



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

APPELLANT: Bernadeta Gurrolla
DOCKET NO.: 20-36178.001-R-1
PARCEL NO.: 28-22-308-051-0000

The parties of record before the Property Tax Appeal Board are Bernadeta Gurrolla, the appellant, by John W. Zapala, of the Law Offices of John Zapala, P.C. 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 **no change** 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: \$2,178
IMPR.: \$10,668
TOTAL: \$12,846

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 frame and masonry construction with 1,134 square feet of living area. The dwelling is 57 years old. Features of the home include a central air conditioning and a 1-car garage. The property has a 5,446 square foot site and is located in Oak Forest, Bremen Township, Cook County. The subject is classified as a class 2-03 property under the Cook County Real Property Assessment Classification Ordinance.

The appellant contends overvaluation and assessment inequity with respect to the subject's improvement as the bases of the appeal. In support of the overvaluation argument the appellant submitted information on five comparable sales that are located within the same neighborhood code as the subject. The comparables have sites ranging in size from 5,500 to 6,930 square feet of land area that are improved with class 2-03 dwellings of masonry or frame and masonry construction ranging in size from 1,002 to 1,470 square feet of living area. The dwellings range

in age from 54 to 57 years old. One comparable has central air conditioning and a fireplace, and each comparable has a 1-car or a 2-car garage. The comparables sold from February 2018 to June 2019 for prices ranging from \$105,000 to \$122,000 or from \$76.00 to \$114.77 per square foot of living area, including land.

In support of the improvement assessment inequity argument the appellant submitted information on five comparable properties that are located within the same neighborhood code as the subject. The comparables are improved with class 2-03 dwellings of masonry or frame and masonry construction ranging in size from 1,096 to 1,504 square feet of living area. The dwellings range in age from 57 to 59 years old. One comparable has central air conditioning, and each comparable has a 1-car or a 2-car garage. The comparables have improvement assessments ranging from \$6,865 to \$11,032 or from \$6.26 to \$8.06 per square foot of living area. Based on this evidence the appellant requested a reduction in the subject's assessment.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$12,846. The subject's assessment reflects a market value of \$128,460 or \$113.28 per square foot of living area, including land, when applying the level of assessment for class 2 property under the Cook County Real Property Assessment Classification Ordinance of 10%. The subject property has an improvement assessment of \$10,668 or \$9.41 per square foot of living area.

In support of its contention of the correct assessment the board of review submitted information on four comparable properties that are located within the same neighborhood code as the subject. The comparables have sites ranging in size from 5,564 to 5,720 square feet of land area that are improved with class 2-03 dwellings of masonry or frame and masonry construction ranging in size from 1,002 to 1,134 square feet of living area. The dwellings range in age from 57 to 59 years old. Three comparables have central air conditioning, and each comparable has from a 1-car to a 2-car garage. The comparables sold from July 2018 to February 2019 for prices ranging from \$129,000 to \$144,400 or from \$124.80 to \$131.63 per square foot of living area, including land. The comparables have improvement assessments ranging from \$8,919 to \$11,255 or from \$8.13 to \$10.47 per square foot of living area. Based on this evidence the board of review requested confirmation of the subject's assessment.

Conclusion of Law

The appellant contends in part 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 did not meet this burden of proof and a reduction in the subject's assessment is not warranted.

The Board finds the best evidence of market value to be the appellant's comparables #3 and #4, as well as the board of review's comparable #4. These comparables sold for prices ranging from \$108,000 to \$144,400 or from \$76.00 to \$131.63 per square foot of living area, including land. The subject's assessment reflects a market value of \$128,460 or \$113.28 per square foot of living area, including land, which is within the range established by the best comparable sales in this

record. The Board gave less weight to the parties' remaining comparable sales due to their sale dates occurring greater than 13 months prior to the January 1, 2020 assessment date at issue. Based on this evidence the Board finds a reduction in the subject's assessment is not justified based on overvaluation.

The Board finds the best evidence of assessment equity to be the appellant's comparables #1 and #5, as well as the board of review's comparables. These comparables had improvement assessments that ranged from \$6,865 to \$11,255 or from \$6.26 to \$10.47 per square foot of living area. The subject's improvement assessment of \$10,668 or \$9.41 per square foot of living area falls within the range established by the best comparables in this record. The Board gave less weight to the appellant's comparables #2, #3 and #4, due to their larger dwelling sizes when compared to the subject. Based on this record the Board finds the appellant did not demonstrate with clear and convincing evidence that the subject's improvement was inequitably assessed and a reduction in the subject's assessment is not 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: _____

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: May 21, 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

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