



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

APPELLANT: Gary Huiner  
DOCKET NO.: 12-20760.001-R-1  
PARCEL NO.: 28-30-107-001-0000

The parties of record before the Property Tax Appeal Board are Gary Huiner, the appellant, by attorney Julie Realmuto 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:** \$10,888  
**IMPR.:** \$15,993  
**TOTAL:** \$26,881

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) contesting the assessment for the 2012 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 is improved with a one-story dwelling of masonry construction with 1,675 square feet of living area. The dwelling is approximately 28 years old. Features of the home include a full unfinished basement, central air conditioning, one fireplace and an attached 2.5-car garage. The property has a 33,503 square foot site and is located in Tinley Park, Bremen Township, Cook County. The subject is classified as a class 2-03 property under the Cook County Real Property Assessment Classification Ordinance.

The appellant contends assessment inequity with respect to the improvement assessment as the basis of the appeal. In support of this argument the appellant completed Section V - Comparable

Sales/Assessment Equity Grid Analysis using four purported comparables. However, the comparables #1 and #2 had the same address, consecutive parcel numbers (PINs), the same improvement description and photographs for each PIN depict the same dwelling. Furthermore, comparables #3 and #4 have consecutive PINs, the same improvement description and photographs for each PIN depict the same dwelling. The Board finds that the appellant's evidence actually includes two comparables with the improvement assessment allocated between the PINs. The two comparables are improved with one-story dwellings of masonry construction that have 1,260 and 1,418 square feet of living area, respectively. The dwellings were 40 and 33 years old. One comparable has a basement, one comparable has central air conditioning and one comparable has a fireplace. The comparables have improvement assessments of \$16,274 and \$18,846 or \$12.92 and \$13.29 per square foot of living area, respectively. The appellant requested an improvement assessment of \$10,988.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$26,881. The subject property has an improvement assessment of \$15,993 or \$9.55 per square foot of living area. In support of its contention of the correct assessment the board of review submitted information on four equity comparables improved with two 1-story dwellings and two 1.5-story dwellings of frame or masonry construction that ranged in size from 1,402 to 1,795 square feet of living area. The dwellings ranged in age from 57 to 62 years old. Each comparable had a full unfinished basement, central air conditioning and 1-car or a 2-car garage. One comparable had a fireplace. The comparables had improvement assessments ranging from \$15,013 to \$17,999 or from \$10.03 to \$11.27 per square foot of living area.

#### **Conclusion of Law**

The taxpayer contends assessment inequity as the basis of the appeal. When unequal treatment in the assessment process is the basis of the appeal, the inequity of the assessments must be proved by clear and convincing evidence. 86 Ill.Admin.Code §1910.63(e). Proof of unequal treatment in the assessment process should consist of documentation of the assessments for the assessment year in question of not less than three comparable properties showing the similarity, proximity and lack of distinguishing characteristics of the assessment comparables to the subject property. 86 Ill.Admin.Code §1910.65(b). 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 assessment equity to be the two comparables submitted by the appellant and comparables #1 and #3 submitted by the board of review. These comparables had improvement assessments that ranged from \$10.03 to \$13.29 per square foot of living area. The subject's improvement assessment of \$9.55 per square foot of living area falls below the range established by the best comparables in this record. Less weight

was given board of review comparables #2 and #4 due to differences from the subject in style. Based on this record the Board finds the appellant did not demonstrate with clear and convincing evidence that the subject's improvement was inequitably assessed and 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



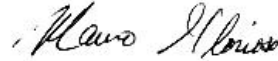
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Member



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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: March 18, 2016



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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.