



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

APPELLANT: Dennis Carmichael
DOCKET NO.: 18-46204.001-R-1
PARCEL NO.: 32-36-111-051-0000

The parties of record before the Property Tax Appeal Board are Dennis Carmichael, the appellant, 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: \$2,413
IMPR.: \$6,747
TOTAL: \$9,160

Subject only to the State multiplier as applicable.

ANALYSIS

The subject property is improved with a multi-level dwelling of frame and masonry construction containing 1,377 square feet of living area. The dwelling is 21 years old. Features of the home include a partial finished basement, central air conditioning, a fireplace and a two-car garage. The property has an 8,775 square foot site and is located in Sauk Village, Bloom Township, Cook County.

The appellant's appeal is based on overvaluation. In support of this argument the appellant submitted an appraisal estimating the subject property had a market value of \$80,000 as of May 15, 2018. The appraisal was prepared by Andrey Balykov, a State of Illinois Certified Residential Real Estate Appraiser. In estimating the market value of the subject property the appraiser developed the cost and the sales comparison approaches to value.

Under the cost approach the appraiser estimated the subject had a site value of \$3,500. The appraiser estimated the replacement cost new of the improvements to be \$181,875. The appraiser estimated depreciation to be \$41,971 resulting in a depreciated improvement value of \$139,904. The appraiser also estimated the site improvements had a value of \$5,000. Adding the various components, the appraiser estimated the subject property had an estimated market value of \$148,400 under the cost approach to value.

Using the sales comparison approach the appraiser provided information on three comparable sales and two listings that were described as ranch, split level or traditional dwellings that ranged in size from 968 to 2,181 square feet of living area. The dwellings ranged in age from 21 to 55

years old. Features of the comparables include a partial or full basement with finished area. Two comparables have central air conditioning and each comparable has a garage. The comparables have sites ranging in size from 6,325 to 8,340 square feet of land area. The comparables sold or were listed for sale from August 2017 to May 2018 for prices ranging from \$69,900 to \$95,000 or from \$43.56 to \$84.62 per square foot of living area, including land. After making adjustments to the comparables for differences from the subject the appraiser estimated the comparables had adjusted prices ranging from \$78,137 to \$88,890 or from \$40.06 to \$89.34 per square foot of living area, including land. Based on this data the appraiser estimated the subject had an estimated value under the sales comparison approach of \$80,000.

In reconciling the two approaches to value the appraiser gave most weight to the sales comparison approach to value and estimated the subject property had a market value of \$80,000 as of May 15, 2018. Based on this evidence, the appellant requested a reduction in the subject's assessment to reflect the appraised value.

The board of review submitted its "Board of Review Notes on Appeal" wherein the subject's total assessment of \$12,739 was disclosed. The subject's assessment reflects a market value of \$111,258 or \$86.31 per square foot of living area, including land, when applying the 2018 three-year average median level of assessment for Cook County of 11.45% for residential property as determined by the Illinois Department of Revenue.

In support of the subject's assessment the board of review submitted information on four comparable sales improved with multi-level dwellings of frame or frame and masonry construction that range in size from 1,121 to 1,526 square feet of living area. The dwellings were 52 or 53 years old. Features of the comparables include a partial finished basement. Two comparables have central air conditioning and each comparable has a two-car or 2.5 car garage. The comparables have sites ranging in size from 8,500 to 12,456 square feet of land area. Each comparable has the same neighborhood code as the subject property. The comparables sold from October 2015 to February 2017 for prices ranging from \$145,000 to \$175,000 or from \$7.64 to \$9.27 per square foot of living area, including land. Based on this evidence, the board of review requested confirmation of the subject's assessment.

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. The Board further finds a reduction in the subject's assessment is warranted.

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. National City Bank of Michigan/Illinois v. Illinois Property Tax Appeal Board, 331 Ill.App.3d 1038 (3rd Dist. 2002); 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 the appellant met this burden of proof and a reduction in the subject's assessment is warranted.

The Board finds the best evidence of market value to be the appraisal of the subject property submitted by the appellant. The appellant's appraiser developed the cost and sales comparison approaches to value and gave most weight to the sales comparison approach. The sales utilized by the appraiser were generally similar to the subject. These properties also sold most proximate in time to the assessment date at issue. The appraised value is below the market value reflected by the assessment. Less weight was given the comparable sales presented by the board of review due to differences from the subject in age and/or the date of sale was too remote to establish market value as of January 1, 2018. Based on this record the Board finds the subject property had a market value of \$80,000 as of January 1, 2018. Since market value has been determined the 2018 three-year average median level of assessment for Cook County of 11.45% shall apply. (86 Ill.Admin.Code §1910.50(c)(1)/(2)).

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: March 16, 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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