



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

APPELLANT: Preston Bowie
DOCKET NO.: 20-36605.001-R-1
PARCEL NO.: 29-30-402-047-0000

The parties of record before the Property Tax Appeal Board are Preston Bowie, the appellant, by Jessica Hill-Magiera, Attorney at Law, in Lake Zurich, 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: \$1,837
IMPR.: \$5,313
TOTAL: \$7,150

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 two-story multi-family building of masonry exterior construction with 2,352 square feet of gross building area. The building is approximately 60 years old. Features include a concrete slab foundation. The property has a 5,250 square foot site and is located in East Hazel Crest, Thornton Township, Cook County. The subject is classified as a class 2-11 property under the Cook County Real Property Assessment Classification Ordinance.

The appellant contends overvaluation as the basis of the appeal. In support of this argument the appellant submitted information on three suggested comparable sales located in the same neighborhood code as the subject and within .12 of a mile from the subject. The comparable parcels each contain 5,250 square feet of land area and are improved with a two-story multi-family dwelling. The buildings were constructed in 1960 and contain 2,352 square feet of gross building area. The comparables sold from January to December 2019 for prices ranging from

\$48,000 to \$72,000 or from \$20.41 to \$30.61 per square foot of gross building area, including land. Based on this evidence, the appellant requested a total reduced assessment of \$7,100.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$18,207. The subject's assessment reflects a market value of \$182,070 or \$77.41 per square foot of gross building area, including land, when applying 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 noted that both parties' comparable sales consist of foreclosure sales.

In support of its contention of the correct assessment the board of review submitted information on three comparable sales located in the same block and same neighborhood code as the subject. Board of review comparable #1 is the same property as appellant's comparable #2. The comparable parcels each contain 5,250 square feet of land area and are improved with a class 2-11 two-story dwelling of masonry exterior construction. The buildings are each 60 years old and contain 2,352 square feet of gross building area with concrete slab foundations. Comparable #3 has a two-car garage. The comparables sold from May 2018 to February 2019 for prices ranging from \$66,000 to \$71,000 or from \$28.06 to \$30.19 per square foot of gross building area, including land. Based on this evidence and argument, the board of review requested confirmation of the subject's estimated market value based on its assessment.

In rebuttal, counsel for the appellant noted the common comparable presented by the parties. Counsel further contended that board of review sales #2 and #3 with sale dates in 2018 were more remote to the lien date at issue and also that comparable #3 includes a garage which is not a feature of the subject. Regardless, the appellant contends that the entire record supports that a reduction in the subject's assessment is warranted.

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 parties submitted a total of five comparable sales, one of which was common to both parties, to support their respective positions before the Property Tax Appeal Board. The Board has given reduced weight to appellant's comparable #1 which depicts a sale price of \$48,000, significantly below the other sales contained in the record, which suggests that for some reason this sale price is an outlier and without further evidence, has been given reduced consideration. The Board has given reduced weight to board of review comparable sales #2 and #3 due to the dates of sale being in 2018, less proximate to the lien date and also comparable #3 has a garage which is not a feature of the subject property.

The Board finds the best evidence of market value to be appellant's comparable sales #2 and #3 along with common comparable, board of review comparable #1, which sold in 2019 for prices of \$71,000 and \$72,000 or for \$30.19 and \$30.61 per square foot of gross building area, including land. These comparables are nearly identical to the subject in location and identical to the subject in lot size, design, age and building size, The subject's assessment reflects a market value of \$182,070 or \$77.41 per square foot of gross building area, including land, which is significantly above all of the sales presented by the parties and above the sales which the Board found to be the two best sales in this record.

Based on this evidence and after considering adjustments to the best sales when compared to the subject, the Board finds 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

Preston Bowie, by attorney:
Jessica Hill-Magiera
Attorney at Law
790 Harvest Drive
Lake Zurich, IL 60047

COUNTY

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