



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

APPELLANT: James Stinneford
DOCKET NO.: 19-40085.001-R-1
PARCEL NO.: 02-05-100-016-0000

The parties of record before the Property Tax Appeal Board are James Stinneford, 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: \$28,022
IMPR.: \$34,478
TOTAL: \$62,500

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 two-story dwelling of frame and masonry exterior construction that has 3,420 square feet of living area. The dwelling was constructed in 1991 and is approximately 28 years old. Features of the home include a full finished basement, central air conditioning, two fireplaces and a three-car garage. The subject has a 40,032 square foot site. The subject is a Class 2-78 property under the Cook County Real Property Assessment Classification Ordinance. The subject property is located in Palatine Township, Cook County.

The appellant contends overvaluation as the basis of the appeal. In support of this argument the appellant submitted an appraisal prepared by Charles Walsh, a state licensed appraiser. The appraiser developed the sales comparison approach to value estimating the subject property had a market value of \$625,000 as of January 1, 2019.

Under the sales comparison approach to value, the appraiser analyzed three comparable sales located in the same subdivision as the subject. The comparables consist of two-story dwellings of frame and masonry exterior construction that are 27 years old. The dwellings contain 3,898 or 3,968 square feet of living area and are situated on sites that range in size from 40,032 to 40,511 square feet of land area. One comparable has an unfinished basement and two comparables have finished basements, one of which is a walkout style basement. Other features include central air conditioning, one fireplace and a three-car garage. The comparables sold from February 2018 to June 2019 for prices ranging from \$585,000 to \$710,000 or from \$150.08 to \$178.93 per square foot of living area including land. After applying adjustments to the comparables for differences to the subject, the comparables had adjusted sale prices that ranged from \$608,270 to \$660,320. Based on these adjusted sales, the appraiser concluded the subject property had a fair market value of \$625,000 of January 1, 2019.

The appellant also completed section V of the appeal form identifying the same three comparable sales used by the appraiser. In summary, these properties sold from February 2018 to June 2019 for prices ranging from \$585,000 to \$710,000 or from \$150.08 to \$178.93 per square foot of living area including land.

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" disclosing the total assessment for the subject property of \$72,063. The subject's assessment reflects an estimated market value of \$720,630 or \$210.71 per square foot of living area including land when applying the Cook County 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 information on four comparable sales. Only one comparable is located in the same neighborhood code as the subject. The proximity of the comparables in terms of distance in relation to the subject was not disclosed. The comparables consist of two-story dwellings of frame or masonry exterior construction that are 4 to 53 years old. The dwellings range in size from 2,908 to 3,776 square feet of living area and are situated on sites that range in size from 6,600 to 18,814 square feet of land area. Three comparables have unfinished basements while one comparable has a finished basement. Other features include central air conditioning, one or two fireplaces and a two or three-car garage. The comparables sold from February 2017 to July 2018 for prices ranging from \$658,000 to \$868,500 or from \$213.57 to \$233.84 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

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 appellant submitted an appraisal estimating the property had a market value of \$625,000 or \$182.75 per square foot of living area including land as of January 1, 2018. The Board of review submitted raw sales data on four suggested comparable sales. The Board gave less weight to the comparable sales submitted by the board of review. Comparable #1 sold in 2017, which is dated and less indicative of the subject's market value as of the January 1, 2019 assessment date. Comparables #2 though #4 are not located in the same neighborhood code as the subject property as assigned by Cook County Assessment Officials nor the did the board of review disclose the comparables proximate location in relation to the subject, which further detracts from the weight of the evidence.

The Board finds the best evidence of market value in this record to be the appraisal submitted by the appellant. The Board finds the appellant's appraiser utilized three comparable sales located in close proximity within the same subdivision as the subject. These comparables were generally similar to the subject in design, age, dwelling size and most features. The Board finds the appraiser made logical market adjustments to the comparables for differences to the subject in arriving at an opinion of value for the subject property of \$625,000 as of January 1, 2019. The subject's assessment reflects a market value of \$720,630, which is considerably more than the appraisal submitted by the appellant. Based on this evidence, the Board finds a reduction in the subject's assessment is justified based on a preponderance of the most credible market value evidence contained in the record.

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: July 20, 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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