



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

APPELLANT: John & Jane Petrone  
DOCKET NO.: 15-39574.001-R-1  
PARCEL NO.: 02-19-232-010-0000

The parties of record before the Property Tax Appeal Board are John & Jane Petrone, the appellants; 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:** \$2,683  
**IMPR.:** \$20,317  
**TOTAL:** \$23,000

Subject only to the State multiplier as applicable.

**Statement of Jurisdiction**

The appellants timely filed the appeal from a decision of the Property Tax Appeal Board pursuant to section 16-185 of the Property Tax Code (35 ILCS 200/16-185) challenging the assessment for the 2015 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 two-story dwelling of frame construction with 1,751 square feet of living area. The dwelling is 29 years old. Features of the home include a slab foundation, central air conditioning and a two-car garage. The property has a 5,112 square foot site and is located in Hoffman Estates, Palatine Township, Cook County. The subject is classified as a class 2-07 property under the Cook County Real Property Assessment Classification Ordinance.

The appellants contend overvaluation as the basis of the appeal. In support of this argument the appellants submitted information on four comparable sales that were assigned the same neighborhood code as the subject property and were located within 5 blocks from the subject. The comparables were two-story dwellings of frame construction containing from 1,669 to 1,934 square feet of living area. The comparables ranged in age from 27 to 34 years old. Three of the comparables had similar slab foundations and one had a "walk out" foundation. Other features of the comparables had varying degrees of similarities when compared to the subject. The

comparables had sale dates occurring from October 2014 to October 2015 for prices ranging from \$210,000 to \$247,450 or from \$108.58 to \$147.55 per square foot of living area, including land.

The appellants' evidence included a copy of the Multiple Listing Service (MLS) data sheet for the subject revealing the subject was being offered for rent for a price of \$1,900 on February 7, 2015.

The board of review did not timely submit its "Board of Review Notes on Appeal". The subject had a total assessment of \$28,475. The subject's assessment reflects a market value of \$284,750 or \$162.62 per square foot of living area, land included, when using the level of assessments for class 2 property of 10% under the Cook County Real Property Assessment Classification Ordinance.

### **Conclusion of Law**

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

The Board finds the best evidence of market value to be the appellants' comparable sales #1, #2 and #4. These comparables were most similar to the subject in location, size, age and features. These comparables also sold proximate in time to the January 1, 2015 assessment date at issue. The best comparables sold from October 2014 to October 2015 for prices ranging from \$220,000 to \$247,450 or from \$129.92 to \$147.55 per square foot of living area, including land. The subject's assessment reflects a market value of \$284,750 or \$162.62 per square foot of living area, including land, which is above the range established by the best comparable sales in this record. The Board gave less weight to the appellants' comparable #3 due to its dissimilar "walk out" foundation, when compared to the subject's slab foundation. The Board also gave less weight to the rental data regarding the subject, as this evidence does not overcome the market sales data in the record. The board of review did not timely submit any evidence in support of the assessment of the subject property or to refute the appellant's argument as required by section 1910.40(a) of the rules of the Property Tax Appeal Board and is found to be in default pursuant to section 1910.69(a) of the rules of the Property Tax Appeal Board. (86 Ill.Admin.Code 1910.40(a) & 1910.69(a)). Based on this evidence the Board finds a reduction in the subject's assessment is 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. 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

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