



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

APPELLANT: ARJ Properties, LLC
DOCKET NO.: 19-39196.001-R-1
PARCEL NO.: 20-22-106-015-0000

The parties of record before the Property Tax Appeal Board are ARJ Properties, LLC, the appellant, by attorney Jennifer Kanik, of the Law Offices of Terrence Kennedy Jr. 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 **No Change** 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: \$4,531
IMPR.: \$8,349
TOTAL: \$12,880

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 a 102-year-old, one-story, single-family dwelling of masonry construction with 1,012 square feet of living area. Features of the home include a full unfinished basement and a two-car garage. The property has a 3,625 square foot site and is located in Chicago, Hyde Park Township, Cook County. The subject is classified as a class 2-03 property under the Cook County Real Property Assessment Classification Ordinance.

The appellant asserts overvaluation in this appeal. In support of the overvaluation argument, the appellant submitted evidence disclosing that the subject property was purchased on April 3, 2019, for a price of \$25,000. Based on this evidence, the appellant requested a reduction in the subject's assessment to reflect the purchase price.

Additionally, the appellant asserted assessment inequity and comparable sales as a basis of the appeal. However, the appellant never submitted any evidence to support either of those bases.

The appellant requested an extension of time to submit further evidence which was granted. The appellant submitted additional documents in the form of a memorandum outlining a recent sale of the subject property in April 2019, the settlement statement, as well as the MLS property listing. Based on the additional evidence, the appellant is requesting a total assessment amount of \$2,500.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$12,880. The subject property has an improvement assessment of \$8,349 or \$8.25 per square foot of living area. The subject's assessment reflects a market value of \$128,800 or \$127.27 per square foot of living area, land included, when using the Cook County Real Estate Classification Ordinance level of assessment for class 2 property of 10%.

In support of its contention of the correct assessment the board of review submitted information on four equity comparables; all of which contain sales data.

The matter was set for a hearing before an ALJ on August 25, 2023. On August 25, 2023, however, the parties entered into a written agreement to waive the hearing and have the matter decided on the evidence that had been submitted.

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 did not meet this burden of proof and a reduction in the subject's assessment is not warranted.

As a preliminary matter, it should be noted, that the appellant failed to complete the requisite Section IV – Recent Sales Data. While some of this missing information can be gleaned from the MLS listing and the settlement statement, some cannot. Most notably, is the omission of evidence regarding whether the transfer of property was between related family members, or in this case corporations. The settlement statement lists the Seller as Atlantic Municipal Corporation with the Buyer being ARJ Properties, LLC. Without Section IV being completely filled out, this Board cannot be sure the parties are unrelated.

The Board concludes that the best evidence of market value to be the board of review's comparables #1, #2 and #3. Like the subject property, these comparables have a one-story, single-family dwelling with a full basement, a two-car garage, and are located within the same neighborhood code as the subject property, while one is located within the same subarea.

These comparables sold between August 2017, and December 2019, for amounts ranging from \$137.96 to \$191.41 per square foot of living area, land included in the sale price. The subject

property's assessment reflects a market value of \$128,800, land included, or \$127.27 per square foot of living area, which is below the range established by the best comparables in the record. Accordingly, the Board determines that the appellant has failed to establish by a preponderance of the evidence that the subject property was overvalued. Based on the evidence, the Board therefore finds that a reduction in the subject's assessment on this basis 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: _____

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: October 17, 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

ARJ Properties, LLC, by attorney:
Jennifer Kanik
Law Offices of Terrence Kennedy Jr.
180 North LaSalle Street
Suite #2650
Chicago, IL 60601

COUNTY

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