



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

APPELLANT: Preston Bowie
DOCKET NO.: 18-50217.001-R-1
PARCEL NO.: 29-30-402-047-0000

The parties of record before the Property Tax Appeal Board are Preston Bowie, the appellant, by Jessica Hill-Magiera, Attorney at Law, in Lake Zurich; 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: \$1,706
IMPR.: \$4,844
TOTAL: \$6,550

Subject only to the State multiplier as applicable.

Statement of Jurisdiction

The appellant timely filed the appeal from a decision of the board of review pursuant to section 16-185 of the Property Tax Code (35 ILCS 200/16-185) 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 multi-family dwelling of masonry construction that was built in 1961. The dwelling contains 2,352 square feet of living area and is situated on a 5,250 square foot site. Features include a concrete slab foundation and two bathrooms. The subject is a Class 2-11 property under the Cook County Real Property Assessment Classification Ordinance. The subject property is located in Thornton Township, Cook County.

The appellant contends the market value of the subject property is not accurately reflected in its assessed valuation. In support of the overvaluation claim, the appellant submitted a grid analysis of four comparable properties located within .09 of a mile from the subject. The comparables consist of two-story multi-family dwellings of masonry construction that were built in 1961 or 1963. Each comparable has concrete slab foundation and two bathrooms. Comparables #3 and #4 each have a two-car garage. Like the subject, the dwellings have 2,352 square feet of living area and are situated on sites that contain 5,250 square feet of land area. The comparables sold

from April 2017 to December 2018 for prices ranging from \$55,000 to \$67,000 or from \$23.38 to \$28.49 per square foot of living area including land. Based on this evidence, the appellant requested a reduction in the subject's assessment.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject property of \$16,626. The subject's assessment reflects an estimated market value of \$166,260 or \$70.69 per square foot of living area including land when applying Cook County's Real Property Assessment Classification Ordinance level of assessment for Class 2 property of 10%.

In support of the subject's assessment, the board of review submitted an analysis of four comparable properties located in different assessment neighborhood codes as defined by the county assessor. The comparables consist of two-story multi-family dwellings of masonry or frame and masonry construction that are from 46 to 68 years old. The comparables have a full finished or unfinished basement, one comparable has a central air conditioning, one comparable has a fireplace, and three comparables have a garage. The dwellings range in size from 1,811 to 2,916 square feet of living area and are situated on sites that contain from 4,914 to 12,142 square feet of land area. The comparables sold from April 2017 to June 2018 for prices ranging from \$190,000 to \$220,320 or from \$74.76 to \$107.62 per square foot of living area including land. Based on this evidence, the board of review requested confirmation of the subject's assessment.

In rebuttal, the appellant submitted a map depicting the location of both parties' comparables in relation to the subject. Board of review's comparables #1 and #4 are located approximately 6 miles from the subject and each comparable is located in a different community than the subject. In addition, counsel argued each comparable has a basement, unlike the subject's concrete slab foundation.

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 the appellant met this burden of proof and a reduction in the subject's assessment is warranted.

The parties submitted eight suggested comparable sales for the Board's consideration. The Board gave no weight to the comparables submitted by the board of review due to their dissimilar distant location when compared to the subject and each comparable has a basement, superior to the subject's concrete slab foundation. The Board finds comparable sales submitted by the appellant are more similar if not identical to the subject in location, design, age dwelling size and most features. These comparables sold from April 2017 to December 2018 for prices ranging from \$55,000 to \$67,000 or from \$23.38 to \$28.49 per square foot of living area including land. The subject's assessment reflects an estimated market value of \$166,260 or \$70.69 per square foot of living area including land, which is greater than the most similar comparable sales contained in this record. Based on this analysis, the Board finds a reduction in the subject's assessment is warranted.

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

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: 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 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

State of Illinois
Property Tax Appeal Board
William G. Stratton Building, Room 402
401 South Spring Street
Springfield, IL 62706-4001

APPELLANT

Preston Bowie, by attorney:
Jessica Hill-Magiera
Attorney at Law
790 Harvest Drive
Lake Zurich, IL 60047

COUNTY

Cook County Board of Review
County Building, Room 601
118 North Clark Street
Chicago, IL 60602