



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

APPELLANT: Olusegun Apata
DOCKET NO.: 20-33533.001-R-1
PARCEL NO.: 29-32-100-054-0000

The parties of record before the Property Tax Appeal Board are Olusegun Apata, the appellant, by attorney Robert Rosenfeld, of Robert H. Rosenfeld & Associates, LLC in Northbrook; 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: \$3,630
IMPR.: \$22,700
TOTAL: \$26,330

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 consists of a 2-story dwelling of frame and masonry exterior construction with 3,741 square feet of living area. The dwelling is approximately 15 years old. Features of the home include a full basement, central air conditioning, a fireplace, and a 3-car garage. The property has a 10,374 square foot site and is located in Homewood, Thornton Township, Cook County. The subject is classified as a class 2-78 property under the Cook County Real Property Assessment Classification Ordinance.

The appellant contends assessment inequity regarding the improvement as the basis of the appeal. In support of this argument the appellant submitted information on four equity comparables with the same assessment neighborhood code as the subject, one of which is on the same street and block. The comparables are class 2-78 properties improved with dwellings of frame or masonry exterior construction ranging in size from 2,875 to 3,798 square feet of living

area. The comparables are 15 to 38 years old and have partial or full unfinished basements. Each comparable has central air conditioning, one fireplace, and a 2-car, a 2.5-car or a 3-car garage. The comparables have improvement assessments ranging from \$13,768 to \$22,122 or from \$4.79 to \$6.32 per square foot of living area. Based on this evidence, the appellant requested a reduction in the subject's improvement assessment.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$30,315. The subject property has an improvement assessment of \$26,685 or \$7.13 per square foot of living area.

In support of its contention of the correct assessment the board of review submitted information on four equity comparables with the same assessment neighborhood code as the subject, one of which is on the same street and block. Comparable #4 is the same as appellant's comparable #4. The comparables are class 2-78 properties improved with 2-story dwellings of frame or frame and masonry exterior construction ranging in size from 2,011 to 3,181 square feet of living area. The comparables are 16 to 48 years old and have partial or full basements, two of which have finished area. Each comparable has central air conditioning, one fireplace, and a 2-car or a 3-car garage. The comparables have improvement assessments ranging from \$18,320 to \$23,152 or from \$6.32 to \$9.83 per square foot of living area. Based on this evidence, the board of review contends the subject's assessment is supported.

Conclusion of Law

The appellant contends assessment inequity as the basis of the appeal. When unequal treatment in the assessment process is the basis of the appeal, the inequity of the assessments must be proved by clear and convincing evidence. 86 Ill.Admin.Code §1910.63(e). Proof of unequal treatment in the assessment process should consist of documentation of the assessments for the assessment year in question of not less than three comparable properties showing the similarity, proximity and lack of distinguishing characteristics of the assessment comparables to the subject property. 86 Ill.Admin.Code §1910.65(b). The Board finds the appellant met this burden of proof and a reduction in the subject's assessment is warranted.

The record contains seven equity comparables for the Board's consideration, one of which is common to both parties. The Board finds six of these comparables which includes the parties' common comparable have significant differences in age and/or dwelling size when compared to the subject. The only comparable truly similar to the subject in location, age, dwelling size and features is appellant's comparable #3. This comparable is located on the same street as the subject and approximately two houses away from the subject. These seven comparables have improvement assessments ranging from \$13,768 to \$23,152 or \$4.79 to \$9.83 per square foot of living area. The Board finds the best comparable which is appellant's comparable #3 has an improvement assessment of \$22,122 or \$5.82 per square foot of living area. The subject's improvement assessment of \$26,685 or \$7.13 per square foot of living area falls within the range established by the comparables in this record on a per square foot basis but above the range on an overall basis and has a higher improvement assessment in relation to the best comparable. Based on this limited record and after considering adjustments to the comparables for differences when compared to the subject and giving significant weight to the most similar comparable, the Board

finds the subject's improvement was inequitably assessed and 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

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 16, 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

State of Illinois
Property Tax Appeal Board
William G. Stratton Building, Room 402
401 South Spring Street
Springfield, IL 62706-4001

APPELLANT

Olusegun Apata, by attorney:
Robert Rosenfeld
Robert H. Rosenfeld & Associates, LLC
40 Skokie Blvd
Suite 150
Northbrook, IL 60062

COUNTY

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