a comparable property: {{ primary.street\_number }} {{ primary.street\_name }}.
* {%p endif %}
* {%p if schedule\_incorrect %}
* Yearly depreciation: The assessed value of {{ address }} should be further reduced under the 1% yearly depreciation guideline in accordance with a correct **Effective Age of {{ capped\_age }}**.
* {%p endif %}
* {%p if show\_depreciation %}
* Condition of the home: If the City of Detroit deviates from the 1% yearly depreciation guideline, the assessed value of {{ address }} should be reduced in accordance with a change in **Effective Age to {{ new\_effective\_age }}**.
* {%p endif %}
* {%p if economic\_obsolescence %}
* Economic obsolescence: The assessed value of {{ address }} should be **further reduced** as a result of impairment in its utility and/or desirability caused by factors outside the property’s boundaries.
* {%p endif %}

Here is the relevant data on {{ formal\_owner }}’s property:

|  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- |
| **Address** | **Baths** | **Square Footage** | **Year Built** | **Exterior** | **Stories** | **Neighb.** |
| {{target.street\_number}} {{target .street\_name}} | {{ target.baths }} | {{ target.total\_sq\_ft }} | {{ target.year\_built}} | {{ target.exterior\_display}} | {{ target.stories }} | {{ target.neighborhood }} |

{% if has\_primary %}

Here is the relevant data on most similar property sold in the target property’s neighborhood during the last 24 months: ({{primary.street\_number}} {{primary.street\_name}}). This property sold for {{primary\_sale\_price}} on {{ primary\_sale\_date }}:

|  |  |  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- | --- | --- |
| **Address** | **Dist.** | **Sale Price** | **Sale Date** | **Baths** | **Square Footage** | **Year Built** | **Exterior** | **Stories** | **Neighb.** |
| {{primary.street\_number}} {{primary.street\_name}} | {{ primary\_distance }} | {{ primary.sale\_price }} | {{ primary.sale\_date }} | {{ primary.baths }} | {{ primary.total\_sq\_ft }} | {{ primary.year\_built}} | {{ primary.exterior\_display}} | {{ primary.stories }} | {{ primary.neighborhood }} |

The City of Detroit assigned {{ address }} an assessed value of {{ target.assessed\_value}}. This means that the Assessment Division calculates that this property has a fair market value of {{ current\_faircash }}. Const 1963, art 9, § 3 (requiring that municipalities assess property at no more than 50 percent of their true cash value).

This assessment is inaccurate. The Michigan Constitution requires that properties by assessed at no more than 50% of their market value. Based on the above comparable, the true market value of {{ address }} is {{ contention\_faircash }} and the assessed value should be no more than {{ contention\_sev }}.

To calculate {{ address }}’s market value, the most similar comparable property was selected. The sale price of this property should be the basis for calculating the assessed value of the subject property. The sales approach, which determines a property’s value by the sales of similar properties, is a more precise way to determine property values than the assessor’s cost to construct approach. The cost approach is a complicated multi-step approach that includes potential for error at each of the following steps: when depreciating the cost of the building, when localizing costs using the county multiplier, when drawing Economic Condition Factor (“ECF”) zones, and when localizing costs using ECF ratios. The sales approach avoids these pitfalls by evaluating how market forces are acting upon actual properties in using sales prices as the basis for valuation.

{% endif %}{% if has\_comparables %}

These comparable properties were selected from all the residential property sales marked arms-length by the Detroit Assessment Division between April 1, 2021 to March 31, 2023. All comparable properties have the same exterior type as the subject property. The comparable properties also have approximately the same number of rooms, square feet, and are a similar age as the subject property. In support of the argument that the assessed value of {{ address }} should be reduced, the comparable properties below had an average fair market value of {{ contention\_faircash2 }}.

Here is the relevant data on the comparable properties:

|  |  |  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- | --- | --- |
| **Address** | **Dist.** | **Sale Price** | **Sale Date** | **Baths** | **Square Footage** | **Year Built** | **Exterior** | **Stories** | **Neighb.** |
| {%tr for item in comparables %} | | | | | | | | | |
| {{ item.address }} | {{ item.distance }} | {{ item.sale\_price }} | {{ item.sale\_date }} | {{ item.baths }} | {{ item.total\_sq\_ft }} | {{ item.year\_built}} | {{ item.exterior\_display}} | {{ item.stories }} | {{ item.neighborhood }} |
| {%tr endfor %} | | | | | | | | | |

{% endif %}

**Incorrect Depreciation of {{** address **}}**

**{% if schedule\_incorrect %}**

The City of Detroit has incorrectly depreciated {{ address}}. The City’s failure to accurately depreciate the property is based on the depreciation standards outlined in Volume I of the 2014 Assessor’s Manual. {{ address }} has an Actual Age of {{ target.age }} but the City assigned an Effective Age of {{ target.effective\_age }}. Therefore, the City claimed that the property was {{ percent\_good }}% good for purposes of determining the property’s depreciated cost and True Cash Value. According to the standard 1% value decrease per year, the City should have assigned the property an Effective Age of {{ capped\_age }} with a percent good of {{ capped\_percent\_good }}%. The City is only allowed to deviate from the 1% yearly depreciation for “exceptional maintenance, remodeling, replacements and additions,” including exceptionally poor maintenance. The property did not experience any such improvement that would warrant a deviation from the 1% yearly depreciation. As a result, the City incorrectly depreciated and assessed the property. Therefore, we are seeking a reduction of the assessed value of {{ address }}, in accordance with a change in Effective Age to {{ capped\_age }}.

{% endif %}

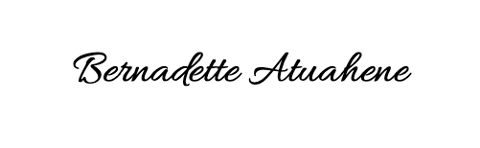
**{% if show\_depreciation %}**

The City of Detroit has also incorrectly depreciated {{ address }} by determining its Effective Age as {{ effective\_age }} with a Corresponding Percent Condition of {{ percent\_good }} to determine that the property’s condition rating was “{{ assessor\_damage\_level }}”. Due to {{ address }}’s condition evidenced in Appendix 1 and 2 below, the City should have rated the condition of the home as “{{ damage\_level }},” with a Corresponding Percent Condition of {{ damage\_midpoint }}. As a result, the assessed value of {{ address }} was similarly improperly inflated pursuant to the depreciation standards outlined in Volume I of the 2014 Assessor’s Manual. Therefore, if the City of Detroit deviates from the 1% yearly depreciation guideline, we are seeking a reduction of the assessed value of {{ address }}, in accordance with a change in Effective Age to {{ new\_effective\_age }}.

{% endif %}{% if economic\_obsolescence %}

The City of Detroit should also reduce the assessed value of {{ address }} because of its economic obsolescence. Due to the description provided in Appendix 1 of the property’s surrounding conditions, the assessed value of {{ address }} should be further reduced as a result of impairment in its utility and/or desirability caused by factors outside the property’s boundaries.

{% endif %}



Sincerely,

\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

**Institute for Law and Organizing**

Executive Director

**{% if economic\_obsolescence or show\_depreciation %}**

**Appendix 1**

The damage to {{ address }} is described as the following:

{{ damage }}

**{% if show\_depreciation and has\_images %}**

**Appendix 2**

Photos of the damage described in Appendix 1 are below.

{% for image in images %}

{{ image }}

{% endfor %}

{% endif %}

**{% endif %}**