



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

APPELLANT: Hoover Residential Properties, LLC  
DOCKET NO.: 14-35667.001-R-1  
PARCEL NO.: 29-04-405-047-0000

The parties of record before the Property Tax Appeal Board are Hoover Residential Properties, LLC, 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:

**LAND:** \$1,828  
**IMPR.:** \$2,672  
**TOTAL:** \$4,500

Subject only to the State multiplier as applicable.

**Statement of Jurisdiction**

The appellant timely filed the appeal from a 2013 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 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 is improved with a 1.5-story masonry dwelling. The building is 71 years old and contains 1,210 square feet of living area. Features include a full basement with finished area, central air conditioning and a 2-car garage. The site is 5,625 square feet in size and is located in Riverdale, Thornton Township, Cook County. The subject is classified as a class 2-03 property under the Cook County Real Property Assessment Classification Ordinance.

The appellant contends overvaluation as the basis of the appeal. In support of this argument the appellant completed Section IV - Recent Sale Data of the appeal form indicating the subject was purchased in settlement of a contract for deed from two individuals on June 25, 2013 for \$37,000. The sale was handled through a realtor, advertised in the Multiple Listing Service and was on the market 4½ months. The sale was not between family or related corporations. The

appellant submitted a Residential Real Estate Contract, a Settlement Statement and a Warranty Deed documenting the sale.

The appellant also submitted a copy of the 2013 Property Tax Appeal Board Final Administrative Decision (Docket #13-33419.001-R-1) in which the total assessment was lowered to \$4,500. The assessment reflects a market value of \$45,000 or \$37.19 per square foot of living area, including land, at the 10% level of assessment for class 2 properties. Based on this evidence, the appellant requested the 2014 assessment be reduced to \$3,700.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$6,789. The subject's assessment reflects a market value of \$67,890 or \$56.11 per square foot of living area including land. In support of its contention of the correct assessment, the board of review submitted information on three comparable sales.<sup>1</sup> They are described as 1-story masonry or frame and masonry dwellings that range in age from 51 to 59 years old and range in size from 1,077 to 1,472 square feet of living area. They feature full basements with finished area and 1 or 2 .5 car garages. Two comparables feature fireplaces and central air conditioning. The comparables sold from December 2013 through June 2014 for prices ranging from \$99,999 to \$124,000 or from \$71.33 to \$123.14 per square foot of living area including land. Based on this evidence, the board of review requested confirmation of the subject's assessment.

In written rebuttal, the appellant's attorney claimed board of review comparables #2 and #3 are the same property.

### **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 of review submitted information on three comparable sales that were very similar to the subject. They sold within 6 months of the subject's assessment date for prices ranging from \$71.33 to \$123.14 per square foot of living area including land. The Board gives these sales some weight.

The Board finds the evidence disclosed the subject property sold 6 months prior to the subject's assessment date for \$37,000. The appellant provided evidence that the sale had the elements of an arm's-length transaction. Based on this evidence, considering the best sales provided by the board of review and the sale of the subject property, the Board finds a reduction in the subject's assessment commensurate with the assessment established in the prior tax year is appropriate.

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<sup>1</sup> Board of review comparables #2 and #3 are the same property.

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: 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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