



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

APPELLANT: Edward K. Matteson
DOCKET NO.: 17-42310.001-R-1
PARCEL NO.: 32-29-402-021-0000

The parties of record before the Property Tax Appeal Board are Edward K Matteson, the appellant, by attorney Jessica Hill-Magiera, in Lake Zurich; 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: \$1,684
IMPR.: \$10,523
TOTAL: \$12,207

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 2-story dwelling of frame construction with 1,776 square feet of living area. The dwelling was constructed in 1906 and has a full unfinished basement. The property has a 6,126 square foot site and is located in South Chicago Heights, Bloom 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 inequity with respect to the improvement as the basis of the appeal. In support of this argument, the appellant submitted information on four comparables that have the same assessment neighborhood code as the subject. The comparables are class 2-11 properties described as 2-story dwellings that range in size from 1,728 to 1,892 square feet of living area and were constructed from 1898 to 1913. Each comparable has a basement. The comparables have improvement assessments ranging from \$10,006 to \$11,609 or \$5.41 to \$6.28

per square foot of living area. Based on this evidence, the appellant requested a reduction in the subject's assessment.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$15,059. The subject has an improvement assessment of \$13,375 or \$7.53 per square foot of living area.

In support of its contention of the correct assessment the board of review submitted information on four equity comparable that have the same assessment neighborhood code as the subject. The comparables are class 2-11 properties described as 1.5-story or 2-story dwellings of frame or masonry exterior construction that range in size from 1,374 to 1,658 square feet of living area. The dwellings are approximately 75 to 117 years old. Three comparables have full unfinished basements and one comparable has a concrete slab foundation. One comparable has a fireplace and three comparables each have a one-car or a two-car garage. The comparables have improvement assessments ranging from \$10,987 to \$16,329 or from \$7.75 to \$10.23 per square foot of living area. Based on this evidence, the board of review requested confirmation of the subject's assessment.

In rebuttal, the appellant's counsel argued the board of review comparables are not comparable to the subject due to differences in age, style and/or dwelling size.

Conclusion of Law

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

The record contains twelve equity comparables for the Board's consideration similar to the subject in location. The Board gave less weight to the board of review comparable due to differences in age, style and dwelling size when compared to the subject and the comparables submitted by the appellant.

The Board finds the best evidence of assessment equity to be the appellant's comparables as they are most similar to the subject in age, style and dwelling size. These comparables have improvement assessments ranging from \$10,006 to \$11,609 or \$5.41 to \$6.28 per square foot of living area. The subject has an improvement assessment of \$13,375 or \$7.53 per square foot of living area, which is above the range established by the best comparables in this record. After considering adjustments to the best comparables for differences when compared to the subject, the Board finds the appellant proved by clear and convincing evidence that subject's improvement assessment was inequitable and therefore, 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:

May 18, 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

AGENCY

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