



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

APPELLANT: MetroBank  
DOCKET NO.: 12-25249.001-R-1 through 12-25249.004-R-1  
PARCEL NO.: See Below

The parties of record before the Property Tax Appeal Board are MetroBank, the appellant, by attorney Brian P. Liston, of the Law Offices of Liston & Tsantilis, P.C. in Chicago; and the Cook County Board of Review.

Based on the facts and exhibits presented in this matter, the Property Tax Appeal Board hereby finds **A Reduction** 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:

DOCKET NO	PARCEL NUMBER	LAND	IMPRVMT	TOTAL
12-25249.001-R-1	25-02-100-046-0000	555	0	\$555
12-25249.002-R-1	25-02-100-047-0000	652	0	\$652
12-25249.003-R-1	25-02-100-048-0000	679	0	\$679
12-25249.004-R-1	25-02-100-049-0000	843	0	\$843

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 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 consists of four vacant parcels. The lots range in size from 2,467 to 3,750 square feet of land area and are located in Chicago, Hyde Park Township, Cook County. The subject lots are classified as class 1-00 vacant land under the Cook County Real Property Assessment Classification Ordinance.

The appellant contends assessment inequity as the basis of the appeal. In support of this argument the appellant submitted information on four equity comparables. The comparables are vacant lots that range in size from 3,043 to 4,768 square feet of land area and have assessments ranging from \$684 to \$1,072 or \$.22 per square foot of land area.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$7,281. The subject properties have land assessments ranging from \$1,480 to \$2,250 or \$.60 per square foot of land area. In support of its contention of the correct assessment the board of review submitted information on five sales that occurred from March 2008 to March 2012 for prices ranging from \$170,000 to \$2,000,000 or from \$10.84 to \$52.77 per square foot of land area. The comparables range in size from 10,019 to 37,897 square feet of land area. Four of the comparables have land assessments ranging from \$10,535 to \$49,564 or from \$.50 to \$1.85 per square foot of land area; At least, two of the comparables have improvement assessments associated with them. No assessment data was presented as to comparable #5.

The appellant submitted a rebuttal brief requesting that the Board's decision be written on the evidence in the record.

### **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 met this burden of proof and a reduction in the subject's assessment is warranted.

The Board finds the best evidence of assessment equity to be appellant's comparables. These comparables were most similar in size when compared to the subject lots. They had improvement assessments of \$.22 per square foot of land area. The subject lots have land assessments of \$.60 per square foot of land area, which are above the land assessments established by the best comparables in this record. The Board gave less weight to the board of review's land comparables due to their significantly larger sizes and/or their dissimilarity as improved properties. Based on this record the Board finds the appellant did demonstrate with clear and convincing evidence that the subject's improvement was inequitably assessed and a reduction in the subject's assessment commensurate with the appellant's request is 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.



Chairman



Member



Member



Member



Acting Member

DISSENTING: \_\_\_\_\_

### CERTIFICATION

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:

February 24, 2017



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.