



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

APPELLANT: Ronald Pierson  
DOCKET NO.: 10-20692.001-R-1  
PARCEL NO.: 23-32-103-004-0000

The parties of record before the Property Tax Appeal Board are Ronald Pierson, the appellant, by attorney Arnold G. Siegel of Siegel & Callahan, P.C. in Chicago; and the Cook 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 Cook County Board of Review is warranted. The correct assessed valuation of the property is:

**LAND:** \$11,467  
**IMPR:** \$121,108  
**TOTAL:** \$132,575

Subject only to the State multiplier as applicable.

**Statement of Jurisdiction**

The appellant timely filed the appeal from a decision of the Cook County Board of Review pursuant to section 16-160 of the Property Tax Code (35 ILCS 200/16-160) challenging the assessment for the 2010 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 two-story dwelling with 6,402 square feet of living area<sup>1</sup> of masonry construction. The dwelling is 15 years old. Features of the home include a full finished basement, central air conditioning, two fireplaces and a four-car garage. The property has a 50,965 square foot site and is located in Palos Park, Palos Township, Cook County. The subject is classified as a class 2-09 property under the Cook County Real Property Assessment Classification Ordinance.

The appellant contends overvaluation as the basis of the appeal. In support of this argument the appellant submitted an appraisal estimating the subject property had a market value of \$1,200,000 as of January 10, 2009.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$132,575. The subject's assessment reflects a market value of \$1,325,750 or \$207.08 per square foot of living area, including land, when using 6,402 square feet of living area and applying the Cook County level of assessment for class 2 property of 10%.

In support of its contention of the correct assessment the board of review submitted information on four comparable sales.

### **Conclusion of Law**

The appellant 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. 86 Ill.Admin.Code §1910.63(e). Proof of market value may consist of an appraisal of the subject property, a recent sale, comparable sales or construction costs. 86 Ill.Admin.Code §1910.65(c). The Board finds the appellant did not meet this burden of proof and a reduction in the subject's assessment is not warranted.

The Board finds the best evidence of market value to be the appellant's appraisal's sales #1, #4 and the listing #6, as well as board of review sales #1 and #2. These comparables had varying degrees of similarity to the subject and also sold or

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<sup>1</sup> The parties differ as to the size of the subject dwelling. The board of review reports the dwelling as having 6,402 square feet of living area and submitted the subject's property characteristic sheet as support. The appellant's appraiser reports the dwelling as having 5,303 square feet of living area, but did not submit a sketch in the appraisal as support.

were listed most proximate to the January 1, 2010 assessment date. The Board gave less weight to the appellant's appraisal's value conclusion due to its effective date occurring 11 months prior to the assessment date without adjusting for time. The Board gave less weight to the appellant's appraisal's sales #2 and #3 due to their sale dates occurring greater than 26 months prior to the January 1, 2010 assessment date. The Board gave less weight to the appellant's appraisal's sale #5 due to its significantly larger size, when compared to the subject. The Board also gave less weight to the board of review sales #3 and #4 due to their sale dates occurring greater than 31 months prior to the January 1, 2010 assessment date. The best comparables sold from June 2008 to February 2009 for prices ranging from \$1,050,000 to \$2,740,000 or from \$201.92 to \$499.20 per square foot of living area, including land. The subject's assessment reflects a market value of \$1,325,750 or \$207.08 per square foot of living area, including land, which is within the range established by the best comparable sales in the record. Furthermore, the appellant's appraisal's listing #6 had an asking price of \$1,340,000 or \$206.15 per square foot of living area including land, which supports the subject's assessment. Based on this evidence the Board finds a reduction in the subject's assessment is not justified.

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.

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Chairman

*K. L. Fan*

*Klaus Albrecht*

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Member

\_\_\_\_\_  
Member

*JR*

*Jerry White*

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Member

\_\_\_\_\_  
Acting Member

*Robert Steffen*

\_\_\_\_\_  
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: November 20, 2015

*A. Proctor*

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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 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.