

FINAL ADMINISTRATIVE DECISION ILLINOIS PROPERTY TAX APPEAL BOARD

| APPELLANT: | Ron Plonis |
|--------------|--------------------|
| DOCKET NO .: | 18-42765.001-R-1 |
| PARCEL NO .: | 32-25-107-039-0000 |

The parties of record before the Property Tax Appeal Board are Ron Plonis, the appellant, by attorney Peter D. Verros, of Verros Berkshire in Oakbrook Terrace; and the Cook County Board of Review.

Based on the facts and exhibits presented in this matter, the Property Tax Appeal Board hereby finds <u>No Change</u> 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: | \$1,875 |
|--------|---------|
| IMPR.: | \$6,881 |
| TOTAL: | \$8,756 |

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 multi-level dwelling of frame exterior construction with 1,121 square feet of living area. The dwelling is approximately 42 years old. Features of the home include a partial basement with finished area and a two-car garage. The property has a 6,820 square foot site and is located in Sauk Village, Bloom 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 in the same neighborhood code and within 2 miles of the subject property. The comparables were improved with similar class 2-34 dwellings of frame exterior construction that range in size from 985 to 1,164 square feet of living area. The comparables range in age

from 47 to 117 years old. Each comparable has a partial basement with recreation area, two comparables have central air conditioning, and two comparables have a two-car garage. The comparables have improvement assessments ranging from \$2,668 to \$5,342 or from \$2.29 to \$4.60 per square foot of living area. The appellant requested the improvement assessment be reduced to \$5,314 or \$4.74 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 \$8,756. The subject property has an improvement assessment of \$6,881 or \$6.14 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 within ¹/₄ of a mile and in the same neighborhood code as the subject property. The comparables are class 2-34 properties and improved with multi-level dwellings of frame exterior construction that range in size from 1,053 to 1,121 square feet of living area. The comparables range in age from 42 to 45 years old. Each comparable has a partial basement with recreation area and each comparable has a one-car or a two-car garage. The comparables have improvement assessments ranging from \$6,475 to \$7,282 or from \$6.15 to \$6.81 per square foot of living area. The board of review requested that the subject's assessment be confirmed.

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 submitted eight equity comparables for the Board's consideration. The Board gave less weight to the appellant's comparables as these comparables have central air conditioning, and/or lack a garage and/or considerably older age when compared to the subject

The Board finds the best evidence of assessment equity to be board of review comparables. These comparables had varying degrees of similarity in dwelling size, age and features. These comparables had improvement assessments that ranged from \$6,475 to \$7,282 or from \$6.15 to \$6.81 per square foot of living area. The subject's improvement assessment of \$6,881 or \$6.14 per square foot of living area falls within the range on an improvement assessment basis and below the range as established by the best comparables in this record on a per square foot basis. Based on this record the Board finds the appellant did not demonstrate with clear and convincing evidence that the subject's improvement was inequitably assessed and a reduction in the subject's assessment is not 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:**

<u>CERTIFICATION</u>

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:

February 21, 2023

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 <u>PETITION AND</u> <u>EVIDENCE</u> 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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APPELLANT

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COUNTY

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