



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

APPELLANT: Nick Andrews
DOCKET NO.: 18-25145.001-R-1 through 18-25145.002-R-1
PARCEL NO.: See Below

The parties of record before the Property Tax Appeal Board are Nick Andrews, the appellant, by attorney Robert Rosenfeld, of Robert H. Rosenfeld and Associates, LLC 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:

DOCKET NO	PARCEL NUMBER	LAND	IMPRVMT	TOTAL
18-25145.001-R-1	01-01-120-024-0000	911	321	\$1,232
18-25145.002-R-1	01-01-120-021-0000	4,138	37,046	\$41,184

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 2018 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 two parcels, one of which is improved with a two-story dwelling of stucco exterior construction with 2,802 square feet of living area. The dwelling is approximately 91 years old. Features of the home include a full unfinished basement, central air conditioning and two fireplaces. Parcel 01-01-120-021-0000 has an approximately 8,712 square foot site and is located in Barrington, Barrington Township, Cook County. Neither party provided descriptive information for parcel 01-01-120-024-0000. The subject parcels are classified as class 2-01 and class 2-06 properties under the Cook County Real Property Assessment Classification Ordinance.

The appellant's appeal is based on overvaluation of the parcels. In support of the argument, the appellant submitted a brief along with a copy of a Settlement Statement. The Settlement

Statement depicts that the property with a street address of 506 South Hough Street was sold by Nancie K. Kozel and purchased by the appellant on September 15, 2016 for a price of \$410,000.

The Property Tax Appeal Board takes notice that the subject property was the subject matter of an appeal before the Board the prior year under Docket No. 17-20719.001-R-1. In that appeal the Property Tax Appeal Board issued a decision lowering the assessment of the subject property to a total assessment of \$42,416 based on the evidence submitted by the parties. For this 2018 tax year appeal, the Board also takes notice that the subject's address and the appellant's reported mailing address are the same suggesting the property is owner occupied.

Based on this evidence in the 2018 tax year appeal, the appellant requested a reduction in the assessment of the two parcels to a total assessment of \$41,000 in order to reflect the purchase price.

The board of review submitted its "Board of Review Notes on Appeal." The appellant submitted a copy of the Final Decision depicting the total assessment for the two parcels comprising the subject of \$47,864. The subject's total assessment reflects a market value of \$478,640 or \$170.82 per square foot of living area, land included, when using the level of assessments 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. The evidence provided by the board of review further disclosed that no township equalization factor was applied in 2018 and 2016 was the beginning of the general assessment cycle for the subject property. Based on this evidence, the board of review requested confirmation of the subject's assessment.

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.

The Property Tax Appeal Board finds that the assessment as established by the Board for the 2017 tax year should be carried forward to the 2018 tax year subject only to equalization as provided by section 16-185 of the Property Tax Code.

Section 16-185 of the Property Tax Code (35 ILCS 200/16-185) states in part:

If the Property Tax Appeal Board renders a decision lowering the assessment of a particular parcel on which a residence occupied by the owner is situated, such reduced assessment, subject to equalization, shall remain in effect for the remainder of the general assessment period as provided in Sections 9-215 through 9-225, unless that parcel is subsequently sold in an arm's length transaction

establishing a fair cash value for the parcel that is different from the fair cash value on which the Board's assessment is based, or unless the decision of the Property Tax Appeal Board is reversed or modified upon review.

The Property Tax Appeal Board takes notice of the issuance of a decision reducing the subject's assessment for the 2017 tax year in Docket No. 17-20719.001-R-1. The record further indicates that the subject property is an owner-occupied dwelling and that 2016, 2017 and 2018 are within the same general assessment period. The record contains no evidence indicating the subject property has more recently sold in an arm's length transaction. For these reasons the Property Tax Appeal Board finds that a reduction in the subject's assessment is warranted to reflect the assessment as established in the Board's prior year's decision plus the application of an equalization factor, if any.

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: July 20, 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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