



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

APPELLANT: Pearl Crown, LLC  
DOCKET NO.: 17-43593.001-R-1  
PARCEL NO.: 31-25-103-041-0000

The parties of record before the Property Tax Appeal Board are Pearl Crown, LLC, the appellant, by attorney Abby L. Strauss, of Schiller Law 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:** \$3,354  
**IMPR.:** \$3,726  
**TOTAL:** \$7,080

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 and masonry exterior construction with 1,092 square feet of living area. The dwelling was constructed in 1958 and is approximately 60 years old. Features of the home include a concrete slab foundation and a two-car attached garage. The property has a 10,320 square foot site and is located in Park Forest, Rich Township, Cook County. The subject is classified as a class 2-03 property under the Cook County Real Property Assessment Classification Ordinance.

The appellant's appeal is based on overvaluation. In support of this argument the appellant completed Section IV – Recent Sale Data disclosing the subject property was purchased on July 28, 2015 for a price of \$21,000, the parties involved in the transaction were not related, the property was sold by a realtor and advertised for sale through the Multiple Listing Service (MLS) but for how long was not disclosed. The appellant also submitted a residential real estate

contract associated with the sale that depicted a purchase price of \$70,800 and a closing date of September 10, 2015. Based on this evidence, the appellant requested a reduction in the subject's assessment to reflect the purchase price.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$8,454. The subject's assessment reflects a market value of \$84,540 or \$77.42 per square foot of living area, land included, when using the 2017 level of assessment for class 2 property under the Cook County Real Property Assessment Classification Ordinance of 10%.

In support of its contention of the correct assessment the board of review submitted information on four comparable sales located within a different assessment neighborhood code than the subject. The comparables have sites ranging in size from 18,920 to 20,930 square feet of land area. The properties have the same classification code as the subject and are improved with one-story dwellings of frame exterior construction that range in size from 1,100 to 1,425 square feet of living area. The dwellings are either 59 or 60 years old. Each comparable has a concrete slab foundation. One comparable has central air conditioning and a fireplace. Three comparables each have a 1-car to a 2.5-car garage. The comparables sold from September 2014 to April 2017 for prices ranging from \$115,000 to \$124,900 or from \$80.70 to \$113.55 per square foot of living area, including land. The board of review's grid analysis disclosed the subject property sold in September 2015 for \$70,800. Based on this evidence, the board of review asserts that the subject's assessment is correct.

In rebuttal, the appellant argued the only credible evidence presented to the Property Tax Appeal Board as to the subject property's market value was submitted by the appellant.

### **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 a reduction in the subject's assessment is warranted based on the evidence in the record.

The Board finds the best evidence of market value to be the purchase of the subject property in September 2015 for a price of \$70,800 as reported in the sales contract submitted by the appellant and in the board of review's grid analysis. The Board finds the purchase price is below the market value reflected by the assessment. The Board finds the board of review did not present any evidence to challenge the arm's length nature of the transaction. Furthermore, the Board gave less weight to the comparables submitted by the board of review due to differences in location, lot size and/or dwelling size when compared to the subject. After reviewing the evidence, the Board finds a reduction in the subject's assessment commensurate with the appellant's request is appropriate.

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

AGENCY

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