FINAL ADMINISTRATIVE DECISION
ILLINOIS PROPERTY TAX APPEAL BOARD

APPELLANT: Michael D. Reynolds
DOCKET NO.: 19-56085.001-R-1
PARCEL NO.: 29-09-217-013-0000

The parties of record before the Property Tax Appeal Board are Michael D. Reynolds, the appellant, by attorney 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:	$3,491
IMPR.:	$574
TOTAL:	$4,065

Subject only to the State multiplier as applicable.

Statement of Jurisdiction

The appellant timely filed the appeal 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 is improved with a one-story, single-family dwelling of masonry construction with 1,355 square feet of living area. The dwelling was 61 years old. Features include a full, unfinished basement, a one-car garage, and one full bathroom. The property has a 9,975 square foot site and is located in Dolton, Thornton 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 as the basis of the appeal. In support of this argument, the appellant submitted information on six suggested sales comparables. The appellant also submitted a copy of the Board's decision in case number 18-42353.001-R-1 reducing the subject property's 2018 assessment. That decision does not bring about a rollover that would result in the 2018 reduced assessment automatically carrying forward to 2019, because the subject is not owner occupied. See 35 ILCS 200/16-185. Nevertheless, the Board decision reducing the subject's 2018 assessment provides the basis for the direct appeal taken by the appellant in this case. Id.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of $8,215. The subject property has an improvement assessment of $4,724 or $3.52 per square foot of living area. The subject property's assessment reflects a fair market value of $82,150, land included, or $60.63 per square foot of living area. In support of its contention of the correct assessment, the board of review submitted information on two suggested sales comparables.

In rebuttal, the appellant asserted that the board of review's comparables are not sufficiently similar to the subject to warrant consideration, and the appellant's comparables are superior.

Conclusions of Law

The taxpayer asserts that 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 taxpayer must prove the value of the property by a preponderance of the evidence. 86 Ill. Admin. Code §1910.63(e); Winnebago County Bd. of Review v. Property Tax Appeal Bd., 313 Ill. App. 3d 1038, 1043 (2d Dist. 2000). 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 on this basis is warranted.

The Board concludes that the best evidence of the subject's market value is the appellant's suggested comparables one, two, and six. Like the subject property, each of these comparables has a one-story, single-family dwelling of masonry construction with a garage. Their dwellings are similar in age and living area square footage to the subject dwelling. All of these comparables are assigned to the same neighborhood code as the subject.

These comparables were sold between February 2018 and April 2019, for amounts ranging from $27.05 to $31.88 per square foot of living area, land included in the sale prices. The subject property's assessment reflects a market value of $82,150, land included, or $60.63 per square foot of living area, which is well above the range established by the best comparables in the record. Accordingly, the Board determines that the appellant has established by a preponderance of the evidence that the subject property was overvalued. The Board also notes that the board of review's two sales comparables provide further support for the conclusion that the subject was overvalued. Based on the evidence, the Board therefore finds that a reduction in the subject's assessment on this basis 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:

C E R T I F I C A T I O N

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: April 15, 2025

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 <u>PETITION AND EVIDENCE</u> 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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