



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

APPELLANT: Kofi Curry
DOCKET NO.: 14-33632.001-R-1
PARCEL NO.: 29-07-413-051-0000

The parties of record before the Property Tax Appeal Board are Kofi Curry, the appellant(s); 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: \$ 928
IMPR.: \$6,457
TOTAL: \$7,385

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 property consists of a multi-family dwelling of masonry construction. The dwelling was constructed in 1965. Features include a full basement and a one-car garage. The property has a 4,125 square foot site and is located in Thornton Township, Cook County. The subject is classified as a class 2-11 property under the Cook County Real Property Assessment Classification Ordinance.

The appellant contends assessment equity and overvaluation as the bases of the appeal. In support of the equity argument, the appellant submitted four comparables. In support of the market value argument, the appellant submitted an appraisal estimating the subject property had a market value of \$25,000 as of August 9, 2014. The appellant's appraisal indicates the subject contains 2,242 square feet of living area. In addition, the appraisal states comparable #2 was an REO sale for an undisclosed amount. Comparable #4 was a judicial sale for an undisclosed

amount and an REO sale in the amount of \$10,199 was “located in association with comparable listing #5.” In addition, the appraisal indicates the comparables required significant adjustments.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$7,385. The subject's assessment reflects a market value of \$73,850, when applying the 2014 level of assessment for class 2 property under the Cook County Real Property Assessment Classification Ordinance of 10%. In support of its contention of the correct assessment the board of review submitted information on four equity comparables. The Board notes that the board of review's equity comparable #1 and the appellant's equity comparable #1 are the same property.

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 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 improvement assessment equity to be the board of review's comparables. These comparables have improvement assessments that range from \$4.50 to \$4.59 per square foot of living area. The subject's improvement assessment of \$3.67 per square foot of living area falls below the range established by the best comparables in this record. Based on this record the Board finds the appellant did not demonstrate with clear and convincing evidence that the subject's improvement was inequitably assessed and a reduction in the subject's assessment is not justified.

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 appellant's sale comparables are too dissimilar to the subject property in living area and other key property characteristics to provide a range within which the subject's assessment should fall. Based on this evidence the Board finds the appellant has not met his burden of proof and a reduction in the subject's assessment is not justified.

In addition, the Board gives little weight to the appellant's appraiser's conclusion of the subject's market value as the appraiser's conclusion, by the appraiser's own admission, was based on incomplete data regarding the prices and circumstances of several of the comparable sales. As such, the Board finds that the appellant has not met his burden of proving by a preponderance of the evidence that the subject's assessment does not accurately reflect the subject's fair market

value. Based on this evidence the Board finds a reduction in the subject's assessment is not 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



Acting 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: June 23, 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.