



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

APPELLANT: Karen De Vries
DOCKET NO.: 13-36319.001-I-1 through 13-36319.003-I-1
PARCEL NO.: See Below

The parties of record before the Property Tax Appeal Board are Karen De Vries, 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 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
13-36319.001-I-1	29-23-401-037-0000	5,840	21,050	\$26,890
13-36319.002-I-1	29-23-401-038-0000	7,065	6,417	\$13,482
13-36319.003-I-1	29-23-401-066-0000	2,722	1,906	\$4,628

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 consists of three parcels improved with two structures. One is an industrial building approximately 40 years old containing approximately 5,302 square feet of building area. The construction is metal panel over frame on a concrete foundation with no basement. The second improvement is described as a 1½-story frame single-family dwelling approximately 84 years old. It contains approximately 2,122 square feet of living area and features a full finished basement. The site's three parcels contain a total of approximately 33,071 square feet of land area located in South Holland, Thornton Township, Cook County. The subject is classified as a class 5-93 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 an

Appraisal Report estimating the subject property had a market value of \$245,000 for the three parcels and two improvements as of January 1, 2011. The appraiser developed the sales comparison approach analyzing 5 comparable sales of industrial buildings and 3 comparable sales of single-family dwellings. The industrial buildings, built between 1927 and 1981, ranged in size from 5,826 to 11,760 square feet of building area. They sold from June 2008 to March 2011 for prices ranging from \$55,000 to \$206,000. Based on these sales, the appraiser estimated the market value of the industrial building at \$120,000 including land. The comparable single-family dwellings ranged in age from 48 to 107 years old and ranged in size from 1,356 to 2,106 square feet of living area. The homes sold from October 2010 to March 2012 for prices ranging from \$95,000 to \$125,000. Based on these sales, the appraiser estimated the market value of the single-family residence at \$125,000 including land.

The appellant also submitted a copy of the 2012 Property Tax Appeal Board Final Administrative Decision (Docket #12-32474.001-I-1) in which both parties agreed to an assessed value of \$45,000 for the subject. The assessment reflects a market value of \$180,000 including land, at the 25% level of assessment for class 5 properties.

In a cover letter, the appellant's attorney requested the subject's 2013 assessment be set at \$41,512.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$65,274. The subject's assessment reflects a market value of \$261,096 including land. In support of its contention of the correct assessment, the board of review submitted evidence in the form of printouts from the Cook County Assessor's Office for four comparable sales of industrial buildings. The properties ranged in size from 9,000 to 51,902 square feet of building area. Two comparables were built in 1961 and 2001 and two had no age reported. The comparables sold from October 2008 through December 2013 for prices ranging from \$800,000 to \$4,900,000 including land. Based on this evidence, the board of review requested confirmation of the subject's assessment.

In written rebuttal, the appellant's attorney cites the 2012 decision of the Property Tax Appeal Board.

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 appellant submitted an appraisal report that developed the sales comparison approach to value in estimating the market value of the subject property to be \$245,000. The appraisal was somewhat dated having an effective date of January 1, 2011, 24 months prior to the subject's assessment date. The board of review submitted information on four comparable sales of

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industrial buildings but did not submit sales comparables for the residence that was located on the subject property.

Based on this evidence, considering the sales provided by the board of review and the dated appraisal submitted by the appellant, the Board finds a reduction in the subject's assessment commensurate with the assessment established in the prior tax year is appropriate.

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: _____

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: March 19, 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

State of Illinois
Property Tax Appeal Board
William G. Stratton Building, Room 402
401 South Spring Street
Springfield, IL 62706-4001

APPELLANT

Karen De Vries, by attorney:
Arnold G. Siegel
Siegel & Callahan, P.C.
20 North Clark Street
Suite 2200
Chicago, IL 60602

COUNTY

Cook County Board of Review
County Building, Room 601
118 North Clark Street
Chicago, IL 60602