

FINAL ADMINISTRATIVE DECISION ILLINOIS PROPERTY TAX APPEAL BOARD

APPELLANT: G & F Manufacturing Company, Inc.

DOCKET NO.: 20-30344.001-I-1 through 20-30344.004-I-1

PARCEL NO.: See Below

The parties of record before the Property Tax Appeal Board are G & F Manufacturing Company, Inc., the appellant(s), by attorney James P. Boyle, of Crane and Norcross LLC 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 <u>A Reduction</u> 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 |
|------------------|--------------------|--------|----------------|----------|
| 20-30344.001-I-1 | 24-16-300-007-0000 | 13,231 | 21,882 | \$35,113 |
| 20-30344.002-I-1 | 24-16-300-008-0000 | 13,231 | 9,841 | \$23,072 |
| 20-30344.003-I-1 | 24-16-300-036-0000 | 16,875 | 8,417 | \$25,292 |
| 20-30344.004-I-1 | 24-16-300-075-0000 | 6,100 | 436 | \$6,536 |

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 2020 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 contains four PINs. The subject property consists of an approximately 46,1476 square foot parcel of land improved with a 19,278 square foot industrial building. The property is located in Oak Lawn, Worth Township, Cook County and is classified as class 1 and class 5 property under the Cook County Real Property Assessment Classification Ordinance. PINs -007, -008, and -036 are considered class 5 and PIN -075 is a class 1.

The appellant contends overvaluation as the basis of the appeal. In support of this argument the appellant submitted an appraisal estimating the subject property had a market value of \$560,000 as of January 1, 2020. The appraisal was written and signed by a certified appraiser who developed the income capitalization approach and the sales comparison approach in arriving at

the final value conclusion. Under the income capitalization approach, the appraiser analyzed five rental comparables. Under the sales comparison approach, the appraiser analyzed five sales comparables. The appraiser gave primary emphasis to the sales comparison approach. The appellant further indicated that there was a blended level of assessment of 23.38%. The appellant requested a reduction in the subject's assessment commensurate with the conclusions of the appraisal.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$156,476. The subject's assessment reflects a market value of \$669,398 when applying Cook County Real Property Assessment Classification Ordinance level of assessment for class 5 properties of 25% and class 1 properties of 10%. The board of review did not object to or propose a different blended level of assessment than the 23.38% submitted by the appellant. The board of review did not submit any other evidence.

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 Board finds the best and only evidence of market value contained in this record is the appraisal submitted by the appellant estimating the subject property had a market value of \$560,000 as of January 1, 2010. The Board finds this appraisal persuasive because the appraisal was done by a certified appraiser who used generally accepted practices within the field of property appraisal. Additionally, the comparables used by the appraiser were similar to the subject property. The subject's assessment reflects a market value of \$669,398, which is greater than the appraised value submitted by the appellant. The board of review did not submit any evidence beyond the "Notes on Appeal." Based on the evidence in the record, the Board finds a reduction in the subject's assessment is warranted. The Board also finds that the blended level of assessment of 23.38% is the correct level of assessment. Since market value has been established, the blended 23.38% level of assessment as determined by the Cook County Real Property Classification Ordinance shall apply. 86 Ill.Admin.Code \$1910.50(c)(3).

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.

| Cl | nairman |
|-------------|---------------|
| a R | Sovet Stoffen |
| Member | Member |
| Dan Dikini | Sarah Bobbler |
| 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: | March 18, 2025 | | | |
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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.

Docket No: 20-30344.001-I-1 through 20-30344.004-I-1

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

G & F Manufacturing Company, Inc., by attorney: James P. Boyle Crane and Norcross LLC 180 N Wacker Drive 6th Floor Chicago, IL 60606

COUNTY

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