



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

APPELLANT: Ron Plonis
DOCKET NO.: 17-39585.001-R-1
PARCEL NO.: 29-22-203-028-0000

The parties of record before the Property Tax Appeal Board are Ron Plonis, the appellant, by attorney Peter D. Verros of Verros Berkshire, PC 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: \$2,868
IMPR.: \$7,377
TOTAL: \$10,245

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 multi-level dwelling of masonry exterior construction with 832 square feet of living area. The dwelling is approximately 58 years old. Features of the home include a partial basement finished as a formal recreation room, central air conditioning and a two-car detached garage. The property has a 7,171 square foot site and is located in South Holland,¹ Thornton Township, Cook County. The subject is classified as a class 2-34 property under the Cook County Real Property Assessment Classification Ordinance.

The appellant contends assessment inequity with respect to the improvement as the basis of the appeal. In support of this argument, the appellant submitted information on four equity comparables located within the same neighborhood code as the subject property, three of which

¹ The Board finds the best evidence of the location of the subject property is found in the property record card provided by the appellant depicting the subject's location is in South Holland.

are in South Holland. The comparables are improved with similar class 2-34 multi-level dwellings of frame and masonry exterior construction ranging in size from 912 to 1,114 square feet of living area. The dwellings range in age from 21 to 58 years old. Each comparable has a partial basement finished as a formal recreation room, central air conditioning and either a 1.5-car or a 2-car attached garage. The comparables have improvement assessments that range from \$4,323 to \$6,873 or from \$4.03 to \$6.17 per square foot of living area. Based on this evidence, the appellant requested the subject's improvement assessment be reduced to \$4,584 or \$5.51 per square foot of living area.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$10,245. The subject property has an improvement assessment of \$7,377 or \$8.87 per square foot of living area.

In support of its contention of the correct assessment, the board of review submitted information on four equity comparables located in South Holland and within the same neighborhood code as the subject property. The comparables are improved with similar class 2-34 multi-level dwellings of frame or frame and masonry exterior construction ranging in size from 988 to 1,190 square feet of living area. The dwellings range in age from 45 to 51 years old. Each comparable has a partial basement finished as a formal recreation room and either a one-car or a two-car garage. Comparable #4 has central air conditioning. The comparables have improvement assessments that range from \$8,727 to \$11,193 or from \$8.59 to \$10.19 per square foot of living area. Based on this evidence, the board of review requested confirmation of the subject's assessment.

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 parties provided eight suggested equity comparables to support their respective positions before the Property Tax Appeal Board. The Board gives less weight to appellant's comparables #3 and #4, as well as board of review comparables #2 and #3 which differ from the subject in dwelling size, age and/or location.

The Board finds the best evidence of assessment equity to be appellant's comparables #1 and #2, along with board of review comparables #1 and #4. These comparables are relatively similar to the subject in location, dwelling size, design, age and features. The comparables have improvement assessments that range from \$4,323 to \$9,246 or from \$4.03 to \$8.83 per square foot of living area. The subject's improvement assessment of \$7,377 or \$8.87 per square foot of living area is within the overall improvement assessment range established by the best comparables in this record and slightly above the range on a square foot basis. Accepted real

estate valuation theory provides, all other factors being equal, as the size of a property increases, its per unit value decreases. Likewise, as the size of a property decreases, its per unit value increases. Based on this analysis, the Board finds the subject's higher per square foot improvement assessment is justified given its smaller size. Therefore, no reduction in the subject's improvement assessment is 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. 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: June 8, 2021



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

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