



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

APPELLANT: Jeffrey Markowitz
DOCKET NO.: 21-38952.001-R-1
PARCEL NO.: 14-32-103-021-0000

The parties of record before the Property Tax Appeal Board are Jeffrey Markowitz, the appellant(s); 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: \$ 40,000
IMPR.: \$ 86,000
TOTAL: \$126,000

Subject only to the State multiplier as applicable.

Statement of Jurisdiction

The appellant timely filed the appeal pursuant to section 16-160 of the Property Tax Code (35 ILCS 200/16-160) challenging the assessment for the 2021 tax year after receiving a decision from the Cook County Board of Review. 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, masonry dwelling with 2,084 square feet of living area. The dwelling is 127 years old and is situated on a 3,200 square foot parcel of land. It is in North Chicago Township, Cook County and is classified as a Class 2 property under the Cook County Real Property Assessment Classification Ordinance. The appellant indicated the subject property is owner-occupied.

The appellant contends overvaluation as the basis of the appeal. The appellant indicated his cause of action as “comparable sales” in section (2d) of the appeal form. In support of this argument the appellant submitted descriptive information on an appeal grid sheet for five equity comparables, two of which reflected sale data. The comparables sold in May, 2020 and August, 2020 for \$340.91 and \$475.61 per square foot of living area, including land. 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 \$126,000. The subject's assessment reflects a market value of \$1,260,000, or \$604.61 per square foot of living area, including land, when applying the statutory level of assessment 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 equity comparables, three of which reflected sale data. The comparables sold between January 2012 and January 2015 for prices ranging from \$391.87 to \$694.32 per square foot of living area, including land. Based on this evidence, the board of review requested confirmation of the subject's assessment.

Neither party submitted written rebuttal. Both parties waived their right to an oral hearing.

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

The appellant submitted two recent sales located in the subject's subarea. They were similar to the subject in square footage of living area, age and design but varied from the subject in other features, such as number of fireplaces, garage size, construction, and air conditioning. The board of review submitted three sales, two of which were located two blocks from the subject with the third located in the subject's subarea. They were also similar to the subject in square footage of living area, design, construction, and age, however, two of the sales occurred in 2012 with the third sale occurring in 2015.

The Board finds the three best sales in the record to be the appellant's comparable(s) #1 and #3, as well as the board of review's comparable(s) #4. These comparables were all similar to the subject based on a combination of size, location, age, and design, and sold for prices ranging from \$340.91 to \$694.32 per square foot of living area, including land. The subject's assessment reflects a market value of \$604.61 per square foot of living area, including land, which is within the range established by the best comparables in this record, after consideration of similarities and differences between the subject and suggested comparables with an emphasis on the features and sale dates. As such, the Board finds the appellant has not proven, by a preponderance of the evidence, that the subject is overvalued 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:

October 17, 2023



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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