FINAL ADMINISTRATIVE DECISION
ILLINOIS PROPERTY TAX APPEAL BOARD

APPELLANT: Greenside Properties, LLC
DOCKET NO.: 13-36218.001-R-1
PARCEL NO.: 25-19-211-007-0000

The parties of record before the Property Tax Appeal Board are Greenside Properties, LLC, the appellant, by attorney Stephanie Park, of Park & Longstreet, P.C. in Rolling Meadows; 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:

LAND:	$2,062
IMPR.:	$4,438
TOTAL:	$6,500

Subject only to the State multiplier as applicable.

Statement of Jurisdiction

The appellant timely filed the appeal from a 2012 Final Administrative Decision of the Property Tax Appeal Board pursuant to section 16-185 of the Property Tax Code (35 ILCS 200/16-185) in order to challenge 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 is improved with a multi-level single-family masonry dwelling. The building is 41 years old, contains 969 square feet of living area and features a partial basement with finished area. The site is approximately 3,750 square feet in size and is located in Chicago, Lake Township, Cook County. The subject is classified as a class 2-34 property under the Cook County Real Property Assessment Classification Ordinance.

The appellant contends the market value of the subject property is not accurately reflected in its assessed valuation. In support of this overvaluation argument the appellant submitted information on four comparable sales of similar multi-level dwellings in the same neighborhood code as the subject. They range in size from 969 to 1,036 square feet of living area and range in age from 40 to 51 years old. The comparables sold from December 2012 to March 2013 for prices ranging from $24,000 to $33,500 or from $24.77 to $34.57 per square foot of living area including land.

The appellant submitted a copy of the 2012 Property Tax Appeal Board Final Administrative Decision (Docket #12-25336.001-R-1) in which the total assessment was lowered to $6,500. Based on this evidence, the appellant requested a reduction in the subject's assessment to $6,500.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of $10,550. The subject's assessment reflects a market value of $105,500 or approximately $108.88 per square foot of living area including land. In support of its contention of the correct assessment the board of review submitted information on four comparable sales and four equity comparables. The sales comparables are described as 1-story or multi-level frame and/or masonry dwellings that range in size from 886 to 1,222 square feet of living area. The comparables range in age from 45 to 52 years old and feature partial basements with finished areas. Comparables #1 through #4 sold in June and December 2013 for prices ranging from $129,500 to $165,000 or from $126.84 to $146.16 per square foot of living area including land. Since the equity comparables are not responsive to the appellant's market value argument, the equity data has not been summarized or analyzed in this decision.

Based on this market value evidence, the board of review requested confirmation of the subject's assessment.

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

The Board finds appellant's comparables #1 and #2 were most similar to the subject in age, style, location, size and features. These comparables sold for $24,000 and $25,500 or for $24.77 and $25.81 per square foot of living area including land. The subject's assessment reflects a market value of $105,500 or approximately $108.88 per square foot of living area, land included, which is greater than the most similar comparables in the record. The Board gave no weight to the equity comparables submitted by the board of review since the basis of this case was overvaluation. The Board gave less weight to appellant's comparables #3 and #4 and all of the board of review comparable sales based on dissimilarities with the subject in location, style, size, exterior construction and/or features.

Based on this evidence, the Board finds a reduction in the subject's assessment commensurate with the appellant's request 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. Pursuant to Section 1910.50(d) of the rules of the Property Tax Appeal Board (86 Ill.Admin.Code §1910.50(d)) the proceeding before the Property Tax Appeal Board is terminated when the decision is rendered. The Property Tax Appeal Board does not require any motion or request for reconsideration.

Chairman

Member	Member
Member	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: February 13, 2019

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 or years of the same general assessment period, as provided in Sections 9-125 through 9-225, 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 such subsequent year or years 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 OR YEARS. A separate petition and evidence must be filed for each of the remaining years of the general assessment period.

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.

PARTIES OF RECORD

AGENCY

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