



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

APPELLANT: James Fieldhouse
DOCKET NO.: 17-32693.001-R-1 through 17-32693.002-R-1
PARCEL NO.: See Below

The parties of record before the Property Tax Appeal Board are James Fieldhouse, the appellant, by attorney George N. Reveliotis, of Reveliotis Law, P.C. in Park Ridge; 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
17-32693.001-R-1	18-03-225-017-0000	1,863	6,870	\$8,733
17-32693.002-R-1	18-03-225-018-0000	1,863	6,870	\$8,733

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 2017 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 one-story dwelling of frame exterior construction with 1,249 square feet of living area. The dwelling is approximately 64 years old. Features of the home include a concrete slab foundation and a 2-car garage. The property has a 6,480 square foot site located on two separate parcels in Brookfield, Lyons Township, Cook County. The subject is classified as a class 2-03 property under the Cook County Real Property Assessment Classification Ordinance.

The appellant submitted a copy of the final decision of the Cook County Board of Review dated January 19, 2018 for the 2017 assessment year concerning the two parcels which depicts assessments of \$9,453 for Parcel #1 (PIN 18-03-225-017-0000) and \$9,453 for Parcel #2 (PIN 18-03-225-018-0000). The subject's two parcels have a combined total assessment of \$18,906. The attorney for the appellant submitted its "Residential Appeal" with a "Comparable

Sales/Assessment Grid Analysis”, “Addendum to Petition” showing a separate listing of each individual parcel’s land and improvement assessments, and a supplemental “Brief” from the appellant’s attorney.

The appellant contends improvement assessment inequity as the basis of the appeal and did not contest the land assessments for either of the subject’s two parcels. In support of this argument, the appellant submitted information on four equity comparables that are located within the same neighborhood code as the subject. The comparables are improved with one-story dwellings of frame or masonry exterior construction ranging in size from 1,274 to 1,401 square feet of living area. The dwellings range in age from 48 to 66 years old. One comparable has a full unfinished basement and three comparables have concrete slab foundations; one comparable has central air conditioning; one comparable has a fireplace; and each comparable has a 1-car or a 1.5-car garage. The comparables have improvement assessments ranging from \$9,603 to \$15,065 or from \$7.54 to \$10.75 per square foot of living area. Based on this evidence, the appellant requested that the subject’s improvement assessment for Parcels #1 and #2 be reduced to \$12,250 or \$9.81 per square foot of living area.

The Board finds the board of review did not submit any evidence in support of its 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.

The appellant’s submission included a copy of the final decision from the Cook County Board of Review revealing the subject had a total assessment of \$18,906. The appellant’s petition depicts the subject’s improvement assessment is \$15,180 or \$12.45 per square foot of living area.

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

The Board finds the only evidence of assessment equity was submitted by the appellant. The Board gives less weight to the appellant’s comparables #2 and #3 due to their full unfinished basement, larger dwelling size and/or newer age when compared to the subject.

The Board finds the best evidence of assessment equity to be the appellant’s comparables #1 and #4 as they are similar to the subject in location, design, age, dwelling size, foundation and features. These comparables had improvement assessments of \$10.20 and \$10.74 per square foot of living area. The subject's improvement assessment of \$12.15 per square foot of living area exceeds the assessments of the best comparables in this record and is not supported. The board of review did not submit any evidence in support of the subject’s assessment. Based on this

record, the Board finds the appellant demonstrated with clear and convincing evidence that the subject's improvement was inequitably assessed and 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:

November 17, 2020



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

James Fieldhouse, by attorney:
George N. Reveliotis
Reveliotis Law, P.C.
1030 Higgins Road
Suite 101
Park Ridge, IL 60068

COUNTY

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