



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

APPELLANT: John & Megan Steigauf
DOCKET NO.: 20-32302.001-R-1
PARCEL NO.: 18-06-131-041-0000

The parties of record before the Property Tax Appeal Board are John & Megan Steigauf, the appellants, by attorney Megan Steigauf, of James J. Roche & Associates in Hinsdale; 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: \$10,972
IMPR.: \$126,528
TOTAL: \$137,500

Subject only to the State multiplier as applicable.

Statement of Jurisdiction

The appellants 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 consists of a 2-story dwelling of masonry exterior construction with 4,538 square feet of living area. The dwelling is approximately 19 years old. Features of the home include a full basement that is finished with a recreation room, central air conditioning, central air conditioning, three fireplaces and a 3-car garage. The property has a 12,540 square foot site and is located in Western Springs, Lyons Township, Cook County. The subject is classified as a class 2-08 property under the Cook County Real Property Assessment Classification Ordinance.

The appellants' appeal is based on overvaluation. In support of this argument the appellants submitted evidence disclosing the subject property was purchased on October 22, 2020 for a price of \$1,375,000; the parties to the transaction were not related; and the property was sold by a realtor and advertised for sale through the Multiple Listing Service (MLS) for approximately 233 days. To document the sale the appellants submitted the Settlement Statement which

disclosed broker commissions were paid, Multi-Board Residential Real Estate Contract and the PTAX-203 Illinois Real Estate Transfer Declaration. The appellants also submitted the Listing and Property History Report for the subject property that disclosed the subject was listed for \$1,750,000 on February 1, 2018 and sold in April 2018 for \$1,650,000. The subject property was listed back on the market on January 8, 2020 for \$1,699,000, then reduced to \$1,625,000 on June 9, 2020 and final list price \$1,575,000 on July 10, 2020 before it most recently sold in October 2020 for \$1,375,000. Based on this evidence, the appellants requested a reduction in the subject's assessment to reflect the 2020 purchase price.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$145,526. The subject's assessment reflects a market value of \$1,455,260 or \$320.68 per square foot of living area, land included, when using the level of assessment for class 2 property under the Cook County Real Property Assessment Classification Ordinance of 10%.

In response to the appeal, the board of review notes appellants' counsel is the owner and taxpayer of the instant property, which presents a conflict of interest. The board of review further contends the appellant failed to demonstrate how the October 2020 sale of the subject property is relevant to a January 1, 2020 date of value. The board of review also submitted a MLS printout associated with 2018 sale of the property for \$1,650,000. Lastly, the Board contends the 2016 sale price more accurately reflects the subject's market value.

In support of its contention of the correct assessment the board of review submitted information on four comparable sales located within the same subarea as the subject and within the same assessment neighborhood code as the subject. The comparables are situated on sites ranging in size from 7,600 to 17,572 square feet of land area and are improved with 2-story dwellings of frame or frame and masonry exterior construction ranging in size from 2,640 to 3,898 square feet of living area. The homes are 94 to 146 years old and have partial or full basements, three of which are finished with a recreation room. Two comparables have central air conditioning. Each comparable has one or two fireplaces and three comparables each have a 2-car garage. The comparables sold from September 2017 to December 2020 for prices ranging from \$1,025,000 to \$1,525,000 or from \$360.92 to \$399.20 per square foot of living area, including land.

In written rebuttal, the appellants' counsel first argued there is no conflict of interest in the appellants representing herself in this appeal. Second, the appellants have clearly demonstrated that as of January 8, 2020 the listing price of \$1,699,000 for the property was excessive as the property sat on the market for 233 days. Third, the comparable properties provided by the board of review have assessment lower than 10% of their recent purchase prices or are not comparable to the subject property due to their larger lot sizes and updated improvements.

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 Board finds the best evidence of market value to be the purchase of the subject property in October 2020 for a price of \$1,375,000. The appellants provided evidence demonstrating the sale had the elements of an arm's length transaction. The appellants completed Section IV - Recent Sale Data of the appeal disclosing the parties to the transaction were not related, the property was sold using a Realtor, the property had been advertised on the open market with the Multiple Listing Service and it had been on the market for 233 day. In further support of the transaction the appellants submitted a copy of the sales contract, settlement statement and the PTAX-203 Illinois Real Estate Transfer Declaration. The Board finds the purchase price is below the market value reflected by the assessment. The Board also finds the October 2020 of the subject property sold more proximate in time to January 1, 2020 assessment date and is most reflective of the subject's market value than the 2018 sale of the subject that was reported by the board of review. The Board finds the board of review did not present any evidence to challenge the arm's length nature of the transaction. Furthermore, the Board gives less weight to the board of review comparables due to significant differences in age and/or dwelling size when compared to the subject. In addition, two comparables sold over 3 years prior to the January 1, 2020 assessment date. Based on this record the Board finds a reduction in the subject's assessment commensurate with the appellants' request is appropriate.

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: June 18, 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

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