

## FINAL ADMINISTRATIVE DECISION ILLINOIS PROPERTY TAX APPEAL BOARD

APPELLANT:	Quiana Blevins
DOCKET NO.:	20-43680.001-R-1
PARCEL NO .:	28-27-403-008-0000

The parties of record before the Property Tax Appeal Board are Quiana Blevins, the appellant, by attorney Eric Feldman of Eric Feldman & Assoc. 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 *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:	\$1,980
IMPR.:	\$6,424
TOTAL:	\$8,404

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 exterior construction with 1,168 square feet of living area. The dwelling is approximately 48 years old. Features of the home include a concrete slab foundation, a fireplace and a two-car garage. The property has a 7,200 square foot site and is located in Country Club Hills, 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 assessment inequity with respect to the improvement as the basis of the appeal. In support of this argument the appellant submitted information on five equity comparables that have the same assessment neighborhood code as the subject and are located within approximately .97 of a mile from the subject property. The comparables are class 2-03 properties that are improved with 1-story dwellings of frame or frame and masonry exterior

construction ranging in size from 1,144 to 1,393 square feet of living area. The dwellings are 50 to 59 years old. Two comparables each have a full or partial basement, one of which has finished area. Comparable #4 has central air conditioning and a fireplace. Each comparable has a one-car or a two-car garage. The comparables have improvement assessments that range from \$5,358 to \$6,994 or from \$4.31 to \$5.27 per square foot of living area. Based on this evidence, the appellant requested the subject's improvement assessment be reduced to \$5,606 or \$4.80 per square foot of living area.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$10,401. The subject property has an improvement assessment of \$8,421 or \$7.21 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 that have the same assessment neighborhood code as the subject and are located either on the same block or approximately ¼ of a mile from the subject property. The comparables are class 2-03 properties that are improved with 1-story or 1.5-story dwellings of frame or frame and masonry exterior construction ranging in size from 1,000 to 1,326 square feet of living area. The dwellings are 40 to 48 years old. Comparable #3 has a concrete slab foundation and three comparables each a have a full basement, two of which have finished area. Comparable #1 has central air conditioning and three comparables each have a two-car garage. The comparables have improvement assessments that range from \$7,383 to \$10,420 or from \$7.21 to \$7.86 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 taxpayer 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 a total of nine suggested equity comparables for the Board's consideration. The Board has given less weight to the appellant's comparables #1 and #4, as well as the four comparables submitted by the board of review which differ from the subject in that they have a basement foundation in contrast to the subject's concrete slab foundation or they have a dissimilar 1.5-story design when compared to the subject's 1-story design. Additionally, the appellant's comparable #4 and board of review comparable #1 have central air conditioning, unlike the subject and board of review comparable #1 lacks a garage, a feature of the subject.

The Board finds the best evidence of assessment equity to be the appellant's comparables #2, #3 and #5, which are relatively similar to the subject in location, dwelling size, design, foundation type, age and some features. These best comparables have improvement assessments that range from \$6,002 to \$6,994 or from \$4.31 to \$5.27 per square foot of living area. The subject's

improvement assessment of \$10,410 or \$7.21 per square foot of living area falls above the range established by the best comparables in the record both in terms of total improvement assessment and on a per square foot basis. After considering adjustments to the best comparables for differences when compared to the subject, the Board finds the subject's assessment is excessive. Therefore, based on this record the Board finds a reduction in the subject's assessment is warranted.

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

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

#### APPELLANT

Quiana Blevins, by attorney: Eric Feldman Eric Feldman & Assoc. P.C. 53 W. Jackson Blvd. Suite 1622 Chicago, Il 60604

#### COUNTY

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