

FINAL ADMINISTRATIVE DECISION ILLINOIS PROPERTY TAX APPEAL BOARD

APPELLANT:Techno Magnetic Media & Computer Supplies, Inc.DOCKET NO.:20-33641.001-R-1PARCEL NO.:15-09-106-002-0000

The parties of record before the Property Tax Appeal Board are Techno Magnetic Media & Computer Supplies, Inc., 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 <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:

LAND:	\$2,387
IMPR.:	\$11,270
TOTAL:	\$13,657

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 1-story dwelling of masonry exterior construction with 960 square feet of living area. The dwelling is approximately 67 years old. Features of the home include a full unfinished basement and a 2-car garage. The property has a 4,340 square foot site and is located in Bellwood, Proviso Township, Cook County. The subject is classified as a class 2-02 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 located within the same assessment neighborhood code as the subject. The comparables are improved with class 2-02 dwellings of masonry exterior construction ranging in size from 975 to 996 square feet of living area. The comparables are 68 to 95 years old and have full unfinished basements. Each comparable is reported to have central air conditioning and a 2-

car garage. The comparables have improvement assessments ranging from \$11,193 to \$11,842 or from \$11.24 to \$11.98 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 \$14,771. The subject property has an improvement assessment of \$12,384 or \$12.90 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 located within the same assessment neighborhood code and same block or within a ¹/₄ mile from the subject, all of which are on the same street as the subject. The comparables are improved with class 2-02, 1-story dwellings of masonry exterior construction with 812 or 842 square feet of living area. The comparables are 70 or 71 years old and have full basements, one of which is finished with a recreation room. Two comparables have central air conditioning. Each comparable has a 1-car to a 2-car garage. The comparables have improvement assessments ranging from \$11,460 to \$11,928 or from \$13.61 to \$14.48 per square foot of living area.

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 eight equity comparables for the Board's consideration which have varying degrees of similarity to the subject in location, age, dwelling size and features. For example, the three of the appellant's comparables are older dwellings than the subject and all have central air conditioning which is a feature the subject lacks. The board of review comparables are smaller dwellings than the subject. Furthermore, two comparables have central air conditioning and one comparable has finished basement area which are features the subject lacks. Nevertheless, these comparables have improvement assessments ranging from \$11,193 to \$11,928 or from \$11.24 to \$14.48 per square foot of living area. The Board finds appellant's comparable #2 is most similar to the subject in age and dwelling size and has an improvement assessment of \$11,566 or \$11.79 per square foot of living area. The subject's improvement assessment of \$12,384 or \$12.90 per square foot of living area falls within the range established by the best comparables in this record on a square foot basis but higher on an overall basis. Furthermore, the subject's improvement assessment is greater than the most similar comparable in the record. Based on this record and after considering adjustments to the best comparables for differences when compared to the subject, 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 Member **DISSENTING:**

<u>CERTIFICATION</u>

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 <u>PETITION AND</u> <u>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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APPELLANT

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COUNTY

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