



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

APPELLANT: TJ Cohen  
DOCKET NO.: 14-20863.001-R-1  
PARCEL NO.: 15-01-300-003-0000

The parties of record before the Property Tax Appeal Board are TJ Cohen, the appellant(s), by attorney William J. Davy, of the Law Offices of William J. Davy 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:** \$13,740  
**IMPR.:** \$72,056  
**TOTAL:** \$85,796

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 2014 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 consists of a two-story dwelling of frame construction with 4,012 square feet of living area. The dwelling is 63 years old. The property has a 17,175 square foot site, and is located in River Forest Township, Cook County. The subject is classified as a class 2-06 property under the Cook County Real Property Assessment Classification Ordinance.

The appellant contends overvaluation as the basis of the appeal. The appellant disclosed that the subject property was purchased on February 3, 2012 for a price of \$725,000, or \$180.71 per square foot, including land, from Frank Cermak and Dorothy Evan. The parties were unrelated and the property was advertised for sale for an undisclosed length of time. The appellant failed to submit any evidence in support of this transaction, such as a settlement statement or property transfer declaration. The appellant did provide a generic printout indicating the subject PIN, plus an additional PIN, were transferred as stated. The appellant further requested a personal property

deduction in the amount of 2.5%, however, no evidence of the cost of the personal property was provided. The appellant request an assessment reduction to \$70,688.

The board of review submitted its "Board of Review-Notes on Appeal" disclosing the total assessment for the subject of \$85,796. The subject's assessment reflects a market value of \$857,960, or \$213.85 per square foot of living area, including land, when applying a 10% level of assessment as determined by the Cook County Real Property Classification Ordinance.

In support of its contention of the correct assessment, the board of review submitted information on four sale comparables. The grid sheet also reflected the sale of the subject in February 2012 for \$725,000. Based on this evidence, the board 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 did not meet this burden of proof and a reduction in the subject's assessment is not warranted.

The Board finds that the appellant failed to provide any evidence in support of the contention that this sale was an arm's-length transaction at market value. *Section IV-Recent Sale Data* of the petition indicates that evidence of a recent sale *must* be provided. As the appellant failed to provide either a sales contract, RESPA statement, settlement statement, or a Real Estate Transfer Declaration form, the appellant has failed to prove by a preponderance of the evidence that the subject property was overvalued, and therefore, an assessment reduction is not 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



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.