



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

APPELLANT: Gregory Jones & Renewal Properties
DOCKET NO.: 19-55705.001-R-1
PARCEL NO.: 31-25-104-008-0000

The parties of record before the Property Tax Appeal Board are Gregory Jones & Renewal Properties, the appellants, 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: \$2,535
IMPR.: \$3,965
TOTAL: \$6,500

Subject only to the State multiplier as applicable.

Statement of Jurisdiction

The appellants timely filed the appeal from a final administrative decision of the Property Tax Appeal Board pursuant to section 16-185 of the Property Tax Code (35 ILCS 200/16-185) 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 1-story dwelling with 1,092 square feet of living area of frame and masonry exterior construction. The dwelling was constructed in 1959 and is approximately 60 years old. Features of the home include a concrete slab foundation, central air conditioning, and a 2-car garage. The property has a 7,800 square foot site and is located in Park Forest, Rich Township, Cook County. The subject is classified as a class 2-03 property under the Cook County Real Property Assessment Classification Ordinance.

The appellants contend overvaluation as the basis of the appeal. In support of this argument the appellants submitted information on four comparable sales located within the same assessment neighborhood code as the subject and from 0.01 of a mile to 1 mile from the subject. The parcels range in size from 7,800 to 10,320 square feet of land area and are improved with 1-story, Class 2-03 homes of frame and masonry exterior construction with 1,092 or 1,170 square feet of living

area. The dwellings were built in 1959 or 1960. One home has central air conditioning. The comparables sold from July 2017 to July 2019 for prices ranging from \$34,500 to \$62,000 or from \$31.59 to \$53.11 per square foot of living area, including land. Based on this evidence, the appellants 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 of \$8,046. The subject's assessment reflects a market value of \$80,460 or \$73.68 per square foot of living area, including land, when applying the level of assessment for class 2 property under the Cook County Real Property Assessment Classification Ordinance of 10%.

In support of its contention of the correct assessment the board of review submitted information on four comparable sales located in Park Forest, none of which are within the same assessment neighborhood code as the subject.¹ The parcels range in size from 7,680 to 8,937 square feet of land area and are improved with 1-story, Class 2-03 homes of frame, masonry, or frame and masonry exterior construction with 1,213 or 1,215 square feet of living area. The dwellings range in age from 54 to 56 years old. Three homes have a basement with finished area and one home has a concrete slab foundation. Each home has central air conditioning and a 1.5-car or a 2-car garage. The comparables sold from January 2016 to September 2018 for prices ranging from \$99,900 to \$120,000 or from \$82.22 to \$98.93 per square foot of living area, including land. Based on this evidence, the board of review requested confirmation of the subject's assessment.

In written rebuttal, the appellants argued the board of review's comparables sold in 2016 and/or differ from the subject in dwelling size, foundation type, and/or bathroom count.

Conclusion of Law

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

The record contains a total of eight comparable sales for the Board's consideration. The Board gives less weight to the board of review's comparables, which are less similar to the subject in dwelling size and/or foundation type. Moreover, the board of review's comparables #1 and #2 sold less proximate in time to the January 1, 2019 assessment date than the other comparables in this record. The Board also gives less weight to the appellants' comparable #3, which is located one mile from the subject, and the appellants' comparable #4, which sold less proximate in time to the assessment date than the other comparables in this record.

The Board finds the best evidence of market value to be the appellants' comparables #1 and #2, which sold more proximate in time to the assessment date and are more similar to the subject in

¹ The Board notes no distances from the subject were provided.

dwelling size, age, location, site size, and some features. However, these comparables each lack a garage and central air conditioning, which are features of the subject, suggesting upward adjustments to these comparables would be needed to make them more equivalent to the subject. These two most similar comparables sold for prices of \$34,500 and \$35,000 or \$31.59 and \$32.05 per square foot of living area, including land, respectively. The subject's assessment reflects a market value of \$80,460 or \$73.68 per square foot of living area, including land, which is above the range established by the best comparable sales in this record. Based on this evidence and after considering appropriate adjustments to the best comparables for differences from the subject, the Board finds 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:

May 21, 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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