



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

APPELLANT: Timothy Lynch
DOCKET NO.: 19-30708.001-R-1 through 19-30708.003-R-1
PARCEL NO.: See Below

The parties of record before the Property Tax Appeal Board are Timothy Lynch, the appellant , by attorney Brian P. Liston, of the Law Offices of Liston & Tsantilis, P.C. 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
19-30708.001-R-1	24-27-102-025-0000	1,349	14,683	\$16,032
19-30708.002-R-1	24-27-102-026-0000	1,349	14,683	\$16,032
19-30708.003-R-1	24-27-102-067-0000	845	0	\$845

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 2019 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 three parcels improved with a 3-story, multi-family building of masonry exterior construction with 6,030 square feet of building area. The building is approximately 45 years old. Features of the building include an unfinished basement. The property has a 3,175 square foot site and is located in Alsip, Worth Township, Cook County. The subject is classified as a class 2-11 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 three equity comparables that are located in the same neighborhood code as the subject property. The comparables are improved with 3-story, class 2-11 multi-family buildings of masonry exterior

construction ranging in size from 6,030 to 6,554 square feet of building area. The comparables are either 45 or 46 years old. Each comparable has an unfinished basement. The comparables have improvement assessments ranging from \$26,922 to \$31,277 or from \$4.46 to \$4.87 per square foot of building area. Based on this evidence, the appellant requested that the subject's improvement assessment be reduced to \$28,341 or \$4.70 per square foot of building area.

The appellant's submission included a copy of the "Cook County Board of Review" final decision dated February 29, 2020 which disclosed the subject has a total assessment for the three parcels of \$41,797. The "Addendum to Petition" which disclosed the subject's total assessment reflects a total land assessment of \$3,543 and an improvement assessment of \$38,254 or \$6.34 per square foot of living area.

The board of review submitted its "Board of Review Notes on Appeal" for only one of the parcels under appeal. Nevertheless, in support of its contention of the correct assessment, the board of review submitted information on three equity comparables that are located in the same neighborhood code as the subject property. The comparables are improved with 2-story, class 2-11 multi-family buildings of masonry exterior construction ranging in size from 2,942 to 3,648 square feet of building area. The comparables range in age from 19 to 39 years old. Each comparable has a basement with one finished with an apartment and from a 2-car to a 3-car garage. Two comparables each have central air conditioning. One comparable has two fireplaces. The comparables have improvement assessments ranging from \$27,074 to \$32,876 or from \$7.44 to \$9.94 per square foot of building area. Based on this evidence, the board of review requested the subject's assessment be confirmed.

Conclusion of Law

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

The parties submitted six suggested comparables for the Board's consideration. The Board finds the best evidence of assessment equity to be the appellant's comparables which are overall most similar to the subject in location, design, age, dwelling size, and features. The comparables have improvement assessments ranging from \$26,922 to \$31,277 or from \$4.46 to \$4.87 per square foot of building area. The subject's improvement assessment of \$38,254 or \$6.34 per square foot of building area falls above the range established by the most similar comparables in this record and is excessive. The Board gives less weight to the board of review comparables which are significantly smaller buildings than the subject. Based on this record, the Board finds the appellant demonstrated with clear and convincing evidence that the subject's improvement was inequitably assessed and a reduction in the subject's assessment is 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: _____

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: June 18, 2024



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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