



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

APPELLANT: Glynn Kelly
DOCKET NO.: 20-40127.001-R-1
PARCEL NO.: 18-05-220-014-0000

The parties of record before the Property Tax Appeal Board are Glynn Kelly, the appellant, by attorney Katherine Amari O'Dell, of Amari & Locallo 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 **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: \$6,750
IMPR.: \$44,750
TOTAL: \$51,500

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 part 1-story and part 2-story dwelling with 2,405 square feet of living area of frame and masonry exterior construction. The dwelling was constructed in 1923 and is approximately 97 years old. Features of the home include a basement, a fireplace, and a 2-car garage. The property has a 7,500 square foot site and is located in La Grange, Lyons Township, Cook County. The subject is classified as a class 2-06 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 an appraisal estimating the subject property had a market value of \$515,000 as of January 1, 2020. The appraisal was prepared by Davis Barros, a certified general real estate appraiser, for ad valorem tax purposes.

Under the sales comparison approach, the appraiser selected five comparable sales located in the same neighborhood as the subject, four of which are located on the same street as the subject. The parcels range in size from 6,368 to 12,199 square feet of land area and are improved with 1.5-story or 2-story homes ranging in size from 2,066 to 2,421 square feet of living area. The dwellings were built from 1922 to 1978. The comparables sold from July 2019 to March 2021 for prices ranging from \$439,000 to \$525,000 or from \$212.49 to \$217.59 per square foot of living area, including land. The appraiser made adjustments to the comparables for differences from the subject in land size, above grade layout, and age/condition to arrive at adjusted sale prices ranging from \$214.61 to \$215.98 per square foot of living area, including land. Based on this analysis, the appraiser concluded a value of \$515,000 for the subject as of January 1, 2020.

Based on this evidence, the appellant requested a reduction in the subject's assessment to reflect the appraised value conclusion.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$64,405. The subject's assessment reflects a market value of \$644,050 or \$267.80 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%.

In support of its contention of the correct assessment the board of review submitted information on four comparable sales located within the same assessment neighborhood code as the subject, two of which are located within 0.25 of a mile from the subject. The parcels range in size from 6,200 to 7,500 square feet of land area and are improved with 2-story, Class 2-06 homes of frame or stucco exterior construction ranging in size from 2,218 to 2,329 square feet of living area. The dwellings range in age from 93 to 117 years old. Each home has a basement, one or two fireplaces, and a 1-car or a 2-car garage. Two homes each have central air conditioning. The comparables sold from April 2017 to December 2020 for prices ranging from \$1 to \$775,000 or from \$0 to \$349.41 per square foot of living area, including land. Based on this evidence, the board of review requested confirmation of the subject's assessment.

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 appellant presented an appraisal and the board of review presented four comparables sales for the Board's consideration. The Board finds the best evidence of market value to be the appraisal submitted by the appellant. The Board finds the appraiser selected comparable sales of properties that are similar to the subject in location, with four of the five comparables located on the subject's street, and that sold proximate in time to the assessment date, and the appraiser made appropriate adjustments to these comparables for differences from the subject. The Board gave less weight to the board of review's comparables, which are less similar to the subject in

location than the appraisal sales. Moreover, the board of review's comparable #1 sold for \$1 which is not likely to be reflective of market value, the board of review's comparable #4 sold in 2017, less proximate in time to the assessment date than the other comparables in this record.

The subject's assessment reflects a market value of \$644,050 or \$267.80 per square foot of living area, including land, which is above the appraised value. The Board finds the subject property had a market value of \$515,000 as of the assessment date at issue. Since market value has been established the level of assessment for class 2 property under the Cook County Real Property Assessment Classification Ordinance of 10% shall apply. (86 Ill.Admin.Code §1910.50(c)(2).

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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