



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

APPELLANT: Leon Huang
DOCKET NO.: 18-39704.001-R-1 through 18-39704.002-R-1
PARCEL NO.: See Below

The parties of record before the Property Tax Appeal Board are Leon Huang, 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
18-39704.001-R-1	02-30-113-009-0000	\$6,789	\$0	\$6,789
18-39704.002-R-1	02-30-113-010-0000	\$6,256	\$31,522	\$37,778

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 a two-story dwelling of frame construction with 3,640 square feet of living area. The dwelling is approximately 29 years old. Features of the home include a full unfinished basement, central air conditioning, a fireplace and a three-car garage. The property has a 10,880 square foot site and is located in Hoffman Estates, Palatine Township, Cook County. The subject is classified as a class 2-78 property under the Cook County Real Property Assessment Classification Ordinance.

The evidence in the record disclosed that the subject property is an owner-occupied residence that was the subject matter of an appeal before the Property Tax Appeal Board for the prior years under docket numbers 16-25086.002-R-1 and 17-20766.002-R-1 for PIN 02-30-113-010-0000.¹

¹ The appellant did not contest the assessments in 2016, 2017 and 2018 for PIN 02-30-113-009-0000.

In those appeals the Property Tax Appeal Board rendered a decision lowering the assessment of the subject property to \$37,778 based on the evidence submitted by the appellant. The Property Tax Appeal Board takes notice that 2016, 2017 and 2018 are within the same general assessment period for Palatine Township. (86 Ill.Admin.Code §1910.90(i)).

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 three equity comparables and requested the subject's assessment for PIN 02-30-113-010-0000 be reduced to \$43,020 (\$6,256 for land and \$36,764 for the improvement, which equates to \$10.10 per square foot of living area). The appellant did not request a change in the board of review's vacant land assessment of \$6,789 for PIN 02-30-113-009-0000.

The board of review submitted its "Board of Review Notes on Appeal" wherein the final assessment of the subject property totaling \$51,210 was disclosed for PIN 02-30-113-010-0000. The subject property has an improvement assessment of \$44,954 or \$12.35 per square foot of living area. In support of its contention of the correct assessment, the board of review submitted information on three equity comparables to demonstrate the subject was being assessed uniformly.

Conclusion of Law

After reviewing the record and considering the evidence, the Property Tax Appeal Board finds that it has jurisdiction over the parties and the subject matter of this appeal. Pursuant to section 16-185 of the Property Tax Code (35 ILCS 200/16-185), the Board finds the prior year decision should be carried forward to the subsequent year subject only to equalization.

Section 16-185 of the Property Tax Code (35 ILCS 200/16-185) provides 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 that it rendered decisions under docket numbers 16-25086.002-R-1 and 17-20766.002-R-1 reducing the subject's 2016 and 2017 total assessment to \$37,778. 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 sold in an arm's length transaction subsequent to the Board's decision or that the assessment year in question is in a different general assessment period or that the decision of the Property Tax Appeal Board for the 2016 and 2017 tax years were reversed or modified upon review. For these reasons the Property Tax Appeal Board finds that a reduction in the subject's assessment is warranted to reflect the Board's

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decision for the 2016 and 2017 tax years assessing the subject property at \$37,778 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



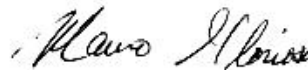
Member

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: April 21, 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

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