



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

APPELLANT: Matthew Hooker  
DOCKET NO.: 13-33544.001-R-1  
PARCEL NO.: 14-32-217-041-0000

The parties of record before the Property Tax Appeal Board are Matthew Hooker, the appellant, by attorney Kevin B. Hynes, of O'Keefe Lyons & Hynes, LLC 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 **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:** \$13,125  
**IMPR.:** \$41,790  
**TOTAL:** \$54,915

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 2013 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 multi-family dwelling of masonry construction with 1,813 square feet of living area. The dwelling is 100 years old. Features of the home include a full basement apartment, central air conditioning and three fireplaces. The property has a 1,875 square foot site and is located in Chicago, North Chicago Township, Cook County. The subject is classified as a class 2-11 apartment building under the Cook County Real Property Assessment Classification Ordinance.

The appellant's appeal is based on overvaluation and assessment inequity. In support of the overvaluation argument the appellant submitted evidence disclosing the subject property was purchased on July 8, 2011 for a price of \$460,000.

In support of the assessment inequity argument, the appellant submitted a grid analysis containing six comparable properties. Based on this evidence, the appellant requested a reduction in the subject's assessment to reflect the purchase price.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$54,915. The subject's assessment reflects a market value of \$549,150 or \$302.90 per square foot of living area, land included, when using the level of assessments for class 2 property of 10% under the Cook County Real Property Assessment Classification Ordinance. The subject has an improvement assessment of \$48,335 or \$26.66 square foot of living area.

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

### **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 comparable sales submitted by the board of review. These properties were similar to the subject in location, use, style, foundation type and also sold more proximate in time to the January 1, 2013 assessment date. The comparables were superior to the subject in lot size and three were superior due to their two-car garage. However, the comparables were inferior to the subject in age, lack of finished basement area, lack of central air conditioning and number of fireplaces. These sales occurred from August to October 2013 for prices ranging from \$660,000 to \$1,575,000 or \$285.71 to \$719.18 per square foot of living area, including land. The subject's assessment reflects a market value of \$549,150 or \$302.90 per square foot of living area including land, which is below the range of the best sales on a total market value basis and within the range on a per square foot basis. The Board gave less weight to the subject's sale in July 2011, due to its occurrence greater than 17 months prior to the January 1, 2013 assessment date at issue.

As to the appellant's assessment inequity argument, the Board finds the parties submitted 10 suggested comparables for the Board's consideration. The Board gave less weight to the appellant's comparable #1 due to its slab foundation, when compared to the subject's full basement apartment. In addition, this comparable was located over one mile from the subject property. The Board also gave less weight to the board of review's comparables #3 and #4 due to their larger sizes, when compared to the subject. The Board finds the remaining comparables were similar to the subject in location and size, however, the subject was superior to the comparables due to its finished basement apartment and its significantly younger age. The best comparables had improvement assessments ranging from \$30,079 to \$57,467 or \$16.60 to \$33.69 per square foot of living area. The subject's improvement assessment is \$41,790 or

\$23.05 per square foot of living area, which is within the range of the best comparables in this record.

In conclusion, the Board finds the appellant has failed to prove overvaluation by a preponderance of the evidence or unequal treatment in the assessment process by clear and convincing evidence. The Board further finds the subject's assessment as established 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.



Chairman



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: December 23, 2016



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.