



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

APPELLANT: Peter Shoun
DOCKET NO.: 21-49338.001-R-1
PARCEL NO.: 13-16-411-004-0000

The parties of record before the Property Tax Appeal Board are Peter Shoun, the appellant, by attorney Stephanie Park, of Park & Longstreet, P.C. in Inverness; 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: \$18,373
IMPR.: \$20,627
TOTAL: \$39,000

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 2021 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 1.5-story dwelling of frame exterior construction with 1,412 square feet of living area.¹ The dwelling is 108 years old. Features of the home include a full unfinished basement, central air conditioning, a fireplace, and a 1-car garage. The property has a 6,562 square foot site and is located in Chicago, Jefferson Township, Cook County. The subject is classified as a class 2-03 property under the Cook County Real Property Assessment Classification Ordinance.

The appellant's appeal is based on both unequal treatment in the assessment process as well as overvaluation concerning the subject property. In support of these arguments the appellant

¹ The Board finds the best description of the subject is found in the appraisal submitted by the appellant, which contains a detailed property sketch with measurements.

submitted information on 16 equity comparables and an appraisal of the subject.² The equity comparables consist of 1-story or 1.5-story class 2-03 dwellings of frame, masonry, or frame and masonry exterior construction ranging in size from 1,368 to 1761 square feet of living area. The homes are 74 to 115 years old. Each dwelling has a full basement. Two comparables have central air conditioning, two comparables each have a fireplace, and 12 comparables each have either a 1-car, 1.5-car, or 2-car garage. The comparables have improvement assessments ranging from \$13,902 to \$24,055 or from \$9.44 to \$14.06 per square foot of living area.

In support of the overvaluation argument, the appellant submitted an appraisal estimating the subject property had a market value of \$390,000 as of January 1, 2021. The appraisal was prepared by Charles Walsh, a Certified Residential Real Estate Appraiser. In estimating the market value of the subject property, the appraiser developed the sales comparison approach to value by using four comparable sales. The comparables are improved with dwellings that range in size from 1,119 to 2,112 square feet of living area. The dwellings are 102 or 110 years old. Each dwelling has a full unfinished basement and either a 1-car or 2-car garage. Three comparables have central air conditioning. The parcels range in size from 4,375 to 5,080 square feet of land area. The sales occurred from April 2020 to July 2022 for prices ranging from \$376,000 to \$458,000 or from \$216.86 to \$406.61 per square foot of living area, including land. Adjustments were applied for differences between the comparables and the subject property for dwelling size, garage size, bathroom count, and other features to arrive at adjusted prices ranging from \$376,890 to \$433,790. Based on this data, the appraiser arrived at a market value of \$390,000 or \$276.20 per square foot of living area, including land, as of January 1, 2021.

Based on this evidence, the appellant requested a reduced improvement assessment of \$13,335 or \$9.44 per square foot of living area and a reduced total assessment of \$31,709 for an estimated market value of \$317,090 or \$224.57 per square foot of living area, including land, when applying the 10% level of assessment under the Cook County Real Property Assessment Classification Ordinance.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$49,999. The subject property has an improvement assessment of \$31,626 or \$22.40 per square foot of living area. The subject's total assessment reflects a market value of \$499,990 or \$354.10 per square foot of living area, including land, when using the 10% level of assessment under the Cook County Real Property Assessment Classification Ordinance.

In support of its contention of the correct assessment the board of review submitted information on four comparables. The comparables consist of 1-story or 1.5-story dwellings of frame or masonry exterior construction ranging in size from 1,014 to 1,591 square feet of living area. The dwellings are 60 to 125 years old. Each dwelling has a full unfinished basement. Three comparables have central air conditioning and three comparables each have a 2-car garage. The parcels range in size from 3,150 to 5,520 square feet of land area. The comparables have improvement assessments ranging from \$21,406 to \$29,544 or from \$18.57 to \$24.30 per square foot of living area. Two comparables sold in April 2020 and October 2021 for prices of \$1 and \$405,000 or for \$0.00 and \$350.65 per square foot of living area, including land. Based on this evidence, the board of review requested confirmation of the subject's assessment.

² For ease of reference, the appellant's comparables have been renumbered #1 through #16.

In rebuttal, the appellant argued that the board of review's comparables #1, #3, and #4 support the appellant's contention that the subject property is overassessed based on equity and that the board of review's unadjusted comparable sales should be given no weight.

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 met this burden of proof and a reduction in the subject's assessment is warranted.

The parties submitted an appraisal and two comparable sales to support their respective positions before the Property Tax Appeal Board. The Board finds the best evidence of market value to be the appraisal submitted by the appellant estimating the subject property had a market value of \$390,000 or \$276.20 per square foot of living area, including land, as of January 1, 2021. The appraisal was completed using four comparable sale properties, when compared to the subject, and contained appropriate adjustments to the comparable properties, which further advances the credibility of the report. The subject's assessment reflects a market value above the appraised value. The Board gave less weight to the board of review's unadjusted comparable sales, one of which differs significantly from the subject in dwelling size, and the other which sold for \$1, calling into question the arm's length nature of the sale. Based on this record, the Board finds a reduction in the subject's assessment is justified based on overvaluation.

The taxpayer also 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 did not meet this burden of proof and a further reduction in the subject's assessment is not warranted given the reduction for market value considerations.

The parties submitted a total of 20 equity comparables to support their respective positions before the Property Tax Appeal Board. The Board has given reduced weight to appellant's comparables #1, #2, #4, and #6, which either differ from the subject in age or lack a garage, a feature of the subject. The Board gives reduced weight to appellant's comparables #9 through #16, which are less similar to the subject in dwelling size. The Board also gives diminished weight to board of review comparables #1, #2, and #4, which differ from the subject in dwelling size and/or lack a garage.

The Board finds the best evidence of assessment equity to be the appellant's comparables #3, #5, #7, and #8 along with board of review comparable #3, which are similar to the subject in age, dwelling size, and some features, noting upward adjustments for the comparables' lack of central

air conditioning would be necessary to make them more equivalent to the subject. These comparables have improvement assessments that range from \$18,384 to \$29,544 or from \$13.44 to \$18.57 per square foot of living area. The subject's improvement assessment as reduced herein of \$20,627 or \$14.61 per square foot of living area falls within the range established by the best comparables in this record. Based on this evidence, the Board finds the appellant did not demonstrate with clear and convincing evidence that the subject's improvement was inequitably assessed after being reduced on market value grounds and no further reduction in the subject's improvement assessment is warranted on the basis of assessment equity.

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: January 21, 2025



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

Peter Shoun, by attorney:
Stephanie Park
Park & Longstreet, P.C.
1620 W Colonial Pkwy.
Inverness, IL 60067

COUNTY

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